



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

DEC 15 1983

MEMORANDUM FOR: Roger J. Mattson, Director, Division of Systems Integration
 FROM: R. Wayne Houston, Assistant Director for Reactor Safety, DSI
 SUBJECT: COMMENT ON DIFFERING PROFESSIONAL OPINION BY R. B. A. LICCIARDO
 ON MCGUIRE UNIT 2 TECHNICAL SPECIFICATIONS
 Reference: Memorandum dated as of December 7, 1983, from R. B. A. Licciardo
 to G. Norman Lauben

The following comments are made pursuant to the provision of NRC Appendix 4125 G.2.6 and should be appended to the transmittal of the referenced DPO to the Office Director.

Although not explicitly stated by the originator, the management decision with which he disagrees appears to me to be that which resulted in the issuance of the operating license for McGuire Unit 2 in May 1983 with its accompanying Technical Specifications. To the best of my knowledge, his concerns for this decision were not clearly articulated until recent weeks when he made it known to his management that he was considering the submittal of a DPO. In the months prior to the issuance of the McGuire Unit 2 license, Mr. Licciardo had been given an assignment to review the proposed Technical Specifications (based upon the W Standard Tech. Specs.) for matters relevant to the Reactor Systems Branch scope of review responsibility. I have known for a number of months that his evaluation was reviewed by but not concurred in by his supervisor. In a lengthy discussion with Mr. Licciardo on December 8, 1983, regarding his concern, I was advised that he had discussed his problems with the proposed Tech. Specs. for McGuire with the Standard Tech. Spec. Section of the Division of Licensing and that he was advised that they would not consider his views without concurrence of his management. He has taken no initiative to bring his views to my attention except through the DPO mechanism.

With respect to the procedures set forth in NRC Appendix 4125, specifically in Part C, "Content of a Written Statement of Differing Professional Opinion," I note that the originator's statement is exceedingly brief, couched in only very general terms, and does not adequately describe any specifics as to how his views differ from those that have been taken by the staff. Clearly, the merits of his views cannot be weighed unless and until such specifics are provided. To the best of my knowledge, Mr. Licciardo's only request for assistance or use of agency resources pursuant to NRC Appendix 4125, B. has been for the typing of his memorandum.

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DEC 15 1983

There is a very current effort related to the originator's concern, although I have no reason to believe that either he or his supervisor have had prior familiarity with it. I refer to the work of the Task Group on Technical Specifications Report, NUREG-1024 (November 1983), "Technical Specifications Enhancing the Safety Impact," and the follow-up effort to develop a plan to implement the recommendations of that Task Group (memorandum from W. J. Dircks to Harold Denton, dated November 14, 1983, and memorandum from Harold Denton to others, dated December 9, 1983). The Task Group's Recommendation No. 5 deals specifically with the safety basis for Standard Tech. Specs.



R. Wayne Houston, Assistant Director
for Reactor Safety,
Division of Systems Integration

cc: R. B. A. Licciardo
G. N. Lauben
B. Sheron
T. Novak
~~E. Adensam~~
R. Birkel