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PROPOSED AGENDA - BACKGROUND ON ITEMS

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I. INTRODUCTION

Purpose of meeting is to obtain information to aid in making a decision on submittal of B-SAR-205 as a reference SSAR and on timing of submittal if the decision to submit is made.

II. DISCUSSION OF ISSUES

A. Current Policy - General

The basis for present planning is the AEC policy stated in WASH-1341 for Reference and Duplicate plants and the policy document dated July 1974 for Replicate Plants. Recent industry experience, particularly with the replication option, indicates some inconsistency between staff practice and the stated policy. Assurance that the former AEC policies and stated practices on standardization are being implemented by NRC is vital to being able to make any decision regarding standard plant licensing via any of the options.

B. Need for NRC Policy Statement in January 1977

Regulatory Guide 1.49, "Power Levels of Nuclear Power Plants," states the NRC will issue notice of its intent to consider applications at core thermal power levels greater than 3800 megawatts at least two years prior to acceptance of such applications and also states that such acceptance will be after 1/1/79. Can the nuclear industry expect a policy statement by the NRC in January 1977 regarding the acceptability of higher power level plants? A policy statement at that time, which includes a schedule for further consideration of increasing the power level restriction (if the decision is negative at that time), will be a substantial standardization planning tool for the nuclear plant suppliers and owners.

C. Effect of Licensing Reform Legislation

The AEC standardization policy statement of March 5, 1973 stated that standardized designs would receive priority in scheduling and staff

manpower assignment. The recent proposed licensing reform legislation in Section III gives NRC the power to discriminate between utility applications. In addition, there has been a noted lack of participation by A-E firms in reference SSAR licensing. It is understandable that the NRC would adopt policies that would encourage standardization. We are concerned, however, that there is a possibility of it becoming extremely difficult for a custom plant application to be approved on a timely schedule in the future in the interest of promoting standardization.

D. Nine-Month Review for B-SAR-205

The B-SAR-205 design is essentially identical with the 205 fuel assembly design previously reviewed through the SER stage on three CP applications and with one other application now under review. Since substantial NRC review for this plant has already been performed, B&W anticipates a much shorter review schedule for the PDA than is indicated in WASH-1341, or has been experienced by other vendors, or was proposed for our B-SAR-241. B&W believes 9 months to be an adequate and sufficient review period for the PDA and will support this schedule if the B-SAR-205 is filed. Can the NRC Staff provide a commitment to this schedule or propose some other schedule at this time in keeping with the policy of assigning priority?

E. Fees for the B-SAR-205 Review

We understand the present intent is not to charge review fees for a reference SSAR until it is adopted by a CP application. Can this be verified? We need to know what the schedule is for a final rule on fees and the applicability of this rule on SSAR's in process of review.

F. Frequency of Updating a Reviewed and Approved Standard NSS

We are concerned that the present rate of change in licensing requirements in fact negates the chances for standardization. For standardization to be successful, industry must design and NRC must license a number of identical plants. The updating process after preliminary design approval has the potential for negating the benefits of standardization. We understand NRC is now developing the detailed criteria for updating reference

standard SAR's. We urge that these criteria be formulated so as to obtain full benefit from standardization. Our specific suggestions are:

- Minimize the number of "different" plants by extending the interval between updates beyond the present two years mentioned in WASH-1341. This is especially needed in cases where a minimum number of plants have not materialized to make use of the SSAR.
- Limit the changes to be made at an update to those that can be justified on a cost-benefit basis.
- Provide for consistency in licensing requirements between the different SSAR's. This may require a consistent implementation date for updates to avoid providing an unfair advantage in the market to the vendor who updates last.

G. Power Level

BNW's present intent is to offer the 205 fuel assembly plant with identical hardware, but at two power levels - 3600 and 3800 MW. The difference between the plants will be operating conditions only, not hardware. The Babcock-205 has higher thermal efficiency at the 3600 MW rating than at 3800 MW and thus may be more desirable to some utilities. We would like to cover both power levels by a single review, so B-SAR-205 will contain analysis for 3800 MWt. At the final design stage, some applicants may prefer operation at 3600 MW rather than the 3800 MW level. In these cases either a custom FSAR or an addition to B-SAR-205 will provide separate analysis and operating limitations for the 3600 MW power level. We would like a commitment that B-SAR-205 may be used in this manner.