UNITED STATES
ATOMIC ENERGY COMMISSION
DIRECTORATE OF REGULATORY OPERATIONS
REGION I
631 PARK AVENUE
KING OF PRUSSIA, PENNSYLVANIA 19406

JAN 3 1975

H. D. Thornburg, Chief, Field Support and Enforcement Branch, RO:HQ

RO INSPECTION REPORT 50-289/74-35 (Track #F14043HO)

The subject report is forwarded for Headquarters action as follows:

1. Revision of Technical Specifications with respect to 100% rated power.

As noted in report Deta [illegible]), there is an apparent discrepancy between the Technical Spec[illegible]cations and the license with regard to the limit on reactor power. Also the regional position on this matter, which was provided to the licensee, is stated. Our position was based on the following:

a. License Condition 2.c(1) is in itself explicit, and compliance with this limit is, in our opinion, determined by heat balance in accordance with Technical Specifications Table 4.1-1, Item 3.

b. The Technical Specification limit of 102% power refers, in our opinion, to power determined by the power range channels (neutron detectors) which provide input signals to the protection system reactor power/imbalance trip circuit.

c. According to Technical Specifications Table 4.1-1, Item 3, when the core heat balance and the power range channels differ by more than 2%, the power range amplifier for the affected channel(s) must be recalibrated. Therefore, core power by heat balance could be 2535 MWt (licensed power) and core power by power range monitors could be 102%, the license and Technical Specifications would be adhered to, and the apparent discrepancy referred to disappears.

We believe that the proper method of clearing up this matter, is by an appropriate change to Section 3 of the Technical Specifications, i.e., defining a new LCO. We would like to see a specification which addresses core power limit, as identified in the facility license, the method for determining core power, and the actions required when this limit is exceeded. Additionally, this recommendation should be applied generically for inclusion in Standard Technical Specifications currently being developed by DL and to other facilities which, like Three Mile Island, are not explicit in this regard.

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2. Revision of Technical Specifications with respect to shock suppressor surveillance.

As noted in report Detail 2.b(8), several snubbers were found with very little fluid in their reservoirs, and the licensee's resolution of this specific problem and long term corrective actions are discussed. Other similar failures have been reported by the licensee (Abnormal Occurrence Reports Nos. 50-289/74-14, 74-20 and 74-23) and additional commitments are described in these reports.

These failures were detected during surveillance inspections started by the licensee in August 1974 as a result of suggestions made by our inspector because Technical Specifications Table 4.1-2, Item 11 only requires inspection at refueling intervals. Additionally, Calvert Cliffs Technical Specifications Table 4.2-2, Item 24 also requires inspection at refueling intervals.

We believe that refueling interval inspections are inadequate based on Met Ed's experience and are inconsistent with the inspection frequency for Bergen-Patterson and other brand suppressors established by DL correspondence to several licensees following initial discovery of this problem with Bergen-Patterson snubbers (example enclosed as Enclosure 1). In the case of Met Ed the snubbers involved have been manufactured by Grinnell.

We recommend that the Technical Specifications for all licensees should include inspections of snubbers at 120 day intervals.

E. J. Brunner, Chief
Reactor Operations Branch

Enclosure:
As stated
cc: J. Davis
K. Seyfrit
F. Dreher

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