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See Proposed Tech Spec. Change.

SUBJECT: Forwards Rev 5 to Amend Applications 64 & 78 to Licenses NPF-10 & NPF-15,respectively,re spent fuel pool reracking. New racks will increase number of storage locations in each spent fuel pool from 800 to 1,542 elements.

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SUBJECT: Forwards Rev 5 to Amend Applications 64 & 78 to Licenses NPF-10 & NPF-15,respectively,re spent fuel pool reracking.

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HAROLD B. RAY
VICE PRESIDENT

TELEPHONE
714-458-4400

January 18, 1990

U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, D. C. 20555

Gentlemen:

Subject: Docket Nos. 50-361 and 50-362
Spent Fuel Pool Reracking (TAC Nos. 68308/9)
San Onofre Nuclear Generating Station
Units 2 and 3

Reference: March 10, 1989 letter from Kenneth P. Baskin (SCE) to Document Control Desk (NRC); Subject: Same as above

This letter provides Revision 5 to the License Amendment Request for reracking the spent fuel pools at the San Onofre Nuclear Generating Station (SONGS), Units 2 and 3. Southern California Edison Company (SCE) plans to install free standing, high density, spent fuel racks in the spent fuel pools (SFPs) of SONGS 2 and 3. The purpose of the new racks is to increase the number of storage locations in each existing SFP from 800 to 1542 elements. Additional storage is needed because the Federal Repository will not be available as initially scheduled.

The initial request for this License Amendment was submitted by the above reference. Subsequent to this, the following revisions were submitted:

1) Revision 1 on April 19, 1989 which mainly addressed review comments received from the NRC Chemical Engineering Branch relating to the use of Boraflex neutron absorbing material.

2) Revision 2 on June 1, 1989 which mainly provided additional information regarding abnormal thermal loads on the fuel handling building/spent fuel pool.

3) Revision 3 on September 22, 1989 which included information on 1) responses to Action Items identified during NRC meetings and telephone conversations held in April, May and June 1989 regarding rack and fuel handling building structural analyses, and 2) revised information regarding the spent fuel pool reracking process and cumulative construction doses.

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4) Revision 4 on November 2, 1989 which included a proposed Technical Specification in response to a request from the NRC staff requiring a minimum spent fuel pool boron concentration, as well as technical information regarding spent fuel rack reanalysis associated with deletion of one row of storage locations in Region II racks, storing 30 additional assemblies in the cask pool during reracking operations, and revised information regarding the structural characteristics of the cask pool cover and its lifting mechanism.

This submittal (Revision 5) includes the following:

1. Enclosure 1: Summary of Revision 5 changes

2. Enclosure 2: Revised Amendment Applications including changes to the Safety Analysis and proposed changes to the following Technical Specifications:

   a. 3.9.7 and Bases, "Fuel Handling Building - Spent Fuel Storage Pool Building" to add requirement of no construction lifts occurring prior to a minimum fuel decay time of 88 days.

   b. 3.9.12 and Bases, "Fuel Handling Building Post-Accident Cleanup Filter System" to permit hatches to be open during reracking construction except when fuel is moved.

   c. Bases for 3.9.13, "Spent Fuel Pool Boron Concentration" to correct a typographical error.

   d. 5.6.1 and 5.6.2, "Criticality" incorporating clarifications requested by the NRC staff.

   e. 5.6.3, "Drainage" to clarify required water level during fuel storage and not during fuel movement.

3. Enclosure 3: Complete "Spent Fuel Pool Reracking Licensing Report" which includes the following:

   a. Responses to NRC heavy loads and spent fuel pool cooling questions from September 6, 11 and 15, 1989 telephone calls.

   b. Identification of evaluation process for potential heavy loads not identified in this license amendment request.

   c. Identification of April 1, 1990 need date for License Amendment including basis.

   d. Miscellaneous clarifications and corrections.

In order to maximize the safety plus provide for efficient heavy load handling, SCE plans to use a single-failure-proof temporary gantry crane for heavy load lifts above the spent fuel pool. The temporary gantry crane,

manufactured by Ederer, Inc., is being designed to meet the requirements of NUREG-0554 in accordance with commitments made in Ederer's Generic Licensing Topical Report EDR-1(P)-A, Revision 3, dated October 9, 1982. Ederer's Topical Report was approved by the NRC on August 26, 1983, and no exceptions are taken to the NRC approved Ederer generic design.

The information enclosed responds to the requests for additional heavy loads and spent fuel pool cooling information requested by the NRC during telephone conversations on September 6 and 15, 1989 and provides additional SCE changes and corrections to the reracking license amendment requests. Additional information requested by the NRC during a telephone conversation on December 20, 1989 concerning the rack row deletion reanalysis will be provided by February 9, 1990. As discussed in more detail in the enclosed Reracking Report, Amendment approvals are requested by April 1, 1990 because pre-license amendment construction activities at San Onofre Unit 2 began on November 27, 1989 and new racks are scheduled for delivery beginning January 25, 1990 in preparation for installation of the first rack in the Unit 2 cask pool during the first week in April 1990. This will allow for completion of all reracking activities during the Cycle 5 operation for each unit.

If you have any questions or need additional information concerning the reracking license amendment requests, please let me know.

Very truly yours,

Harold B. Ray

Enclosures

cc: J. B. Martin, Regional Administrator, NRC Region V
C. Caldwell, NRC Senior Resident Inspector, San Onofre Units 1, 2 and 3
J. H. Hickman, California Department of Health Services