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RULES REVIEW DIVISION  
USNRC

Subject: Arkansas Nuclear One - Units 1 and 2  
Docket Nos. 50-313 and 50-368  
License Nos. LPR-51 and NPF-6  
Comments on Draft Supplement 1 to Generic Letter 83-11,  
"Licensee Qualification for Performing Safety Analyses"

Gentlemen:

The purpose of this letter is to provide Entergy Operations' comments for Arkansas Nuclear One to the draft Supplement 1 to Generic Lette. 83-11. In addition to comments on the proposed supplement, the Staff requested comments on three questions. The following are comments on the requested questions.

(1) To what extent can an organization other than the NRC (a third party) review a new methodology or a significant change to an existing methodology?

Since many of the NRC reviews of methodologies are currently assigned to subcontractors, it would seem that third party reviews would not be significantly different. There would be concerns with the "independence" of the review but such reviews/audits are currently practiced in other industries, such as the financial sector; therefore, it would appear to be a reasonable approach. An alternative might be the development of a set of NRC-approved standards and criteria that the third party reviewer would be required to maintain in which licensees could hold the third party reviewer accountable.

(a) What capabilities should be required of a third-party reviewer?

These third party reviewers would obviously have to possess the appropriate technical and licensing capabilities to provide a defensible review. The NRC should establish a certification process for third party reviewers. This would ensure an adequate supply of qualified reviewers. This could include current/former NRC contractors in the area of interest, documented expertise in the required field, and documented experience in

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performing analyses of the type being reviewed, etc. It would seem that such capabilities/requirements would already be compiled for current NRC contractors.

(b) What is the safety significance of not having the NRC perform the review?

With appropriate controls placed upon the quality of reviews, comparison to other vendor methodologies and the exercising of sound engineering judgment, the safety significance would be minimal.

(c) What documentation should be submitted to the NRC by the third-party reviewer and/or by the licensee?

A report summarizing the methodology and applications that were reviewed, a synopsis of the review process and depth, and comparisons to standardized problems or other industry results that would support reviewers' judgments regarding the subject. Additionally, the reviewer would prepare a licensing assessment including comparisons to existing regulatory requirements and issue a safety evaluation report. In short, the report should include the information necessary for the NRC to audit the controls over the application of the methodology. This report should include a clear delineation of the applicability of the methodology and could possibly be required to have a pre-defined format and content.

(d) What type of acceptance (e.g., a safety evaluation report) should be issued?

A cover letter reflecting receipt of the licensee/contractor review report and the applicability/limitations of the methodology should be issued. The letter could state that application of the methodology is permissible within the constraints outlined in the submitted report and that future NRC audits/inspections would verify compliance with the report.

(e) How would approved references (e.g., Core Operating Limits Report (COLR) parameters in technical specification reporting requirements) be handled?

Referencing the submittal reports and NRC approval letters that described the methodology and application would be a method of handling approved references.

(f) What information, if any, should be available for NRC audit?

The same information that would currently be available for topical report reviews -- all of it.

(2) What other viable approaches can be used for accepting new or revised methods?

Standard benchmark cases might provide a means of determining the validity of methods. With the extensive benchmark data from the NRC's own development of RELAP5 and other methods, such benchmark cases could be readily compiled.

(a) Should a regulatory guide be developed?

A regulatory guide would be valuable in order to ensure consistency in documentation content and format and for ease in NRC audit/inspection.

(b) Can a set of criteria, as proposed in the generic letter supplement for previously approved generic methods, also be developed for new methods?

This could be done on a case by case basis.

(3) To what technical disciplines should this process apply? Commentors should clearly differentiate any comments submitted in response to these questions from comments on the generic letter supplement.

The above responses are from the perspective of reactor physics, accident, and transient analysis.

The following are general comments on the proposed Attachment 1 of the draft Supplement 1 to Generic Letter 83-11. With the increasing frequency with which utilities switch fuel vendors, the applicability of a particular method to either a specific fuel design or to a core which contains a mixture of fuel types will be important. Use of a vendor's hot channel analysis code with an EPRI or different vendor's transient codes may not necessarily yield conservative results and, in fact, may not be consistent with the "reload analysis package" that has been approved by the NRC. In-house application procedures should have the proper controls to preclude such a misapplication but should also be permitted to include the flexibility to perform comparison tests between the different methodologies, possibly with vendor assistance, to show that a conservative assessment can be made. This, in effect, would be a deviation from "approved" methodologies but one that is supported by analysis and acceptable under 10CFR50.59.

Compliance with the generic letter would be easier if an NRC inspection procedure was developed concurrently so licensees would know the requirements, and specifically, what questions and documentation requests might be needed to support audits. The effort to provide both the generic letter and the inspection procedure at the same time would probably make the documents more consistent. Also, the NRC should consider providing licensees the flexibility to conduct its own assessment of a third party reviewer similar to what is currently allowed in NRC Inspection Module 40501, "Licensee Self-Assessments Related to Team Inspections".

Should you have any questions, please contact me.

Very truly yours,



*for* Dwight C. Mims  
Director, Nuclear Safety

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