

From: Karla Smith
To: Rebecca Nease
Date: 1/8/02 8:39AM
Subject: Re: Backfit analysis

Geary,
Rebecca plans to revise the backfit response (analysis) based on the points below. Please let me know if you have any problems with this approach. I do not want her to get too far with this if you do not feel this is the right approach. We are willing to talk with you about it if you think that is necessary.

Thanks
Karla

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>>> Rebecca Nease 01/08/02 08:33AM >>>
Karla,

As we discussed (at length) yesterday, I will reorganize my ANO backfit argument in the following manner:

1. Our position wrt Appendix R, III.G has always been that licensees must comply with III.G.2 or III.G.3 or get an exemption. This is exemplified by numerous generic (SOC, GLs, INs) and ANO-specific docketed information (SERs).
2. NRR requested (on the docket) that ANO list the fire areas (FAs) in which they credit manual actions. NRR reviewed and approved of the use of manual actions in 14 FAs. The 2 FAs which are the subject of our inspection finding (98J and 99M) were not included in those 14 FAs approved for manual action.
3. In reading their backfit claim [REDACTED]
4. The criteria ANO described under which they would take manual action included: sufficient time to perform the manual actions and sufficient number of operators. [REDACTED]

Conclusion: There was no backfit, and ANO is not in compliance with Appendix R, Section III.G.2.

Rebecca

[REDACTED]