

AFRRI COMMENTS

SAR REVIEW PLAN AND ACCEPTANCE CRITERIA

INTRODUCTION

SECTION	REQUIREMENT	COMMENT	SUGGESTION
SF&C, p. viii	Specify measurements in both SI and English units.	This requirement is unnecessarily burdensome. Many existing plant drawings and diagrams are in one system or another, to invest the time and manpower to convert them solely for the purpose of SAR submittal is a waste of resources.	Require only that the licensee use one system or the other for individual drawings or diagrams, as applicable.
RP&AC, p. iv	The text references: "Appendix A of this document is an example of an NRC Evaluation Report"	No such example document was found in the material received for review.	Forward a copy of the example document to the licensee.

NOTE: SF&C denotes comments pertaining to the SAR Standard Format and Content
RP&AC denotes comments pertaining to the SAR Review Plan and Acceptance Criteria

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CHAPTER 1: GENERAL DESCRIPTION OF THE FACILITY

SECTION	REQUIREMENT	COMMENT	SUGGESTION
RP&AC, p. 1-6, ¶ 1.4.3	The reviewer should assess the effect of the shared facilities on safety.	The task of the licensee in describing the interactions of multiple facilities depends on the exact definition of "shared facilities."	The concept of "shared facilities" should be very explicitly defined, with consideration of the implications of this definition on SAR analysis and review.

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CHAPTER 6: ENGINEERED SAFETY FEATURES

SECTION	REQUIREMENT	COMMENT	SUGGESTION
No comments on this chapter.			

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CHAPTER 8: ELECTRICAL POWER SYSTEMS

SECTION	REQUIREMENT	COMMENT	SUGGESTION
No comments on this chapter.			

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CHAPTER 9: AUXILIARY SYSTEMS

SECTION	REQUIREMENT	COMMENT	SUGGESTION
SF&C, p. 9-4, ¶ 9.4	Applicant should discuss how the facility meets all local building and fire codes.	There is no practical way to demonstrate, in the SAR, that the facility meets "all local building and fire codes." The facility had to meet the codes in existence when the facility was originally constructed, and then comply with periodic inspections. However, satisfactory inspections are not documented, only violations or noncompliance. The proposed general requirement to demonstrate compliance with "all local building and fire codes" is impractical.	Delete the general statement for the applicant to demonstrate compliance with "all local building and fire codes."
RP&AC, p. 9-5, ¶ 9.3.1	The NRC will review systems, components, and methods used to prepare and ship fuel off site in accordance with applicable regulations.	The applicant will have difficulty furnishing suitable material for review. There is currently no authorized shipping cask for TRIGA fuel, and no specific destination to which fuel may be shipped.	Modify the text of this section to recognize that specifics on the systems, components, and methods for preparing and shipping fuel off site may not be available.

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