

From: Lawrence Burkhart
To: Gary Beatty
Date: 5/15/01 1:16PM
Subject: Fwd: FENOC QAP (Part 72 deletion)

Please see attached and let me know when you could discuss.

Mail Envelope Properties (3B01646A.537 : 6 : 21370)

Subject: Fwd: FENOC QAP (Part 72 deletion)
Creation Date: 5/15/01 1:16PM
From: Lawrence Burkhart

Created By: LJB@nrc.gov

Recipients	Action	Date & Time
firstenergycorp.com beattyg (Gary Beatty)	Transferred	05/15/01 01:16PM

Post Office	Delivered	Route
firstenergycorp.com		internet

Files	Size	Date & Time
Mail MESSAGE	596	05/15/01 01:16PM

Options

Auto Delete:	No
Expiration Date:	None
Notify Recipients:	Yes
Priority:	Standard
Reply Requested:	No
Return Notification:	None

Concealed Subject:	No
Security:	Standard

To Be Delivered:	Immediate
Status Tracking:	Delivered & Opened

Attached E-mail

From: Kenneth Heck
To: Lawrence Burkhart
Date: 5/14/01 2:10PM
Subject: FENOC QAP (Part 72 deletion)

Larry -

When we discussed the RAI with FENOC on May 10th, I asked about the proposed deletion of the commitment to Part 72 Subpart G from their QA topical. I asked whether they had initiated an amendment request for their SAR, but I didn't understand their response. I also didn't understand whether this deletion was limited only to Davis Besse because Perry identified it as a reduction in commitment.

Since this item has the potential to delay our review of the QA topical, I would appreciate if you either set up a informal telecom or get additional clarification on the following:

1) The Part 72 commitment in the FENOC QAP is being deleted. The basis provided (Sidebar 1, Attachment 4) is that "The FENOC QAP will be applied to the scope of activities conducted under the 10 CFR 72 at the DBNPS as specified by the Dry Fuel Storage Certified Safety Analysis Report."

2) What is the Dry Fuel Storage Certified Safety Analysis Report? The staff isn't familiar with the term "certified" as applied to a SAR. Are they referring to the Part 50 SAR, the Part 72 SAR, or the SAR for a certified fuel cask design?

3) Is the intent to relocate the commitment by incorporating the FENOC QAP by reference in the Part 50, Part 72, or cask SAR? If this is the intent, what regulatory change process will FENOC use to update the SAR for each of these cases?

4) If the FENOC QAP is not being incorporated by reference, are QA requirements already contained in the SAR? Or will they need to be incorporated through a license amendment?. Again, what SAR is being referred to?

5) If Part 71/Part 72 commitments to the FENOC QAP are deleted, the staff (i.e., NMSS) will need to review the proposed quality program for maintaining existing fuel and the associated systems used for dry storage.

6) In the telecom, there was some confusion as to why Perry considered this change a reduction in commitment. FENOC should clarify whether the commitment is limited to the Davis Besse facility.

If we have a better description of what FENOC intends to do, we can resolve this matter promptly. If it is necessary to involve the Waste side of the house, I need to get them actively involved so as not to impact the schedule.

Ken