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December 21, 1979

Mr. Robert L. Baer, Chief
Light Water Reactors Branch No. 2
Division of Project Management
U.S. Nuclear Regulatory Commission
7920 Norfolk Avenue
Bethesda, MD 20852

P.B. Haga
Director
Plant Analysis & Licensing

Subject: Transmittal of Offshore Power Systems
Responses to Post-TMI NRC Requirements,
Topical Report No. 36A93

Dear Mr. Baer:

Enclosed are 4 copies of Offshore Power Systems Topical Report No. 36A93, "Offshore Power Systems Responses to Post-TMI NRC Requirements", December 1979. An additional 36 copies have been shipped to you via United Parcel Service. The report addresses IE Bulletin 79-06A, (including Revision 1); "TMI-2 Lessons Learned Task Force Status Report and Short-Term Requirements", NUREG-0578 (as modified by D. B. Vassallo's letters dated 10/10/79 and 11/9/79); additional short-term requirements in D. B. Vassallo's letter dated 10/10/79; and "TMI-2 Lessons Learned Task Force Final Report", NUREG-0585. While Offshore Power Systems recognizes that a response to the IE Bulletin was not required, we felt that our responses would contribute to the completeness of the overall report and provide a framework for understanding how the Floating Nuclear Plant and our application for a Manufacturing License relate to the requirements resulting from the TMI accident.

The intent of our report is to provide sufficient input (including certain Offshore Power Systems' commitments) on the subject of the TMI accident to support the issuance of a License to Manufacture Floating Nuclear Plants. Based on the review of our report, the NRC should be in a position to issue a Safety Evaluation Report Supplement addressing the TMI accident. It is

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important to note that many of the post-TMI NRC requirements are understandably somewhat subjective in tone (especially those in NUREG-0585) and as such should be used in establishing new regulatory directions of an intermediate- or long-term nature. Such requirements are not amenable to immediate implementation as a condition for issuance of a Manufacturing License.

The Manufacturing License is unique and differs from the Construction Permit in that sites and plant owners are unspecified. This leaves ample time during the site selection and Operating License approval process to review the Floating Nuclear Plant final design and assess how well it addresses the lessons learned from the TMI accident. Accordingly, implementation of long-term requirements, some of which will not be finalized until after rulemaking proceedings, need not delay completion of the NRC review of our application for a Manufacturing License. We already have shown that the Floating Nuclear Plant is quite resilient regarding the types of design changes now being considered for possible eventual implementation. There is little doubt that long-term lessons learned can be incorporated into the Floating Nuclear Plant.

Based on the above, we ask the NRC to complete its review and issue a supplement to the SER in March, 1980 as originally planned and stated to the Hearing Board on November 2, 1979.

Very truly yours,

P. B. Hays

CC: A.R. Collier
V.W. Campbell

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