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Mr. Samuel J. Chilk
Secretary of the Commission
U. S. Nuclear Regulatory Commission
Washington, DC 20555

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

Dear Mr. Chilk:

Subject: Request for Comments on NRC Proposed
Policy for Regulations of Advance Nuclear
Power Plants

The staff of GPU Nuclear Corporation (GPUN) herewith submits comments on the subject proposed policy. Comments were requested in a March 26, 1985 Federal Register notice (50 FR 11882).

As a general comment, we believe this policy is a good attempt at getting a head start on the regulation of a new generation of nuclear power plants. However, we believe that the NRC is continuing to be too prescriptive in these new regulations.

The Federal Register notice also contained six specific questions; our answers to those are contained in the enclosure.

Sincerely,

JR Thorpe

J. R. Thorpe
Director
Licensing & Regulatory Affairs

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Enclosure

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add Dennis K. Rathbun, H-1013
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Acknowledged by card JUN 4 1985

Enclosure

1. Regulatory approach should be less prescriptive and more design objective oriented. Design objective should apply to safety goals, safety approach and safety margins.
2. There is no clear cut answer to item 2. As in question 1, clear objectives would produce designs that would handle the problem identified in question 2.
3. Mandating "simplified" designs are unnecessary. Designs will come out simple, consistent with the design objectives, if the objectives are clearly stated.
4. We would strongly recommend for applying current experience, modified to be less prescriptive and more criteria-oriented, rather than a case by case basis.
5. Again an illustration of being prescriptive. If a good job is done on criteria and goals, then the designs will come out adequate to meet these criteria.
6. We would recommend a prototype approach on a totally new reactor concept.