



June 5, 1992
LD-92-075

Docket 52-002

Mr. Robert C. Pierson, Director
Standardization Project Directorate
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Subject: Tier 1 Design Information and Inspections, Tests,
Analyses, and Acceptance Criteria (ITAAC) Submittal for
System 80+™

References: 1. ABB-CE Letter LD-92-060, Submitting Pilot ITAAC,
dated April 30, 1992.
2. NRC Letter from R. C. Pierson to E. H. Kennedy
(ABB-CE), dated May 21, 1992

Dear Mr. Pierson:

ABB-CE submitted a pilot set of 10 ITAAC (Reference 1) and met with the NRC on May 20, 1992 to obtain staff feedback on the submittal. Subsequently, we have received Reference 2 which officially provided NRC comments. We appreciate the rapid review which enables us to proceed expeditiously with our ITAAC preparation program.

In response to the staff's request, an index listing all of the proposed Tier 1 topics will be transmitted to the NRC for concurrence. It will depict which topics have associated ITAAC and will list other products ABB-CE plans to provide under the ITAAC banner. For example, one product will be a "road map" which will cross reference such topics as PRA assumptions, Chapter 6 and 15 assumptions, and the ITAAC area in which they are covered. This material will be provided on or about July 10, 1992.

The 10 pilot ITAAC which the NRC has commented on will be modified to respond to the comments and to account for any additional changes which appear to be necessary based on ongoing GE-NRC negotiations and correspondence. Before submitting the modified version in late July, we plan to take into account comments which have been submitted by NUMARC and others in the industry. A meeting with NRC staff will be requested to obtain concurrence that the modified ITAAC are acceptable in scope, level of detail, and specificity.

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To facilitate staying abreast of the lead plant submittals and negotiations, we are accepting the NRC's advice to attend ACRS and GE-NRC meetings which are open to the public when ITAAC is on the agenda. To aid this plan, it is requested that the NRC notify us in sufficient time to arrange attendance at those meetings. We also plan to bring NUMARC into our ITAAC preparation process to obtain the benefit of their involvement in the ITAAC development process.

Preparation of the entire ITAAC package will proceed concurrently with the above efforts. In the NRC/ABB-CE meeting in May, we proposed to hold several meetings with the staff to agree on the Tier 1 scope and probable criteria of each ITAAC prior to expending extensive preparatory effort. The staff, however, expressed its strong preference that ABB-CE simply submit the complete ITAAC package based on our best effort, preferring to work out the differences after a formal submittal. We agree to this staff position. However, prompt and thorough feedback on our modified ITAAC pilot submission becomes very crucial as the only basis for a mid-course correction which may save substantial staff and applicant resources in review and corrective actions later.

ABB-CE's Tier 1 Design and Information ITAAC submittal is scheduled to be transmitted to the NRC by October 16, 1992, which we believe will be timely to maintain SECY 91-161 schedules.

Very truly yours,

COMBUSTION ENGINEERING, INC.



C. B. Brinkman
Acting Director
Nuclear Systems Licensing

/lw

cc: D. Giessing (DOE)
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