

February 8, 1983

TO ALL OPERATING REACTOR LICENSEES

SUBJECT: LICENSEE QUALIFICATION FOR PERFORMING SAFETY ANALYSES IN SUPPORT  
OF LICENSING ACTIONS (Generic Letter No. 83-11)

Gentlemen:

The purpose of this letter is to inform you of the current NRR practice regarding licensee qualification for performing safety analyses in support of licensing actions.

Over the past few years, the number of licensees electing to perform their own safety analyses to support reload applications, technical specification amendments, etc... rather than contract the work out to their NSSS vendor or other organizations has increased substantially. We encourage utilities to perform their own safety analyses since it significantly improves their understanding of plant behavior.

NRC's experience with safety analyses using large, complex thermal-hydraulic computer codes such as RELAP and TRAC has shown that a large percentage of all errors or discrepancies discovered in safety analyses can be traced to the user rather than to the code itself. This realization has led NRR to place additional emphasis on assuring the capabilities of the code users as well as on the codes themselves. For example, for the past two years NRR has been working with the Vendor Inspection Branch in Region IV to inspect the acceptability of the QA procedures used for code development, verification, use, and maintenance for all licensees and vendors involved with safety analysis codes presently under staff review. While this aspect of our review focuses primarily on the competence of the licensee and vendors regarding quality assurance practices, the technical competence of the licensees and vendors with respect to their ability to set up an input deck, execute a code, and properly interpret the results must also be assured. NRR obtains this assurance by reviewing the code verification information submitted by the licensee or vendor. The information we look for includes comparisons performed by the user of the code results to experimental data, plant operational data, or other benchmarked analyses.

We are concerned however, that some licensees planning to perform their own safety analyses may not intend to demonstrate their ability to use the code by performing their own code verification. Rather, they plan to rely on the code verification work previously performed by the code developer or others.

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NRR does not consider this acceptable and each licensee or vendor who intends to use a safety analysis computer code to support licensing actions should demonstrate their proficiency in using the code by submitting code verification performed by them, not others.

In order to eliminate problems on future licensing submittals, I request that you factor this into your future licensing submittal plans.

Original signed by  
Darrell G. Eisenhut

Darrell G. Eisenhut, Director  
Division of Licensing

*Attachments: See jacket*

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