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I can not concur with the T-H writings on Oconee. We require a Tech. Spec. limit on coolant flow. See, for example, Pebble Springs or all standard plants. It is even more important to issue a Tech. Spec. on flow when a plant is taking credit for measured flow instead of design flow. Typically, the Tech. Spec. limit is 5% higher than the flow used for safety evaluation. The 5% accounts for errors in the continuous monitoring device, drift and calibration errors. In addition to this 5%, the applicant usually retains a 2 to 3% operating band. If the flow drops below the Tech. Spec. limit, power reduction is required. For details, see the Omaha or BG & E Tech. Spec.

The total 1% margin proposed on Oconee is obviously inadequate. There is no mention in the write-up of continuous monitoring and the uncertainties of continuous monitoring. Instead, reference is made to a three year-old measurement, that is not relevant to the new core. I am aware of the flux/flow trip; this trip, however, provides no help for occurrences when the primary protection is not the overpower trip. There is no mention of how the uncertainties of the continuous flow measurement are accounted for in the setting of the flux/flow trip.

In light of the flow anomalies observed during the past few years, (BG & E, for example) I do not think we should let Oconee start up without a well-documented Tech. Spec. limit on coolant flow. The matter requires urgent attention.

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