

From: James Creed
To: Dick Rosano, Doug Coe, Glenn Tracy, John Thomps...
Date: Mon, Jun 12, 2000 10:00 AM
Subject: Quad Cities SDP

Gentlemen:

During our call last week, someone asked that whoever had some thoughts on this issue should wade in with them. These represent only one person's opinion. I hope these comments will be viewed as constructive.

I don't think we should use the SDP in a formal setting, simply because it is unfair. The NRC has just completed one entire cycle of Operational Safeguards Response Evaluations under a set of guidelines. Quad Cities was the last of that cycle. [The only reason it was done after April 1 was due to scheduling peculiarities. In fact, I believe we had it actually scheduled last year, but had to change]. If you follow the directions established by Chairman regarding the conduct of the last eleven OSREs did not include using the SDP. She said we should use them to test new concepts. It was this direction that I went into the Clinton, Davis Besse, Perry and Quad Cities OSREs. We told the RIII stakeholders that great value could be obtained by using the SDP to evaluate any findings from these OSREs. They agreed.

Additionally, and from a technical standpoint - OSRE is not part of the baseline program, so shouldn't this be handled under the old program rather than the new program? Another technical point was that the "bridge" between the PPSDP and the Reactor Safety SDP includes the assumption that the Reactor Safety SDP cannot be entered until the threat has been contained or neutralized. My recollection is that that didn't happen in two of the four cases. Using the PPSDP in this case would void that assumption.

If we formally apply the SDP process to Quad Cities, they will be the only plant in the country, and the only one of the 70+ plants to be evaluated that way. Simply stated, it seems unfair.

Thanks for your time.
Creed

CC: Boss, David Orrik, Michael Parker, Zan-Shing (R...

