



Portland General Electric Company

Bart D. Withers Vice President

March 21, 1983

Trojan Nuclear Plant  
Docket 50-344  
License NPF-1

Mr. Darrell G. Eisenhut, Director  
Division of Licensing  
Office of Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission  
Washington DC 20555

Dear Mr. Eisenhut:

Licensee Qualification for Performing Safety Analyses  
in Support of Licensing Actions (Generic Letter No. 83-11)

Portland General Electric is pleased to note in Generic Letter 83-11 that the NRC encourages utilities to perform their own safety analyses. Having supported license changes in the past with in-house analyses, Portland General Electric recognizes the need for both verified codes and knowledgeable users. We are, therefore, in agreement that code proficiency is a desirable goal. We do not believe, however, that the method proposed in Generic Letter 83-11 is necessary or will, in fact, meet the stated goal. The reasons for believing this are two-fold:

- 1) Portland General Electric has in-house a strict quality assurance program and procedures requiring independent checking and verification of safety analyses. Both the originator and checker are engineers and in most cases have their professional engineering license.

Independent assessment and checking of a calculation provides additional assurance that the calculation (including code usage) has been done correctly and that the results are reliable.

- 2) A user verification package does provide some measure of an analyst's qualification to use code, but they do not guarantee error-free results. Many of the computer codes in use today are capable of performing a wide variety of problems. A user verification package designed to exercise all the options available to the user would be prohibitively large and expensive to formulate and run. In addition, to provide meaningful results the correct solutions to such benchmark runs would have to be unknown to the code user, otherwise code "massaging" could be used to attain good comparison between test data and computer predictions.

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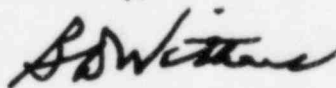
The key ingredient to correct and meaningful results when sophisticated computer codes are utilized is engineering judgment. No user verification package can ensure that this ingredient will be used for a specific code application.

In addition to the items discussed above, Generic Letter 83-11 proposes a method which in its present state is ambiguous and open ended and, therefore, potentially extremely expensive. Should the NRC continue to pursue this requirement for user verification packages to accompany safety analysis submittals, the following items would need to be clarified:

- 1) Large complex thermal-hydraulic codes are specifically cited in Generic Letter 83-11 but the problems described are germane to all codes. Is the NRC's proposed policy limited to certain codes or does it span the entire gamut of computer codes used for safety analyses?
- 2) What is the composition and type of user verification package which, in the NRC's mind, ensures a user's qualification to both utilize a code and to interpret its results?
- 3) Who is qualified by a verification package? Is a specific employee or the organization qualified by submittal of an acceptable verification package? Also, must a new verification package be submitted with each new safety analysis or can a previously submitted verification package be referenced?

In summary, Portland General Electric does not believe that a user qualification package as described in Generic Letter 83-11 will serve its intended goals. Such a proposal will, on the contrary, have a negative impact on a utility's desire to perform its own safety analyses, and consequently will result in less understanding of plant behavior on the part of the licensee. We respectfully suggest that the intended goals of Generic Letter 83-11 be met through encouragement of in-house code verification and usage, independent checks of safety analyses, and attendance at computer code user workshops, rather than through additional regulatory requirements.

Sincerely,



Bart D. Withers  
Vice President  
Nuclear

c: Mr. Lynn Frank, Director  
State of Oregon  
Department of Energy