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60 FR 54712
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(8)

EPRI
Electric Power Research Institute

Leadership in Electrification through Global Collaboration

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Chief, Rules Review and Directives Branch
U.S. Nuclear Regulatory Commission
Mail Stop T-6D-69
Washington, D.C. 20555-0001

Dear Sir:

EPRI appreciates this opportunity to comment on the USNRC's "Proposed Generic communication: Licensee Qualification for Performing Safety Analyses (M91599)" which appeared in the Federal Register Vol. 59, Number 206, October 25, 1995, p. 54712. Overall, we are in accord with the thrust of the proposal to allow third party review of licensee or vendor analysis methods. This would be a cost effective way to proceed in the future.

As a general comment, we note that the phrase "analysis methods" is not explicitly defined, and that it is not clear whether methodologies or computer codes, or both, are being included in this phrase. A clarification of intent would be helpful. Additionally, more specific comments are included in the attachment. For your convenience, these comments have been identified according to the questions asked within the text of the notice.

Sincerely,

J. G. Haugh for

V. K. Chexal
Director
Nuclear Power Group

782L/VKC/kel

c: R. Jones
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Attachment

Comments on "Proposed Generic Communication; Licensee Qualification for Performing Safety Analyses (M91599)":

1. The term, "insignificant change to an existing methodology" is not well defined.

1a. a) Any organization that has an approved methodology on a similar plant or equivalent expertise should be qualified to perform a review of an application methodology.

b) Any organization qualified to review a code should have the capability to develop a code similar to that being evaluated.

1b. If the reviewer is qualified and there's no conflict of interest, there is no safety significance.

1c. Documentation: A report summarizing (1-f below) and all significant findings, including key criteria validation and benchmarkings, i.e. the basis of the approval.

1d. Acceptance should be handled in a similar manner to current practice (e.g., NRC letter of approval).

1e. Any third party reviewer must have access to all applicable information. This may require non-disclosure agreements. Obtaining such agreements would be the responsibility of the reviewer prior to accepting the work.

1f. A review history would detail a description of who performed the review, the minimal technical requirements of the code or method, the acceptance criteria of each requirements, all supporting calculations, and the application bases. This should be performed under App B QA.

2. A group of independent experts in the appropriate areas could be commissioned in lieu of the "third party organization".

2a. Written guidance should be available.

2b. Yes, good code development, practice, applicable V&V, qualification, and review for specific applications can be developed.

3. Any code or methodology that requires NRC approval should be covered by this process.

Comments on Attachment 1 - "Guidelines for Qualifying Licensees to Use Generically Approved Analysis Methods":

Does the licensee who applies under the attachment base the methodology on a previously approved plant SER or can they develop under these regulations a "new" topical based only on the generic code SER?

Sect. 2.2: For clarity, the words "application of the" should be deleted in the following, "In-house application... and approved application of the methodology,..."

Sect. 2.3: Training in code or method should be performed by either the developer of the code or method. or someone who has been previously qualified in the use of the code or method.

Sect. 2.4: "During an operating cycle and vendor...". The "vendor" analysis should be changed to "analysis of record" which may <u>not</u> have been performed by a "vendor" (Vendor is not well defined as it could be the plant, fuel , or code vendor).

Sect. 2.4: "An appropriate set of benchmark..." should include analysis of events, (when adequate plant data does not exist), using higher order codes or published numerical benchmarks.

Sect 2.4: "Any deviations..." must be explained. It should be changed to "any deviation of engineering significance".