

NRC FORM 699 (9-2003)		U.S. NUCLEAR REGULATORY COMMISSION		DATE 12/18/2007
CONVERSATION RECORD				TIME 9:00am
NAME OF PERSON(S) CONTACTED OR IN CONTACT WITH YOU Russ Bell		TELEPHONE NO. 202-739-8087	TYPE OF CONVERSATION <input type="checkbox"/> VISIT <input type="checkbox"/> CONFERENCE <input checked="" type="checkbox"/> TELEPHONE <input checked="" type="checkbox"/> INCOMING <input type="checkbox"/> OUTGOING	
ORGANIZATION NEI		SUBJECT Re: Intent of conditions listed in Safety Evaluation for NEI 07-02		
SUMMARY (Continue on Page 2)				
<p>A Conference Call that included Russ Bell, Dennis Brushbaum of NEI; Phil Stillwell, Jim Eagles of South Texas Projec; Gary Young of Entergy; and Steve Alexandar, Gerry Gulla, Lynn Mrowca and myself for the NRC. Russ's questions related to the conditions presented on page 5 of the SE. In particular they question:</p> <p>Condition 1 The intent and need of condition 1, that stated early implementation would require the COL applicant to supplement or modify their description of the MR Program to "describe" the implementation milestone. They understood that since the regulation's requirement is "prior to authorization to load fuel" that there was no regulatory impetus to make a document change of this type if the regulatory compliance date was committed to in the COLA.</p> <p>The original intent was to ensure that the staff was informed if the program was implemented early and to capture that information to inform our audit schedule of the operational program. In looking at the final wording, the staff agreed to review this wording with an eye towards clarifying the intent.</p> <p>Condition 2 A brief discussion of condition two raised no real concern for NEI or the industry representatives, however, the staff, in looking at this one is uncertain that this "condition" is necessary. The intent as, proposed by legal, appears to be to present a "suggestion" in the body of the Maintenance Rule document which probably should not be a condition for Maintenance Rule.</p> <p>Condition 3 The third condition, addresses when SSC functions are added to and subtracted from the maintenance rule scope, post-COL, but which they felt had already cleanly been addressed as part of changes incorporated into Revision 3 of NEI 07-02.</p> <p>After conferring with the NRR Maintenance Rule SME, Steve Aledxandar, it became apparent that a mis-communication had occurred and that the SME concurred with NEI's assessment.</p> <p><i>Continue on Page 2</i></p>				
ACTION REQUIRED				
The staff agreed to look into the possibility of issuing a revision to clarify the status of or need for these conditions.				
NAME OF PERSON DOCUMENTING CONVERSATION Michael A. Canova		SIGNATURE		DATE 12/27/2007
ACTION TAKEN aRevision intitiated under ML073650081				
TITLE OF PERSON TAKING ACTION Project Manager		SIGNATURE OF PERSON TAKING ACTION		DATE 01/22/2008