



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

FEB 16 1977

MEMORANDUM FOR: L. J. Evans, Jr., Chief  
Requirements Analysis Branch, SG

FROM: J. Mark Elliott, Chief  
Reactor Safeguards Section  
Program Support Branch, NRR

SUBJECT: COMMENTS ON FEBRUARY 10 MEMO TO UPGRADE WORKING  
GROUP ENTITLED "STATUS REPORT - UPGRADE RULE  
ACTIVITY"

As per your instructions, the enclosed comments have been organized under the three suggested questions. However, we have taken the liberty of reordering those questions.

- 1) Does the narrative say what it is meant to say?
  - a) The narrative approach fails in providing a clear presentation of the rule.
  - b) There are a large number of instances where the term "as appropriate" is used. This indicates a vagueness which is undesirable.
  - c) The division of the basic capability narrative into detection with reference to later response discussion seems undesirable.
- 2) Are all sections and entries complete?
  - a) Specific capability being discussed should be in title of each narrative.
  - b) The use of force as a mode of adversary action is strangely absent.
  - c) Why is the protected area excluded from basic capability 1 narrative?
  - d) There seem to be a number of essential requirements not present.
- 3) Are sections organized logically?
  - a) Suggest separation of detection and assessment functions.

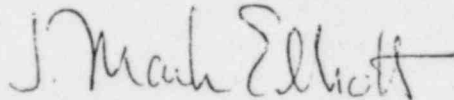
8212080137 821025  
PDR FOIA  
WEISS82-441  
PDR

L. J. Evans, Jr.

-2-

FEB 16 1977

In conclusion, we feel that even though the contents of the subject document are recognized to be incomplete, this approach to the statement of the rule is unsatisfactory. This position is based upon our conviction that a formal rule statement will not provide ample space or freedom to provide a satisfactory statement and explanation of performance requirements and minimum essential system specifications. In short, this approach appears to create more problems than it will solve.



J. Mark Elliott, Chief  
Reactor Safeguards Section  
Program Support Branch, NRR

cc: J. R. Miller, NRR  
J. J. Miller, NRR