

MEMORANDUM TO: T. KING, DPO PANEL

09 AUG 94

FROM: C. MORRIS, EELB

IN RES: REQUESTED COMMENTS

The following comments are in response to your request during our discussion of my DPO on Catawba circuit breaker coordination for comments on the DPV-SP report of 21 July 1994.

I shall be brief; not brief enough, but I find that what should be said will not fit in the margins of the DPV-SP report, as you suggested.

(1) Paragraph 1, page 1 summarizes the DPV concern satisfactorily, for an introduction, but then the report proceeds to forget what, "In the view of Mr. Morris [is] the most important concern...."

(2) Finally in "Conclusions" the report says that a "formal" submittal including sufficient supporting information should be submitted by the licensee.

(3) Paragraph 4, page 4: "There was general agreement that the technical issue associated with the DPV was not one of meeting specific agency rules and regulations, but one of good engineering practice in minimizing the amount of equipment lost due to the above described faults." This is a strange statement which I will not analyze here, except to say, that the main concern of my DPV is not a technical issue at all, but a policy decision with respect to the acceptability of the licensee's argument.

(4) Paragraph 1, page 5:

The DPO panel is fortunate to have the services of as perceptive a reader as P. Baranowsky, who found this paragraph completely clear. I found it so difficult as to be incomprehensible, which is odd because I wrote the DPV this paragraph responds to.

My difficulty was partly resolved when I considered the conclusions of the DPV-SP report (on page 5) because they use the word "formal" twice in describing what the licensee needs to do. From the context, one can then decide which of the meanings of formal was intended; the first two in my dictionary are opposites; I won't repeat them here; nor will I explain the other grammatical and logical difficulties, because I believe that we can all agree on what the subject paragraph meant to say. It is irrelevant to the subject of the DPO, as stated, therein, so that there should be no need to restate it here, either. It may, however, be the "crux" of the concerns that the DPV-SP had. We must take ~~there~~ <sup>their</sup> word for it.

If you have any questions, I am at your service.