



**CENTERIOR
ENERGY**

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60 FR 54712
Oct. 25, 1995
(19)

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11443

Docket Number 50-346

License Number NPF-3

Serial Number 2348

January 8, 1996

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

Subject: Comments Regarding Proposed Generic Communication:
Licensee Qualification and Performing Safety Analyses
(M91599)

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Gentlemen:

Toledo Edison (TE), a subsidiary of Centerior Energy, is partial owner of and is responsible for operation of the Davis-Besse Nuclear Power Station (DBNPS). As a 10 CFR Part 50 licensee, TE has a vested interest in both the technical and regulatory aspects of the proposed generic letter supplement which provides an alternative method for licensees to perform their own safety analyses.

Toledo Edison has reviewed the proposed supplement to Generic Letter 83-11 "Licensee Qualification for Performing Safety Analyses in Support of Licensing Actions" (60FR54712). Based on this review, TE provides the following comments:

1. The proposed generic letter supplement appears to be geared toward organizations, such as Nuclear Steam Supply System (NSSS) vendors or the Electric Power Research Institute (EPRI), that routinely submit topical reports to the Nuclear Regulatory Commission (NRC) for review. Toledo Edison recommends that the guidance be explicit enough to allow for utilities to reference topical reports submitted by non-NSSS vendors, in particular, other utilities. For example, Studsvik of America has developed the CASMO-3/SIMULATE-3 computer code package that is used extensively by utilities throughout the United States for reactor physics analyses. Several

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utilities have submitted topical reports to the NRC based upon these computer codes and have obtained NRC approval of their use. Studsvik, however, has not submitted their codes and methods to the NRC for generic approval and will not likely do so.

2. The guidance contained in the proposed generic letter should insure that sufficient flexibility exists to allow utilities to optimize their resources in performing their own safety analyses. Most NSSS and fuel vendors obtain NRC approval of their analytical methods which employ a certain set of computer codes to perform various portions of their safety analyses. However, other computer codes exist which are capable of being used for some portions of safety analyses with similar accuracy and reliability. Therefore, TE recommends that the proposed guidance be sufficiently flexible to allow substitution of computer codes within an approved analytical methodology.
3. At present, there is no simple means for a utility to discern which codes and methods have been approved by the NRC. Therefore, TE recommends that the NRC establish, and maintain readily available, a listing of the codes or methods it has approved.
4. The proposed generic letter supplement contains provisions for licensees in implementing vendor updates in computer codes. However, at some point in time, it is possible that these incremental updates could result in significant changes to an approved code or method, which may require NRC reapproval. Therefore, TE recommends that the NRC define the point at which reapproval is necessary so as to avoid any future ambiguities over the updates for users and vendors, as well as for the NRC.

Should you have any questions regarding these comments, please contact Mr. Peter W. Smith, Acting Manager - Regulatory Affairs, at (419) 249-2366.

Very truly yours,



GAB/eld

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