

DOCKET NUMBER

PROPOSED RULE

46 FR 18045

FR-50

11

STONE & WEBSTER ENGINEERING CORPORATION

245 SUMMER STREET, BOSTON, MASSACHUSETTS

ADDRESS ALL CORRESPONDENCE TO P.O. BOX 2325, BOSTON, MASS. 02107

W U TELEF 84-0001
94-0977

BOSTON
NEW YORK
CHERRY HILL, N.J.
DENVER
CHICAGO
HOUSTON
PORTLAND, OREGON
SAN DIEGO
WASHINGTON, D.C.

DESIGN
CONSTRUCTION
REPORTS
EXAMINATIONS
CONSULTING
ENGINEERING

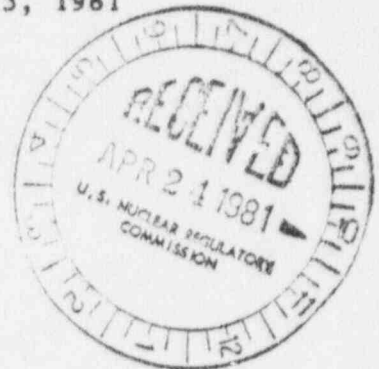


Secretary of the Commission
Attention Docketing and Service Branch
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

April 13, 1981

Dear Sir:

LICENSING REQUIREMENTS FOR PENDING CP AND ML APPLICATIONS
PROPOSED RULE; 10CFR50.34(e)
(46FR18045), MARCH 23, 1981



We are pleased to submit our comments on the subject proposed rule.

General Comment

We do not consider it warranted that rules be imposed on Construction Permit (CP) applicants, that are still under rule-making for operating plants - particularly when the outcomes of those rulemakings are uncertain.

Specific Comments

Paragraph (1) (i) - It is unreasonable to expect a meaningful probabilistic risk assessment (PRA) before the safety goal, degraded core, and other rulemakings are resolved, especially when the NRC has not yet defined the methods it expects will be used in the performance of the PRA.

Paragraph (2)(iii) - The control room design should not be subject to NRC "approval", but only to NRC "review", as is discussed in NUREG-0659. The rule should stipulate that the control room design consider state-of-the-art human factor principles, since direct application of all such principles may conflict with existing regulations.

Paragraph (2)(ix) - This paragraph is a major example of the above "general comment" in that it imposes a requirement on a subject that is still under rulemaking and which is more stringent than the preliminary results of that rulemaking, and which gives no credit for the operation of emergency core cooling systems as outlined in 10CFR50 Appendix K.

Paragraph (3)(iii) - The wording of this paragraph should be carefully reviewed to ensure that no conflict exists with the requirements of 10CFR50 Appendix B. We further suggest that these requirements be melded into Appendix B, rather than being stated separately.

8105050432

THIS DOCUMENT CONTAINS
POOR QUALITY PAGES

L-4-11 p. 5

SofC

2

Paragraph (3)(iii)(B) - It is impractical for the entire QA/QC organization to be located at the construction site, particularly for activities which are not construction oriented.

We appreciate the opportunity to assist in the development of this proposed rule and hope that the above comments will be of use to you in its finalization.

Very truly yours,

LP Walker for

R. B. Bradbury
Chief Licensing Engineer

DJC:VMB