

From: Kathleen O'Donohue *KTO*
To: Sunil Weerakkody
Date: 1/29/04 7:10AM
Subject: Re: Key Messages and Q&As on Manual Actions

I do not believe the NRC has sufficient information to make the statement in the third bullet. We have not inspected and independently verified each manual action at every plant. Nor reviewed past performance specific to manual actions that was all inclusive. As an ex-operator I can tell you that I have every reason to believe that there are manual actions out there that can not be done in the time assumed and/or can not be accomplished by every operator.

Another reason not to leave the third bullet as written is that the licensee can infer from this statement that there is little to no safety significance associated with manual actions, approved or unapproved, and therefore we can never get anything higher than green for an unacceptable manual action.

If we say anything about the health and safety of the public, we should make it less absolute, such as - as indicated by limited sampling, there appears to have been no compromise to the health and safety of the public.

CC: Ogle, Charles R.; Payne, Charlie

A-12

15

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Creation Date: 1/29/04 7:10AM
From: Kathleen O'Donohue

Created By: KFO@nrc.gov

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CRO CC (Charles R. Ogle)
DCP CC (Charlie Payne)

nrc.gov
owf2_po.OWFN_DO
SDW1 (Sunil Weerakkody)

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