

From: [Zackary Rad](#)
To: [Raddatz, Michael](#)
Cc: [Perry Robinson](#); [Jay Laughlin](#)
Subject: RE: I need your comments on the following
Date: Monday, May 21, 2012 3:55:55 PM

It appears that this may require an additional submittal as the proposed License Condition references the guidance documentation in the correspondence. I would like to discuss via phone so that we fully understand the language in question, specifically item #3.

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From: Raddatz, Michael [mailto:Michael.Raddatz@nrc.gov]
Sent: Monday, May 21, 2012 1:19 PM
To: Zackary Rad
Cc: Jack Rollins
Subject: I need your comments on the following

issues with your submittal, If you can send me revised language I will include it:

Comments Please

1. Page 10 of 14, under number 1, Evaluation Guidance, first paragraph – should the “and” between 1 and 2 be an “or”?
I agree the and should be an or because the safety functions can be those in 1 not just those in 1 and 2.
2. Page 11 of 14, section c, last paragraph – is this ok? Should “SRP guideline” be “performance requirement” instead?
I asked this question to them and thought it was odd that they referenced the SRP and not the regulatory requirements. Your suggestion is well taken and I believe that performance requirements is better defined and more applicable.
3. Page 12 of 14, under evaluation guidance, third paragraph – (i) allows some changes in the method, I thought we did not want any changes made without our approval?

These words come from the NRR guidance. I agree that this creates some confusion relative to the statement in the first paragraph that says “for changes to the ISA methodology....” I suggest that the first paragraph be changed to “all changes to the ISA methodology” and the third paragraph be removed unless they can provide additional justification/clarification about how this would work.

4. Page 13 of 14, under Items excluded from the evaluation – do they need to clarify that all changes still have to be evaluated and a record kept, just that the detailed evaluation does not have to be done?

Their oral explanation of this meets what you stated above. The words aren't great but their intention, as conveyed to me, is okay. We could ask them to make it clearer to assure that all changes are evaluated but certain administrative changes don't require full evaluations.

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