

February 23, 1994

Mr. Thomas E. Tipton, Vice President & Director  
Operations, Management and Support Services Division  
Nuclear Management and Resources Council  
1776 Eye Street, N.W.  
Suite 300  
Washington, DC 20006-3706

Dear Mr. Tipton:

I am responding to your letter of January 11, 1994, concerning shutdown operations. In your letter, Nuclear Management and Resources Council (NUMARC) raised three concerns based on the review of SECY-93-190, "Regulatory Approach to Shutdown and Low-Power Operations." These concerns are as follows:

- Regulation in the area of outage planning and control is inappropriate.
- Proposed shutdown rule overlaps with maintenance rule.
- Underlying technical basis for shutdown Technical Specifications is questionable.

The staff will consider NUMARC's comments in the proposed rulemaking for shutdown operations. With respect to your request to discuss with us the underlying technical basis for shutdown Technical Specifications, we will initiate such a dialogue after the proposed rule is issued for public comment.

In the attachment to your letter, you made specific comments on model technical specifications which the staff sent to the NSSF Owners Groups. The staff is reviewing these comments and will consider them in the development of any new requirements.

We look forward to working with you in resolving this important safety issue.

ORIGINAL SIGNED BY A. C. THADANI

Ashok C. Thadani, Director  
Division of Systems Safety and Analysis  
Office of Nuclear Reactor Regulation

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EDITED BY: R. Sanders  
DATE: 2/22/94

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*X SR-5, Facility Liaison*

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