February 9, 1984

Note to Al DeAgazio

SUBJECT: DAVIS-BESSE 1 - MAIN STEAM ISOLATION VALVE SURVEILLANCE TESTING (OELD # 841 951)

The discussion of the description of what we're doing is pretty good and its fairly obvious on its face that this change doesn't have any significant hazards considerations involved in it; however, you have to do more than just slap in the boiler plate statements that it does not involve a significant increase in probability, etc. If you're going to use the three standards you have to describe why it doesn't involve a significant increase in probability, etc. If this thing had come in after May 6, 1983, I would have suggested that you send it back to the Licensee and reject it for an inadequate discussion but unfortunately it came in before that so you have to do the inventing of reasons.

for Joe Scinto

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