



OFFICE OF THE
SECRETARY

UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555
September 10, 1990

55FR 31462

MEMORANDUM FOR: James M. Taylor
Executive Director for Operations

FROM: Samuel J. Chilk, Secretary

SUBJECT: SECY-90-241 - LEVEL OF DETAIL REQUIRED FOR
DESIGN CERTIFICATION UNDER PART 52

The attached public comments from General Electric and Westinghouse addressing the subject SECY paper were received by the Secretary and are forwarded for your use. Copies of both letters have been informally provided to the designated point of contact, Martin Virgilio.

Attachments:
As stated

cc: Chairman Carr
Commissioner Rogers
Commissioner Curtiss
Commissioner Remick
OGC
GPA
PDR - Advance
✓ DCS - P1-24

For
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PDR SECY
90-241 PDC



Westinghouse
Electric Corporation

Energy Systems

Nuclear and Advanced
Technology Division

Box 355
Pittsburgh Pennsylvania 15230-0355

September 5, 1990

NS-NRC-90-3540

Mr. Samuel J. Chilk, Secretary
Office of the Secretary of the Commission
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

ATTENTION: Docketing and Service Branch

SUBJECT: SECY 90-241, Level of Detail Required for Design Certification under
Part 52; Response to Commission Request for Comments.

Dear Mr. Chilk:

Westinghouse supports the comments on the issues raised in SECY 90-241 and in related Commission briefings which were submitted to you on behalf of the nuclear power industry by NUMARC in its letter dated August 31, 1990 and the attachments thereto. We have the following additional comments which we believe reinforce the comments submitted by NUMARC, particularly as they relate to standardization issues.

It is important to emphasize that the reforms embodied in Part 52 will result in substantially greater standardization of plants which are built to certified designs than that which resulted from the Part 50 licensing process. However, we see the real potential for delaying actions necessary for effective implementation of the Part 52 design certification process by tying the level of detail required for design certification to the current focus on the additional degree to which nuclear power plants which reference a certified design should be standardized. Plant standardization relates to the control of differences between plants which reference a given certified design after the first one has been constructed and begins operation. It need not, and in our view should not, be related to the NRC certification (assuring the safety) of a standardized design.

It is premature to attempt to establish the details of standardization for plants referencing a certified design through the design certification process. Such decisions should be made on a case-by-case basis. As was stated by Mr. Minnick in his additional comments in the ACRS letter dated August 14th on this subject,

"... it is clear that standardization is not an unmixed blessing. ... the ultimate degree of standardization should not be pursued for its own sake,

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but rather should be limited to that degree clearly essential to the assurance of plant safety.

"... competition among suppliers, and innovation and improvement in general, are considerably hampered by standardization. ..."

Informed decisions in this regard require a knowledge of the details of the proposed change from the baseline, why it is being considered, what the alternatives are, if any, and most importantly, what the safety and economic effects of making (or not making) the change may be. This can only be done for a real proposed change on an actual plant implementing the certified design. It cannot be done in the abstract.

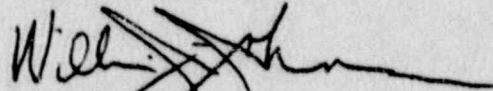
The control of standardization for a given type or family of plants referencing a certified design can and should be achieved through the process by which the certified design is implemented. That is, the first plant built referencing a certified design will establish the proper baseline from which changes for future implementation may be evaluated.

The industry recognizes the value of the enhanced standardization of plants resulting from referencing certified designs reviewed and approved by the NRC pursuant to Part 52 and views it as a step toward attaining a fuller realization of the economic benefits of plant standardization. Westinghouse believes that these economic benefits of standardization should be achieved through industry initiatives.

Hence, Westinghouse agrees that standardization beyond that related to safety should be achieved through the the industry approach outlined in NUMARC's comment letter and that this should be pursued while the NRC completes the review and certification of the evolutionary and passive ALWRs. The level of detail in applications for certification should be independent of this initiative and should be based on that necessary to make the required safety determinations and to issue the certification rule.

I thank you for this opportunity to present our views on this very important matter.

Very truly yours,



William J. Johnson, Manager
Nuclear Safety Dep