GE Nuclear Energy

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September 5, 1990

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

Dear Mr. Chilk:

This is in response to the Nuclear Regulatory Commission's request for comments on the NRC staff paper, SECY-90-241, which discusses the level of design detail required to be submitted by an applicant seeking a standard design certification under 10 CFR Part 52. We commend the NRC's efforts to solicit wide public comment by interested parties on such a fundamentally important topic and appreciate this opportunity to offer our views.

As you are aware, GE, from the beginning, has been a staunch supporter of standard plant certification and we are of the view that it represents the only viable path to reestablishment of the nuclear option. Most recently, we have been heavily involved in industry discussions concerning key Part 52 implementation issues. As such, we have provided substantial input to the detailed industry response, communicated through NUMARC, regarding such issues as "level of detail" and the need for and use of a "two-tier approach." We heartily endorse the NUMARC comments and urge the Commission to give them, and the unified industry positions they represent, the utmost consideration.

It is GE's belief that the forthcoming Commission guidance on these and related issues, in regard to both its timeliness and content, is likely to have a profound effect on the ongoing attempt to demonstrate the viability of Part 52 and, thus, the very future of nuclear power in this country.

Sincerely,

D. R. Wilkins

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NUCLEAR MANAGEMENT AND RESOURCES COUNCIL

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September 4, 1990

TO: Standardization Oversight Working Group

SUBJECT: NUMARC Response to SECY 90-241

Attached is the NUMARC response to SECY 90-241, Level of Detail required for Design Certification under Part 52, which was transmitted to the NRC today.

A separate letter documenting the NUMARC response to the questions posed by the Commissioners on costs, schedules and suggested improvements to the NRC review processes will be forwarded to you next week for review and comment.

It is unlikely that the Commission will make a decision on the level of detail issue before mid-October 1990. We intended to hold further discussions with the NRC Staff, the Commissioners' Technical Assistants and the Commissioners during the next six weeks to emphasize our positions on these important topics.

Sincerely,

Bill

William H. Rasin
Director, Technical Division

WHR/APH/kls