

November 10, 1983

Note to George Knighton

SUBJECT: DIABLO CANYON - AMENDMENT 6, IMPLEMENTATION DATES LETTER &
EXEMPTION PACKAGE (OELD #'s 839-228, -248, -249)

With respect to the amendment package, the cover letter to the licensee should reflect the fact that no contentions or petitions have been received with respect to any of the F.R. notices in connection with the actions covered. In addition, check immediately before issuing, as to whether or not there have been any comments or petitions with respect to any of the four notices involved in this amendment. The package does not need to come back to ELD.

With respect to the implementation dates letter, I don't understand what we're saying in connection with changes 1&2. The letter says that it is the staff's position that the license conditions for items 1&2 are satisfied. However, all the letter discusses is incoming mail from the licensee. Two particular conditions call for completed corrective actions that perform a certain function. What makes you think the actions have in fact been completely satisfied? If that is what you are going to say, then fix the letter to say something to the effect ... since the licensee has fully completed the requirements of these conditions in a satisfactory fashion, the license conditions have been met. At least you are able to reach both of these conclusions. I would not say that you can conclude that you have met these requirements.

The exemptions package contains no support for the conclusion that this action will not endanger life and property and is in the best interest. You apparently assume that changing the date of submission of the updated FSAR by 6 months has no effect. I think that assumption should be substantiated by some reasoning in the paper, particularly since this paper suggests that the existing FSAR may not be accurate (the delay is being requested on the grounds that the updated FSAR takes into consideration the findings of the IDVP). It looks to me like they are suggesting that the IDVP is going to indicate that the FSAR is inaccurate as it now stands.

Joe Scinto

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