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May 28, 1981

Mr. William Dircks
Executive Director for Operations
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Subject: Preliminary Design Approval Extensions

Dear Sir:

The Atomic Industrial Forum's (AIF) Committee on Reactor Licensing and Safety (CRLS) views with some encouragement recent action taken by the NRC in the area of standardization. We refer to the January 14 letter from John F. Ahearne to Carl Walske and the February 4, 1981, Federal Register notice (46 FR 10880) concerning the extension of the applicability period for certain previously issued Preliminary Design Approvals.

These two actions represent positive steps toward the goal of preserving the standardization options available to the nuclear industry. The AIF-CRLS concurs with the NRC position as stated in the Federal Register notice that resources already expended in the review of PDA applications should be preserved and that the standardization program should be used effectively.

However, the Commission policy, as stated in this Federal Register notice, refers to the use of "current licensing requirements" as the benchmarks against which an application referencing on extended PDA will be reviewed. We are, therefore, concerned that during the period when new NRC guidelines for PDA extensions are under consideration and possibly during the development of a revised standardization program, this Commission policy may be misinterpreted such that actions are taken which are inconsistent with its stated intent of maintaining standardization as an effective approach. In particular, a previously approved standard design should not be reviewed against all current interpretive documents (such as Regulatory Guides, Standard Review Plans, Branch Technical Positions, etc.). Such action would result, in our judgement, in an approach that would likely negate almost completely the benefits of such an approved design.

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PDR COMMS NRCC
CORRESPONDENCE PDR

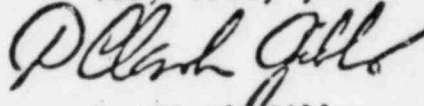
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We believe that, in the case of a new application referencing one or more extended PDAs, the most effective use of staff and industry resources, consistent with proper protection of public health and safety, would result from:

1. Ensuring that the significant safety issues arising from Three Mile Island be addressed in the new application, and;
2. Ensuring that previously reviewed and approved material not affected by significant safety issues arising from Three Mile Island is not subject to re-review.

In this regard, it is our understanding that the intent of the Commission's policy on a new application referencing one or more PDAs is to ensure that previously approved areas not affected by significant TMI-related safety issues are not rereviewed and to provide direction to an applicant regarding the appropriate TMI issues to be addressed in the new application. This approach, in our view, is a proper method of ensuring effective use of NRC Staff as well as industry resources, retaining the benefits of PDA reviews already completed, maintaining the viability of the Commission's standardization program and demonstrating a positive attitude toward the licensing of new nuclear power facilities.

Very truly yours



D. Clark Gibbs
Chairman
Committee on Reactor Licensing
and Safety

DCG:hlt