



September 16, 1992
LD-92-099

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

Subject: System 80+™ Tier 1 Submittal Schedule

Reference: ABB-CE Letter LD-92-075 to NRC, dated June 5, 1992.

Dear Mr. Pierson.

ABB-CE is in the process of developing Tier 1 Design Descriptions and accompanying ITAAC (Inspections, Tests, Analyses and Acceptance Criteria) for System 80+. As we earlier informed you (Reference), we are working to a mid-October submittal date. However, several considerations have subsequently come into play which strongly indicate the desirability of modifying the schedule in order to improve the product and thereby, to potentially improve the review schedule, not only for ITAAC, but also for closing out Draft Safety Evaluation Report open items.

ABB-CE has been, and continues to be, an active participant in the industry review of the lead plant ITAAC and in the NUMARC - NRC interactions on this extremely important aspect of design certification. The August 26, 1992 meeting in San Jose between the industry and NRC staff served to define the extent of differences between the industry and NRC positions related to ITAAC while hopefully also contributing to identifying potential compromise solutions. The industry is looking for resolution of these seemingly implacable ITAAC problems at the NUMARC - NRC management meeting scheduled for September 18, 1992.

Currently, ABB-CE is involved in the month-long industry review in San Jose which will not be completed until the end of September. Not only is ABB-CE learning from the feedback on the lead plant ITAAC, but several of the System 80+ system ITAAC will also be reviewed by industry peers. Furthermore, participation by NRC management and utility management in the San Jose project on September 21-22 is expected to lead to acknowledgement of what constitutes ITAAC which are satisfactory to both the regulator and the potential licensee.

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We are also awaiting the results of the NRC staff's review of the eight modified pilot System 80+ ITAAC which were resubmitted August 10, 1992.

If ABB-CE maintains its present schedule for ITAAC submittal, it will not be possible to incorporate all of the above feedback into the product. In our opinion, such a submittal would not constitute a meaningful step toward achieving an ITAAC package satisfactory to either NRC staff or potential COL holders and would, of necessity, require additional iterations.

As a result, ABB-CE proposes to delay the ITAAC submittal until the package can accommodate the guidance and decisions from the sessions mentioned above. We would like to meet with you to work out a schedule which would provide the best ITAAC package which meets the NRC's resource needs. We are confident that the proposed approach will be more efficient for both NRC and ABB-CE resources and may actually speed up the review process. I must, however, make it very clear that ABB-CE is not proposing any slippage in the review schedules which target a November 1993 Final Design Approval. Indeed, we are hopeful this action will result in an earlier issuance.

Thank you very much for your consideration of this matter. I look forward to meeting with you to discuss the details of a coordinated submittal of the System 80+ Design Descriptions and ITAAC.

Very truly yours,

COMBUSTION ENGINEERING, INC.



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