



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
REGION III  
799 ROOSEVELT ROAD  
GLEN ELLYN, ILLINOIS 60137

EL8  
# RIII - 23  
8/1/80

July 25, 1980

MEMORANDUM FOR: E. L. Jordan, Assistant Director for Technical Programs,  
Division of Reactor Operations Inspection, IE

THRU: *A* 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 (AITS 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.

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

Enclosure: Memo dtd 7/25/80

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