

3/22/84

Note to: George Dick

From: Jack Goldberg

SUBJECT: GINNA AMENDMENT RE CONSOLIDATION OF MANAGEMENT RESPONSIBILITIES

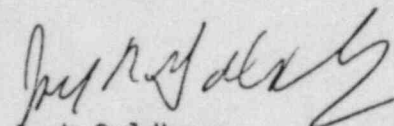
I realize that the attached amendment package has been pending for many months and that the amendment is relatively minor. Nevertheless, I am returning it without ELD concurrence because the reasons given for the conclusions on the three NSHC standards of 10 C.F.R. § 50.92 do not support the conclusions; i.e., the conclusions ("Consequently, ..."; "Therefore, ..."; "Therefore, ...") do not necessarily follow from the stated reasons. What needs to be done to correct this is to state why the consolidation of responsibilities (1) "will not cause a significant increase in the probability or consequences of an accident, (2) will not create a new or different kind of accident, and (3) does not significantly reduce the margin of safety. For example, assuming the facts support it, something like the following might be used for the first standard:

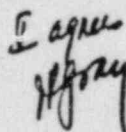
"The consolidation of responsibility of the Superintendent does not affect the operation, per se, of the facility and will not affect the role of the Superintendent or any other individual insofar as accident mitigation is concerned. Therefore, there will be no significant increase in the probability or consequence of a previously evaluated accident if this consolidation is authorized."

Similar reasons could be stated for the second standard.

For the third standard, it could be stated, if true, that the consolidation does not involve any change to the plant systems hardware, tech spec's, limiting conditions, etc. and therefore will not result in a significant reduction in the margin of safety.

If you have any questions, please call me (x27619).


Jack Goldberg



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