

**From:** Michael Canova  
**To:** Russ BELL  
**Date:** Wed, Dec 5, 2007 1:25 PM  
**Subject:** RE: SE for NEI 07-02

Russ:

SRP 17.6, MAINTENANCE RULE, section III, REVIEW PROCEDURES, Item 1, Scoping in accordance with 10 CFR 50.65(b), states "The program description should identify that additional SSC functions may be added to or subtracted from the MR scope prior to fuel load; as appropriate, as additional information is developed (e.g., emergency operating procedures (EOPs)) after the license is issued."

Condition 3 can conceivably occur any time after the COL issuance. Condition 3 addresses the intent of this SRP section in addressing items that are added to scope after the COL is issued, to assure that all such SSCs are properly scoped into the Maintenance Program in a timely fashion.

Your previous response to this issue was that no such items will be added. In that case, obviously this conditional issue does not apply. But if it does occur, the approved scoping methodology would need to be in place, hence the schedule for implementation of the Maintenance Rule Program would need to be accelerated.

Please feel free to give me a call and we can decide on whether additional discussion with a broader audience is required.

Mike

>>> "BELL, Russ" <rjb@nei.org> 12/4/2007 2:30 PM >>>

Mike,

Thanks for the corrected SE. I know you want to put this behind you, but I have a question about Condition 3 (below) in Section 4.1. I don't understand why Condition 3 is needed. Sections 17.X.1.1b&c of the template already address the addition of SSCs to the MR HSS scope and the establishment prior to fuel load of the MR expert panel to update and maintain the MR scope and SSC classification.

This appears to me to be a separate issue from early use of the MRP to address post-closeout ITAAC maintenance. On this matter, it is premature to say whether licensees will use the MR to do that. But at least I understand why Conditions 1 & 2 are there. Not so Condition 1.

Please advise and let's schedule a conference call if needed.

Thanks again.

MRPD Condition 3:

If a COL applicant determines that additional SSC functions may be added or subtracted prior to fuel load (and the Commission's § 52.103(g) finding), the COL MRPD will need to be supplemented to include this contingency within the scope of the MR Program. Condition 1 also applies.

-----Original Message-----

From: Michael Canova [<mailto:MAC6@nrc.gov>]  
Sent: Monday, December 03, 2007 2:22 PM  
To: KASS, Leslie; BELL, Russ  
Subject: SE for NEI 07-02

A copy is attached. It is just now getting issued, well behind our target date.

Mike

Michael A. Canova  
Project Manager  
US-NRC  
Office of New Reactors  
Division of New Reactor Licensing

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