Docket No. 50-346

Mr. Richard P. Crouse Vice President, Nuclear Toledo Edison Company Edison Plaza - Stop 712 300 Madison Avenue Toledo, Ohio 43652 DISTRIBUTION

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Dear Mr. Crouse:

SUBJECT: SUBCOOLING MARGIN IN TECHNICAL SPECIFICATION

As part of the staff's review of Multiplant Action (MPA) number B-57, dealing with technical specifications for decay heat removal, we identified a possible nonconservatism in the standard technical specifications regarding the required subcooling margin that must be established when reactor coolant pumps are to be secured in modes 3, 4 and 5. The required subcooling margin is stated to be 10°F. However, when instrument uncertainties and elevation head effects are taken into account, this subcooling margin may not be sufficient to prevent flashing in the higher elevation of the hot legs and steam accumulation at the top of the hot leg U-bends with consequent interruption of natural circulation, the very condition the subcooling margin was designed to prevent.

You are therefore requested to evaluate the adequacy of the subcooling margin specified in Technical Specification 3.4.1.2 that must be established for natural circulation conditions, and ensure that a sufficient margin exists such that void formation is precluded when instrument error and elevation effects are accounted for. If you conclude that the margin specified is inadequate, you should propose a revised subcooling margin which will ensure that void formation does not occur when decay heat removal is through natural circulation only. Please confirm the adequacy of the specified subcooling margin or submit a proposed revision to your technical specifications no later than July 15, 1985.

Sincerely,

\*ORIGINAL SI SY JOAN F. STOLA\*

John F. Stolz, Chief Operating Reactors Branch #4 Division of Licensing

cc: See next page

ORB#4:DL ORB#4:DL ADeAgazio;cr JStolz 6/3/85

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