

THE UNIVERSITY OF MICHIGAN
MICHIGAN MEMORIAL-PHOENIX PROJECT

OFFICE OF THE DIRECTOR
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PHOENIX MEMORIAL LABORATORY
NORTH CAMPUS
ANN ARBOR, MICHIGAN 48105

September 4, 1985

Docket 50-2
License R-28

United States Nuclear Regulatory Commission
Harold Denton, Director
Division of Reactor Licensing
Washington, D.C. 20555

Gentlemen:

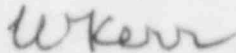
The University of Michigan requests that Ford Nuclear Reactor Technical Specifications, page 9, section 3.1, specification (5) be changed as follows:

- (5) The reactor shall be subcritical by at least 0.025
delta K/K during fuel loading changes.

A revised page 9 is enclosed for incorporation in our Technical Specifications.

In our license renewal request, originated on November 30, 1984, the shutdown margin relative to the cold, xenon free critical condition with all three shim safety rods inserted was changed from 0.03 delta K/K to 0.025 delta K/K (page 9, section 3.1, specification (1)). The minimum subcritical reactivity for fuel movement is the minimum shutdown margin with all rods inserted. It was an oversight on our part that we did not request a concurrent change in specification (5) reactivity to 0.025 delta K/K.

Sincerely,



William Kerr, Director
Michigan Memorial-Phoenix Project

Enclosure

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