

October 27, 1983

Note to: J. Scinto

From: R. Rawson

SUBJECT: BROWNS FERRY AMENDMENT PACKAGE RELATING TO REDUCTION OF
MINIMUM WATER LEVEL

The statement of basis as to why the Staff proposes to find that this amendment raises no significant hazard considerations is, in my view, inadequate. I do not doubt that Commission example (iv) may encompass this amendment, but the explanation as to why that is the case here does not do the job. First, the distinction drawn between "a health physics requirement" and a "safety limit" is not at all obvious to me. Second, some explanation is needed as to why the change from a minimum water level above a single irradiated fuel assembly from 6½ feet to 5½ feet "will not result in any reduction in a reactor safety margin." The explanation of licensee's discussion of the 10 CFR 50.92 standard does not cure these deficiencies because it fails to address the third prong of that standard.

Until these defects are cured, I would not recommend OELD concurrence.



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