

*F2*

**From:** Charles R. Ogle *RET*  
**To:** Payne, Charlie  
**Date:** 6/24/04 7:38AM  
**Subject:** Fwd: Re: HELP ON SUMMER INSPECTION

*Rec*

If you still need help

*V-7*

**From:** Sunil Weerakkody, *NRC*  
**To:** Ogle, Charles R.  
**Date:** 6/22/04 5:30PM  
**Subject:** Re: HELP ON SUMMER INSPECTION

Chuck:

I was at meetings all day. I called the number in the appended Email around 5.20 PM. Please ask Charlie to contact either Phil Qualls (301-415-1849) or Alex Klein (301-415-3477). In the mean time, here is my two cents (Please confirm with Alex or Phil you proceed):

1. The licensee may have an unapproved Manual Action.
2. If they do, Charlie should focus on determining the feasibility of the action using March 2003 Feasibility Criteria.
3. If they meet the criteria, this becomes an open Item ( a green NCV).

They should be able close it when we issue the interim enforcement discretion, until the rule is finalized.

4. If they cannot meet the March 2003 criteria, then the risk could be higher and you enter the enforcement space.

*-e2*  
>>> Charles R. Ogle 06/22/04 09:37AM >>>

I know your folks are really busy, but we need to have someone talk to Charlie at Summer. We are in the second week of the TFP and are finding major problems with the licensee's compliance strategy with Appendix R. As I understand it, they did not provide the protection required by III.G.2 and instead de-energize the electrical busses to avoid any maloperations. They then send operators out in the field to perform manual actions to verify that the de-energize components are in the proper position.

In response to our queries, the licensee has been unable to provide any licensing basis documentation to justify their approach. Though they are still looking for paper, their latest position is that this was discussed in phone calls with the NRC when they set up their fire protection program.

Looking ahead, assuming the licensee can't find any paper to document that this approach received NRC approval, I expect the risk will be very large.

Before we get too far down this path, I'd like to have the inspectors talk this over with a technical expert to ensure that we aren't missing something really obvious. If one of your folks has a minute, I'd appreciate it if they could get in contact with Charlie Payne at the Summer RI office 803.345.5683

**CC:** Hannon, John; Klein, Alex; Koltay, Peter; Qualls, Phil

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**Subject:** Fwd: Re: HELP ON SUMMER INSPECTION  
**Creation Date:** 6/24/04 7:38AM  
**From:** Charles R. Ogle

**Created By:** CRO@nrc.gov

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