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Carl Walske
President

June 2, 1982

The Honorable Nunzio J. Palladino
Chairman
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Dear Chairman Palladino:

The Atomic Industrial Forum (AIF) continues to be active in the areas of nuclear power plant design standardization and single-stage licensing, especially through the efforts of its Committee on Reactor Licensing and Safety (CRLS) and Standardization Subcommittee. We have been encouraged by your recent statements concerning the need for widespread standardization in order to realize the full advantages of single-stage licensing.

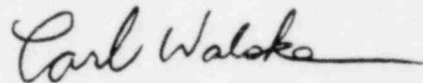
In a letter to me dated January 14, 1981, John Ahearne stated that the NRC intended to extend administratively those Preliminary Design Approvals (PDAs) that were then about to expire. The Federal Register of February 4, 1981 (46 FR 10880) noticed extension of the applicability period of certain PDAs for a period of six months, and indicated this was done "to conserve resources that have been expended...and to make effective use of the standardization concept, while new guidelines for PDA extensions are under consideration."

However, the NRC administratively extended only some PDAs and those for only six months. We are dismayed that the NRC has not completed its intended action of developing and implementing new guidelines regarding PDA extensions during the temporary extension period. Since the PDAs in question have again expired, as have others, and new guidelines are not in place, the past NRC action of administratively extending PDAs was clearly not productive. We consider the development and implementation of new guidelines regarding PDA extensions along with administrative extension of expired PDAs an important step to demonstrate both your continued interest in nuclear power plant standardization and your realization of the need to preserve the significant efforts that have already been expended in this area.

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We request that the NRC develop and implement new guidelines regarding PDA extensions and take the intended action to extend administratively PDAs that have expired until such time as these PDAs are re-activated under new guidelines. This will assist in keeping the nuclear industry viable and provide a design base for utilization by new plants. As further background, I am enclosing a letter to Mr. William J. Dircks dated May 28, 1981, from D. Clark Gibbs, Chairman of our CRLS, commenting on the previous Commission policy concerning new applications referencing extended PDAs. If you need any further clarification, please let me know.

Sincerely,



CW:hlt
Enclosure

cc: Mr. William J. Dircks