

From: James Heller
To: Brent Clayton, Stephen Campbell } (R III)
Date: Tue, Jun 29, 1999 10:48 AM
Subject: Re: Fwd: TIA

I have read the attachments. It does not read like a SL-IV NOV. It reads like a S/L III for a significant failure to comply with the a TS LCO (reference supplement I paragraph C.1.

I have attached a blank the enforcement panel work sheet. When you prepare the worksheet don't limit your self to only TS 3.8.1.1.c. It looks like the TS3.1.5.a.2 also applies. This TS may also defuse some the licensee argument.

jim

>>> Stephen Campbell 06/28 2:05 PM >>>

We are in a crunch to resolve this potential . Basically, the NRC identified that the licensee removed Division 1 EDG11 from service while Division 2 SLC system was inoperable. The licensee has developed a bases that SLC was unnecessary to mitigate a design basis accident, is not divsionalized and therefore, is not a violation of TS 3.8.1.1.c . This bases is documented in the Level 1 condition report they have generated as a result of this event. Consequently, the shutdown action statement was not followed and subsequent reports to the NRC were not made. We submitted a TIA where the TS branch stated that it is preliminarily a violation. We need to start the package rolling so we can exit by July 23. Can we discuss this pretty soon? This is a heads up that it is coming and has high management attention.

CC: Andrew Kugler, Anton Vogel

D/B