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From:

Gregory Smith RI

To: Date: John Thompson NEF-1/29/01 6:53AM

Subject:

Re: COMSECY 0036 and 0610*

Your suggestion makes sense--so does your E-mail--except the last half of the last sentence---...to ensure that our guidance....remains clear. We didn't know about the SRM and don't know what the proposed rev for the group 2 questions is and still we are not clear. We are busy gathering info that we don't know what to with.

>>> John Thompson 01/25 2:58 PM >>> NEC. Bill.

The SRM on Quad Cities and the correpsonding guidance for the interim PPSDP (COMSECY 0036) was issued to the regions this afternoon. There was some additional minor changes made at the last minute by OE. The immediate implication as I see it is that the current 0610* Group 2 question for safeguards is incompatible with the SRM guidance. The current safeguards Group 2 question is: "does it involve a nonconformance with safeguards requirements?" This could mean to include 73.55(a). Without a nonconformance, one could argue you can not enter the PPSDP.

Even the proposed Group 2 questions under consideration may need revision in this regard, since Group 2, question 1 makes reference to the performance requirements of 73.55. My suggestion is to make the reference to the regulation specific to 73.55 (b)-(h).

In a conference call today with HQs and the regions on this issue, there was not agreement on what the problem was or the action to be taken. Since it is apparant to me that the SRM directly impacts the guidance in 0610*, I would suggest that the Group 2 question effort on 0610* needs to be issued in concert with the 609 Appendix E revision to ensure that our guidance to inspectors on how and when to enter the PPSDP remains clear.

