

APR 29 1982

Docket File
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MEMORANDUM FOR: Themis P. Speis, Assistant Director
for Reactor Safety
Division of System Integration

FROM: Thomas M. Novak, Assistant Director
for Operating Reactors
Division of Licensing

SUBJECT: CONTROL ROD POSITION- MULTI-PLANT ISSUE E-06

By memorandum on the above subject dated February 1, 1982, you recommended, "that the enclosed technical specifications be implemented by license amendment for Fort Calhoun, Palisades, and Maine Yankee." After careful consideration of this recommendation by the assigned PM and the LPM for E-06, we find the proposed TS inappropriate for the following reasons.

- o Palisades and Ft. Calhoun designs utilize a "synchro system" for primary position indication on their rack and pinion drive mechanism instead of the "pulse counting system" used on the magnetic jack type drives at the other CE designed units. Therefore, much of the proposed TS does not apply to these two units.
- o Although the Maine Yankee custom TS do not have specific operability requirements for CEA position indication systems, they do have position comparison and shift surveillance requirements (see enclosed copy of TS).
- o The recommendation that "... the enclosed technical specifications be implemented by license amendment ..." is clearly a backfit proposal. As such, DSI should prepare the necessary analyses to gain CRGR approval prior to requesting DOL to take the recommended action.

We concur with your closeout of the E-06 TACs for the Palisades, Ft. Calhoun and Maine Yankee units at the present time. Any additional review you perform may be done under plant specific TACs. Please contact the assigned PMs for new TAC numbers as necessary.

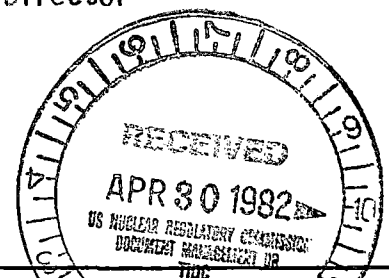
Original signed by:
Thomas M. Novak

Thomas M. Novak, Assistant Director
for Operating Reactors
Division of Licensing

cc: w/enclosure

T. Speis
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4/23/82



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DATE	4/23/82	4/23/82	4/ /82	4/17/82	4/27/82	4/28/82	4/29/82