CONFIRMED

DATE ISSUED: 1/4/79

MINUTES OF THE
ACRS SUBCOMMITTEE MEETING ON
REGULATORY ACTIVITIES
WASHINGTON, D.C.
DECEMBER 6, 1978

ACRS-1601
PDR 2/1/79

The ACRS Regulatory Activities Subcommittee held a meeting on December 6, 1978, at 1717 H Street, N.W., Washington, D.C. The purpose of this meeting was to review:

1. proposed Regulatory Guides,
2. revisions to the existing Regulatory Guides, and
3. other matters pertinent to activities that affect the current licensing process or reactor operations.

Notice of this meeting was published on Tuesday, November 21, 1978, in the Federal Register, Volume 43, Number 225; a copy is included as Attachment A. Dr. Andrew Bates was the Designated Federal Employee for this meeting. A list of meeting attendees is included as Attachment B.

INTRODUCTORY STATEMENT BY THE CHAIRMAN

Dr. Siess, the Subcommittee Chairman, convened the meeting at 8:45 a.m., reviewed briefly the schedule for the meeting, and noted that the Subcommittee had received writtern comments from the General Electric Company on the Draft Regulatory Guide 1.XXX, "Qualification of Quality Assurance Program Audit Personnel for Nuclear Power Plants." The Subcommittee had not received any requests for time to make oral statements from the members of the public.

Dr. Siess indicated that, in addition to the items scheduled for discussion, he would like to discuss briefly with the Subcommittee what action needs to be taken on the changes to Appendix H to 10 CFR Part 50 which were made subsequent to its approval by the Subcommittee on October 4, 1978, and by the full Committee on October 5, 1978.

7902140320

DRAFT REGULATORY GUIDE 1.XXX, "QUALIFICATION OF QUALITY ASSURANCE PROGRAM AUDIT PERSONNEL FOR NUCLEAR POWER PLANTS"

Mr. Richardson reviewed this Guide, indicating that it endorses with certain exceptions ANSI/ASME N45.2.23-1978. This Guide describes a method acceptable to the NRC Staff for complyig with the Commission's regulations with regard to qualification of quality assurance program audit personnel for nuclear power plants.

With reference to the last paragraph of Section B (Discussion) of this Guide, which states "ANSI/ASME N45.2.23-1978 does not incude the statement that is contained in other N45.2 series Standards pertaining to its use for activities covered by the ASME Boiler and Pressure Vessel Code, Section III, Division 1 and 2, and Section XI. The NRC Staff's review of the Standard indicates that it should be applied to these code-covered activities", Dr. Siess remarked that although this paragraph comes under the Discussion Section it sounds more like a Regulatory Position. He asked whether the NRC Staff considers this as a Regulatory Position.

Mr. Milhoan responded that there is no explicit statement in the Standard to exclude its applicability to Code-covered activities. Therefore, the NRC Staff included a paragraph under Section B of this Guide to point this out and indicate that the Standard should also be applied to the Code-covered activities.

Dr. Siess pointed out that the NRC Staff's intention is not made clear and some clarification would be helpful.

Mr. Bender commented that he does not fully agree with the appropriateness of forcing the Guide on the Code Committee. He feels that intermixing this issue with the existing requirements would create some confusion.

In response to a question from Dr. Siess, Mr. Milhoan noted that he does not know whether the exclusion statement was deliberately left out of the Standard.

Mr. Bender remarked that he does not want to sanction a position that imposes certain requirements on the Code Committee without knowing whether the Code Committee would recognize it or not. He suggested that the NRC Staff consult with the Code Committee to get their opinion on this issue.

Mr. Milhoan indicated that he would provide a copy of this Guide to the Working Group on quality assurance and stamping for its review and comments during the public comment period of this Guide.

Discussion Of General Electric (GE) Comments

The Subcommittee discussed the GE commments (Attachment C) on this Guide and sought some response from the NRC Staff to those comments.

With regard to the GE comment on the credit/point count system, Mr. Milhoan noted that the NRC Staff has not yet looked at this issue in detail so as to determine whether it should be included as non-mandatory guidance as suggested by GE. He stated that the NRC Staff would consider this issue in detail along with other public comments on this Guide.

Indicating that the GE comment concerns the adequacy of the Standard rather than of the Guide, Dr. Siess asked whether there is any mechanism to transmit these comments to the Standards Committee for resolution.

Mr. Milhoan indicated that they would forward these comments to the Standards Committee for resolution and submit that resolution to the Subcommittee subsequent to the public comment period of this Guide.

In response to a question from Dr. Siess as to whether GE has made this comment to the Standard's Working Group, Mr. Shirley from GE noted that these comments were submitted to the Working Group. However, the Working Group did not accept these comments, and consequently GE cast a negative ballot on this Standard.

Dr. Siess indicated that the Subcommittee would definitely like to see the Working Group's response to the GE comments. He also commented that if the Standard Committee is not looking at negative votes as strongly as they ought to be, then the NRC Staff should look at it. As a general rule, when the NRC Staff is endorsing a consensus Standard, they should have a clear perspective on a negative ballot and its resolution.

Mr. Milhoan indicated that he would try to get additional information on this issue and submit to the Subcommittee.

With reference to GE's recommendation that certain items (Page 1, Attachment C) referenced in the Standard be identified as non-mandatory guidance in the Guide, Mr. Bender asked whether GE has any suggestions for some other alternative qualification approach.

Mr. Shirley responded that he would try to get an answer and provide it to the Subcommittee at a later date.

After further discussion, the Subcommittee indicated that the NRC Staff could issue this Guide for public comments.

DRAFT REGULATORY GUIDE 1.8, REVISION 2, "PERSONNEL SELECTION AND TRAINING"

Regulatory Guide 1.8 endorses with certain exceptions ANSI/ANS 3.1-1977, "Selection and Training of Nuclear Power Plant Personnel." This Guide describes a method acceptable to the NRC Staff for complying with the Commission's regulations with regard to personnel selection and training for nuclear power plants.

With reference to the phrase, "bachelor's degreee or equivalent," used in Regulatory Position 6 of this Guide and the NRC Staff's interpretation of the word "equivalent", Dr. Siess commented that the qualification (4 years of formal schooling) that is considered equivalent to a bachelor's degree does not seem to be appropriate. He does not think that 4 years of formal schooling without a degree is equivalent to four years culminating in a bachelor's degree. He suggested that certain modifications so as to make a clear distinction between a bachelor's degree and 4 years of schooling would be helpful.

The NRC Staff indicated that they would make appropriate changes to preclude the implication that 4 years of schooling is equivalent to a bachelor's degree.

Dr. Siess sought some clarification of the term "applied experience" used in Regulatory Position 6.

Mr. Beckham indicated that to gain applied experience one has to be actually working in a nuclear facility, rather than observing someone doing the work in the area in which he or she seeks qualification.

In reponse to another question from Dr. Siess, Mr. Beckham noted that the terms "operational experience and technical experience" mean the same thing as "applied experience".

Dr. Siess commented that using different words to mean the same thing is confusing. He suggested that if all those terms mean the same thing, then it is better to use one term throughout.

The NRC Staff noted that they would make appropriate changes to avoid confusion.

The Subcommittee suggested that several editorial changes, provided suggestions for clarification in some areas, and indicated that the NRC Staff could issue this Guide for public comments.

DRAFT REGULATORY GUIDE 1.XXX, "SAFETY RELATED PERMANENT DEWATERING SYSTEMS"

This Guide identifies acceptable geotechnic and hydrologic engineering design bases and criteria to minimize review problems common to permanent dewatering systems that are depended upon to serve safety-related purposes.

Prior to the NRC Staff's presentation on this Guide. Dr. Siess commented that the relationship between the "Discussion" and the "Regulatory Positions" is not clear; the coherency is missing, and it seems hard to relate the Positions with the Discussion.

Indicating that this Guide requires that the dewatering system should meet the appropriate criteria of Appendices A and B to 10 CFR 50 and it also endorses a Branch Technical Position, Dr. Siess asked:

1. In view of the fact that all systems should comply with the appropriate requirements of Appendices A and B of 10 CFR 50, is it necessary to outline such a requirement in this Guide? Why does this Guide allow certain exceptions to Appendix A?

2. Is it necessary to write a Guide to tell the applicants that they should follow a particular Branch Technical Position?

Mr. Hulman responded by providing some clarification to the intent of Regulatory Position 1. He noted that Regulatory Position 1 is intended to distinguish between Seismic Category I and non-Seismic Category I portions of a dewatering system. In view of the fact that certain portions of a system may not be affected by natural phenomena such as tornados and earthquakes, the NRC Staff feels that these portions of the system can take some exception to Appendix A requirements, and they do not have to be designed as Seismic Category I systems. However, the NRC Staff wants the whole system (Seismic Category I portions and non-Seismic Category I portions) to meet the quality assurance requirements delineated in Appendix B. Since the Branch Technical Position provides detailed information on this issue, it is referenced in this Guide.

In response to another question from Dr. Siess as to whether the NRC Staff is ploughing new ground through this Guide, Mr. Hulman noted that this is the first time the NRC Staff has proposed that certain portions of a safety system need not have to be designed to meet Seismic Category I requirements.

With regard to Regulatory Position 2, the Subcommittee indicated that this Position may not be necessary, since the information provided in Regulatory Position 2 has already been included in Regulatory Guide 1.70, "Standard Format and Content of Safety Analysis Reports for Nuclear Power Plants"; there is no need to include a Regulatory Position to tell the applicants that they have to follow the Standard Format.

The NRC Staff agreed with the Subcommittee and indicated that they would delete Regulatory Position 2.

In response to a question from Dr. Siess regarding the intent of Regulatory Position 4, Mr. Hulman noted that the dewatering system design varies from site to site; some are unique designs. Since the NRC Staff is concerned about the technical adequacy and reliability of these systems, Regulatory Position 4 is included to require that a proposed dewatering system should be designed to perform its intended safety function.

In response to another question from Dr. Siess, Mr. Hulman noted that the Branch Technical Position which is endorsed by this Guide will be replaced eventually through the implementation of this Guide.

Dr. Siess commented that a Regulatory Guide intended to replace a Branch Technical Position should incorporate a large proportion of that particular Branch Technical Position. In this case, only certain parts of the Branch Technical Position are incorporated in the Regulatory Guide and certain other parts are incorporated in the Standard Format. He wondered how the few pages of this Guide are going to replace all the technical contents of the Branch Technical Position.

Mr. Nilsen responded that this Guide in its present form includes all the important parts of the Branch Technical Position.

After further discussion, Dr. Siess commented that the value-impact statement of this Guide is not clear; it could have been written better. Moreover, the Branch Technical Position which is endorsed by this Guide

is not referenced clearly in the Guide. The Regulatory Positions of this Guide do not seem to spell out definitive criteria. It seems very difficult to relate the Regulatory Positions to the Discussion, and this problem seems to exist in almost all of the Regulatory Guides. The NRC Staff should try to resolve this problem and improve the relationship between the Position and Discussion in the future Regulatory Guides.

The Subcommittee suggested several editorial changes, provided suggestions for clarification, and indicated that the NRC Staff could issue this Guide for public comments.

DRAFT REGULATORY GUIDE 1.XXX, "ATMOSPHERIC DISPERSION MODELS FOR POTENTIAL ACCIDENT CONSEQUENCE ASSESSMENTS AT NUCLEAR POWER PLANTS"

Prior to the NRC Staff's presentation on this Guide, Dr. Siess indicated that previous drafts of this Guide were reviewed by the Subcommittee on two previous occasions. The present version of this Guide was reviewed by an ACRS consultant, Dr. Gifford, and he seems to be satisfied with its technical contents. Dr. Siess suggested that, since this Guide repesents a change in the existing siting criteria, the NRC Staff provide a technical presentation to the ACRS full Committe at a near future date to explain the bases for the selection of sector probability level and overall site probability level, and how they relate to previous practice.

Mr. Beratan reviewed this Guide, indicating that two previous drafts were considered by the Subcommittee at its November 2, 1977, and July 5, 1978 meetings. The changes made to this Guide subsequent to the previous subcommittee meetings include:

1. resolution of differing opinions among the NRC Staff on the probability level,
2. resolution and incorporation of the Subcommittee's comments and suggestions,
3. additional clarification in several areas,

4. expansion of the implementation section, and
5. complete restructuring of this Guide.

After endorsement by the ACRS, this Guide will be submitted to the Regulatory Requirements Review Committee (RRRC). As recommended by the RRRC, an information paper has also been prepared to inform the Commission of the proposed changes to the atmospheric disperison model.

Mr. Markee provided a comparison of the main features between current (old) model and the new model (Attachment D).

Mr. Markee noted that the new model would provide more realistic estimates of diffusion conditions. The results of the parametric studies indicate that the use of the new model usually would not result in more restrictive diffusion conditions as compared to the old model. The new model would fulfill the industry need for a more realistic model for the assessment of X/Q values.

Oral Statement From Dames & Moore - Mr. I. Spickler

Mr. Spickler from Dames & Moore (representing Dames & Moore and the Atomic Industrial Forum) stated that they endorse the new model described in the draft Regulatory Guide on Atmospheric Dispersion model. They hope that the NRC Staff will include enough flexibility in this Guide so as to modify it as necessary to incorporate new developments as they occur. He feels that the use of the new model will not result in added workload on the applicants; only some minor efforts will be required to modify the existing computer programs so as to accommodate the requirements of the new model.

In response to a question from Dr. Siess, regarding implementation, Mr. Hulman noted that the NRC Staff will use both the old and the new models to judge the conservatism of an applicant's assessment of diffusion conditions. If the differences in the results of these two models are small, then the NRC Staff will allow the use of either model. However, if the new model shows exceptionally higher estimates than the old model, the NRC Staff will prefer the use of the new model because it is much more realistic than the old model.

Mr. Etherington suggested that the NRC Staff check the technical accuracy of the statement in Section C.1.3.2 (2) which states "Ground-level relative concentrations for fumigation conditions cannot be higher than those produced by non-fumigation stable atmospheric conditions."

The NRC Staff indicated that they will look into this and make appropriate changes, if necessary.

The Subcommittee discussed this Guide in detail, including the value-impact statement, suggested several editorial changes, provided suggestions for clarification in several areas, and indicated that the NRC Staff could issue this Guide for public comments.

REGULATORY GUIDE 1.104, REVISION 1, "SINGLE-FAILURE-PROOF OVERHEAD CRANE HANDLING SYSTEMS FOR NUCLEAR POWER PLANTS"

This Regulatory Guide was reviewed by the Subcommittee at the October 4, 1978 meeting. As there were several concerns raised by the Subcommittee and by a representative of a crane manufacturer, Ederer Incorporated, the Subcommittee suggested that the NRC Staff resolve these concerns and bring it back to the Subcommittee at a future date.

Mr. Porse indicated that subsequent to the ACRS Subcommittee meeting on October 4, 1978, this Guide was reviewed by the Regulatory Requirements Review Committee on Novemer 21, 1978. After the review of this Guide, the Regulatory Requirements Review Committee recommended that this Guide be issued as a NUREG document. Therefore, the NRC Staff has decided not to issue this as a Regulatory Guide but to issue it as a NUREG document.

The Subcommittee did not raise any objection to this.

STATUS REPORT ON THE DRAFT REGULATORY GUIDE 1.XXX, "LIGHTNING PROTECTION FOR NUCLEAR POWER PLANTS"

Mr. Sullivan stated that this Guide is scheduled to be reviewed by the Subcommittee on January 3, 1979. They have not resolved all the technical comments based on dissenting opinions among the NRC Staff. The dissenting Staff member has submitted an alternative to this Guide which will be submitted to the Subcommittee for its review.

SCHEDULE FOR THE JANUARY 3, 1979 MEETING

The NRC Staff indicated that the following Regulatory Guides will be submitted to the Subcommittee for its review at the January 3, 1979 meeting:

1. Draft Regulatory Guide 1.XXX, "Lightning Protection for Nuclear Power Plants"
2. Regulatory Guide 1.141, Revision 1, "Containment Isolation Provisions for Fluid Systems."

Dr. Siess thanked all the participants and adjourned the meeting at 12:35 pm.

NOTE: For additional details, a complete transcript of the meeting is available in the NRC Public Document Room, 1717 H St., N.W., Washington, D.C. 20555, or from Ace-Federal Reporters, Inc., 444 North Capital Street, N.W., Washington, D.C.

[7590-01-M]

ADVISORY COMMITTEE ON REACTOR SAFEGUARDS SUBCOMMITTEE ON REGULATORY ACTIVITIES

Meeting

The ACRS Subcommittee on Regulatory Activities will hold an open meeting on December 6, 1978, in Room 1046, 1717 H Street NW., Washington, D.C. 20555. Notice of this meeting was published in the FEDERAL REGISTER on October 20, 1978 (43 FR 49080).

In accordance with the procedures outlined in the FEDERAL REGISTER on October 4, 1978 (43 FR 45926), oral or written statements may be presented by members of the public, recordings will be permitted only during those portions of the meeting when a transcript is being kept, and questions may be asked only by members of the subcommittee, its consultants, and staff. Persons desiring to make oral statements should notify the designated Federal employee as far in advance as practicable so that appropriate arrangements can be made to allow the necessary time during the meeting for such statements.

The agenda for subject meeting shall be as follows:

WEDNESDAY, DECEMBER 6, 1978

THE MEETING WILL COMMENCE AT 8:45 A.M.

The subcommittee will hear presentations from the NRC staff and will hold discussions with this group pertinent to the following:

(1) Draft Regulatory Guide 1.XXX, Draft 1, "Qualification of Quality Assurance Program Audit Personnel for Nuclear Power Plants."

(2) Draft Regulatory Guide 1.XXX, Draft 1, "Safety Related Permanent Dewatering Systems."

(3) Draft Regulatory Guide 1.8, Draft 1, Revision 2, "Personnel Selection and Training."

(4) Draft Regulatory Guide 1.XXX, "Atmospheric Dispersion Models for Potential Accident Consequence Assessments at Nuclear Power Plants."

(5) Regulatory Guide 1.104, Revision 1, "Single-Failure-Proof Overhead Crane Handling Systems for Nuclear Power Plants."

Other matters which may be of a predecisional nature relevant to reactor operation or licensing activities may be discussed following this session.

Persons wishing to submit written statements regarding regulatory guide 1.104, revision 1, may do so by providing a readily reproducible copy to the subcommittee at the beginning of the meeting. However, to insure that adequate time is available for full consideration of these comments at the meeting, it is desirable to send a readily reproducible copy of the comments as far in advance of the meeting as practicable to Mr. Gary R. Quittschreiber (ACRS), the designated Federal employee for the meeting, in care of ACRS, Nuclear Regulatory Commission, Washington, D.C. 20555 or telecopy them to the designated Federal employee (202-634-3319), as far in advance of the meeting as practicable. Such comments shall be based upon documents on file and available for public inspection at the NRC Public Document Room, 1717 H Street NW., Washington, D.C. 20555.

Further information regarding topics to be discussed, whether the meeting has been canceled or rescheduled, the Chairman's ruling on requests for the opportunity to present oral statements and the time allotted therefor can be obtained by a prepaid telephone call to the designated Federal employee for this meeting, Mr. Gary R. Quittschreiber, telephone 202-634-3267, between 8:15 a.m. and 5 p.m., e.s.t.

ATTACHMENT A

ACRS SUBCOMMITTEE MEETING ON
REGULATORY ACTIVITIES
DECEMBER 6, 1978
WASHINGTON, D.C.

ATTENDEES LIST

ACRS

C. P. Siess, Chairman
M. Bender, Member
H. Etherington, Member
A. Bates, Staff*
S. Duraiswamy, Staff

*Designated Federal Employee

AIF

A. C. Bivens

EDERER INC.

C. W. Clark

GE

N. Shirley

BECHTEL

B. S. Montgomery

EBASCO SERVICES, INC.

M. A. Pierson
G. Martin, Jr.

YANKEE ATOMIC ELECTRIC CO

J. N. Hamawi

DAMES AND MOORE

I. Spickler

STONE & WEBSTER

C. Grochmac

ML&B

W. A. Horin

NRC

D. Beckham
C. W. Nilsen
E. H. Markee
R. G. Wescott
R. Kornasiewicz
E. L. Hill
T. L. Johnson
R. Gonzales
L. Hulman
L. Beratan
J. Milhoan
S. D. Richardson
G. W. Knighton
L. Porse
D. Sullivan
A. Smith

UNIVERSITY OF FLORIDA

N. H. Slater

BROOKHAVEN NATIONAL LAB

J. N. O'Brien

VEPCO

F. H. Timpano

VIRGINIA ELECTRIC

J. E. Streightiff

ACE-FEDERAL REPORTERS

R. Heer

ATTACHMENT B

COPY

GENERAL ELECTRIC

NUCLEAR ENERGY

PROJECTS DIVISION

GENERAL ELECTRIC COMPANY, 175 CURTNER AVE., SAN JOSE, CALIFORNIA 95125
MC 682, (408) 925-5040

RECEIVED
ADVISORY COMMITTEE ON
REACTOR SAFEGUARDS U.S. N.R.C
DEC 14 1978
AM 7 8 9 10 11 12 1 2 3 4 5 6 PM

MFN 427-78

December 5, 1978

Advisory Committee on Reactor Safeguards
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

Attention: G. R. Quittschreiber

Gentlemen:

SUBJECT: DRAFT 1, PROPOSED REGULATORY GUIDE 1.xxx (RS810-5), "QUALIFICATION OF QUALITY ASSURANCE PROGRAM AUDIT PERSONNEL FOR NUCLEAR POWER PLANTS," DATED 9/27/78

General Electric is pleased to comment on the subject guide. GE comments deal with the credit/pointcount system and the validation of examination criteria.

The subject regulatory guide fully endorses ANSI/ASME N45.2.23-1978, with the exception of Section 1.5 of the standard. GE recommends that Section 2.3.1, "Education and Experience;" Section 2.3.5, "Examination;" Section 3.3, "Requalification" (portion dealing with reexamination in accordance with paragraph 2.3.5); and Section 4.2, "Qualification Examination," of ANSI/ASME N45.2.23-1978 be identified in the regulatory guide as non-mandatory guidance. The basis for this recommendation is the following.

CREDIT/POINTCOUNT SYSTEM

Section 2.3.1 requires that a credit/pointcount system be used for qualifying lead auditors. Such a concept is counter-productive and deprives management of the selection prerogative. The point score system is an academic exercise which does not realistically evaluate a lead auditor's qualifications. For an example, a young Rhodes scholar with a PhD in nuclear engineering, with several courses in QA; one year in pressure vessel design, and a member of a supplier evaluation team which had performed one audit, could not become a lead auditor until he had participated in four more QA audits. Yet a person with an Associate degree in Arts, with five years' experience as an inspector and auditor in a non-nuclear industry, has enough credits to immediately become a lead auditor.

ATTACHMENT C

CURRENT MODEL (OLD MODEL)

CIRCULAR MINIMUM EXCLUSION BOUNDARY

NO LATERAL PLUME MEANDER

DIRECTIONALLY INDEPENDENT X/Q (5% LEVEL)

NEW MODEL

DIRECTIONALLY VARIABLE EXCLUSION BOUNDARY

LATERAL PLUME MEANDER

DIRECTIONALLY DEPENDENT X/Q

CHOOSE LIMITING SECTOR X/Q (0.5% LEVEL)

LIMITED BY DIRECTIONALLY INDEPENDENT X/Q (5% LEVEL)

(WITH MEANDER AND VARIABLE EXCLUSION AREA BOUNDARY)

ATTACHMENT D

The use of a credit/pointcount system for qualification of lead auditors has been deleted in the latest draft of ANSI/ASME NQA-1, draft 4, revision 0, October 1978, "Quality Assurance Program Requirements for Nuclear Power Plants." This latest draft has been approved by the ASME Nuclear Quality Assurance Main Committee and forwarded to the Nuclear Codes and Standards Committee.

VALIDATION OF EXAMINATION CRITERIA

Sections 2.3.5, 3.3 and 4.2 address examination and reexamination of lead auditors for the purpose of qualifying such personnel to lead audits. Utilization of the examination criteria identified in Section 3.2.5 (and referenced in Sections 3.3 and 4.2) would require validation as prescribed in CFR Title 41, Chapter 60, Part 60-3. As stated in Section 60-3.4, evidence of a test's validity should consist of empirical data demonstrating that the test is predictive of or significantly correlated with important elements of work behavior which comprise or are relevant to the job or jobs for which candidates are being evaluated. Because of the difficulty of validation, it is doubtful that each validation attempt would be successful, and users of the standard would be in the position of having to violate the standard or the Federal Regulation.

General Electric would be pleased to provide any further information and to actively interact with the NRC on this subject. Robert J. Murillo of my staff (408) 925-3406 may be contacted in this respect.

Very truly yours,

J Benson for

Glenn G. Sherwood, Manager
Safety and Licensing Operation

GGS:bp/1131-32

cc: L. S. Gifford (GE)
G. A. Arlotto (USNRC)

ATTACHMENT C