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NL86-0093

Dave Fischer
Technical Specification Coordination Branch
Office of Nuclear Reactor Regulation
US Nuclear Regulatory Commission
Washington, D.C. 20555

Subject: Rulechanges to Allow Criteria Implementation

Dear Dave:

The only rulechanges necessary to implement the Wolf Creek split is a change to 50.36a (RETS) which would not support moving sections 3.3.3.10 and 3.3.3.11 (Effluent Instrumentation) or 3.11 and 3.12 (Rad Effluent and Environmental Monitoring). Note the organization of RETS varies substantially from plant to plant and thus the number of conflicts (4) is not universally applicable. Also I've never been sure how the 40% figure was arrived at in the beginning. If counting "yes" and "no" (under column labelled LCO Remains) in the NRC report works; then 12 of 51 "no's" are in jeopardy without the rulemaking. It is also worth noting that some non-criteria changes (duplication of regulations, etc.) would tend to identify other desirable changes and that a clarification to the Enforcement Policy might be appropriate to implement the Policy Letter's treatment of FSAR deviations as de facto 50.59 violations.

K.R. Wilson, Chairman
Working Group #4

KRW/dhd

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