ARMED FORCES RADIOBIOLOGY RESEARCH INSTITUTE



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23 February 1995

SUBJECT:

Draft Application Format and Content Guidance and Review Plan and

Acceptance Criteria for Non-Power Reactors

Director, Non-Power Reactors and Decommissioning Project Directorate United States Nuclear Regulatory Commission M. S. 11-B-20 Washington, DC 20555

Dear Director:

We have reviewed the Introduction and Chapters 1, 6, 8, and 9 of the draft "Format and Content for Applications for the Licensing of Non-Power Reactors" and the draft "Safety Analysis Report Review Plan and Acceptance Criteria for Non-power Reactors."

We find these drafts generally clear and workable. We believe they represent an improved mechanism for the preparation, review, and ultimate approval of Safety Analysis Reports (SARs) and licensing applications for non-power reactors.

Specific comments and questions related to our review of these documents are attached. Please contact Mark Moore, at telephone number (301)295-5590, if you have any questions regarding these comments.

Attachments:

(1) Comments on Introduction

(2) Comments on Chapter 1

(3) Comments on Chapter 6

(4) Comments on Chapter 8

(5) Comments on Chapter 9

MARK L. MOORE Reactor Facility Director

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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 of 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:

SAR REVIEW PLAN AND ACCEPTANCE CRITERIA

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.

NOTE:

SAR REVIEW PLAN AND ACCEPTANCE CRITERIA

CHAPTER 6: ENGINEERED SAFETY FEATURES

SECTION	REQUIREMENT	COMMENT	SUGGESTION
No comments on this chapter.			

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

SAR REVIEW PLAN AND ACCEPTANCE CRITERIA

CHAPTER 8: ELECTRICAL POWER SYSTEMS

SECTION	REQUIREMENT	COMMENT	SUGGESTION
No comments on this chapter.			

NOTE:

SAR REVIEW PLAN AND ACCEPTANCE CRITERIA

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.

NOTE: