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**To:** "jbh@nrc.gov" <jbh@nrc.gov>  
**Date:** 9/11/02 2:08PM  
**Subject:** Need Input for Plan Change - 50.54(p) or 50.90?

John,

As we begin to make plans for plant changes associated with no fuel in the spent fuel pool (everything up on the ISFSI pad), the question comes up as to how we go about changing our security plan. I've been asked whether we can simply change the plan via the 50.54(p) process for those changes purely related to having no fuel in the pool. However, some think that a 50.90 change is necessary for this kind of a change.

To some it seems obvious - when there is no fuel in pool the requirements no longer apply! Others feel that it isn't just a simple change (i.e., can't conclude no degradation in the plan) that all requirements related to fuel in the pool immediately go away when the last assembly is removed from the pool.

Could you pulse the security folks and give us some guidance here?

I'll call you next week (or you can call me).

Jim