



## LONG ISLAND LIGHTING COMPANY

SHOREHAM NUCLEAR POWER STATION

P.O. BOX 618, NORTH COUNTRY ROAD • WADING RIVER, N.Y. 11792

JOHN D. LEONARD, JR.

VICE PRESIDENT - NUCLEAR OPERATIONS

July 24, 1985

SNRC-1194

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

Limits of Operation at Shoreham Nuclear Power  
Station Unit 1 under Condition of Facility  
Operating License NPF-36.  
Docket No. 50-322

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Dear Mr. Denton,

The Shoreham Nuclear Power Station Unit 1 is currently operating within the limits of the 5% power license, NPF-36. LILCO's interpretation of this is that the plant can be operated up to 5% rated thermal power on a steady-state basis. LILCO assumes that this interpretation includes the recognition of the potential for momentary power spikes above the 5% steady-state limit which could be the result of a transient caused by an equipment malfunction. LILCO knows of no previous case of a utility operating under the limits of a 5% license where this assumption was not valid. However, LILCO is aware that questions have arisen, in the past, concerning the interpretation and application of license thermal power limits.

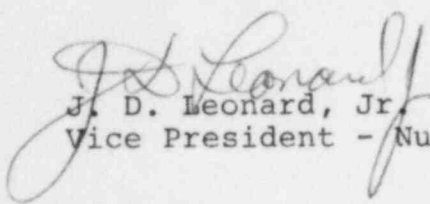
LILCO is extremely concerned that the occurrence of an unplanned transient for which the plant was previously analyzed (documented in the FSAR) and is designed to handle, could be misconstrued to be a violation of the 5% license when, in fact, such an occurrence is part of the analysis basis for the plant. Thus, LILCO wishes to state its understanding of the basis for handling unplanned plant transients which momentarily transcend the steady-state licensed limits, in order to completely clarify this issue. The understanding is that power spikes from unplanned transients do not constitute a violation of our operating license nor, in fact, a threat to public health and safety provided the transient initiated from license conditions.

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LILCO is currently operating the Shoreham Plant in accordance with Facility Operating License NPF-36 in the manner described above. LILCO trusts that you are in agreement with LILCO's position as described. LILCO is aware of the various implications of possible erroneous judgement when approved licensing limitations are interpreted. In this situation, LILCO is confident that a correct judgement has been made. Should you have any questions please contact this office.

Very truly yours,

  
J. D. Leonard, Jr.  
Vice President - Nuclear Operations

JVW/ja

cc: J. . Berry