

Performance Technology

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September 10, 2001

Mr. Sam Collins
Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
11555 Rockville Pike
Rockville, MD 20852-2738

Dear Mr. Collins:

Following my letter to you dated August 8, 2001, concerning the exemption requests for relief from hydrogen monitoring regulations by Three Mile Island Unit 1 and Turkey Point Units 3 and 4, I was contacted by certain members of your staff. Ms. Suzanne Black informed me that she had been designated by you to work with me to see if an acceptable solution could be found to the hydrogen monitoring exemption requests. I have had a number of conversations with her and other members of the NRC.

At this date, a solution appears unlikely without some assistance from NRC upper management. The recent conversations between NRC staff and myself have convinced me that the lower level staff in the NRC do not wish to grant relief with respect to hydrogen monitoring in spite of the words in SECY-00-0198 and presentations to the ACRS and the public. The exemption requests for hydrogen monitoring relief are perceived by lower level NRC staff as obstacles to be overcome in their desire to add new requirements to those requirements that already exist.

Attachment 1 to this letter describes the options that I believe are available at this time for a decision by the NRC management on the exemption requests for Three Mile Island Unit 1 and Turkey Point Units 3 and 4. I am willing to meet with you or your staff this week to discuss these options before the NRC reaches any final position with regard to the Safety Evaluations for the 10CFR50.12 exemption requests from hydrogen monitoring requirements from Three Mile Island Unit 1 and Turkey Point Units 3 and 4. I will call you to discuss an agreeable date for such a meeting.

Sincerely,



Bob Christie

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Attachment 1 - Letter from Bob Christie to Mr. Sam Collins, dated September 10, 2001

Options on Exemption Requests for relief from Hydrogen Monitoring Regulations

1. NRC grants all the exemption requests for hydrogen monitoring.

In this option, the NRC would grant the exemption requests for hydrogen monitoring from 10CFR50.44; 10CFR50, Appendix A, Criterion 41; and 10CFR50, Appendix E, Section VI.

2. NRC grants partial exemptions.

In this option the NRC would grant the exemption requests for hydrogen monitoring from 10CFR50.44; and 10CFR50, Appendix A, Criterion 41 but deny the request for exemption from 10CFR50, Appendix E, Section VI.

3. NRC denies all exemption requests for hydrogen monitoring.

4. The licensee withdraws all hydrogen monitoring exemption requests.

The NRC got San Onofre and Oconee to withdraw the exemption requests for hydrogen monitoring in order to obtain the relief granted by the NRC for hydrogen recombiners and hydrogen purge valves.

5. The licensee withdraws the hydrogen monitoring exemption request for relief from 10CFR50, Appendix E, Section VI. The licensee continues to request relief from 10CFR50.44 and 10CFR50, Appendix A, Criterion 41. The NRC grants these partial exemptions.