

**From:** Daniel Orr <sup>IRI</sup>  
**To:** Eugene Cobey; Scott Barber  
**Date:** 7/20/04 9:46AM  
**Subject:** Re: Substantive Cross Cutting Issues

Gene,  
Agreed that PSEG should be engaged in the mid-cycle letter on the SCWE issue. What is still awkward, at least for me, is that the SCWE issue was not developed in the traditional substantive cross-cutting issue presumption, i.e through inspection findings (or PIs) that documented SCWE issues. Just food for thought. It is a reasonable question from any stakeholder audience and I am not sure we have given it a consistent answer.

Dan

>>> Eugene Cobey 07/20/04 07:20AM >>>

Dan,

I am not sure I understand what you mean by outside the program guidance. There is guidance in IMC 0305, albeit limited. The discussion is not under the cross-cutting issues section but in the mid-cycle and end of cycle review sections.

Basically it states that SCWE issues shall only be discussed if the agency has previously engaged the licensee via a meeting or docked correspondence regarding a potential or actual SCWE concern or issue. These requirements have been satisfied.

If you want to discuss further, please let me know.

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>>> Daniel Orr 07/19/04 02:34PM >>>

We should probably all talk on the SCWE cross-cutter as it is outside of program guidance. Don't disagree that it does not exist, just don't know how we correctly state its existence given the lack of ROP guidance, or at least we are not applying the ROP theory for a cross cutter in regards to SCWE.

Dan

>>> Scott Barber 07/19/04 11:12AM >>>

In a 10:30 a.m. meeting today, I reported that the PI&R cross cutting for Salem and Hope Creek will be proposed to continue, and we will also be proposing a new SCWE cross cutting issue for Artificial Island. We need to make sure that our mid-cycle packages adequately justify our proposal.

Shri Iyer is supposed to be sending a summary e-mail of today's meeting.

**CC:** Anne Passarelli ; George Malone; Marc Ferdas; Mel Gray; Theodore Wingfield

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