



General Electric Company  
175 Cortland Avenue, San Jose, CA 95129

April 29, 1993

Docket No. STN 52-001

Chet Poslusny, Senior Project Manager  
Standardization Project Directorate  
Associate Directorate for Advanced Reactors  
and License Renewal  
Office of the Nuclear Reactor Regulation

Subject: Submittal Supporting Accelerated ABWR Review Schedule - **DFSER Open**  
**Item 1.1-1**

Dear Chet:

In the December 15, 1989 Staff Requirements Memorandum (SRM) relating to SECY-89-334, "Recommended Priorities for Review of Standard Plant Designs," the Commission provided the following guidance to the Staff:

In order to provide added NRC status to the ALWR Requirements Document, when reviewing the specific designs, the Staff should consider the ALWR Requirements Document and dedicate a section in each SER which highlights those areas where the resolution of evolutionary plant issues is different than the resolution achieved through the review of the ALWR Requirements.

On June 12, 1990, GE provided a list and a comparison of the differences between the ABWR design and the ALWR Requirements. On June 15, 1990, Mr. John Taylor wrote to confirm EPRI's agreement with the GE assessment. In its September 20, 1990 SECY-90-329, "Comparison of the General Electric Advanced Boiling Water Reactor Design and the Electric Power Research Institute's Advanced Light Water Reactor Requirements Document," the Staff addressed the differences identified in the GE letter of June 12, 1990 and concluded that the differences did not require policy decisions. The Staff went on to state that, if the Staff identifies possible policy issues in the future, it will inform the Commission so it can determine if evolutionary ALWR designs should address these issues.

In the October 20, 1992 Draft Final Safety Evaluation Report on the ABWR, Section 1.1, the Staff states ... "Since both the ABWR design and the EPRI document have changed since June 1990, GE needs to provide for the Staff's review a comprehensive evaluation of the current ABWR design to identify and explain all differences from the EPRI document. This is Open Item 1.1-1."

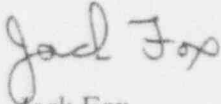
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GE believes that the ABWR SSAR satisfies the objectives of the policy guidance provided by the Commission in the referenced Staff Requirements Memorandum. GE's active participation in the Requirement Program from its onset has resulted in a high level of consistency between the ABWR SSAR and the ALWR Requirements. This is reflected in GE's comparative assessment of June 12, 1990 and its confirmation by EPRI. While changes to the ABWR SSAR and the Requirements Document have occurred since June of 1990, GE does not believe that these changes raise policy issues warranting Commission decision. Following the June 1990 assessment there has been continuing coordination between GE and EPRI and its consultants. Each has been kept informed of issues that could affect the other's program, and positions have been adopted that take due account of those of the other. As a result, any differences that have arisen are believed to be modest both in number and in nature. Accordingly, we believe that further assessment should be left to future project applications, such as during commercial bidding, or, perhaps, during First-Of-A-Kind activity.

Please provide a copy of this transmittal to Jerry Wilson.

Sincerely,



Jack Fox  
Advanced Reactor Programs

cc: Norman Fletcher (DOE)  
Joe Quirk