

From: Joseph Sebrosky
To: Tcmatthews@oppd.com
Date: 05/26/2006 1:52:23 PM
Subject: Shielding comments on draft exemption request

Mr. Matthews,

Below are some shielding comments on the draft exemption request^{*} for you consideration. Please let me know if you have any questions. I believe that they are self explanatory.

Sincerely,

Joe Sebrosky

>>>>>>>>>shielding comments on draft exemption request>>>>>>>>

Comment 1: page 10, last paragraph, last sentence

It is not clear what "configurations" are being discussed

Comment 2: Page 11, Table, Row "b.", 3rd column

Comment: Timing for taking dry reading is not consistent w/TechSpec 1.2.11 and no basis is given for needing an exemption.

Comment 3: Page 12

References to Tech Spec 1.2.11 (a) or (b) are ambiguous. it appears that these refer to Limit/Specification "a" or "b" of tech Spec 1.2.11. However, since Tech Specs 1.2.11a and 1.2.11b are also included with this CoC, this needs to be made clear.

Comment 4: Page 12

The statement "Note that all operations utilizing the bare OS197L cask will be performed remotely" is appropriate as long as everything functions correctly. OPPD should consider whether it is appropriate to add a statement to the effect that potential malfunctions have been considered and are addressed in the plant's operational contingency plans (or whatever the appropriate mechanism would be).

CC: Elizabeth Thompson; Larry Campbell; M Wayne Hodges; Shana Helton

* NOTE: The draft exemption request is publicly available as part of a 5/24/06 meeting summary (see ADAMS accession number MLO61560554).

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