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Eugene Imbro  
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WASHINGTON PUBLIC POWER SUPPLY SYSTEM

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USNRC  
OFFICE OF ADMINISTRATION

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April 22, 1993

Chief, Rules and Directives Review Branch  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Gentlemen:

Subject: **COMMENTS ON PROPOSED GENERIC LETTER ON DESIGN BASES INFORMATION**

The Washington Public Power Supply System has reviewed the proposed generic letter and offers the following comments for your consideration.

We endorse the comments of the Nuclear Management and Resources Council (NUMARC) which stated that the request for information in the proposed generic letter is inappropriate, has no nexus to safety, and bypasses the formal regulatory process.

Surveys conducted by the NRC have confirmed that utility approaches to design basis programs vary greatly, however the various systems used by the utilities have all demonstrated the ability to provide needed design basis information. To request the submittal of information as proposed by the generic letter would duplicate information which the NRC has already documented in NUREG 1397 (An Assessment of Design Control Practices and Design Reconstitution Programs in the Nuclear Power Industry).

That the regulatory process can be bypassed is clearly recognized by both the industry and NRC. This issue was raised in the recent (April 15, 1993) meeting between the NRC staff and Commissioners on the SALP process. In that meeting, Commissioner Curtiss expressed concern about instances where a licensee performs "extra activities" and licensees are then evaluated by "how high they jump", rather than by a system which evaluates the primary activities necessary to maintain safety.

We appreciate this opportunity to comment on the proposed generic letter.

Sincerely,

J.V. Parrish (Mail Drop 1023)  
Assistant Managing Director, Operations

cc: Mr. T Pietrangelo, NUMARC

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