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50-261

SUBJECT: Comment supporting draft GL, "Availability & Adequacy of Design Bases Info."

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**CP&L**

Carolina Power & Light Company

Eugene Imbro  
58FR15885  
3/24/93 (14)

APR 23 1993

SERIAL: NLS-93-110

United States Nuclear Regulatory Commission  
ATTENTION: Chief, Rules and Directives Review Branch  
Washington, DC 20555

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FEDERAL REGISTER, PAGE 15885, MARCH 24, 1993, "AVAILABILITY  
AND ADEQUACY OF DESIGN BASES INFORMATION"

Gentlemen:

Carolina Power & Light Company (CP&L) is pleased to submit this response to the information provided in the Federal Register, page 15885, March 24, 1993, titled, "Proposed Generic Communication: Availability and Adequacy of Design Bases Information."

Carolina Power & Light Company has reviewed the proposed draft Generic Letter on design bases information, and has also reviewed the Nuclear Management and Resources Council (NUMARC) letter dated April 2, 1993, sent to the NRC in response to the proposed draft Generic Letter on design bases information.

Carolina Power & Light Company agrees with the Commission that maintaining current and accessible design documentation is important to ensure that the plant physical and functional characteristics are maintained and are consistent with the design bases as required by NRC regulations; that systems, structures, and components can perform their intended functions; and that the plant is operated in a manner consistent with the design bases. NUMARC has developed guidance for the conduct of design bases reconstitution programs that outlines a framework to organize and collate power plant design bases information that utilities may adopt in developing or assessing their programs.

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USNRC  
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Carolina Power & Light Company agrees with the comments expressed by NUMARC in its letter of April 2, 1993 to the NRC to the effect that the request for information is unnecessary and that it may, unintentionally, bypass the formal regulatory process. Carolina Power & Light Company respectfully suggests, therefore, that the Commission withdraw the draft Generic Letter.

Should the Commission decide, nevertheless, to issue the Generic Letter in final form, CP&L notes that certain terms used in the draft Generic Letter are potentially ambiguous. The specific nature of the information requested is obscured by the request's terminology. Several similar, but apparently not synonymous, terms are used that are never defined. The terms include "design information," "design documentation," and "design reconstitution program." The term "design bases" is defined in 10 CFR 50.2; however, the other terms may be construed to mean something other than what was intended. Definitions should be provided for the ambiguous terms, and others that are considered synonymous should be noted as such.

If clarification of our comments is necessary or if more information is needed, please contact Mr. Fred Emerson at (919) 546-7573.

Yours very truly,



for David C. McCarthy  
Manager  
Nuclear Licensing Section

JHH/jbw

cc: Mr. S. D. Ebnetter  
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