

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) Licensing
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

### Hanner

- 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 V10
  - NEI generic B/F → may we did not find B/F (CRGR)
- our response to NEI – we recognized there were cases where NRC approved man/facts on a case-by-case basis
- June 20 - July 19 mtg summary  
note

12

## • Built-in inconsistency?

Plant licensed after 1979 - license commitment

vs.

pre-1979

- could  $\Delta$  w/o prior NRC approval
  - if  $\uparrow$  in risk, then must get prior NRC approval
  - RG 1.174 (small  $\uparrow$  in risk) we could grant dev'n
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## Craig Anderson :

- We will not discuss  $\rightarrow$  SDD & 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