



General Electric Company
175 Curtner Avenue, San Jose, CA 95125

March 8, 1993

Docket No. 52-001
MFN No. 027-93

Mr. Dennis M. Crutchfield
Associate Director, Advanced Reactors and
License Renewal
Office of Nuclear Reactor Regulation

Subject: Key Schedule Dates for ABWR Review

Dear Mr. Crutchfield:

As follow-up to the meeting which took place on February 25, 1993, this letter provides GE's key schedule dates for completion of all information required for the Staff to complete its reviews of the ABWR. Of course, this objective cannot be achieved without quality and technically complete SSAR and ITAAC submittals on the part of GE, and timely review on the part of the Staff.

As previously advised, GE will submit by July 31, 1993 a final SSAR, verified and reformatted, which will resolve all DFSER outstanding items; a non-proprietary Tier 1 design description; and a complementary integrated set of ITAAC. As prescribed by 10 CFR 52.45(d), this submittal will comply with the filing requirements of 10 CFR 50.30(b).

To facilitate timely Staff review, GE further commits to continue its submittals of marked-up versions of SSAR sections, as developed, such that the Staff will have been provided all substantive modifications well in advance of the July submittal. The marked-up SSAR sections will reflect GE's understanding of what it takes to close each of the design-related DFSER outstanding items. Following confirmation by the Staff that the markup does in fact provide the information to close the item(s), GE will submit amendments to the SSAR to formally document closure of each DFSER item. The last of the SSAR amendments, closing the last of the design-related DFSER outstanding items, will be provided by May 28, 1993.

To further facilitate timely Staff review, GE also intends to make sequential submittals of the ABWR ITAAC as they become available, in advance of the July submittal. It is anticipated these sequential ITAAC submittals will receive expedited Staff review. This is essential to avoid a lengthy post-July Tier 1/ITAAC review. With this early Staff review, the July submittal can reflect resolution of all Tier 1 and ITAAC outstanding items as well as the design-related outstanding items in the DFSER.

The SSAR verification process is currently underway and, when completed, will provide assurance that (1) the final SSAR properly reflects its design documentation,

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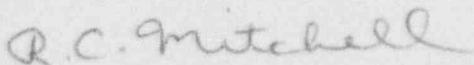
Mr. Dennis M. Crutchfield
March 8, 1993
Page 2 of 2

(2) the final SSAR is technically accurate and consistent within itself, and (3) the Tier 1 material and the final SSAR are consistent. To better facilitate verification of the SSAR, a reformatted SSAR (i.e., final SSAR) is being developed using a new format similar to the format of the SBWR SSAR. GE understands that NRC plans to perform a verification of the final SSAR. No technical issues should result from this verification.

We note the acknowledgement in SECY-93-041 that the NRC Staff can legally issue an FDA without approval of the Design Control Document (DCD) – approval of the DCD being linked to the ensuing step of initiating certification rulemaking. Since both tiers of information that constitute the DCD will have been reviewed and approved by the NRC as part of its FDA determinations, there is no reason why the formal creation of a DCD for inclusion in a notice of proposed rulemaking need be accomplished prior to FDA issuance. Requiring such a step would result in a needless process delay. NRC verification of DCD content – projected in SECY-93-041 – can be done with full effectiveness after issuance of the FDA. Accordingly, we strongly recommend that an FDA be issued as soon as the FSER is issued.

We appreciate the Staff review commitment and the supporting resources reflected in SECY-93-041 and assure the NRC that GE fully intends to fulfill its reciprocal submittal responsibilities.

Sincerely,



R. C. Mitchell, Acting Manager
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