

OCT 4 1985

MEMORANDUM FOR: Victor Stello, Jr., Deputy Executive Director
Regional Operations and Generic Requirements

FROM: Harold R. Denton, Director
Office of Nuclear Reactor Regulation

SUBJECT: BACKFIT DETERMINATION-TVA CLAIM RECEIVED JUNE 4, 1985

Reference: Memo, Stello to Denton, August 28, 1985, Same Subject

In response to your concern over our following procedures as outlined in Draft Manual Chapter-0514, we believe that we have been responsive to the intent of these procedures. In the case of answering TVA's claim of backfit received by us on June 4, 1985, we set the target date of June 20, 1985 (i.e. 12 working days), for completion of the determination and subsequent issuance. This target date was intended to allow margin to assure completion by June 26, 1985 (i.e. the three weeks called for in Draft Manual Chapter 0514).

The NRR staff completed the required actions and returned the proposed response to my office on June 26, 1985. At that point we determined that it would be appropriate to obtain IE concurrence in the proposed response to TVA. This additional action which was not contemplated in the original schedule, nor in the scheduling guidance established in the Manual Chapter, resulted in a delay in completing the action. A detailed chronology of events is presented in the Enclosure. I continue to believe that requesting IE concurrence was a prudent action in this case and that it reflects the kind of thoughtful management involvement that is needed in dealing with backfitting issues.

In addition, we entered the appropriate information on this issue into both the Division of Licensing's tracking system and the agency-wide tracking system. This information is currently included in our monthly status reports.

We are sensitive to the need to manage plant-specific backfitting activities in a controlled and timely manner. Therefore, we will continue to make every effort to be consistent with the Draft Manual Chapter.

Original Signed by

H. R. Denton

Harold R. Denton, Director
Office of Nuclear Reactor Regulation

Enclosure:
As stated

DISTRIBUTION YELLOW TICKET 859222

Central File w/incoming	PTremblay	PPAS
NRC PDR w/incoming	JHannon	HThompson/FMiraglia
NSIC w/incoming	GHolahan	DCrutchfield
ORAB Reading	HSmith (w/incoming	
HRDenton/DEisenhut	yellow folder)	

*Previously concurred

ORAB/DL
*PTremblay:mk
09/18/85

ORAB/DL
*JHannon
09/18/85

ORAB/DL/BC
*GHolahan
09/20/85

AD/OL:DL
GLainas
09/23/85

AD/OL:DL
TNovak
09/26/85

AD/EA:DL
DCrutchfield
9/27/85

AD/OL:DL
HThompson
9/30/85

DL/NRR
DEisenhut
9/ /85

D/NRR
HDenton
10/4/85

8510090340 851004
PDR ADOCK 05000259
P PDR

OCT 4 1985

MEMORANDUM FOR: Victor Stello, Jr., Deputy Executive Director
Regional Operations and Generic Requirements

FROM: Harold R. Denton, Director
Office of Nuclear Reactor Regulation

SUBJECT: BACKFIT DETERMINATION-TVA CLAIM RECEIVED JUNE 4, 1985

Reference: Memo, Stello to Denton, August 28, 1985, Same Subject

In response to your concern over our following procedures as outlined in Draft Manual Chapter-0514, we believe that we have been responsive to the intent of these procedures. In the case of answering TVA's claim of backfit received by us on June 4, 1985, we set the target date of June 20, 1985 (i.e. 12 working days), for completion of the determination and subsequent issuance. This target date was intended to allow margin to assure completion by June 26, 1985 (i.e. the three weeks called for in Draft Manual Chapter 0514).

The NRR staff completed the required actions and returned the proposed response to my office on June 26, 1985. At that point we determined that it would be appropriate to obtain IE concurrence in the proposed response to TVA. This additional action which was not contemplated in the original schedule, nor in the scheduling guidance established in the Manual Chapter, resulted in a delay in completing the action. A detailed chronology of event is presented in the Enclosure. I continue to believe that requesting IE concurrence was a prudent action in this case and that it reflects the kind of thoughtful management involvement that is needed in dealing with backfitting issues.

In addition, we entered the appropriate information on this issue into both the Division of Licensing's tracking system and the agency-wide tracking system. This information is currently included in our monthly status reports.

We are sensitive to the need to manage plant-specific backfitting activities in a controlled and timely manner. Therefore, we will continue to make every effort to be consistent with the Draft Manual Chapter.

Harold R. Denton, Director
Office of Nuclear Reactor Regulation Victor Stello

&

- 2 -

DISTRIBUTION:

Central File NRC PDR NSIC ORAB Reading HRDenton/DEisenhut PPAS
HThompson/FMiraglia DCrutchfield/CSchum HSmith,PPAS

*Previously concurred

ORAB/DL	ORAB/DL	ORAB/DL/BC	AD/SA/DL	DL	NRR
*PTremblay:mk	*JHannon	GHolahan	DCrutchfield	HThompson	HDenton
09/18/85	09/18/85	09/20/85	09/ /85	09/ /85	09/ /85

Victor Stello

- 2 -

In addition, we entered the appropriate information on this issue into both the Division of Licensing's tracking system and the agency-wide tracking system. This information is currently included in our monthly status reports.

We are sensitive to the need to manage plant-specific backfitting activities in a controlled manner. Therefore, we will continue to perform those activities consistent with the Draft Manual Chapter.

Harold R. Denton, Director
Office of Nuclear Reactor Regulation

DISTRIBUTION (YELLOW TICKET #85922)

Central File
NRC PDR
NSIC
ORAB Reading
HRDenton/DGEisenhut
PPAS
HThompson/FMiraglia
DCrutchfield/CSchum
HSmith,PPAS

ORAB/DL
PTremblay.mk
09/18/85

ORAB/DL
JHannon
09/18/85

ORAB/DL/BC
GHolahan
09/ /85

AD/SA:DL
DCrutchfield
9/ /85

DL NRR
HThompson HRDenton
9/ /85 9/ /85



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

OCT 4 1985

MEMORANDUM FOR: Victor Stello, Jr., Deputy Executive Director
Regional Operations and Generic Requirements

FROM: Harold R. Denton, Director
Office of Nuclear Reactor Regulation

SUBJECT: BACKFIT DETERMINATION-TVA CLAIM RECEIVED JUNE 4, 1985

Reference: Memo, Stello to Denton, August 28, 1985, Same Subject

In response to your concern over our following procedures as outlined in Draft Manual Chapter-0514, we believe that we have been responsive to the intent of these procedures. In the case of answering TVA's claim of backfit received by us on June 4, 1985, we set the target date of June 20, 1985 (i.e. 12 working days), for completion of the determination and subsequent issuance. This target date was intended to allow margin to assure completion by June 26, 1985 (i.e. the three weeks called for in Draft Manual Chapter 0514).

The NRR staff completed the required actions and returned the proposed response to my office on June 26, 1985. At that point we determined that it would be appropriate to obtain IE concurrence in the proposed response to TVA. This additional action which was not contemplated in the original schedule, nor in the scheduling guidance established in the Manual Chapter, resulted in a delay in completing the action. A detailed chronology of events is presented in the Enclosure. I continue to believe that requesting IE concurrence was a prudent action in this case and that it reflects the kind of thoughtful management involvement that is needed in dealing with backfitting issues.

In addition, we entered the appropriate information on this issue into both the Division of Licensing's tracking system and the agency-wide tracking system. This information is currently included in our monthly status reports.

We are sensitive to the need to manage plant-specific backfitting activities in a controlled and timely manner. Therefore, we will continue to make every effort to be consistent with the Draft Manual Chapter.

A handwritten signature in dark ink, appearing to read "HR Denton", is written above the typed name.

Harold R. Denton, Director
Office of Nuclear Reactor Regulation

Enclosure:
As stated

CHRONOLOGY OF STAFF ACTIONS

- ° June 5 - Responsible staff completed the determination which was concurred on by his Branch Chief and the Acting Branch Chief of the appropriate licensing branch.
- ° June 6 - Branch Chief of the appropriate operating branch concurred.
- ° June 11 - Appropriate Assistant Director in the Division of Licensing concurred.
- ° June 17 - Appropriate technical review Branch Chief and Deputy Director of the technical division concurred.
- ° June 21 - Director, Division of Licensing concurred.
- ° June 26 - The office of the Deputy Director, NRR, received the determination.
- ° June 27 - Determination was returned to the author with concern that the Vendor Program Branch should also concur.
- ° July 31 - Branch Chief of the Vendor Program Branch and Director of IE concurred.
- ° August 13 - Deputy Director concurred.
- ° August 16 - Director, NRR, concurred.
- ° August 19 - Determination issued to the licensee and the EDO.