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 Office of Nuclear Reactor Regulation, Director

SUBJECT: Responds to NRC 801031 ltr requesting implementation dates for revised post-TMI requirements. Advises that NRC ltr was not received until 801110, reducing 45-day response time by 10 days. Efforts will be undertaken to prepare response.

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November 14, 1980

Director of Nuclear Reactor Regulation
U S Nuclear Regulatory Commission
Washington D C 20555

Monticello Nuclear Generating Plant
Docket No. 50-263 License No. DPR-22

Prairie Island Nuclear Generating Plant
Docket No. 50-282 Licensing No. DPR-42
50-306 DPR-60

Response Schedule for
10/31/80 Post TMI Requirements

All licensees of operating plants were mailed a letter dated October 31, 1980 from Mr Eisenhut, Director, Division of Licensing, Office of Nuclear Reactor Regulation, which contained recently revised post TMI Requirements. That letter requested a response, pursuant to 50.54(f), within forty-five (45) days of the date of that letter to confirm that the implementation dates in enclosure 1 will be met.

Due either to late mailing by NRC or delays in the U S mail, the letter was not received until mid-day November 10, 1980, reducing by at least ten days the time allowed for preparation of a response. This is inadequate time for conduct of a coordinated, multi-discipline review and preparation of a responsive submittal to the extensive list of NRC requirements.

While all reasonable efforts will be undertaken to prepare a prompt response, heavy requirements have already been placed on our technical staffs by TMI action plan modifications, fire protection modifications and environmental qualification reviews. Each of these issues carry mandated commission completion dates. The October 31, 1980 NUREG-0737 document contains about 75 items or major sub-items (II.K.3). Each of these will require significant review to determine its applicability and whether commitments have been previously made or require revision; short-term engineering judgment on design requirements and equipment availability, reassignment of personnel resources; etc.

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To provide accurate, meaningful commitments, with the clear-cut potential for enforcement action for non-conformance, requires deliberate, coordinated review. Nevertheless, we will direct our efforts toward submitting a response within 45 days of receipt of the October 31, 1980 letter; i.e. December 25, 1980.



L O Mayer, PE
Manager, Nuclear Support Service

LOM/bd

cc: J G Keppler
G Charnoff
NRC Resident Inspector