



January 17, 1992

MFN No. 012-92
Docket No. STN 50-605
EEN-9208

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: **Resubmittal of Pilot Inspections, Tests, Analyses and Acceptance
Criteria (ITAAC) Package for the ABWR Certification**

Reference: 1. Letter, P.W. Marriott to Charles L. Miller, same subject, same
Docket, dated September 20, 1991.
2. Letter, R.C. Pierson to P.W. Marriott, "Detailed Comments on
Pilot Inspections, Tests, Analyses and Acceptance Criteria
(ITAAC) Submittal for the Advanced Boiling Water Reactor
(ABWR)," Docket No. STN 50-605 dated December 5, 1991.

The Reference 1 transmittal provided NRC staff with thirty-four (34) copies of nine pilot examples of proposed Tier 1 design certification material for the GE ABWR. This material included a proposed Tier 1 design description (Rule content) as well as the ITAAC entries which derive from this description.

GE has revised the material submitted September 20, 1991, to reflect NRC comments provided in the second reference letter. In addition to revision of the nine pilot examples, the GE material has been expanded to include the following additional ITAAC-related material:

- o A generic ITAAC addressing the subject of equipment environmental qualification (EQ)
- o Proposed design acceptance criteria (DAC) ITAAC for:
 - software configuration management
 - radiation protection
 - man-machine interface systems design team

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Attached are thirty-four (34) copies of the revised material for NRC review and comment.

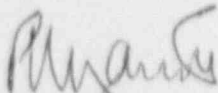
Also attached are thirty-four (34) copies of:

1. An item-by-item GE response to each of the NRC comments provided in the Reference 2 letter.
2. A position paper explaining GE's conclusion that a proposed generic ITAAC on Seismic Category 1 structures is not required and would not be meaningful.

Submittal of this information represents fulfillment of GE's ITAAC related commitments made during the December 9-10, 1991 GE/NRC meetings in San Jose.

It is GE's understanding that further discussion of this material will be on the agenda for the upcoming GE/NRC meetings scheduled for January 28 and 29 in San Jose. We look forward to these discussions.

Sincerely,



P.W. Marriott, Manager
Regulatory and Analysis vices
M/C 382, (408) 925-6948

cc: F.A. Ross (DOE)
N.D. Fletcher (DOE)
R.C. Berglund (GE)
J.F. Quirk (GE)
A.J. James (GE)