See Reg Guide 1.189 Section 5.3

ANO/NRC Appendix R Compliance Meeting
Agenda

1. Opening remarks – NRC — Elmo Collins
2. Opening remarks – ANO — (Craig Anderson)
3. History — (Glenn Ashley) Licencing
4. Chronological Presentation of Relevant Appendix R Manual Action Manual Action Documents — (Woody Walker) FP
5. Industry Survey Results — (Dale James) Engr
6. Backfit Discussion — (Glenn Ashley) Licensing
7. Potential Resolution Paths — (Sherrie Cotton)
8. Question/Answer
9. Final Remarks ANO — (Craig Anderson)
10. Final Remarks NRC

Hannon

- protection of SSD (III.G.2)
- escape clause (III.G.3)
  - Commission recognized difficulty in meeting III.G.2 so wrote in ASD
- another point of view – your B/F claim → NRC upheld VIO
  – NEI Generic B/F → may we did not find B/F (CRGR)
- our response to NEI – we recognized there were cases where NRC approved manfacts on a case-by-case basis
- June 20 – July 19 mtg summary
  note

1.2

- Built-in inconsistency:

Plant licensed after 1979 - license committment

vs.

pre-1979

- could Δ w/o prior NRC approval
- if ↑ in risk, then must get prior NRC approval
- RG 1.174 (small ↑ in risk) we could grant dev'n

Craig Anderson:

- We will not discuss → SDP & feasibility
- Not clear - docs
- Man Acts - we said we were going to use man acts in III.G.2
  - other folks were using man acts w/o exemptions
- Not interested in operating in a manner that is not safe
- During implementation - lot of questions, lots of discussion