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BWXT comment1.html.txt

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<H1>Revised Requirements for the Domestic Licensing of Special Nuclear
Material, 10 CFR Part 70</H1>

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BWXT comment1.html.txt

Separating the performance requirements from the descriptive requirements

<p>

From: Steve Schilthelm

<i>steve.w.schilthelm@mcdermott.com</i>

Date: 1/6/99 5:26:01

Thread ID: 4.1

<p>

The following comments are provided by BWX Technologies, Naval Nuclear Fuel Division, SNM-42

70.62(c)(3) Integrated Safety Analysis Revalidation

This is a new concept which has not been previously introduced into proposed revisions to 10CFR70. BWXT has been performing ISA on an existing facility for nearly 3 years with an investment of over 30 man-years. We reviewed the need for revalidation two years ago and determined that an enhanced approach to change management which uses ISA evaluation techniques and team concepts with qualified reviewers would provide greater confidence in the continuing validity of the ISA

results and would eliminate the need for periodic revalidation.

BWXT believes the focus should be on quality configuration management and maintenance of a valid ISA rather than periodic revalidation and that this section should be deleted.

70.4 Controlled Site Boundary

10CFR20 defines both a "Restricted Area" and a "Controlled Area". This

definition (10CFR70.4) is not consistent with either in 10CFR20. It

appears that 10CFR20 definitions are adequate and that the ISA

consequence criteria should be applied at the Controlled Area Boundary

as defined in 10CFR20.

70.62(d) Management Measures

BWXT supports the concept of management measures as presented. Section (d)(6) however, implies that a QA program be implemented in addition to other management measures in 70.62(d), some of which are elements of a QA program. Section (d)(6) appears to be redundant and unnecessary and should be deleted.

70.4 Integrated Safety Analysis Summary

BWXT supports use of this terminology. This definition places the ISA Summary as part of the license application . Although this is contrary to Industry's position, BWXT believes the ISA Summary could be part of the license application (as BWXT is currently doing with a two part license) as long as it is clearly stated in the rule that changes to the process and the ISA Summary do not require license amendment. This would require some minor revision to this definition. This would also require revision of the draft proposed language in 10CFR70.72 in order to clearly state when a license amendment is required for changes to the ISA Summary (Part 2 of the license). 70.72 should be consistent with the 12/1/98 SRM in that only "those few significant changes that currently would require license amendments" would require license amendments in the future.

</html>