December 9, 1983

Note to Steve Varga

SUBJECT: BEAVER VALLEY 1 PROPOSED RE-ANALYSIS OF LOCA DOSES (OELD # 839 715)

Steve, this is the package we discussed. I've asked the lawyer for Beaver Valley to look into their incoming and maybe we can get it straighten out without the need for the letter from us in the form its presently in (which serves, in my mind, only to put emphasis on what appears to be just a badly written letter from the licensee). Something that doesn't really have substance to the problem - its just badly written.

for Joe Scinto

Note to Tim Colburn (Charlie Trammell)

SUBJECT: POINT BEACH 1 UTILIZATION OF WESTINGHOUSE OPTIMIZED FUEL ASSEMBLY DESIGN (OELD # 839 747)

I think some of the reasons for no significant hazards on page 3 needs to be beefed up. The sentence that says the tech specs relating to the use of the new optimized fuel assembly are judged not to be significant because they meet the Commission's example is not good enough. That's a circular argument. The reason they meet the example is because they aren't significant. Please give a reason for why they are not significant.

The second point relates to the argument about the other changes not being significant because they've previously been approved for other facilities. That is specifically not an acceptable reason for no significant hazards. I think probably what you want to do is use example #6 - that is, a change which may result in some increase but where results are all clearly within the acceptance criteria of the SRP and then you can use your prior experience with other facility approvals as the basis for reaching the conclusion that its all going to be okay within the SRP. That's the example to use.

These revised fuel assembly packages are the kinds of things where there is a question as to whether or not they should be significant hazards. But if you think they are not and you want to set them up using those examples, that's the way to set up the example.

amb for Joe Scinto