

## UNITED STATES NUCLEAR REGULATORY COMMISSION WASHINGTON, D. C. 20555

D. Venelli I.vto

NOTE TO: Darrell G. Eisenhut, Director, DL

THRU:

G. Lainas, AD-SA:DL

FROM:

J. Olshinski, Chief, ORAB:DL

SUBJECT: COMMENTS ON W. DIRCKS TO J. AHEARNE MEMO RE II.F.2

I have made one modification to the last paragraph of the memo to reflect the possibility of a NUREG-0737 rule for operating reactors.

Without making a plant-by-plant examination, I have compared the proposed memo with the information provided to you on II.F.2 by D. Verrelli. I believe that the two are consistent. The only way to be sure that they are entirely consistent is to make a plant-by-plant comparison, but the overall numbers appear to be in general agreement.

D. Verrelli's table indicated 17 technical exceptions. As I read this proposed memo, that number could be 14 - 18. The other numbers on delays also appear to be reasonably consistent.

J. Olshinski, Chief

- ORAB: DL