

From: KEYS, Julie [jyk@nei.org]
Sent: Wednesday, January 06, 2010 4:21 PM
To: Spivack, Ian
Subject: Re: Draft LR-ISG-2009

Thanks. I will not be officially submitting them but have informed Dominion they can if they would like.

Julie Keys
NEI
Sr. Project Manager - Engineering
(p) 202.739.8128
(c) 202.352.7478
nuclear. clean air energy.

From the BlackBerry of Julie Keys

From: Spivack, Ian <Ian.Spivack@nrc.gov>
To: KEYS, Julie
Cc: david.wooten@dom.com <david.wooten@dom.com>; Homiack, Matthew <Matthew.Homiack@nrc.gov>; Votolato, Dori <Dori.Votolato@nrc.gov>
Sent: Wed Jan 06 16:05:43 2010
Subject: RE: Draft LR-ISG-2009

Julie,
Thank you for letting me know about these late comments. I think it is still practical to consider the comments based on their scope and our schedule. Please resubmit these comments as described in the federal register.
Thanks,
Ian

From: KEYS, Julie [mailto:jyk@nei.org]
Sent: Wednesday, January 06, 2010 12:03 PM
To: Spivack, Ian
Cc: david.wooten@dom.com
Subject: Fw: Draft LR-ISG-2009

Ian.
I know we are outside the comment period but I wanted to send you these comments. You can consider them or not according to your processes but they are valid comments and I didn't want to not pass them on.

Thanks,
Julie Keys
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Sr. Project Manager - Engineering
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From the BlackBerry of Julie Keys

From: David Wootten <david.wootten@dom.com>

To: KEYS, Julie

Sent: Wed Jan 06 09:50:53 2010

Subject: Draft LR-ISG-2009

I do not know if it is too late to provide you with input on draft LR-ISG-2009, "Staff Guidance Regarding Plant-Specific Aging Management Review and Aging Management Program for Neutron-Absorbing Material in Spent Fuel Pools," but I have the following comments:

1. They use the term "Carborundum" rather than something more generic. Carborundum is the manufacturer of a neutron-absorber which consists of boron-carbide in a phenol formaldehyde resin. Other manufacturers (e.g., ESK) manufacture boron-carbide in a phenolic resin, which is a similar material. The term Carborundum is used throughout the document in a generic sense and it should only be used for those specific stations that have Carborundum (e.g., Palisades).
2. The ISG uses the term "Region 1 Fuel Storage Racks." This is specific rack defined by a specific station. The ISG should better define "Region 1 Fuel Storage Rack." For example they may say, "fuel storage racks that receive freshly discharged fuel," or something similar.

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