Remarks:

Design activities within GE-Hitachi are rigorously controlled within a framework of procedures. Early in the GE-Hitachi design process, there is a requirement to gather design inputs and customer technical requirements. As defined in the controlling procedure, “design inputs include, but are not limited to design bases, design criteria, design parameters, performance requirements, regulatory requirements, codes and standards”. Customer Technical Requirements often include the additional regulatory requirements, codes and standards. We actively maintain a comprehensive library of such codes and standards for easy reference, including the applicable NRC Regulatory Guides that may exist. In order to ensure a comprehensive design, the design process often, depending upon the complexity of the design, includes an independent verification of the design inputs early in the process (prior to actual initiation of the design efforts) to preclude rework.

Maintaining the library of applicable regulatory requirements, codes and standards is an area where international collaboration would be useful. There are sometimes conflicts between codes and standards and maintenance of a matrix of applicability would be useful similar to the NUCLEAR ENERGY STANDARDS COORDINATION COLLABORATIVE (NESCC), except on an international scale.