

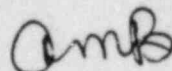
January 30, 1984

Note to Gus Lainas

SUBJECT: DUANE ARNOLD - INTERIM INSPECTION PROGRAM (OELD # 841 382)

This package is in the form of a minor change to the Duane Arnold technical specifications listing the date of commencement of the various 40-month portions of the 10-year inspection interval. On its face, its a minor insignificant change; however, it does raise the same problem that we had on Salem. In the second inspection interval, the Applicant did not inspect in 40-months which would have been October 1981; rather, the Applicant apparently inspected or had this inspection interval start July 1982 which is 40-month plus nine. As you know, the tech spec gives them 40 months plus or minus 25%; however, that leaves the third inspection interval between July 1982 and February 1985 limited to 30 months. This again, raises the question of whether or not 49 months and 30 months are approximately equal intervals which is called for by the Regulations. In Salem, you know the difficulty we faced with that. We chose to treat them as approximately equal intervals but this is going to repeat the same problem. I don't know how one can make a reasonable rational argument that 49 months and 30 months are approximately equal intervals. That is still the Staff position, however, if you want to continue it, go ahead; but this note is to warn you of the weakness in our position and to remind you of that.

In any event, this proposed notice should be published because that is in fact what the Applicant requested. Its okay to noticed whatever we receive but my concern is whether we really should act on this. But that's something we don't have to face until later.


Joe Scinto

cc: M.Thadani
W.Paton

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