

July 5, 1983

Note to: M. Dean Houston  
From: Mary E. Wagner  
SUBJECT: GRAND GULF AMENDMENT PACKAGE

I have reviewed the attachment amendments package in Grand Gulf and note the following deficiencies:

1. NSHC determination:

There is no finding, in the basis for the NSHC, that the three standards of 10 CFR § 50.92(c) have been met.

In addition, there is no discussion of the fact that some of the proposed amendments match the list of examples of amendments not likely to involve SHC. These examples supplement the standards and should be used by the Staff in making its determinations. For example, proposed amendments (b) and (d) seem to fall under example (ii) of the examples of amendments likely to involve NSHC:

""(ii) A change that institutes an additional limitation, restriction or control not presently included in the technical specifications: for example, a more stringent surveillance requirement."

If this is the case, the example should be cited in your proposed NSHC determination with a conclusion that items (b) and (d) fall into the same category. If items (a) and (c) fall within other examples, your determination should so state. For a list of examples, see Attachment 2 to undated Note from D. Eisenhut to All DL Employees, DL Operating Procedure 228, Revised Procedures for Processing Licensing Amendments.

2. Evaluation of Exigent or Emergency Circumstances

The evaluation should include the fact (if it is one) that these proposed amendments have resulted from licensee's ongoing review of tech specs and have just been identified as areas in need of amendment. We must show some reason why these amendments were not requested earlier.

3. Notice

The Notice should contain the same discussion and conclusions needed in the initial NSHC determination.

*Mary*

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