

**From:** <beattyg@firstenergycorp.com>  
**To:** "Lawrence Burkhart" <LJB@nrc.gov>  
**Date:** Tue, May 22, 2001 3:50 PM  
**Subject:** Re: Fwd: FENOC QAP (Part 72 deletion)

Rather than spend the time arranging a conference call we've decided to simply replace the statement in the QAPM that commits to apply the program also to Part 72 activities. This would apply only to Davis-Besse because they are the only FENOC facility licensed for dry fuel storage. Our cover letter in response to the RAI will make mention of this change.

The QAPM is revised and our submittal in response to the RAI is in the formal routing process as of this afternoon. Things don't go as fast when all three plants are involved, but I'm guessing maybe a week or so to get all the necessary reviews.

"Lawrence Burkhart" <LJB@nrc.gov> on 05/15/2001 01:16:26 PM

To: <beattyg@firstenergycorp.com>  
cc:

Subject: Fwd: FENOC QAP (Part 72 deletion)

Please see attached and let me know when you could discuss.  
Content-Transfer-Encoding: quoted-printable  
Content-Type: text/plain; charset=US-ASCII  
Content-Disposition: inline

Larry --20

When we discussed the RAI with FENOC on May 10th, I asked about the = proposed deletion of the commitment to Part 72 Subpart G from their QA = topical. I asked whether they had initiated an amendment request for = their SAR, but I didn't understand their response. I also didn't = understand whether this deletion was limited only to Davis Besse because = Perry identified it as a reduction in commitment.

Since this item has the potential to delay our review of the QA topical, I = would appreciate if you either set up a informal telecom or get additional = clarification on the following:

1) The Part 72 commitment in the FENOC QAP is being deleted. The basis = provided (Sidebar 1, Attachment 4) is that "The FENOC QAP will be applied = to the scope of activities conducted under the 10 CFR 72 at the DBNPS as = specified by the Dry Fuel Storage Certified Safety Analysis Report."

2) What is the Dry Fuel Storage Certified Safety Analysis Report? The staff isn't familiar with the term "certified" as applied to a SAR. Are they referring to the Part 50 SAR, the Part 72 SAR, or the SAR for a certified fuel cask design?

3) Is the intent to relocate the commitment by incorporating the FENOC QAP by reference in the Part 50, Part 72, or cask SAR? If this is the intent, what regulatory change process will FENOC use to update the SAR for each of these cases?

4) If the FENOC QAP is not being incorporated by reference, are QA requirements already contained in the SAR? Or will they need to be incorporated through a license amendment?. Again, what SAR is being referred to?

5) If Part 71/Part 72 commitments to the FENOC QAP are deleted, the staff (i.e., NMSS) will need to review the proposed quality program for maintaining existing fuel and the associated systems used for dry storage.

6) In the telecom, there was some confusion as to why Perry considered this change a reduction in commitment. FENOC should clarify whether the commitment is limited to the Davis Besse facility.

If we have a better description of what FENOC intends to do, we can resolve this matter promptly. If it is necessary to involve the Waste side of the house, I need to get them actively involved so as not to impact the schedule.

Ken

**CC:** <[beattyg@firstenergycorp.com](mailto:beattyg@firstenergycorp.com)>

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**Subject:** Re: Fwd: FENOC QAP (Part 72 deletion)  
**Creation Date:** Tue, May 22, 2001 3:50 PM  
**From:** <[beattyg@firstenergycorp.com](mailto:beattyg@firstenergycorp.com)>

**Created By:** GWIA:beattyg

**Recipients**

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LJB (Lawrence Burkhart)

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Header	687	

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Received: from nrc.gov  
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From: beattyg@firstenergycorp.com  
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To: "Lawrence Burkhart" <LJB@nrc.gov>  
Cc: beattyg@firstenergycorp.com  
Date: Tue, 22 May 2001 15:50:31 -0400  
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