Note to M. Grotenhuis D. Vassallo

SUBJECT: BRUNSWICK CONTAINMENT LEAK TESTING SURVEILLANCE (840 291)

I don't have problems with the package; what I have problems with is the tech spec. The tech spec (page 346-3) indicates that if any two consecutive type "A" test fail, the retest shall be performed at least every 18 months until two tests pass. In this package, we are extending it to allow the 18 months to be plus or minus 25%. That doesn't bother me.

What does bother me is that the tech spec is written wrong. The regulation requires that the tests be done every shutdown for refueling or approximately every 18 months, whichever is earlier (J.3.A.6.B.). For this reason, the tech spec does not adequately reflect the requirements of the Regulation. It is an inappropriate tech spec.

If that is a standard tech spec, then please supply a copy of this note to Mr. Brinkman and I will request Mr. Brinkman to modify the standard tech specs so that they conform to the requirements of the Regulations.

harvoe Scinto

cc: W. Olmstead

8502090254 840518 PDR FDIA ADATO84-166 PDR

December 22, 1983

Note to Hazel Smith

SUBJECT: BIG ROCK MECHANICAL SNUBBERS (840 375)

This is another package with an after-the-application change. There is an assertion that says this was discussed with the Licensee and they approved. The cover letter says that its within the scope of the original amendment. There is no support for that in the SER. There has to be some support for that assertion. The Staff has to stop making changes to these applications or the changes have to be very minor and they have to be explained as very minor.

for Joe Scinto