GENERAL ELECTRIC
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NUCLEAR ENERGY
DIVISION

50-231
Regulatory File Cy.

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Dr. Peter A. Morris
U.S. Atomic Energy Commission
Division of Reactor Licensing
Washington, D.C. 20545

Dear Dr. Morris:

This letter is written to document our interpretation of certain sections given in the Technical Specifications for the Southwest Experimental Fast Oxide Reactor (SEFOR), Docket 50-231, License No. DR-15. The items in question have previously been discussed with members of your staff. The particular sections in question are Section 4.1 and Paragraph 3.9.B of the Technical Specifications, which result in an apparent conflict during the initial loading and wet critical testing.

Specifically, Section 4.1 requires monthly tests of the reactor Scram Protection Logic Channels and Sub-channels. Normally, these tests are performed with the Operate Mode Switch in the "HIGH POWER" position. However, paragraph 3.9.B excludes the use of this position when the reactor head is removed, as will be the case during the initial fuel loading and wet critical tests. A substitute test will therefore be performed during this period of reactor operations using the "ZERO AND LOW POWER" position of the Operate Mode Switch. This test will check the operability of all of the logic channels and sub-channels required by Section 4.1 with the exception of the main primary and main secondary low flow trips. These trips are automatically bypassed when the Mode Switch is in the "ZERO AND LOW POWER" position. Since the planned mode of operation while the head is removed is the "ZERO AND LOW POWER MODE," it is our interpretation that the deletion of the monthly low flow trip tests during loading and wet critical testing meets the intent of the Technical Specifications given at the beginning of Section 4, which provides for deferral of tests under special reactor conditions. These deferred tests will be completed prior to operation of the reactor following installation of the reactor vessel head. By copy of this letter we request your formal concurrence with this interpretation.

Sincerely yours,

R. L. Schmidt
for Karl Cohen
General Manager

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