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April 13, 1994

MFN No. 047-94 Docket No. 52-001

Document Control Desk U.S. Nuclear Regulatory Commission Washington, D.C. 20555

Attention: Richard W. Borchardt, Director Standardization Project Directorate

Subject: Input to Certified Design Material (CDM)/ITAAC Review Guidance

Reference: Letter, R. W. Borchardt to J. F. Quirk, Input to Certified Design Material (CDM) Review Guidance, March 24, 1994

The purpose of this letter is to provide the GE response to the referenced letter which requested GE comments on the staff's draft CDM/ITAAC Review Guidance document.

GE believes the most appropriate response to this request is to provide the GE memorandum that documents its understanding of the CDM form, scope and content guidelines that are now in place. These guidelines have been developed during the extensive GE/NRC/Industry CDM interactions of the past several years and are the basis for the GE CDM document 25A5447.

The attached memorandum was prepared by GE with the intent of providing guidance to engineering personnel assigned to CDM preparation. However, it reflects the GE/NRC agreements on CDM contents and is directly applicable to the staff's effort to put in place a CDM Review Guidance document.

In addition to the detailed issues discussed in the GE memorandum, we believe it is important that the staff CDM Review Guidance reflect the more global guidelines documented by GE (and approved by the staff) in the ABWR Standard Safety Analysis Report, Section 14.3.

LTRBK 94-014

9404150146 9404 PDR ADDCK 0520 It should be noted that Industry comments are being coordinated by Nuclear Energy Institute (NEI) and will be forthcoming in the *i*uture. GE will work with NEI to ensure consistency with this response and NEI's response.

As always, GE personnel will be available to provide clarification of this material and to answer any questions the staff may have.

Sincerely,

Joseph F. Quirk Project Manager ABWR Certification M/C 782, (408) 925-6219

cc: S. A. Hucik (GE) J. A. Beard (GE)R. J. Bell (NEI) T. A. Boyce (NRC) N. D. Fletcher (DOE) J. N. Fox (GE)S. P. Franz (Newman, Bouknight & Edgar) R. Louison (GE)M. A. Rowden (Fried, Frank, ....)