

**From:** Brian Holian  
**To:** Steven Long  
**Date:** Wed, Nov 1, 2000 4:37 PM  
**Subject:** thank you...and "aqua-bluish words"

1) Thank you for the great support... Excellent discussion had by all. Good scrubbing of the "issues" also... That's good regulation.

2) as for words...

Not many...

and Below are are a few areas for consideration..Some are "impact" on licensee...

Some are "impact" on how the public may take it...

3) On my suggestion to attach only a "2 page" summary... That is work we may try in the region. It is for keeping it simple for the public. And it would ref. your more extensive analysis. If it gets requested later,,,that's fine...

I would foresee sending the cover letter (currently 2 pages) forward to the Commission... Att 1 being the violation ; Att 2 being a summary of your analysis. Also...in the same "Blaha" note...or "Craig gram" -just for TA use...we would send up your whole analysis (as an internal staff document).

comments on that initial track..??

Rich, Jim T, Tom Shed, Pete W. join in..

The letter will have Rich and Strosnider and Projects concurrence. Either way...I want this letter moving by Mon to you all...

4) Again..thank you all...

now...

Specific items..

- Item 2...last sent. *does not have a significant effect on* "not important to the staff's final risk..."....Suggest other words than not important
- Item 3 typo...missing r in Fraction
- Item 4 "staff has not performed its own analysis to check the licensee's value" ...need explanation of why not... *due to time and resources available*
- Item 5 "mathematically proper or physically logical"....this is where I thought we were calling them illogical english majors....
- 3rd para...staff does not have the experience data necessary...true..But, I don't like to advertise..
- 4th para..."somewhat non-conservative.." may be better words.. *Based on experience with other tube rupture events*
- Item 6 "the staff believe"s...give more for basis...

I'd add a sentence on the fact , as discussed at the SERP, that this assumption matches other staff assumptions where we have some empirical evidence to base our value. And, even if we did assume all SGs... there would be a very minor change to final risk numbers due to the MSLB small contribution to overall risk total.

*This depends on how much people worry about the point of the sensitivity study results range goes below  $1 \times 10^{-5}$ , using factor of 1.0 would put you just above the  $1 \times 10^{-5}$  threshold.*

*DDH/JS*

Item 8 second last para... Heated "the most"...use other words... Also, "led" not lead in 4th last line

Human error Probabilities

<sup>ages</sup>  
"staff believes.." I'd word differently..

pg. 8 bottom...SAMG have been implemented...Can we be more specific for IP2

Finally...the last two paragraphs should be shorter...and you should delete your comments on what agency policy should be...That dilutes the previous technical work and offers the licensee an "in" on arguing that you knew the "correct" answer before you started. (So did licensee.)

Although we discussed some of this...it is more cover letter material or argumentative analysis that we should reserve...

e.g. "Because the staff's conclusions are intended..."

"It would be inappropriate...."

"mitigating knowledge developed after the fact is not relevant..." etc.

Also..same paragraph..."dominant contributor to public health (typo..heath) consequences from nuclear accidents..."...rough words for public... esp. as we put in context of no risk to public from this particular event...

That's it from a quick read...

CC: James Trapp, Peter Koltay, Peter Wilson, Richar...