

FEB 22 1964

MEMORANDUM FOR: Lake Barrett, Deputy Program Director, TMI Program Office

FROM: Brian W. Sheron, Chief, Reactor Systems Branch, DSI

SUBJECT: DPO OF ROBERT LICCIARDO ON MCGUIRE TECHNICAL SPECIFICATIONS

The purpose of this memorandum is to advise you of the results of our recent efforts to assist in the resolution of Bob Licciardo's DPO on the McGuire Tech. Specs. Over the past two weeks, Norm Lauben and I met with him on four separate occasions, each lasting approximately 2-3 hours, to discuss and try to resolve as many as possible of each of the items identified in his proposed SER on the McGuire Tech. Specs. During these meetings, we addressed about 25% of the items. Most of our time was spent trying to understand the basis for his proposed revisions or additions to the Tech. Specs.

As a result of the four meetings, I have concluded that a fundamental problem he has with the technical specifications is that there is no basis, or traceability provided with the Tech. Specs. so the reviewer can understand where a particular number came from. Lacking this basis information, he went to the docket material, such as the FSAR, and staff SERs. What he found were discrepancies between that information and the Tech. Specs. His approach was to propose modifications to the Tech. Specs. that he felt would make them consistent with the docket material ("the analyses of record"). This approach was consistent with the Standardization and Special Projects Branch's specific request to provide comments in the form of mark-ups. ✍

Based on our experience in these meetings, I have proposed to Bob that he take his proposed SER, with his marked-up Tech. Specs., and transform it into a set of specific questions. For example, if two numbers are inconsistent, he should prepare a question, asking why the numbers were inconsistent. I asked that he clearly document where he found his numbers (i.e., FSAR Amendment No., FSAR chapter, page no.).

We estimated it would take him about three to four weeks to prepare such a question set. Both Norm Lauben (his section leader) and I would review the questions, resolve those that could be resolved within RSB, and, once we were satisfied, we would forward the remainder to the Standardization and Special Projects Branch in DL.

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I met with Cecil Thomas, Chief of the Standardization and Special Projects Branch, and explained to him my proposed plan. He agreed that his branch would review the questions submitted to SSPB and they would try to resolve as many as they could. Following SSPB's review, those items that still remained and appeared to be discrepancies would be brought to the attention of the licensee (Duke Power). Cecil thought that the licensee would voluntarily want to correct any inconsistencies brought to their attention. For items of more substance, such as a proposed additional Tech. Spec., we would follow the guidance of Mr. Denton's October 25, 1983, letter regarding plant-specific backfits. Any items deemed generic during the course of the review would be handled according to the provisions of NRR Office Letter No. 38.

My understanding is that by acknowledging that his DPO merits attention and that a resolution plan has been identified, this would be an acceptable basis for him to consider his DPO resolved.

Original signed by:
Brian W. Sheron

Brian W. Sheron, Chief
Reactor Systems Branch,
Division of Systems Integration

cc: H. Denton
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