OPTIONAL FORM NO. 10
5010-104

UNITED STATES GOVERNMENT

Memorandum

NOV 7 1963

TO : Eber R. Price, Assistant Director
Division of Licensing and Regulation

DATE:

FROM : L. Kornblith, Jr., Assistant Director
for Reactors
Division of Compliance L. Kornblith, Jr.

SUBJECT: PACIFIC GAS & ELECTRIC CO. (HUMBOLDT BAY)
DOCKET NO. 50-133

ATTN: R. G. Page (3)

Attached is a report by our field inspector of a visit to the subject facility on September 30-October 1, 1963.

You will note the discussion of the question of compliance with Section B.1.b.(1) of the technical specifications for License DPR-7. It appears that the licensee has interpreted this specification on maximum reactor power to mean nominal power and has thus operated routinely at 165 ± 2 Mwt. We do not believe that this type of operation raises any question regarding the safety of operation; however, such operation is not in accord with our interpretation of the technical specification as written. We have included, as an appendix to this report, an explanation by the licensee of their interpretation of the technical specification including their method of power level calculation and the sources of error.

This might be an appropriate opportunity to suggest a slightly different approach to drafting technical specifications for power limits. There are two aspects to be considered in determining limits: first, the point at which one is concerned about heat removal or stability and, second, the fission product inventory. The first point determines the power trip setting; the second determines the average power. If PG&E, in their hazards report, used 120% of 165 megawatts for a trip point, then the trip setting specified in the technical specifications should be 115% (to allow for instrument errors) of 165 megawatts, or a trip setting of 190 megawatts. If their accident calculation assumed a fission product inventory based on an average operating power of 165 megawatts, this should be specified as an average power limit, not as a maximum. They would, then, be allowed to operate as close to the trip point as they wished, provided

(continued)

L. 7475

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(continued)

the power averaged over some suitable period (perhaps a month) did not exceed the specified average. (The numbers used above are selected to illustrate the point. Actually, the Humboldt Bay Hazards Report is based on 230 megawatts rather than 165.)

Attachment:
Rpt by R. T. Dodds
dtd 10/15/63

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