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April 21, 1976

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Mr. Robert W. Reid, Chief
Operating Reactors Branch #4
Division of Reactor Licensing
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Re: Docket No. 50-133
License No. DPR-7

Dear Mr. Reid:

This is in response to your letter dated February 17, 1976 requesting a review of the reactor coolant system pressure-temperature limits contained in the Technical Specifications for Humboldt Bay Power Plant Unit No. 3. We have reviewed the minimum fracture toughness requirements for materials of pressure-retaining components of the reactor coolant pressure boundary as specified in 10 CFR 50, Appendix G. We believe that Section IV.B.2 of the Humboldt Bay Technical Specifications establishes a pressure-temperature limit that is conservative with respect to Appendix G for performing system hydrostatic tests. The heatup and cooldown operations in the Humboldt Bay reactor preclude the pressurization of the primary system at temperatures of interest for fracture toughness requirements because of the saturation properties of water. Reactor core criticality tests are either performed at cold conditions with no pressure on the system or at hot conditions with the pressure defined by the steam conditions, which sets the system temperature well above any area of concern for fracture toughness requirements.

In our opinion, the Technical Specifications now provide adequate margins of safety during any condition of normal operation including anticipated operational occurrences and system hydrostatic tests. We believe that no changes in the existing Technical Specifications for Humboldt Bay are required to comply with Appendix G.

Very truly yours,

Philip A. Crane
4661

8602100075 851212
PDR FOIA
FIREST085-665 PDR



50-133

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TO: Mr Reid

FROM: Pacific Gas & Electric
San Francisco, Calif
P A Crane Jr

DATE OF DOCUMENT

4-21-76

DATE RECEIVED 4-27-76

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one signed

DESCRIPTION

Ltr re our 2-17-76 ltr....furnishing info
concerning compliance with Appendix G....

ENCLOSURE

PLANT NAME: Humboldt Bay

SAFETY

FOR ACTION/INFORMATION

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