

October 31, 1983

Note to Gus Lainas

SUBJECT: VERMONT YANKEE 1 ADMINISTRATIVE CONTROLS (OELD # 838 771)

The package is perfectly okay Gus, but it raises a policy problem. We are amending Vermont Yankee's specs at its request to delete from the license a condition to perform the emergency exercises because that's already contained in the Regulation, 10 CFR 50, Appendix E. Its a perfectly acceptable reason for deleting the tech specs; I know of nothing in the tech specs to add anything to the Regulation so its okay with me; however, you have a policy problem. The policy problem results from the fact that you have lots of other amendments coming through, I see them every week, in which specifications are amended calling for the emergency planning exercise so we have lots of other places where we have specs requiring them to do something that the Regulation requires them to do. I have another example of it before me today. Its a Browns Ferry amendment in which we are amending the tech specs to include the requirements for a meeting on the safeguards contingency plan as required by the Regulation. If its okay to delete redundant requirements covered by the the Regulation from Vermont Yankee's tech specs, then its should be okay for everybody. You have to decide what you want to do on this problem.

for amb
Joe Scinto

8502090061 840518
PDR FOIA
ADAT084-166 PDR

October 31, 1983

Note to Dick Clark

SUBJECT: BROWNS FERRY 1 MINIMUM LEVEL OF WATER IN SPENT FUEL POOL
(OELD # 838 741)

You need to do some more work on this package. You seem to be treating the occupational exposure issue as a non-safety issue. That's not correct. It is a safety issue. It may not be an offsite consequences issue but it is a safety issue and the potential for causing an over exposure to a working individual is an accident. So, you have to address the standards in that light. Basically, why don't you indicate what the dose changes would be from 6½' - 5½' of water. I can't see any other affect and if those changes are significant and you may not want to give these guys the grant. What is the change in the exposure levels resulting from the change in the water level? In the absence of that, you can't tell what your argument is. Discuss what the change is and if its small, that a good description of why its insignificant. If its not small, you have to think about this package again.

for *Amb*
Joe Scinto

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