September 26, 1983

Note to: Jim Miller

Bob Lee

SUBJECT: ARKANSAS 2 FUEL CONCENTRATION LIMITS (OELD # 837 040)

I do not agree with this package at all. This package is purportedly going to amend Section 5 of the Tech Specs to change the fuel concentration limits described in Section 5 and then subsequently they're going to do a 50.59 analysis of the core using the higher enrichment fuel. No go. The change of concentration in the fuel is for use in the core. This is a change that has to be authorized in connection with an authorization to use that fuel. I cannot agree that you can modify the tech spec to allow the possession of the higher fuel without intrinsicly authorizing its subsequent use in the core. The guys are not allowed to possess fuel just for the laughs. They're allowed to possess fuel only for use in the core. Unless you're ready to authorize use in the core, you should not separate out the actions so that the eventual use of this fuel in the core is treated under 50.59. That is not acceptable. This may be the applicant's request and if that's the applicant's request, I want some description of this in the notice - that this is a request for modification of the fuel possession limit. This is not a modification which authorizes fuel in the core. Subsequently, after the Sholly notice, this request should be denied. This is not an acceptable request, to separate out possession and the subsequent use in the core.

Joe Scinto