

From: Robert Schin ^{R-II}
To: Nelson (HQ-OE), David ^{OE}
Date: 10/9/03 1:10PM
Subject: Re: RII Comments on Post-Fire Manual Actions Criteria

Dave & Ray,

I wish you good luck with your meeting next Friday. I hope the RII comments will help your preparation.

Bob

>>> David Nelson (HQ-OE) 10/09/03 01:05PM >>> ^{OE}

>>> Robert Schin 10/09/03 12:53PM >>> ^{R-II}
Dave,

Of course you are right that these may not be viewed as 'new requirements' by the NRC. However, licensees may view them as 'new requirements.' Licensees may view III.G.2 as requiring physical protection of cables only if the cable damage will prevent them from achieving and maintaining hot shutdown. They may view local manual actions (e.g., to locally operate an MOV) as being allowed by III.G.2. I think NEI has expressed this view. Certainly the new 'criteria' will require licensees to do many things that they are not now doing.

Bob Schin

>>> David Nelson (HQ-OE) 10/09/03 12:07PM >>> ^{OE}

>>> Robert Schin 10/09/03 11:51AM >>> ^{R-II}
Attached are some comments on your "Draft Manual Action Feasibility Criteria" that you plan to present at the Oct. 17 public workshop.

Overall, this appears to be a drastic change in that it imposes many additional requirements on licensees beyond the current inspection guidance in IP 7111.05.

CC: Gallucci, Ray; Ogle, Charles R.; Payne, Charlie; Pedersen, Renee; Qualls, Phil; Thomas, McKenzie; Weerakkody, Sunil

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