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UNITED STATES NUCLEAR REGULATORY COMMISSION WASHINGTON, D. C. 20555

MAY 21 1981

Docket No. 50-70

Mr. R. W. Darmitzel, Manager Irradiation Processing Product Section Vallecitos Nuclear Center General Electric Company P. O. Box 460 Pleasanton, California 94566

Dear Mr. Darmitzel:

We have completed our initial review of your March 11, 1981 proposed Technical Specifications regarding the GETR seismic modification and have determined that the additional information identified in the enclosure is necessary to continue our review.

Please provide this information within 60 days of receipt of this letter.

Sincerely,

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Robert A. Clark, Chief Operating Reactors Branch #3 Division of Licensing

Enclosure: As stated

cc: See next page



General Electric Company

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Calfornia Department of Health ATTN: Chief, Environmental Radiation Control Unit Radiologic Health Section 714 P Street, Room 498 Sacramento, California 95184

Honorable Ronald V. Dellums ATTN: H. Lee Halterman 201 13th Street Room 105 Oakland, California 94617

Friends of the Earth ATTN: Glenn W. Cady, Esquire Law Offices of Carniato & Dodge 3708 Mt. Diablo Blvd. Suite 300 Lafayette, California 94549

Jed Somit, Esquire 100 Bush Street Suite 304 San Francisco, California 94104

Herbert Grossman, Esquire, Chairman Administrative Judge Atomic Safety and Licensing Board U. S. Nuclear Regulatory Commission Washington, D.C. 20555

Dr. George A. Ferguson Administrative Judge School of Engineering Howard University 2300 6th Street N.W. Washington, D.C. 20059

George Edgar, Esquire Morgan, Lewis & Bockius 1800 M Street, N.W. Washington, D.C. 20036 Dr. Harry Forman Administrative Judge Box 395, Mayo University of Minnesota Minneapolis, Minnesota 55455

Ms. Barbara Shockley 1890 Bockman Road San Lorenzo, California 94580

Advisory Committe on Reactor Safeguards U. S. Nuclear Regulatory Commission Washington, D.C. 20555

Prof. William J. Hall 1245 Civil Engineering Building University of Illinois Urbana, Illinois 61801 Request For Additional Information

GETR Seismic Modifications

Technical Specifications

(Applicable Technical Specification

Number in Parentheses)

- 1. (4.6) Describe the supplemental cooling method to be used, if necessary, for the fuel storage canal.
- 2. (4.6) Propose wording such that this specification does not permit transfer of additional fuel assemblies into the fuel storage canal if the temperature limit is exceeded.
- 3. (4.5) Provide a list of the required pool and canal instrumentation to be included in this specification.
- 4. (4.5) With irradiated fuel in the fuel storage canal or reactor, the canal/pool instrumentation is required regardless of the operating status of the reactor. Therefore, modify your proposed specification to require operability checks for these instruments at least monthly.
- 5. (4.5) Since your analysis assumed an initial canal water level, propose a specification which requires that this level be maintained.
- 6. (6.11) Describe the relative timing between engaged switch closure (6.11) and deenergization of electromagnets (6.2).
- 7. (7.1, 7.6, 7.7, 7.8, 7.9, 7.10, 7.11, 7.12)

It is our understanding that the seismic restraints, missile impacts system, Canal Impact Pad and permanent pool shielding restraints are permanent passive modifications to the facility. These modifications are part of the facility design for which resumption of operation may be authorized. Any change to these modifications would require your evaluation and possibly our evaluation pursuant to 10 CFR §50.59 and specification (9.23). Furthermore, we do not normally require technical specifications regarding visual inspection of passive structural supports. Therefore, in lieu of these proposed specifications you should incorporate any inspections deemed appropriate into you periodic maintenance and test procedures.

8. (4.1) Propose a change which specifies a minimum pool level above the core during power operation consistent with your analysis.

- 9. (7.13) This fuel flooding system (FFS) specification is unacceptable as proposed. You should revise your proposed specification to include the following elements.
 - a. Both trains of the FFS should be operable whenever irradiated fuel is in the reactor or storage tanks. Power operation with only one train operable should be restricted to 72 hours. With no trains operable the reactor should be shutdown within six hours.
 - b. Minimum flow rates and tank levels must be specified.
- 10. (7.13 Basis) These flow rates and leak rates are not consistent with (exceed) those previously evaluated. Discuss these differences in detail and include your justification for not limiting pool and canal leakages in accordance with your analysis.
- 11. (7.5) All subject valves should be listed by valve name and number in a table with their associated operability check frequency. Active valves should be checked no less frequently than quarterly. Check valve integrity may be checked annually.
- 12. Propose a specification which assures that the decay heat rate of fuel in the core will not exceed that associated with 25 days of operation at 50 Mw.
- 13. As discussed on page IIA-8 of the staff's October 27, 1980 safety evaluation, propose a specification which will limit core discharges to occur no earlier that 6 nours after reactor shutdown.
- Identify which check of the seismic scram system verifies the operability of the installed DC batteries.
- 15. As discussed on page II.C-9 of our October 27, 1980 safety evaluation, propose a specification which, pending further evaluation, would preclude the use of aluminum experiment capsules.