

8/23

Koltay

Wiss / Lam / Caves / Brady / Koltay / Qualls

⇒ Phone call

⇒ Manual Actions (⇒) • Plan to submit deviation request

⇒ Outlined my concerns w/ minor violation approach

⇒ Desire to restore non-conforming condition

① May 16 letter - Do we need to submit a deviation
Extent of manual action

② Acceptance criteria for manual actions

Caves

- State of Flux
- History:
 - NEE - ① Procedures / Training
 - ② Thermo Hyd Timeline - Ins & Diagnostic eqs
 - ③ Environmental considerations

- Staff pursuing solutions ⇒ major
mitigation
Asked for I/P/B help.

Adams Accession # ML 013370302 [Manual
Actions letter]

Abstract ⇒ Safe manual action =
Minor violation → CA - program entry -
Low priority →
Ins Guidance / En Guidance will need to
come forward. Trying to avoid

hundreds / thousands of exemption requests.

Specific enforcement action \Rightarrow one lead in Regis II.

Recommended action closeout \Rightarrow for safety point of view -

Deviation could be submitted.

\Rightarrow Plan to submit an exemption request would be sufficient

\Rightarrow Kolbay / Coe \Rightarrow Entering the ~~exemption~~ request

ECP doesn't.

Inspectors need to evaluate manual actions.

White finding \rightarrow accept corrective action
 : accepted L.T. actions
 (submit deviation)