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Mr. Harold R. Denton, Director
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Phillips Building
7920 Norfolk Avenue
Bethesda, Maryland 20814

November 16, 1983

NS-EPR-2855

Dear Mr. Denton:

This letter is intended to clarify Westinghouse's objectives regarding our recent application, RESAR-SP/90, tendered October 24, 1983. This clarification is appropriate in light of the Proposed Commission Policy Statement on Severe Accidents and Related Views on Nuclear Reactor Regulation, 48 FR 16013 published 4/13/83, a/k/a SECY 82-1B.

The application is for Preliminary Design Approval (PDA) of a total standard plant design pursuant to Appendix O to 10 CFR Part 50 and in accordance with the Commission's 1978 policy statement on standardization. In that regard, then, RESAR-SP/90 is expected to be suitable and available for incorporation by reference as an approved design in new CP applications subsequent to PDA issue. PDA issue is projected for the third quarter, 1985.

The application is also intended to conform to the guidance provided by the proposed severe accident policy statement previously referred to. In that regard, each of the implementation guidelines enumerated in Section X of that policy statement will be satisfied with one single exception provided by that policy. In particular, the application will: comply with current Commission regulations including the requirements set forth in the CP Rule 10 CFR 50.34(f); address all applicable Unresolved Safety Issues; address and justify any deviations from the Standard Review Plan, NUREG-0800, as required by 10 CFR 50.34(g); and incorporate design features for the prevention, management, or mitigation of severe accidents as indicated and demonstrated by the performance of a complete Probabilistic Risk Analysis to be submitted as part of the application.

The single exception is that regarding the need for completed rulemaking prior to PDA issue. As we have previously indicated, Westinghouse intends to also make application for Final Design Approval (FDA) through rulemaking. This application is scheduled for 1985 submittal with final approval through rulemaking projected for 1987. Upon issue of the FDA we would intend to modify the approved preliminary design as appropriate in consideration of any design changes identified through the severe accident rulemaking on the final design.

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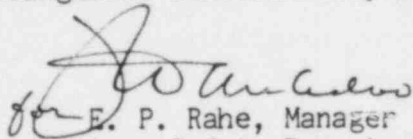
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Should the preliminary design be incorporated by reference in new domestic CP applications during the intervening period (i.e., between PDA issue and FDA issue through rulemaking), then those changes would be adopted on those CP applications as appropriate by consideration of the cost effectiveness of the risk reduction indicated.

We consider our approach to be fully consonant with the intent and provisions of the Commission's proposed severe accident policy statement of which Westinghouse has expressed consistent and strong support. We recognize that the policy statement, as presently drafted, encourages complete standard plant applications for Final Design Approval through rulemaking. We share the Commission's view that this objective is key to any substantive improvement in the future licensing process. However, we also view that improvements in design are equally important to improvements in process from the standpoint of overall regulatory efficiency and industry well-being. In that regard, we believe that the Commission should afford every incentive to industry efforts in the development of improved, next-generation, designs which are fundamentally responsive to the important insights derived from past industry experience and the heightened introspection of the past few years triggered by the TMI accident. Such development programs are necessarily lengthy by nature involving a considered progression from conceptual to preliminary to final design specification. The NRC should recognize and reaffirm a continuing role for Preliminary Design Approvals as an appropriate incentive for such major design development initiatives.

We solicit and would appreciate your early acknowledgement and endorsement of our licensing approach for this, our Westinghouse Advanced Pressurized Water Reactor (WAPWR) Design.

Very truly yours,
Westinghouse Electric Corporation


E. P. Rahe, Manager
Nuclear Safety Department

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cc: Gary C. Meyer - SSPB