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**CE POWER SYSTEMS**  
STN 50-470F

August 30, 1985  
LD-85- 042

Harold R. Denton, Director  
Office of Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Subject: Forward Referenceability

Reference: C-E letter LD-85-035, A. E. Scherer to H. R. Denton,  
"Application for Amendment of the CESSAR Final Design  
Approval", August 2, 1985

Dear Mr. Denton:

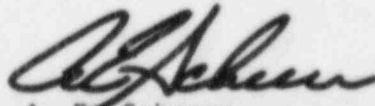
Combustion Engineering is very pleased to see the issuance of the Commission's "Policy Statement on Severe Reactor Accidents Regarding Future Designs and Existing Plants". In accordance with Section B.3.b(1) of the policy, Combustion Engineering requests that FDA-2 for CESSAR be amended to permit its reference in new CP and OL applications. The second option in the policy for reference designs which had been previously granted a Final Design Approval states that the request must include a suitable interface requirement to ensure that referencing CP and OL applications will satisfy each of the criteria in Section B.2 of the policy. Such an interface is provided in the attachment to this letter and will be included in Amendment 11 of CESSAR.

The above Reference recently requested an amendment to the CESSAR FDA. We understand that issuance of the amendment is expected to occur at the end of September. We, therefore, request that the forward referenceability provision be included in that amendment.

If you have any question, please feel free to contact me or Mr. G. A. Davis of my staff at (203) 285-5207.

Very truly yours,

COMBUSTION ENGINEERING, INC.



A. E. Scherer  
Director  
Nuclear Licensing

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AES:bks  
Attachment

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#### 1.1.3.3.2 Point Interfaces

The physical connections between CESSAR design scope systems and the BOP are designated point interfaces. They are shown by the "flags" on the CESSAR design scope system piping and instrumentation diagrams (P&ID's). Point interfaces are defined in Categories A, G, H, I, K, N, O, and P of the individual system interface requirements sections.

#### 1.1.3.4 Identification of Relevant Guidance Documents

Each system's interface section includes a listing of General Design Criteria (GDC), Regulatory Guides, industry codes and standards which C-E considers relevant to the design of the base system. The GDCs, Regulatory Guides, codes and standards are not imposed as interface requirements unless specifically identified as such in the individual CESSAR/BOP interface categories.

#### 1.1.3.5 Severe Reactor Accidents

For those System 80 plants that did not reference the CESSAR preliminary design approval in application for a construction permit, the criteria and procedural requirements stated in the 1985 NRC policy statement on severe reactor accidents must be met. These requirements are:

- a. Demonstration of compliance with the procedural requirements and criteria of the current Commission regulations, including the Three Mile Island requirements for new plants as reflected in the CP Rule [10 CFR 50.34(f)];
- b. Demonstration of technical resolution of all applicable Unresolved Safety Issues and the medium-and high-priority Generic Safety Issues, including a special focus on assuring the reliability of decay heat removal systems and the reliability of both AC and DC electrical supply systems;
- c. Completion of a Probabilistic Risk Assessment (PRA) and consideration of the severe accident vulnerabilities the PRA exposes along with the insights that may add to the assurance of no undue risk to public health and safety; and
- d. Completion of a staff review of the design with a conclusion of safety acceptability using an approach that stresses deterministic engineering analysis and judgement complemented by PRA.

#### 1.1.4 CESSAR ORGANIZATION

CESSAR is organized to respond to the Regulatory Guide 1.70, Revision 2, "Standard Format and Content of Safety Analysis Reports for Nuclear Power Plants", September, 1975.