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Westinghouse
Electric Corporation

Water Reactor
Divisions

Nuclear Technology Division

Box 355
Pittsburgh Pennsylvania 15230

CT 1
February 9, 1984 → *Exhibit Action*
Yellow Ticket

NS-EPR-2886

Harold R. Denton, Director
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
7920 Norfolk Avenue
Phillips Building
Bethesda, Maryland 20814

Subject: RESAR SP/90 Preliminary Design Approval Application

Dear Mr. Denton:

Your letter of January 25, 1984 asked for Westinghouse's acknowledgement and understanding that the RESAR SP/90 PDA and FDA design reviews are subject to final Commission policy now evolving relative to standardization and severe accident considerations.

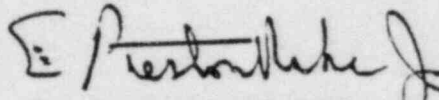
We appreciate the NRC's position that changing regulatory policy attaches some uncertainty to reference standard plant reviews at this time. We, nevertheless, remain willing to proceed with our application despite that uncertainty and, in fact, with full expectation that we may need to satisfy certain regulatory requirements not now in place. This willingness stems from the high confidence we place in our design and, in particular, its advanced safety features and integrated total plant design assessment and specification.

However, your letter indicates an even more fundamental issue than that regarding changing requirements. In particular, you indicate that the very role of PDAs in a future licensing process is open to question. Our previous letter to you (NS-EPR-2855) of November 16, 1983 stated that the PDA concept remains an important incentive for industry initiatives involving major new design development programs and that such initiatives are key to the future health of this industry. As you are well aware, regulatory

accreditation has become an important consideration in market receptivity of new design offerings, both domestically and internationally. Major development programs require major investments and involve significant lead times. Marketing activities cannot wait until final completion of such lengthy development effort and yet are seriously compromised if regulatory accreditation is absent.

Westinghouse began the development program of the RESAR SP/90 in 1978 and is now at a stage where serious commercial activity is appropriate. We must have a program in place with expectation of near term regulatory accreditation. A PDA without utility (referencability for a facility license application) would be of limited value to us. We request that you reconsider your position and reaffirm a continuing role for PDAs in the future licensing process.

Very truly yours,



E. Preston Rahe, Jr., Manager
Nuclear Safety Department

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cc: D. G. Eisenhut
R. J. Mattson