

**From:** James Creed  
**To:** John Grobe  
**Date:** Thu, Jul 27, 2000 7:11 AM  
**Subject:** Quad Cities SDP and the OSRE

Jack:

As you requested, here is a summary of some of the reasons we have expressed as to why using the SDP to evaluate the Quad Cities OSRE seems inappropriate:

1. The SDP has not been used in any of the other "original" OSRE evaluations. This means that we are treating Quad Cities uniquely. This appears patently unfair and may violate both the "Efficiency and Effectiveness" and "Unnecessary Regulatory Burden" principles that guide us.
2. We did not inform the licensee that this method of analysis would be used. In fact, we indicated to the contrary that any findings would be handled the same way as the others, and in accordance with Chairman Jackson's direction for the "last eleven" OSRE's.
3. Technically, the findings cannot transition from the Physical Protection SDP (PPSDP) to the Reactor Safety SDP because one of the "Assumptions for Entering Reactor Safety SDP" specified in Appendix E, IMC 0609 was not met. It says that the threat must be "known to have been terminated, neutralized or contained." That didn't happen at Quad Cities and was never considered part of the evaluation nor exercises.
4. It has been widely recognized that the SDPs - both PPSDP and Reactor Safety SDP will have to be modified to be made effective. Discussion was that this would need to be done before the next OSRE - or whatever we are going to call the next evaluations. If this is true, it will mean that Quad Cities will be the ONLY OSRE evaluated using this specific SDP. Again, it seems patently unfair.
5. During recent discussions during SDP Review Panels, positions were promulgated that established "new rules" to apply the SDP at Quad Cities. One related to just stopping discussion and calling a finding white in the PPSDP, because it was difficult to apply the Reactor Safety SDP. While another finding was forced through the Reactor Safety SDP, using different "rules" to render a Yellow finding. None of these rules have been discussed with stakeholders, as was the original SDP.

You should check with Mike Parker, because he has some PRA reasons the SDP shouldn't be used at Quad. I hope this answers your question.

Jim Creed

**CC:** Steven Reynolds

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