



MAINE YANKEE ATOMIC POWER COMPANY •

ENGINEERING OFFICE

1671 WORCESTER ROAD
FRAMINGHAM, MASSACHUSETTS 01701
617-872-8100

July 2, 1981
FMY 81-99
2.C.2.1

United States Nuclear Regulatory Commission
Washington, D.C. 20555



Attention: Office of Nuclear Reactor Regulation
Division of Licensing
Operating Reactors Branch #3
Mr. Robert A. Clark, Chief

- References:
- (a) License No. DPR-36 (Docket No. 50-309)
 - (b) MYAPC Letter to USNRC, FMY 81-65, Proposed Change No. 84, April 28, 1981
 - (c) MYAPC Letter to USNRC, FMY 81-79, dated May 15, 1981

Subject: Withdrawal of Request to Remove Shutdown Margin T.3.3.10.A.3
From Proposed Change No. 84

Dear Sir:

In Reference (b), Maine Yankee requested the minimum shutdown reactivity requirement of Technical Specification 3.10.A.3 be deleted because that requirement is redundant to the requirement of Technical Specification 3.10.A.2. You disagreed on the basis that such a limit has historically been imposed. We hereby withdraw our request to modify Specification 3.10.A.3, although the issue may be discussed further at a later date.

As stated in our letter, Reference (c), the minimum available CEA worth at Hot Zero Power, at 4000 MWD/MTU burnup is 3.78% delta rho with the highest worth CEA stuck out of the core, including a 10% uncertainty. The very conservative estimate of steam line break cooldown reactivity addition is 3.57% delta rho.

As you can see our minimum available CEA worth is more than adequate to compensate for very conservatively calculated steam line break reactivity additions. Therefore, we do not consider the available shutdown margin value of 3.2% delta rho in Technical Specification 3.10.A.3 an important issue in approving the cycle 6 core reload submittal. You may modify this section as deemed appropriate within the bounds of our minimum available CEA worth, although it does not seem reasonable to require more than the 3.57% delta rho reactivity addition described in Reference (c).

If you have any questions please contact us.

Very truly yours,

MAINE YANKEE ATOMIC POWER COMPANY

Robert H. Groce
Robert H. Groce
Senior Licensing Engineer

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PDR ADOCK 05000309
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