



General Electric Company
1230 Capital Avenue, Fairfield, CT 06424

March 9, 1992

MFN No. 053-92
Docket No. STN 50-605
EEN-9232

Document Control Desk
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Attention: Robert C. Pierson, Director
Standardization and Non-Power Reactor Project Directorate

Subject: NRC Conference Call on DSER Comments to ABWR SSAR ISI
Requirements

Reference: P.W. Marriott to R. C. Pierson, "GE Response to Inservice
Inspection (ISI) Issue of GE/NRC Meeting October 9-10, 1991;
January 6, 1992, MFN No. 008-92

As a follow-up to the referenced letter, a GE/NRC conference call was held on February 19, 1992 to discuss the ISI sections of the ABWR SSAR. The following summarizes the staff's positions:

1. Design access for preservice and inservice examinations is an ASME Section XI Code requirement. Since ABWR is a new plant, the SSAR must commit unconditionally to design for such access.
2. The section on relief requests should be deleted in its entirety. This is a new plant and should be designed to meet applicable Codes and regulations without relief.
3. Specific code editions should not be referenced. The code editions used for PSI and ISI (and construction as well) are based on the date of issuance of the construction permit or the operating license, respectively, per 10CFR50 Section 50.55a. These items are considered interface requirements for utility applicants as described in the DSER.
4. The Augmented Inspection section of the SSAR must address erosion-corrosion examination because it is expected to be incorporated into the Code in the near future. Also the SSAR must address prior augmented inspection requirements of IE/NRC Bulletins and GE SILs as applied to the ABWR.

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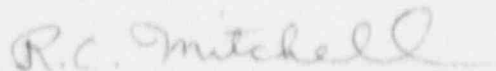
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5. A crisp distinction must be made in the text between exclusions, which pertain to the classification boundary, and exemptions, which pertain to ASME Code PSI/ISI requirements, due to past problems NRC has experienced with utility implementation of these requirements.

It should be noted that these positions are substantially different than those expressed by the staff at the October 9-10, 1991 meeting and, as a consequence, GE is withdrawing the SSAR changes in the referenced letter. The SSAR changes corresponding to the above positions will be addressed in GE's response to SECY-91-355.

Sincerely,



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