

January 26, 1984

Note to Rich Rawson

SUBJECT: MCGUIRE AMENDMENT ON SSF EMERGENCY LIGHTING

Your note on the McGuire package would solve the problem but I don't think its going to turn out to be factually accurate. I would be very surprised if the safe shutdown facility for Appendix R purposes is totally independent of and unrelated to the remote shutdown panels required by GDC-19. I suspect that the safe shutdown facility serves that dual function.

Moreover, its not simply whether or not the SSF is required by any other Regulation. It may also be used to accomplish some safety function that uses the SSF as an acceptable alternative (one way of doing it) even though a Regulation doesn't explicitly require a SSF. That may be true for some of the older plants but I'm not sure its true for a plant like McGuire. I would think the principle interaction for a safe shutdown facility is going to be between Appendix R and GDC-19.

If you wish, you can forward a copy of this note to Ralph to put him on notice that I'm going to be suspicious of any assertion that the SSF is unrelated to anything else. I think he should simply 30-day notice this thing.

AMB
for Joe Scinto

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PDR FOIA
ADAT084-166 PDR

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Note to: J. Scinto &

J. Gray

From: R. Pearson

Re: McGuire amendment on SST emergency lighting

We did not concern in this package for the resource given in my attached note. To assist NTRR, I have re-drafted the FTRD input in a way that reaches my concern if factually accurate. That re-draft is also attached.

Concurrent with this note, I have forwarded the re-draft to Ralph Birkel for his review and particularly for his confirmation of factual accuracy. I thought it best to move this along both tracks in parallel.

R.P.