



UNION CARBIDE CORPORATION P. O. BOX 324, TUXEDO, NEW YORK 10987
 MEDICAL PRODUCTS DIVISION TELEPHONE NUMBER: (914) 351-2131

November 6, 1984

The Director of Nuclear Reactor Regulation
 U. S. Nuclear Regulatory Commission
 Washington, DC 20555

Attn: Division of Licensing

Gentlemen:

Union Carbide submitted to the NRC an R-81 License renewal application on May 23, 1980. On September 28, 1984 the NRC's Division of Licensing issued Union Carbide a renewed R-81 License.

Upon review of the new license Technical Specifications Union Carbide has noted four areas where corrections or clarifications are needed. These items are described in Exhibit 1 attached.

These four items consist of one typographical error and three clarifications of terminology regarding safety limits and operational setpoints. Union Carbide expressed its views on this terminology issue in a March 23, 1984 letter to the Commission.

Union Carbide has not forwarded and does not believe an additional licensing fee is required because:

1. the requested changes are in effect a final detail of the license renewal process upon which the appropriate licensing fee has been submitted,
2. the changes are minor in nature, clarifications, or section placement corrections, and
3. the attached terminology clarifications were expressed to the NRC prior to the September 1984 re-issuance of the license.

Sincerely,

WGRuzicka
 W. G. Ruzicka
 Manager, Nuclear Operations

WGR:js
 Attachment

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AVIS L. NORTON
 Notary Public, State of New York
 No. 4700803 Qualified in Orange Co.
 Commission Expires March 30, 1985

EXHIBIT 1

Technical Specification Change Request

License No. R-81, Docket No. 50-54

1. Section 2.1.1 - Specifications

Delete: 1) The maximum steady power level under various flow conditions shall be less than or equal to 5 MW (nominal).

Add: 1) The safety limit shall be 14 MW at 1800 gpm primary coolant flow rate.

2. Section 2.1.1 - Specifications

Delete: 3) Flow shall not be less than 1800 gpm for power above 250 KW.

3. Section 2.1.2 - Specifications

Delete: 1) The maximum reactor power level shall be 500 KW

Add: 1) The safety limit shall be 6.7 MW

4. Section 3.5.1 - Specifications

Delete: See Section 3.3.5

Add: See Section 3.5

Reasons for Requested Changes

Change 1) The maximum steady state operating power level of 5 MW is a Limiting Safety System Setpoint and it is covered in Section 2.2.1 Specification 2. The safety limit, as defined in Section 1.0 "Definitions" and 10 CFR 50.36, is 14 MW at 1800 gpm. This fact is already covered in Sections 2.1.1 "Basis" where it refers to Section A1 of Appendix 2 of the Safety Analysis Report.

Change 2) The 1800 gpm flow requirement above 250 KW is a Limiting Safety System Setpoint and it is covered in Section 2.2.1 Specification 3.

Change 3) The maximum power level in the natural convection mode of operation is a Limiting Safety System Setpoint and it is covered in Section 2.2.2 Specification 1. The safety limit, as defined in Section 1.0 "Definitions" and 10 CFR 50.36, is 6.7 MW in the natural convection mode. This fact is already covered in Sections 2.1.2 "Basis" where it refers to natural convection burnout as being 6.7 MW.

Change 4) Typographical error.