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58 FR 1885

3/24/93

(21)

April 22, 1993

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

Subject: Comments on "Proposed Generic Communication; Availability and Adequacy of Design Bases Information"

CNRO-93/00019

Dear Mr. Meyer:

Entergy Operations, Inc. has reviewed the notice of opportunity for public comment for the proposed generic letter concerning the availability and adequacy of design bases information (58 FR 15885). We wish to submit the following comments on behalf of Arkansas Nuclear One Units 1 & 2, Grand Gulf Nuclear Station, and Waterford 3 Steam Electric Station.

Entergy Operations is willing to share information about our design bases programs with the NRC at any time. However, the information which the proposed generic letter would request has been previously communicated to the NRC staff. We have discussed the adequacy and the scheduling of the design bases program for each of our facilities with various members of the NRC staff through a number of meetings, presentations, and other interactions. In addition, other utilities and the Nuclear Utility Management and Resources Council (NUMARC), on behalf of the industry, have also provided general and specific design bases information to the NRC. Therefore, responses to the proposed generic letter would not appear to provide any new or useful information to the NRC staff.

The proposed generic letter specifies a voluntary response and states that it imposes no new or changed requirements. However, the phrase that the responses will be used "[t]o assist the staff in prioritizing its inspection program" may imply negative consequences for those utilities who do not respond, even though they have been cooperative and open with the NRC staff.

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In conclusion, the proposed generic letter would incur an expenditure of industry and NRC resources for little benefit. Entergy Operations therefore respectfully requests that the NRC not pursue the issuance of the proposed generic letter. We believe this position to be consistent with ongoing NRC efforts to eliminate requirements marginal to safety, to reduce regulatory burden, and to move toward more performance oriented regulation and away from prescriptive approaches.

Entergy Operations has also reviewed the comments prepared in regard to the proposed generic letter by NUMARC. We endorse their positions in regard to this matter, which are generally similar to our own.

Entergy Operations appreciates the opportunity to express our views on the proposed generic letter and the Commission's consideration of our comments.

Sincerely,

W.R. Hagley
for J.R. McGehee

JRM/hek

cc:

Mr. T. W. Alexion
Mr. R. P. Baikhurst
Mr. R. H. Bernhard
Mr. R. B. Bevan, Jr.
Mr. J. L. Blount
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Mr. E. J. Ford
Mr. D. C. Hintz
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