

**From:** D. Ashley  
**To:** John Hufnagel  
**Date:** 03/17/2006 8:26:47 AM  
**Subject:** telecon discussion on apdx B.

John-

Per our phone conversation. See below. We can discuss next week about telecon.

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We have reviewed OC submittals dated November 11 and December 8, 2005. In these submittals the applicant takes exceptions to corrective action, confirmation process, and administrative controls AMP elements in NUREG-1801 for the Met tower underground fuel piping and the SBO mechanical equipment. The applicant states that these three AMP elements are not in accordance with the requirements of Appendix B of 10 CFR Part 50. However, the applicant states that these three elements meet the guidance in Branch Technical Position IQMB-1. The EQV staff finds that the applicant is not meeting the guidance in IQMB-1 in the following areas.

IQMB-1 states that the confirmation process should be described and that the effectiveness of prevention and mitigation programs should be verified periodically. The submittals do not address prevention and mitigation programs.

IQMB-1 states that the administrative controls of the program should be described. The submittals do not describe the administrative controls. Example of administrative controls include use of procedures, documentation of corrective action, and maintenance of records.

EQV also finds that the LRA revisions in the submittals are incomplete. Sections A.0.5 and B.0.3 state that the corrective action, confirmation process, and administrative controls meet the requirements of Appendix B of 10 CFR Part 50. The descriptions in Sections A.0.5 and B.0.3 are not consistent with the corrective action, confirmation process, and administrative controls descriptions in Section B.1 of the LRA which states that corrective action, confirmation process, and administrative controls do not meet the requirements of Appendix B of 10 CFR Part 50.

The submittals describes a program that has not yet been developed. A commitment should be added to Table A.5 of the LRA that states that the new program will be implemented prior operating on an extended license.

EQV would like to discuss these issues with the applicant.

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regards,

Donnie Ashley  
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**CC:** Steve Tingen

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**From:** D. Ashley

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