

**From:** Glenn Kelly, *NAR*  
**To:** George Hubbard, Mark Rubin, Richard Barrett, Ri...  
**Date:** Thursday, June 29, 2000 02:21 PM  
**Subject:** Implications of Joe's findings on SFP fire timing

If what Joe says holds up:

- 1) Current decommissioning plants (including some of the oldest ones?) may need to be examined for seismic vulnerabilities and have their cranes and heavy load movement practices examined. Any deficiencies may need to be done by backfit unless they lead to vulnerabilities that do not pass adequate safety.
- 2) Dry cask storage casks may be vulnerable to zirconium fires if they lose their helium cover gas or the internals of the cask are damaged. The current Rule allows casks to be loaded one year after shutdown. To date, no casks have been licensed for fuel that is less than 5 years shutdown. The Rule may need to be changed. The risk from the casks may need to be examined, and the insurance and security provided for them may also need to be reexamined.
- 3) I see few changes for operating reactors. It may now be prudent to include SFP risk in with operating reactor risk as the risk totals may now be doubled (assuming most risk continues to be from large seismic events.) There may be a need to check the operating reactor SFPs for seismic vulnerabilities if timing as short as two hours after fuel uncover with building collapse is a possibility.

4/190