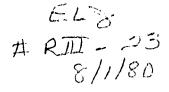


UNITED STATES NUCLEAR REGULATORY COMMISSION REGION III

799 ROOSEVELT ROAD GLEN ELLYN, ILLINOIS 60137



July 25, 1980

MEMORANDUM FOR: E. L. Jordan, Assistant Director for Technical Programs,

Division of Reactor Operations Inspection, IE

THRU:

R. F. Heishman, Chief, Reactor Operations and Nuclear

Support Branch, RIII

FROM:

D. C. Boyd, Chief, Reactor Projects Section 4

SUBJECT:

PALISADES PLANT -- TECHNICAL SPECIFICATION INTERPRETATION CONCERNING THE OPERATION OF THE CONCENTRATED BORIC ACID

TANKS (ÁITS FO3084680)

The attached letter from B. L. Jorgensen is self-explanatory. The point to be emphasized is that the licensee's interpretation of Technical Specification 3.2.2.c is that it permits routine operation with one of the concentrated boric acid tanks essentially empty as long as the redundant tank level is at 118 inches or greater. This is the current operating practice at this plant.

In our view this practice is contrary to the basic redundancy concept employed in most safety related systems. This system is designed to accommodate the redundancy concept, yet it is being operated as if only one concentrated boric acid tank exists; or is necessary. We believe that the intent of Technical Specification 3.2.2.c is to provide for short-term operational and maintenance flexibility but that it is not intended to permit long-term operation with one tank essentially empty.

It is requested that this matter be referred to the appropriate NRR branch for review and clarification.

Reactor Projects Section 4

Enclosure: Memo dtd 7/25/80