

From: Paul Rebstock *-PRS*
To: Iqbal Ahmed
Date: 09/28/2006 4:04:47 PM
Subject: CrossFlowUFM: Draft Safety Evaluation Withdrawing Acceptance

Iqbal,

Attached please find my comments on the draft SE that Allen distributed for comment on September 21.

Since I am not familiar with the details of what has already been covered in the reviews of the submittals, and have limited time available for this effort, I have addressed the issue as broadly as I can without delving into the details of the Topical Report itself. This is intended more as a review of the review than as a review of the instrument. The concerns indicated in the attachment are things that I believe need to be addressed whether we accept the unit or not, and which do not appear to be adequately addressed in the draft SE.

The single most significant question in my mind at present is the treatment of the *in-situ* flow profile. It appears that there may have been some testing related to non-ideal flow profiles, but that that testing may have been inadequate. Also, I am not convinced that calibration of the XFlow unit by reference to an installed venturi-based flowmeter would resolve the accuracy concerns, for reasons detailed in the attachment.

Let me know if you need anything else or need clarification of my (hastily-written) comments.

- Paul

CC: Allen Howe

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