



July 23, 1979

RICHARD E. SCHAFFSTALL  
Associate

Operating Reactors Branch #2  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555  
ATTN: Mr. Dennis Ziemann

Gentlemen:

In response to your June 11, 1979, letter concerning implementation of Category 2 and 3 Regulatory Guides in the SEP, we request some clarification.

The letter states that Category 2 Guides require further staff consideration prior to deciding whether certain identified items of the Regulatory Position should be backfitted. Enclosure 1, however, merely lists the applicable Regulatory Guides, without differentiating, in general, which specific requirements in the Regulatory Positions have been or will be selected as appropriate for backfitting.

A similar situation exists for the identified Category 3 Regulatory Guides and Positions. The enclosure generally does not identify which portions of the various Regulatory Positions were required by the R<sup>3</sup>C to be resolved either by conformance to the Guide or by an equivalent alternative.

It would appear most useful if the NRC were to provide each licensee copies of both the minutes of the R<sup>3</sup>C meetings which concluded that backfitting was appropriate together with the Value/Impact Assessment which formed the rationale for requiring the backfit. With this information available, licensees would be able to focus on Regulatory Positions intended to be backfitted and direct their resources to implementing proper resolution of the identified items.

Sincerely,

Richard E. Schaffstall  
Executive Director  
SEP Owners Group

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