

Dec 9, 1995
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Dear Shirley Jackson, Chairman NRC,

The lack of a finished SAR, updated to NRC SER requirements, before a CoC is issued for a generic cash is causing confusion in SAR document use by everybody connected. I request that when a generic cash SAR is referenced in any documents, the Revision number is supplied and the date as well. ^(published) Licenses, vendors, fabricators, public service commissions, etc. often refer to only the SAR as if everybody involved thinks the SAR, referenced in the CoC, was the final document - when in fact it was certainly not. It contained contradictions and differences from the NRC SER and needed two changes, Revision OA and Revision OAA, before acceptable for the VSC-24 cash. This cash was the 1st to be used in generic rulemaking and so guidance and clarification is needed here.

The VSC-24 received Certification May 7, 1993. The NRC letter of April 28, 1993 issues the NRC SER referenced and dated in that Certificate. The letter is to Sierra Nuclear, the cash vendor, and requests that, since there was a proprietary release and changes in SAR needed to meet the SER requirements, Sierra submit the necessary completed version of the SAR in 3 months (about July 28) and to use an A suffix. That was not done. As you can see still in the Nov 28, 1994 letter to Sierra from Mr. Stutz (ACN 9412020179) the SAR then still needs modifications "to eliminate contradictions or differences between the SAR and NRC's SER and CoC"! Only in a Sierra June 5, 1995 (ACN 9506160243) submittal

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do we finally see Revision OAA with the necessary changes. Is this Rev. OAA then the SAR finally accepted by NRC to meet the VSC-24 SER and CoC requirements? If so, it is the one to be referenced by all users and fabricator of the cash, isn't it? When I tried to explain this to our Wis. PSC their response was that OA and OAA apply to any utility, using the VSC-24 storage cash and that I was correct. Mr. Hansen NRC told them that Update OA and OAA insert material into the SAR that NRC asked Sierra to perform and that "the material is in the licensing record but not in the SAR." Why is it not now * in the SAR? We see constant reference in documents to the SAR but not to Rev. OA or OAA. How do we know which one they are actually referencing if a rev # and date are not supplied? WEPCO has told our PSC staff that where update O differs from the CoC and SER they will follow the CoC and SER. But it is the SAR that is often referenced to fabricator subcontracts, etc., when generic cashs are used isn't it? This creates confusion and the possibility that an SAR version is being used that even "contradicts or differs from CoC and SER requirements" doesn't it?

Ever since the proposed rule for the 1st generic cash certification I have requested a final SAR be accepted before a cash is certified and I still think that should be required. The SAR should completely fulfill all requirements of the NRC SER and CoC before it is issued to

anybody to use. That only seems prudent and in the interest of public safety. Why issue a faulty document and then issue two inserts of changes which were clearly required before certification. Why not finalize the SAR document to fulfill requirements 1st so that there is no confusion?

Now that we have SAR OAA, how is that document allowed to be changed in the future? It is my understanding that to change this document, rulemaking and an amendment is required, as the cash was certified (SER, SAR, CoC) by rulemaking. Once NRC accepts an amendment, the SAR document would be changed to include this new information - and every future user would get this new revision (1) of the document and a date it was issued. Once again the need for all references to state an SAR revision date and number. The 0 version was only SER required updates for certification. The 1 version would be an amendment change done after certification. (No Revision 1 was allowed although Sierra thought they could do this.) This is the 1st use of the generic cash ruling and general license and vendor use of the documents. Clarification is needed. What is the process for a vendor to change the SAR generic document issued to a vendor cash design? It is an amendment done by rulemaking, and a requirement that use of the document is referenced by number and date in documents is needed. Thank you for addressing this concern. Fawn Shillinglaw