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**Date:** 8/30/02 12:58PM  
**Subject:** Strawman SG GLCP Tech Specs

Louise, Emmett, Ken, Ted;

Attached are strawmen of the SG GLCP tech specs for discussion at our meeting on September 11th. These are saved in the Standard TS format. The admin TS contains other TSs unrelated to the SG program because this information was already in the STS files - you can ignore sections not related to the SG Program and its associated report.

As we have discussed, these TSs incorporate the comments in your Perry Decision letter, in that they include the performance criteria, repair criteria, and inspection intervals in the technical specifications. Specifically we have included them in the administrative tech specs for consistency with other similar program requirements in the standard tech specs.

As you can see we have consolidated the performance criteria and inspection interval requirements to what we believe are their key elements from a regulatory control aspect. These requirements in their full form are too detailed for a technical specification. The entire text of the performance criteria and inspection interval requirements will of course be contained within the SG Program. We believe that the TS should contain only the "bottom line", with the program requirements existing to protect the tech spec limits.

You will also note that we have not listed the repair criteria in the tech specs except to include the concept as a key element in the SG Program. This is in recognition of our belief and Emmett's statement in our June meeting that this parameter does not rise to the significance of the repair criteria, performance criteria, or inspection intervals. We propose that the licensee control the repair methods in accordance with the applicable codes and standards and SG Program requirements. As is always the case, safety significant changes should require prior NRC review under 50.59.

I think you appreciate that the proposed approach is a significant change in the direction of the GLCP and one that was adopted only after considerable industry discussion. We look forward to a productive exchange on this subject at our upcoming meeting.

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