Note to:

Dean Houston

From:

Mary Wagner

SUBJECT:

GRAND GULF NOTICE: ESTABLISHMENT OF LATER SUBMITTAL

DATES TO MEET LICENSE CONDITIONS

I have reviewed the above-referenced Notice and see one matter that should be dealt with therein.

In this request, Licensees are asking that certain submittal deadlines to meet license conditions be changed to later dates, to reflect schedular delays. Most of these deadlines have already been missed. As a result, Licensees are in technical violation of several license conditions. When we spoke about this some time ago, you indicated that the SER supplement (to be issued end of May, before the original submittal dates expired) would discuss these slippages and conclude they were supported on the basis of preoperational experience. This fact should be mentioned in this Notice.

We have had a similar problem before in Grand Gulf -- where we granted extensions of submittal dates well after the existing submittal dates in the license had expired. In that instance, I think we stated that there had been an oral understanding between Staff and licensees (prior to the expiration of the original dates) that these dates would slip and that licensee would not be cited for violation of these conditions pending the processing of the amendments In so doing, we countered the impression - that Licensee knowingly missed the dates and was operating in violation of its license conditions. Please check the earlier amendment to see what we said there and if it would be appropriate to say the same thing here.

Please see clipped pages for other comments.

Mary Wagner