

From: Peter Tam
To: INTERNET:David.distel@exeloncorp.com;
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Date: 6/4/02 1:16PM
Subject: Comments on Proposed Amendment **(TAC MB2893)**

David:

This e-mail, regarding LCO 3.9, is followup of the telecon that took place on 5/31/02 with our reviewer Zena Abdullahi.

It is the staff's understanding that the proposed amendment is not intended to disable the refueling interlocks indefinitely. The refueling interlocks are built-in design bases features intended to prevent inadvertent criticality due to human error. Your proposed to provide an equivalent protection to ensure that all control rods are inserted, and cannot be withdrawn during fuel movement. Specifically, the proposed amendment will substitute an automatic feature with a verification that all CRs are inserted. However, such verification is subject to human errors. The proposed alternative option is merely intended to provide you with the flexibility to continue fuel movements under certain circumstances. The proposed amendment is not intended to expedite the refueling outage by performing fuel movement without the refueling interlocks, or avoiding performance of SR 4.9.A before starting in-vessel fuel movement, by declaring the refueling equipment interlocks inoperable.

Thus, to clarify the intention of your proposed change to LCO 3.9.C, the Basis for LCO 3.9 can probably be benefitted by wording such as:

"It is not the intent of the alternative option in LCO 3.9.C to eliminate the first performance of SR 4.9.A prior to in-vessel fuel movement. It is expected that the refueling interlocks would be operable except for equipment failures or expiration of the required surveillance interval. Core alteration will not be performed with the refueling interlocks inoperable solely for convenience or for expediting the refueling process."

Your supplement to the amendment application should also name existing plant procedures that enforce the surveillance requirements of the refueling interlocks before fuel movement. The staff would like to be able to recognize that while the Basis as revised above is not enforceable, the intent of the proposed amendment is established with no ambiguity by the existence of proper wording in the Bases section and plant procedures.

In addition, we recommend that you consider some sort of separate identification for the two action statements in 3.9.C. This will allow referring to each action statement separately, i.e. LCO 3.9.C.1 and 3.9.C.2.

This e-mail does not convey a formal NRC staff position, and does not formally request additional information. Its sole objective is to prepare you for a phone conversation.

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