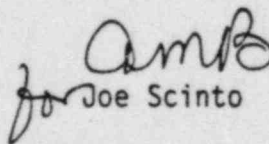


March 27, 1984

Note to Gery Gears

SUBJECT: PEACH BOTTOM 2 - MULTIPLE REVISIONS TO TECH SPECS (OELD # 843 589)

The package is okay except for page 4. You use as part of the example that a change meets all acceptance criteria by referencing the standard technical specifications and you mention that the standard technical specifications are incorporated in the Standard Review Plan. That's not acceptable. What the Commission's example relating to the Standard Review Plan means is that you have to reference an explicit Standard Review Plan acceptance criteria, not the general provision that talks about the standard technical specifications. There can be a substantial change in margins when you change from custom specs to the standard specs and, still, the plant operation would be safe. Although its safe, there can be a significant change in safety margins and thus a significant hazards consideration. You have to use some argument other than "its within the standard technical specifications". For this particular action which deviates from a Reg Guide, I think you have to go through each of the separate three criteria for significant hazards and discuss why it does not involve an increase in the probability or consequences of an accident, a new accident, or a significant change in safety margin referred to in the tech spec. The specific reference to the standard technical specifications is not sufficient to constitute an example of no significant hazards consideration.

  
for Joe Scinto

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