RELIABLE ELECTRICITY FOR MAINE SINCE 1972

laine Yankee

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January 31, 1990 MN-90-14 CDF-90-17

UNITED STATES NUCLEAR REGULATORY COMMISSION Attention: Document Control Desk Washington, DC 20555

References: (a) License No. DPR-36 (Docket No. 50-309)

(b) USNRC Letter to MYAPCo dated November 21, 1989 - NRC Bulletin No. 89-03, Potential Loss of Shutdown Margin During Refueling Operations

Subject: NRC Bulletin No. 89-03: Potential Loss of Required Shutdown Margin During Refueling Operations

## Gentlemen:

NRC Bulletin 89-03, Reference (b), identified a concern regarding the potential loss of shutdown margin during refueling operations. The problem presented was the potential loss of shutdown margin resulting from the placement of highly enriched fresh assemblies in intermediate core locations during refueling operations. In order to assure an adequate shutdown margin is maintained during all refueling operations, the following actions were requested:

#### NRC Request:

Assure that any intermediate fuel assembly configuration (including control rods) intended to be used during refueling is identified and evaluated to maintain sufficient refueling boron concentration to result in a minimum shutdown margin of approximately 5%.

#### Maine Yankee Response:

Fuel assembly configurations (including control rods) intended to be used during refueling are identified in procedures and evaluated to ensure that minimum shutdown margin is maintained.

### NRC Request:

Assure that fuel loading procedures only allow those intermediate fuel assembly configurations that do not violate the allowable shutdown margin and that these procedures are strictly adhered to.

#### Maine Yankee Response:

Fuel loading procedures prohibit use of intermediate fuel assembly configurations which have not been evaluated to ensure minimum shutdown margin has been maintained.

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# NRC Request:

Assure that the staff responsible for refueling operations is trained in the procedures recommended in Item 2 above and understand the potential consequences of violating these procedures. This training should include the fundamental aspects of criticality control with higher enriched fuel assemblies.

## Maine Yankee Response:

This item will be addressed by training in the procedures that assure the core configuration is maintained in accordance with the assumptions used in the required shutdown boron concentration analysis. This training is scheduled to be provided to the staff responsible for supervising refueling operations prior to the next core refueling.

We trust this information is satisfactory. Please contact us should you have any questions in this matter.

Very truly yours,

Charles D. Frizzle President

CDF:SJJ

c: Mr. William T. Russell Mr. Eric J. Leeds Mr. Cornelius F. Holden

## STATE OF MAINE

Then personally appeared before me, Charles D. Frizzle, who being duly sworn did state that he is President of Maine Yankee Atomic Power Company, that he is duly authorized to execute and file the foregoing response in the name and on behalf of Maine Yankee Atomic Power Compary, and that the statements therein are true to the best of his knowledge and belief.

Barbara Notary Public lavaxa

BARBARA J. PADAVANA NOTARY PUBLIC, MAINE MY COMMISSION EXPIRES JUNE 20, 1006