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(2)

From: Rebecca Karas
To: Michael, Glenn A(Z01119); TThompson@NACINTL.COM
Date: Wed, Oct 24, 2001 10:28 AM
Subject: RE: Editorial Observation on Preliminary NAC UMS CoC Amendment2

OK. Tom and I will check this out. If they were not edited in Amendment 1, then we will leave them as Amendment 0, with no markings.

Becky

>>> "Michael, Glenn A(Z01119)" <GMICHAEL@apsc.com> 10/24/01 10:22AM >>>

Becky,

The pages in question were NOT changed by Amendment 1. That is what is misleading about showing them as Amendment 1 pages in the Amendment 2 package. The pages are unchanged from the original issuance (Amendment 0), but somehow show up with incorrect Amendment 1 markings and rev bars on them in the preliminary Amendment 2 package.

Since the pages were not changed by Amendment 1, I strongly suggest that they not be labeled as Amendment 1 pages in the final Amendment 2 package.

Glenn

-----Original Message-----

From: Rebecca Karas [<mailto:RLK@nrc.gov>]
Sent: Wednesday, October 24, 2001 4:46 AM
To: Michael, Glenn A(Z01119); TThompson@NACINTL.COM
Cc: Hansen, Brian J(Z01015); Weber, Thomas N(Z00499); BNewton@NACINTL.COM; SMountan@NACINTL.COM; tthompso@NACINTL.COM; Jayne McCausland; Philip Brochman
Subject: RE: Editorial Observation on Preliminary NAC UMS CoC Amendment2

Glenn/Tom,

The decision to add the "Amendment 1" footer to pages that were, in fact, modified by Amendment 1, but incorrectly did not get an Amendment 1 footer at that time is based on ensuring proper tracking of changes.

Some of these pages may not be changed for quite some time in the future. If they are not properly noted "Amendment 1" now, then future users may incorrectly believe the pages have not changed since the original issue.

I agree that if users simply swap out Amendment 2 pages with this issuance, their copy will not be correct. However, that is why the Tech Specs are included in the computer file in their entirety for users to implement.

So, in summary, this action was to correct the original Amendment 1 issue, in addition to making the requested Amendment 2 changes.

What we could consider, though, is the inclusion of a "summary of changes" page that would briefly summarize changes made for each amendment. In that, it could be noted that one of the changes in the amendment 2 issue was to properly note with rev bars and the "amendment 1" footer those changes that were made in amendment 1 but not correctly annotated. Please work with Tom if you decide to pursue this path. Tom, please provide me with the needed

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page if this is what the two of you decide to do. I am open to a summary of changes being included as long as it is brief (keep in mind there will be many amendments in the future, so each amendment shouldn't take more than a few lines, and should discuss the overall SUBJECTS of the amendment, not the specific changes themselves).

Becky

>>> "Michael, Glenn A(Z01119)" <GMICHAEL@apsc.com> 10/23/01 11:58AM >>>

Tom,

The pages are not correct if they say "Revision 1" when, in fact, they were not revised and issued as part of Revision 1. This can cause the users (your "customers") problems in the future when they try to trace back the history of changes.

As a "customer" and future cask user, I strongly suggest that the pages be corrected in the final version of document that will be issued with the Amendment 2 pages by the NRC when the Final Rule becomes effective. This will have NO effect on the direct final rule process, since these pages are not affected by Amendment 2. The NRC simply needs to put the correct pages in the package.

Glenn

-----Original Message-----

From: Tom Thompson

To: Michael, Glenn A(Z01119)

Cc: Hansen, Brian J(Z01015); jmm2@nrc.gov; SMountan@NACINTL.COM;

tthompso@NACINTL.COM; Weber, Thomas N(Z00499); RLK@nrc.gov; Barbie Locke

Sent: 10/23/01 4:36 AM

Subject: Re: Editorial Observation on Preliminary NAC UMS CoC Amendment 2

Glenn,

In coordination with Becky Karas, NAC (Barbie and I, personally) reviewed the UMS CoC/Tech Specs for Amendment 2 in great detail and we are confident that they are now correct. (1) First, I compared the Amendment 1 Tech Specs to the initially published Tech Specs (Rev. 0) page by page and line by line, as well as the revision bars. There were/are some editorial errors in the Amendment 1 Tech Specs, i.e., the revision/amendment number and or the revision bars on some pages are not correct. (Since these items have no effect on the actual Tech Specs themselves and Amendment 2 was being issued as a Direct Final Rule to be effective by the end of 2001, no effort was expended to correct the published Amendment 1 Tech Specs, but rather the effort was made to ensure the correctness of the Amendment 2 Tech Specs.); (2) Second, I compared the Amendment 2 Tech Specs (in their final form) to "my corrected version of the Amendment 1 Tech Specs" to ensure that the appropriate revision/amendment number and or the revision bars were correct. Becky Karas was double-checking these comparisons. Barbie has just completed a detailed comparison of the "recently published Amendment 2 Tech Specs" to that which was prepared in conjunction with the NRC in August 2001, and has found them to be exactly the same. Thus, NAC is confident that the published Direct Final Rule version of the Amendment 2 Tech Specs is correct.

I hope that this will help you understand the process that got us to the published Amendment 2 Tech Specs.

Thanks for your continuing reviews of our UMS documents.

Tom

"Michael, Glenn A(Z01119)" <GMICHAEL@apsc.com>

10/16/01 07:21 PM

To: "McCausland, Jayne M. (NRC)" <jmm2@nrc.gov>
cc: "Hansen, Brian J(Z01015)" <BJHANSEN@apsc.com>,
"Thompson, Tom (NAC)" <tthompso@nacintl.com>, "Mountain, Sue (NAC)" <SMountan@nacintl.com>, "Weber, Thomas N(Z00499)" <TWEBER01@apsc.com>
Fax to:
Subject: Editorial Observation on Preliminary NAC UMS CoC
Amendment 2

To: Jayne McCausland, NRC

A notice was published in the October 16, 2001 Federal Register (66 FR 52486) containing a direct final rule for amendment 2 of the NAC UMS dry cask certificate of compliance and tech specs. You are shown as the NRC contact for this amendment.

I downloaded the preliminary amendment 2 of the CoC and the TSs, and the preliminary SE from ADAMS for review. There appears to be an administrative/editorial error in the page footers in the preliminary amendment 2 package of the NAC UMS tech specs: a number of pages in the preliminary amendment 2 tech spec package are shown as amendment no. 1, when they should instead be amendment no. 0. Also, revision bars are shown on these pages that were not in the previous versions. Example pages are A3-13, A3-14, A3-15, A3-16, A3-18, A3-19, A3-20, and A5-5. This can be verified by looking at the NAC UMS tech spec amendment no. 1 document in ADAMS under accession no. ML010260245, which was transmitted to NAC International from NRC in a letter dated February 13, 2001 (ADAMS accession no. ML010440434).

This is not a significant adverse comment, but only an observation to help ensure that the final product will reflect the accurate revision numbers and rev bars. As a future user of the NAC UMS dry cask system, we have a

vested
interest in high quality cask licensing documents.

Thanks,

Glenn Michael
Senior Licensing Engineer
Arizona Public Service Company
Palo Verde Nuclear Generating Station
623-393-5750

CC: BNewton@NACINTL.COM; Hansen, Brian J(Z01015); Jayne McCausland; Philip Brochman; SMountan@NACINTL.COM; tthompo@NACINTL.COM; Weber, Thomas N(Z00499)