September 29, 1983

Note to Bob Lee

SUBJECT: ARKANSAS FUEL ENRICHMENT AMENDMENT

Your proposed modification is somewhat vague in reflecting the position
expressed by Burlinger and Fino. I think it needs to be much clearer.
I recommend that the paragraph you have included which starts with the
words "Fuel enrichment" and ends with the words "not a safety limit in
itself" be deleted, and substitute the following paragraph:

> "This change merely permits the possession of fuel of this
> concentration as part of the fuel for the facility. It
> does not authorize its use in the core. Such use would be
> authorized by the existing technical specifications provided
> that the various reactor core safety limits and LCO's set
> forth in the technical specifications, including dynamic
> parameters, rod worths and peaking factors, are satisfied by
> the particular design of the proposed core loading. Specifi-
> cation of reload fuel enrichment, alone, does not uniquely
> determine nor limit the value of reactor core parameters
> important to safety. In other words, fuel enrichment of the
> low enrichment type considered in this amendment has no bearing
> on the safe operation of the reactor core provided that exist-
> ing safety limits and LCO's are satisfied. Therefore, this
> amendment would not authorize operation of the reactor with a
> core reload with assemblies significantly different from those
> previously found acceptable for previous cores at this facility."

The last sentence is necessary since one of the examples of a no significant
hazards consideration amendment is example (iii) which refers to reloads in
which there are no fuel assemblies significantly different from those
previously found acceptable. That's the finding that is necessary for this
thing. If you can't support that finding, then there is trouble with this
package.

Joe Scinto

32