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GE Nuclear Energy
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RULES REVIEW
USNRC

Subject: **Response to Request for Comments**

Reference: Federal Register Volume 60, No. 206, Page 54712/3, Dated 10/25/95

In response to your request for comments on NRC Generic Letter 83-11, Supplement 1 as it appeared in the referenced volume of the Federal Register, GE's Nuclear Energy Production Facility is providing the following comments.

We concur that the submittal of detailed topical reports by the licensees for codes and methods which have already been licensed by the vendor is indeed resource intensive for both the licensee and the staff. Additionally, it is redundant. Therefore we are in complete agreement with the approach which is set forth in the referenced article which would shorten the lengthy review and approval process.

We strongly encourage the acceptance of this supplement as written which states the same criteria as the GE document NEDO-32362, *Utility Licensing of Vendor Methods*, submitted July, 1994 for information as a joint GE/Utility suggestion for this approach. Any reduction in redundant requirements is a step in the direction of reduction in cost burdens for the licensees as well as an increase in time available for both the licensee and the staff to concentrate on issues of significant safety value.

In addition, we would like to comment on other viable approaches for accepting new or revised methods; specifically, item 2(b) of the reference article. The item states, "*Can a set of criteria, as proposed in the generic letter supplement for previously approved generic methods, also be developed for new methods?*" First of all, GE believes that there needs to be a clear definition of both "methods" and "significant changes" to existing methodology. We do believe that a set of criteria can be developed for new methods and for revisions to existing methods. We strongly believe that an improved process is urgently needed, whether this is in the form of a criteria approach, or controls on the timeliness and scope of the traditional approach.

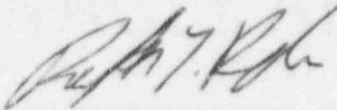
GE has no problem making available any proprietary and technical information for NRC review. We do, however, have some difficulty with the timeliness and scope of these reviews. Based on recent GE experience, prolonged holdups of approvals regularly occur in the management chain after the technical review is completed. Also, the scope of the review frequently becomes expanded in the process of "educating" staff members. We would like to propose an approach to the review and approval process which would include the following:

- The submitter suggests the scope of review. A two week period is allotted for the NRC staff to accept or reject the suggested scope.
- The NRC issues the review schedule.
- Following the scheduled end of technical review, a 30-day period is allocated for management approval. If no communication is forthcoming, the submittal will be considered approved.

GE will, in the next few months, be formulating a set of criteria which they will submit for consideration as an approach to licensing new methods and revisions to existing methods. We will also suggest definitions for "methodology" and for "significant changes" to methodology. GE appreciates the opportunity to participate in the review and to present our comments. If you have any questions, please contact me on (910) 675-5889.

Sincerely,

GE NUCLEAR ENERGY



R. J. Reda, Manager
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cc: Laurence I. Kopp, NRC
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