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May 14, 1985
RBG- 20974
File Nos. G9.5, G9.8.6.2

Mr. Harold R. Denton, Director
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Mr. Denton:

River Bend Station - Unit 1
Docket No. 50-458

Enclosed for your review is a Gulf States Utilities' response to the NRC Staff's concerns identified in Mr. A. Schwencer's letter of April 9, 1985. Please advise if further information is required.

Sincerely,

J. E. Booker

J. E. Booker
Manager-Engineering,
Nuclear Fuels & Licensing
River Bend Nuclear Group

JEB/ERG/je

Attachment

B001
1/1

ATTACHMENT 1

NRC Concern

Section 9.2.7 discusses the standby service water (SSW) system and its interconnection to other safety-related systems. Normally, the SSW system is isolated from the safety-related systems and the normal service water (NSW) system by closed isolation valves. Two of these isolated safety-related systems and the normal service water (NSW) system by closed isolation valves are the reactor plant component cooling water (RPCCW) system and the containment unit coolers. The applicant stated in Amendment 16 that these isolation valves will only be tested during refueling, approximately every 18 months. Maintenance can, and probably will, be performed on these valves during power operation. If this is true then this testing frequency is not acceptable. These valves should be tested in accordance with the ASME Boiler and Pressure Vessel Code Section XI.

Response

These valves will be tested in accordance with the requirements of 10CFR50.55a(g) which references the ASME Boiler and Pressure Vessel Code Section XI.

ATTACHMENT 2

NRC Concern

Amendment 16 eliminated one means of identifying primary boundary leakage by deleting the discussion of the sump fillup rate and pump out time signals from paragraphs 9.3.3.5.1 and 9.3.3.5.5. These signals, prior to Amendment 16, were processed by the plant computer and alarmed in the main control room when the leakage rate exceeded a setpoint. These two paragraphs are concerned with the drywell and containment equipment drains and the reactor building floor drains, respectively. This feature was reviewed as part of the primary boundary leakage detection system and as part of the "defense-in-depth" concept and therefore was relied upon as part of our basis for finding the primary boundary leakage detection system acceptable. It is our position that further justification for these features be presented or that they should be reinstalled.

Response

As indicated in FSAR Sections 5.2.5.1.1 and 5.2.5.1.2, sump fillup rate and/or pump out timers do activate an alarm in the main control room when the leakage rate exceeds a setpoint. To clarify Section 9.3.3.5, the attached revisions will be incorporated in a future amendment.

9.3.3.5 Instrumentation Requirements

9.3.3.5.1 Reactor Building/Fuel Building Equipment Drains

Drywell and Containment Equipment Drains

Control switches are provided in the main control room for either automatic or manual operation of the drywell and containment equipment drain sump pumps (P1A, B and P2A, B). The level in the drywell and containment sumps (TK1 and TK2) is continuously monitored, and control logic is provided for automatic starting and stopping of the sump pumps. Alternate selection of the lead and standby sump pumps is accomplished manually.

Excess leakage to the sump as determined by the leak detection system (Section 5.2.5) is alarmed in the main control room.

16

~~control room.~~ Flow control loops are provided for controlling the drywell and containment equipment drain sump pump discharge flow.

Containment isolation valves are provided in the drywell and containment equipment drain line to provide automatic isolation on a LOCA signal. Manual control switches are provided in the main control room for operation of these air-operated valves.

Fuel Building Equipment Drains

Level controls are provided for the fuel building equipment drain sump (TK3) to automatically start and stop the sump pumps (P3A, B). A mechanical alternator is provided for selecting the lead and standby pumps. Both pumps run with an extreme high water level. Local control switches are provided for either automatic or manual operation of the fuel building equipment drain sump pumps.

The conductivity of the fuel building and reactor building equipment drain sumps discharge is monitored by the plant computer. Control logic is provided so that the flow is directed to the condenser when the conductivity is normal (i.e., low) and diverted to radwaste when the conductivity is high. Control switches are provided in the main control room for either manual or automatic operation of the air-operated flow diverting valves.

Extreme high or low water level, low pump discharge pressure, or extreme high conductivity activates a fuel building/reactor building equipment drain sump trouble alarm in the auxiliary control room.

9.3.3.5.2 Turbine Building Equipment Drains

Level controls are provided for the turbine building equipment drain sumps (TK1A, B, C) to automatically start and stop the sump pumps (P1A through P1F). A mechanical alternator is provided for selecting the lead and standby pumps. Both pumps run with an extreme high water level. Local control switches are provided for either automatic or manual operation of the turbine building equipment drain sump pumps.

The conductivity of the turbine building equipment drain sumps discharge is monitored. Controls are provided so that the flow is directed to the condenser when the conductivity is normal (i.e., low) and diverted to radwaste when the conductivity is high. Control switches are provided in the

main control room for either automatic or manual operation of the air-operated flow diverting valves.

Extreme high or low water level or extreme high conductivity activates a turbine building equipment drain sump trouble alarm in the main control room. 15

9.3.3.5.3 Turbine Building Floor Drains

Level controls are provided for the turbine building floor drain sumps (TK1A, B, C; TK2A,B; TK3; and TK7) to automatically start and stop the sump pumps (P1A through P1F; P2A through P2D; P3A, B; and P7A, B). A mechanical alternator is provided for selecting the lead and standby pumps. Both pumps will be running on extreme high water level. Local control switches are provided for either automatic or manual operation of the turbine building floor drain sump pumps. Extreme high or low water level activates a turbine building floor drain sump level alarm in the main control room. 15

9.3.3.5.4 Radwaste Building Floor/Equipment Drains

Level controls are provided for the radwaste building floor/equipment drain sumps (TK1A, B and TK2) to automatically start and stop the sump pumps (P1A through P1D and P2A, B). A mechanical alternator is provided for selecting the lead and standby pumps. Both pumps are running on extreme high water level. Local control switches are provided for either automatic or manual operation of the radwaste building floor/equipment drain sump pumps.

Extreme high or low water level activates a radwaste building floor drain sump level alarm in the auxiliary control room.

9.3.3.5.5 Reactor Building Floor Drains

<u>Drywell, Containment, and Pedestal Floor Drains</u>

Control switches are provided in the main control room for either automatic or manual operation of the drywell floor drain sump (TK1), containment floor drain sump (TK2), and pedestal drain sump (TK6) pumps. The level in the sumps is continuously monitored, and control logic is provided for starting and stopping the sump pumps (P1A, B; P2A, B; and P6A, B) while operating in the automatic mode. Alternate ~~operation~~ selection of the ~~drywell, containment,~~ lead and ~~pedestal~~ standby sump pumps is done administratively. 16

16 Excess leakage to the sump as determined by the leak detection system (Section 5.2.~~7~~5) is alarmed in the main
16 control room.

Containment isolation valves are provided in the drywell and containment floor drain line to provide automatic isolation on a LOCA signal. Manual control switches are provided in the main control room for operation of these air-operated valves.

Auxiliary Building Floor Drains

The water level in the auxiliary building floor drain sumps (TK3A through TK3F and TK5A, B, C) is continuously monitored, and when the level reaches a high limit, an alarm is activated in the main control room. Level controls are provided for the auxiliary building floor drain sumps to automatically start and stop the sump pumps (P3A through P3M and P5A through P5F). A mechanical alternator is provided for selecting the lead and standby pumps. Both pumps run with an extreme high water level. Local control switches are provided for either automatic or manual operation of the auxiliary building floor drain sump pumps.

Extreme high or low water level or low sump pump discharge pressure activates an auxiliary building floor drain sump alarm in the auxiliary control room.

9.3.3.5.6 Fuel Building Floor Drains

Level controls are provided for the fuel building floor drain sump (TK4) to automatically start and stop the sump pumps. A mechanical alternator is provided for selecting the lead and standby pumps. Both pumps run with an extreme high water level and both pumps automatically stop on extreme low water level. Local control switches are provided for either automatic or manual operation of the fuel building floor drain sump pumps. Extreme high or low water level activates a fuel building floor drain sump level alarm in the auxiliary control room.

ATTACHMENT 3

NRC Concern

The February 6th submittal indicates (Insert A to page 9.2-43) that River Bend does not have redundant SSW loops but instead has four one-third capacity SSW pumps. Therefore the loss of the Division 1 diesel generator will result in two SSW pumps becoming inoperative and leaving only 66% of the required SSWS capacity. This is not acceptable.

Response

The February 6th submittal was incorporated into the FSAR in Amendment 16. FSAR Page 9.2-43 now discusses the following scenarios:

1) Failure of Division I power. While 1SWP*P2C is available, it is not required for shutdown. The fully operable Division II powered equipment (2 standby service water pumps) is sufficient for safe shutdown.

2) Failure of Division II power - Division I pump 1SWP*P2A and Division III pump (1SWP*P2C) (2 standby service water pumps) will provide sufficient cooling for safe shutdown.

3) Failure of Division III power - The remaining standby service water pumps are sufficient for safe shutdown. Some equipment will be operable on Division I power and provided cooling by 1SWP*P2A. As indicated in FSAR Section 9.2.7, one standby service water pump is sufficient for all cooling requirements of a division except the RHR heat exchangers. RHR cooling will be provided by the fully operable Division II.

ATTACHMENT 4

NRC Concern (4-9-85)

FSAR Section 9.2.5 discusses the temperature rise of the water in the ultimate heat sink based on using the cooling tower fans. The February 6th submittal identifies manual initiation of the fans two hours after the initiation of the design basis accident/event. The applicant should provide the results of an analysis of the ultimate heat sink water temperature assuming the maximum Tech. Spec. allowable basin water temperature, the most severe atmospheric conditions of 110°F and 100% RH (FSAR Section 2.3.2.2.1) and short circuiting of the cooling water with the fans not started for two hours and for not being started for three hours. As an alternative, the applicant may determine the maximum delay time for starting the fans which will not result in exceeding the maximum acceptable water temperature. This maximum delay time should include a sensitivity analysis of the time assumed for operator initiation of the fans.

Response

The analysis of the ultimate heat sink water temperature is not affected significantly by assuming the most severe atmospheric conditions of 110°F and 100% RH. During the two hours prior to starting the fans, the more severe atmospheric conditions contribute less than a 0.25 degree rise in basin temperature.

Similarly, if the fans are not started for three hours after shutdown, the basin's overall temperature rises to approximately 88.6°F, which is still below the assumed 2 hour temperature of 88.8°F shown in FSAR Table 9.2-11. This additional delay, therefore, has no effect on the analysis.

With regard to short-circuiting, the standby cooling tower (SCT) water storage basin is a cylindrical concrete structure with a minimum water depth of 46'10" based on a el. 111'10" minimum water level. Structural walls supporting the SCT divide the basin into nine seperate compartments which allow water flow through wall openings below elevation 84'6".

During the summer months, the water, partially shaded by the tower roof, will not exceed 82°F near the surface. Additionally water near the basin bottom will tend to cooldown to the 68°F ground water temperature. This condition of warm water with the atmosphere as heat source at the surface and cooler, denser water with ground water as heat sink toward the bottom will prohibit formation of convective currents leaving conduction as the dominant heat transfer mechanism.

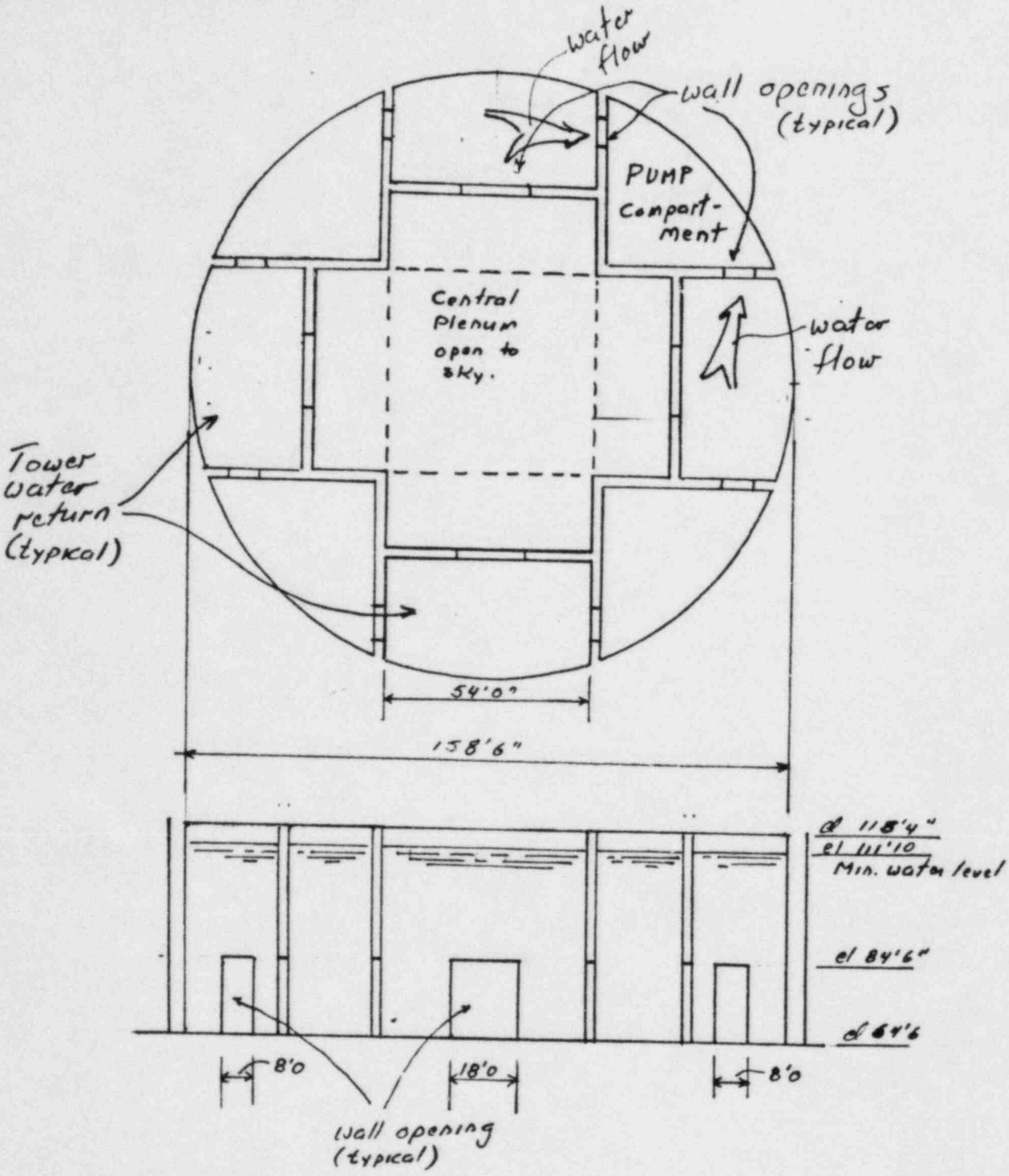
During emergency tower operation, cool water is taken from the bottom of the pump compartment and returned via spray headers in the tower. If

the tower fans are not operating, the warm return water falls vertically through the fill and rains down upon the water in the return compartments. Because this water is warmer, hence less dense than the cooler water at the bottom, convective currents still cannot occur.

Water from the rest of the basin flows into the pump compartment through two 160 ft^2 openings. With 2 pumps in service flow velocities through these openings will be 0.1 ft/sec., far too slow to cause any turbulent mixing to occur in the basin.

In conclusion, even during tower emergency operation the water will remain essentially stagnant and the water near the bottom will not warm significantly until one complete turnover of the basin volume occurs around 7 hours after pump start.

5036.64



Standby Cooling Tower

ATTACHMENT 5

NRC SER Concern (Page 3-19)

The applicant has not yet provided information which verifies that the MSIVs will close within 5.5 seconds after a main steam pipe crack in the pipe break exclusion area.

Response

As indicated in FSAR Appendix 3B, Table 3B-6, the assumed time for MSIV isolation following a main steam line double ended rupture in the subcompartment pressurization analysis to demonstrate the structural integrity of the steam tunnel is 10.5 sec, rather than the above referenced 5.5 sec. This same time, 10.5 sec, is assumed for MSIV isolation following a main steam line single ended rupture (full flow area opening) in the analysis to determine worst case temperature effects. (See our submittals of January 31, 1985, RBG-20026 and March 25, 1985, RBG-20502.)

This 10.5 sec blowdown time can be shown to include three components. High flow in the main steam lines is expected to provide the isolation signal which would initiate MSIV closure. While the setpoint is expected to be reached instantaneously for both the DER and the SER, a conservative time of approximately 0.1 sec is assumed. The response time of the sensing instrument is conservatively assumed to be approximately 0.3 sec and these have been conservatively combined to assume MSIV closure begins within 0.5 sec. Although the MSIVs are designed to close within 3 to 5 sec, a closure time of 10 sec has been assumed to assure a conservative analysis of environmental effects.

BTP ASB 3-1 (Rev. 1, July 1981 of NUREG-0800), "Protection Against Postulated Piping Failures in Fluid Systems Outside Containment" requires consideration of a longitudinal break with a minimum cross-sectional area of 1.0 ft^2 in main steam and feedwater piping within the break exclusion area, even though BTP MEB 3-1 indicates that breaks and cracks need not be postulated in these areas.

As indicated above, RBS considered a single-ended rupture (SER) of a 24" main steam line which has a flow area of 1.2675 ft^2. The flow is choked at the break area; therefore, the blowdown energy addition from a SER is greater than that which would result from a longitudinal break of 1.0 ft^2.

ATTACHMENT 6

NRC SER Concern (Page 3-19)

The applicant has not considered the effects of jet impingement from the pipe crack upon safety-related equipment and components.

Response

This concern will be the subject of future correspondence.

Attachment 7

NRC SER Concern (Page 3-19)

In addition, the applicant should provide the results of an analysis of the effects of a main feedwater line break anywhere within the steam tunnel in terms of pipe whip, jet impingement, flooding, or wetting of safety-related components. An acceptable alternative is for the main feedwater piping in the steam tunnel to be analyzed and supported in accordance with Seismic Category I criteria.

Response

As shown on the attached FSAR revisions, the main feedwater piping in the steam tunnel is analyzed and supported in accordance with Seismic Category I criteria.

Insert A

Seismic interface restraints are provided for the main steam lines (MSL) and main feedwater line (MFL) respectively to physically define the seismic category transition points.

Insert B

from the reactor vessel to and including the outermost isolation valves.

Insert C

outermost isolation valves

Insert D

However, MSL piping is seismically supported up to and including the turbine stop and control valve and MFL piping is seismically supported up to and including the anchors at the auxiliary building/turbine building interface.

Insert E

outermost isolation valve is Safety Class 2; beyond the outermost isolation valve is classified NNS but seismically supported up to and including the anchor at the turbine building/auxiliary building interface.

Insert F

42. Piping is seismically supported from the outermost isolation valve to and including the main turbine stop and control valve.

43. Piping is seismically supported from the outermost isolation valve to and including the anchor at the turbine building/auxiliary building interface.

Insert G

However, piping extending from the third isolation valve up to and including the main turbine stop and control valves is seismically supported.

TABLE 1.8-1 (Cont)

Regulatory Guide 1.29, Rev. 3 (September 1978)

Seismic Design Classification

Project Position - Comply with the following interpretations:

1. Paragraph C.1(b) is interpreted to apply only to the reactor core and reactor vessel internals which are engineered safety features.

2. Paragraph C.1(e) is interpreted in the following manner:

   a. INSERT A → ~~A seismic interface restraint is provided for the main steam line (MSL) and the main feedwater line (MFL) to physically define the seismic category transitional point between steam and feedwater piping in the Auxiliary Building and the Turbine Building.~~

   b. MSL and MFL piping and other components (including the shutoff valves and branch piping of 2 1/2 in or larger nominal pipe up to and including the first valve capable of timely action) INSERT B → ~~that are located between the reactor vessel and the seismic interface restraint~~ are designated Seismic Category I.

   c. MSL and MFL piping and other components outside the INSERT C → ~~seismic interface restraint~~ are not designated Seismic Category I.

   INSERT D →

3. Paragraph C.1.(h) - The reactor plant component cooling water portions of the reactor recirculation pumps are not required to be Seismic Category I since the pumps do not perform a safety function. Interruption of coolant to the recirculation pumps does not result in unacceptable consequences (response to SRP 9.2.2).

TABLE 3.2-1 (Cont)

	Safety[1] Class	Seismic[2] Category	Quality[3] Assurance Category	Tornado[4] Protection Designation	Location[5]	Scope[6] of Supply	Design[7] Detail	Notes
2. MSL from but not including the first field weld outside the jet impingement wall to and including the third isolation valve and all branch lines out to and including the first valve in the branch line	2	I	B	E	A	P	S	(10),6 42)
3. Feedwater line from second isolation valve to and including [redacted] valve	2	I	B	E	A	P	S	(10, 11), 8 43)
4. Branch lines off the feedwater line between the second isolation valve and the [redacted] valve, from the branch point at the feedwater line to and including the first valve in the branch line	2	I	B	E	A	P	S	(10)
5. MSL piping downstream of the third isolation valve to the turbine stop valves and all branch lines	NNS	NA	S	E,N	A,T	P	S	(10, 21)
6. Turbine bypass piping	NNS	NA	S	N	T	P	S	(10)
7. Branch lines of the MSL between the MSL shutoff valve and the turbine main stop valve	NNS	NA	S	E,N	A,T	P	V	(10)

outermost isolation

2

2

TABLE 3.2-1 (Cont)

	Safety[1] Class	Seismic[2] Category	Quality[3] Assurance Category	Tornado[4] Protection Designation	Location[5]	Scope[6] of Supply	Design[7] Detail	Notes
8. Turbine valve, turbine control valve, turbine bypass valves, and the main steam leads from the turbine control valve to the turbine casing	NNS	NA	S	N	T	P	V	(10,21 22,23)
9. Feedwater system components beyond the outermost feedwater [redacted]/isolation valve	NNS	NA	S	F,N	A,T	P	S	(10,6,43)
XXXIII. Condensate Makeup and Drawoff System								
1. Condensate storage tank	NNS	NA	S	E	O	P	V	(14)
2. Piping, containment isolation	2	I	B	E	A,C,F	P	S	
3. Valves containment isolation	2	I	B	E	A,C,F	P	V	
4. Other piping	NNS	NA	S	E	A,C,F,D, T,M,W,O	P	S	
5. Other valves and components	NNS	NA	S	E	A,C,F,D, T,M,W,O	P	V	
XXXIV. Auxiliary AC Power System (Class 1E)								
1. 4160-volt switchgear	2	I	B	E	A,F,R	P	V	
2. 480-volt load centers	2	I	B	E	A,F	P	V	
3. 480-volt motor control centers	2	I	B	E	A,F,R,M	P	V	
4. 4160/480-volt transformers	2	I	B	E	A,R,M	P	V	
5. 120-volt instrument (vital) bus	2	I	B	E	R	P	V	
6. Protective relays for Items 1 through 5, above	2	I	B	E	A,F,R,M	P	V	
7. Cables (including splices) with safety function	2	NA	B	E	-	P	V	
8. Terminal blocks	2	I	B	E	-	P	V	
9. Conduits	NNS	NA	S	E	-	P	-	
10. Cable trays, tray supports, and conduit supports	2	I	B	E	-	P	V,S	(33)
11. Containment electrical penetrations and protection	2	I	B	E	C	P	V	
12. Emergency lighting battery packs	NNS	NA	S	E,N	-	P	V	(33,34)
13. Raceway fire stops and seals	NNS	NA	S	E,N	-	P	V	

TABLE 3.2-1 (Cont)

(7)GE = General Electric - Nuclear Energy Business Group (NEBG) is responsible for details of component design.
S = Stone & Webster is responsible for details of component design.
V = Component vendor is responsible for details of component design.
CBIN = Chicago Bridge & Iron Nuclear is responsible for details of component design.

(8)Details of internal equipment design by Vendor.

(9)A portion of the CRD insert and withdraw lines from the drive flange are Safety Class 1. The remainder of the piping is Safety Class 2 up to and including the first valve on the hydraulic control unit.

(10)See Section 3.2.2.1 for explanation.

(11)In addition to a swing check valve inside the containment and a positive acting check valve outside containment, a third valve with high leaktight integrity is provided in each line outside the containment. The spring loaded piston operator of the positive acting check valve is held open by air pressure during normal operation. Fail-open solenoid valves are used to release air pressure to permit the check valve piston operator to close. The positive acting check valve and the high leaktight integrity isolation valve are remote manually operated from the main control room, using signals which indicate loss of feedwater flow.

The classification of the feedwater lines from the reactor vessel to and including the second isolation valve is Safety Class 1; from the second isolation valve to and including the

INSERT E → ~~seismic restraint (including the shut-off valve) is Safety Class 2; beyond the seismic restraint is classified NNS.~~

(12)1. Lines equivalent to a 3/4-in or smaller liquid line which are part of the RCPB are Safety Class 2.

2. All instrument lines which are connected to the RCPB and are utilized to actuate safety systems are Safety Class 2 from the outer isolation valve or the process shutoff valve (root valve) to the sensing instrumentation.

3. All instrument lines which are connected to the RCPB and not utilized to actuate safety systems are classified

10.3 MAIN STEAM SUPPLY SYSTEM

The main steam supply system is designed to provide the required amount of steam at the required pressure and temperature to the turbine, reheaters, condenser air removal system, turbine gland sealing system, and radwaste steam reboiler. The main steam supply system also conveys steam to the turbine bypass system (Section 10.4.4). The main steam supply system is shown in Fig. 10.3-1a through 10.3-1c. The portion of the main steam supply system up to and including the second isolation valve is discussed in Section 5.4. | 14

10.3.1 Design Bases

The main steam supply system is designed in accordance with the following design criteria:

1. The main steam supply system from the second isolation valve located on the outside of the shield building, up to and including the first weld outside the jet impingement wall located in the auxiliary building steam tunnel and all branch lines from branch point at the line, up to and including the first valve in the branch line, are classified ASME Section III, Safety Class 1, and Seismic Category I.

2. The portion of the main steam supply system from, but not including, the first weld outside the jet impingement wall, up to and including the third isolation valve located in the auxiliary building steam tunnel and all branch lines from the branch point at the line, up to and including the first valve in the branch line, are classified Safety Class 2 and Seismic Category I.

3. The portion of the main steam supply system from, but not including, the third isolation valve up to, but not including, the main turbine stop and control valves is classified Safety Class NNS and Seismic Category N/A, and designed in accordance with ANSI B31.1. ← INSERT G

4. The portion of the main steam supply system from the main turbine stop and control valves and downstream, supplied by GE-LSTG, is classified Safety Class NNS and Seismic Category N/A, and designed in accordance with GE-LSTG standards. GE-LSTG standards are similar to and meet or exceed

TABLE 3.2-1 (Cont)

k. Diesel generator auxiliaries including the lube system, jacket cooling water system, air start system, governor, voltage regulator, and excitation systems. 13

(35) Effluent monitors meet the environmental qualification and quality assurance requirements of Regulatory Guide 1.97, Revision 2.

(36) Valve actuators for active safety-related valves are subject to the same quality assurance requirements as the valve.

(37) The safety-related instrumentation and controls described in Sections 7.1 through 7.6 are subject to the requirements of Appendix B, Quality Assurance Program, and Class 1E requirements (TEEE 279). However, post-accident monitoring instrumentation discussed in Section 7.5 has design and qualification criteria as designated in Table 7.5-2 (e.g., Category 1, 2, 3 or Regulatory Guide 1.97). 11

(38) The sample panel and cooler rack are seismically supported. The instruments are not.

(39) Supports for components designated as Quality Assurance (QA) Category B are also classified as QA Category B. 13

(40) The piping between RHR valves MOV F042B and MOV F027B, and between MOV F042A and MOV F027A, is safety Class 2 as shown on Fig. 5.4-12.

(41) A portion of the main control room remote air intake utilizes pipe in lieu of ductwork. Since this pipe is intended to fulfill the function of ductwork, the pipe and its supports are designed, fabricated, and installed in accordance with ASME III, Class 3 requirements with the following exceptions: 15

a. Visual inspection of the welds is performed.

b. ASME III Code Data Reports, N-stamping, and ANI acceptance are not required.

c. Being part of engineered safety filtration system operating at low pressure (inches W.G.), it is tested in accordance with ANSI N509 as defined in Regulatory Guide 1.52.

INSERT F →

ATTACHMENT 8

NRC Concern

Applicant has requested a schedular exemption for completing the modifications to isolate the control room in the event of a fire. Furthermore, in a telecon on March 20, 1985, the applicant indicated 1) that no justification for the request would be forthcoming and 2) they thought that this request had already been denied. Therefore, until the applicant provides 1) adequate justification, 2) a list of modifications that will not be completed by fuel load, 3) satisfactory compensatory measures for each item listed, 4) a schedule for completion of the modifications, and 5) verification of compliance with the concerns identified in IE Information Notice No. 85-09, we cannot make any findings concerning schedular deviations.

Response

This concern will be the subject of separate correspondence being prepared in response to Staff's concern identified in Mr. A. Schwencer's letter of March 19, 1985.