September 29, 1983

Note to Karl Stahl

SUBJECT: SEQUOYAH 1 AMDTS --- PRESSURIZER PRESSURE ... CONTAINMENT ISOLATION VALVES ... HYDROGEN MITIGATION SYSTEM ... IGNITERS (OELD # 837 461)

I have no trouble with the form of this amendment. My only question to you relates to the reason we give for the third amendment (reducing the number of igniters tested every 18 months). The reason we give is that igniters are considered to be reliable long-life devices. If I remember, that is not the story we told the Commission when that condition first went into this license. That's my recollection. Are you sure that we can now give as a reason without further explanation the idea that these are reliable long-life devices? Don't you think we need to tell them something about what information has changed in the meantime - so that we can change our characterization of igniters from a new novel thing that nobody knew anything about to a reliable device that we only need to check 10% of them every 18 months?

The form of the amendment is okay but whether the reason needs more explanation is up to you.

Joe Scinto

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