

MAY 27 1976

PDR

50-263

Darrell G. Eisenhut, Assistant Director for Operational Technology, DOR
MONTICELLO TECHNICAL SPECIFICATION CHANGES

On April 2, 1976, the Reactor Safety Branch responded to a technical assistance request issued by ORB-2 regarding Technical Specification changes requested by Monticello. On May 18, 1976 (more than six weeks later) we were requested to concur in a package being sent to the licensee. I pointed out that we had already issued a response to their TAR, and that no concurrence was required. Mr. Ziemann called me and stated that projects had extensively rewritten our input because of the poor quality of the writing. I understand the same complaint was voiced at the staff meeting on May 20, 1976.

Enclosed are: (1) the SER in the package prepared by projects, and (2) our response to the TAR. I have reviewed these items and make the following observations:

- (1) The Introduction section was rearranged and reworded. I question that the revised version represents an improvement.
- (2) The conclusion section was replaced with the standard wording regarding health and safety of the public and common defense and security. (We could conclude all of our TAR responses with those standard words if you wish).
- (3) The majority of the text of our TAR response was used verbatim in the project package. Some sentences were reworded but I don't think the rewording aided the clarity. Several sentences were added by projects. These in my opinion, did improve the SER.
- (4) The magnitude of the changes were sufficiently minor that no concurrence by you or I was really needed. In such situations, the project manager should merely confirm with the originator of our TAR that the changes were not substantive.

I would also like to make a general recommendation regarding the Safety Evaluation Reports prepared by the Reactor Safety Branch that respond to TAR's dealing with core reloads. It appears that, with the assistance of licensing project managers, we could develop a set of standard SER's that would be applicable to most reload cases. (For example, GE supplied fuel in a BWR, Westinghouse supplied fuel for a Westinghouse reactor, etc.) Each of these standard SER's would be prepared in the format needed for the final package issued by the Project Branches. The wording in each standard SER would be thoroughly reviewed by Projects and the RSB, and then typed on the VYDEC. In this manner I think we could:

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- (1) Make the overall operation of the Division of Operating Reactors more efficient. It would no longer be necessary to have a reload SER edited, typed, and proof read separately by Operating Technology and Projects.
- (2) Eliminate much of the impact of the variation in the writing ability of individual RSB reviewers and project managers.
- (3) Avoid some of the poorer quality writeups that occur when the review schedule is shortened for any of a variety of reasons.

If you agree with my recommendation, please ask Karl Goller to assign a member of his staff to identify several SER's that could serve as candidates for the standard SER's.

Robert Baer, Chief
Reactor Safety Branch
Division of Operating Reactors

Enclosures:
As Stated

cc: V. Stello
K. Goller
D. Ziemann

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