

From: F. Mark Reinhart
To: Bill Bateman; James Medoff *YNRR*
Date: 10/2/01 2:22PM
Subject: Re: Forwarding of Pre-decisional, Draft Orders to Brian Sheron for Review - See Message

Jim,

Per our discussion, other than a few edit's of Bill's markup, my major comment is attached.

Thanks,

Mark

>>> James Medoff 10/02/01 01:41PM >>>

Bill:

FYI: Just so your kept informed of developments regarding the pre-decisional, draft orders

Farouk Eltawila has informed me that Brian Sheron wanted to get a copy of the pre-decisional, draft orders on the inspections of vessel head penetration nozzles. I gave Farouk a copy of the version that incorporates some of your comments on the original draft of the orders; Farouk said that he will forward this version to Brian Sheron. Please note again, as I told you earlier today, that the edited version incorporates your comments and edits only up to the point where Steve Long's PRA and special circumstance input has been written into the draft orders, and therefore does not incorporate your edits of Steve's portion of document. Mark Reinhart is checking your edits of Steve's portion of the document to see if they change the technical bases of the PRA Branch's adequate protection arguments for issuing the orders.

Thankyou,

Jim M.

cc: J. Zimmerman, F. Eltawila, J. Strosnider, B. Sheron, B. Elliot, M. Young, M. Reinhart, S. Long, D. Nelson

CC: Barry Elliot; Brian Sheron; David(OE) Nelson; Farouk Eltawila; Jack Strosnider; Jacob Zimmerman; Jin Chung; Mitzi Young; Richard Barrett; Steven Long

D-46

The fourth principle is not satisfied because core damage frequency (CDF) could eventually approach the relatively high numerical value of the conditional core damage probability (CCDP) for the loss-of-coolant accident (LOCA) that would result from gross CRDM nozzle failure. CCDP values for the subject plants range from $2E-2$ to $1.4E-3$. To be below the RG 1.174 guidelines of a CDF increase of less than $E-5$ per reactor-year for a plant with a baseline CDF less than $E-4$ per reactor-year, the initiating event frequency would have to be demonstrated to be below $5E-4$ to $7E-3$ per reactor-year. For the plant with its baseline CDF greater than $E-4$ per reactor-year, the initiating event frequency would have to be demonstrated to be below $5E-5$ per reactor-year. For the age of the plants in question and the lack of a qualified examination, there does not appear to be a basis to justify the necessarily low initiating event frequencies. X