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SUBJECT: Clarifies methods that will be used to perform spent fuel pool rereacking for facilities.

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May 4, 1989

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
San Onofre Nuclear Generating Station
Units 2 and 3

Reference: License Amendment Request Nos. 78 and 64
Submitted by SCE to NRC letter dated
March 10, 1989

The purpose of this letter is to clarify the methods that will be used to perform the spent fuel pool reracking for San Onofre Units 2 and 3. In the above referenced License Amendment Request, SCE stated that the possibility of performing the reracking in a "dry" (empty of water) spent fuel pool was being investigated. SCE has eliminated dry reracking from consideration and will proceed with the wet reracking plan as submitted in the above referenced letter.

This decision to proceed with wet reracking is consistent with the comment given by Mr. E. S. Medling (SCE) during an ACRS hearing on April 20, 1989 regarding the reracking of the San Onofre Units 2 and 3 spent fuel pool (See enclosed transcript pages 181 and 182). Mr. Medling's comment was intended to convey that because the concern regarding hot particles is so great, it caused SCE to consider dry reracking. SCE initially considered dry reracking as a potentially viable alternative to wet reracking even though dry reracking would have resulted in a whole body dose of up to 300 person-rem. However, following intensive evaluation, the wet reracking option proved to be superior. Accordingly, please expedite your review of the above referenced License Amendment Request so that the spent fuel pool reracking project will remain on schedule.

Very truly yours,

Enclosure

cc: J. B. Martin, Regional Administrator, NRC Region V
F. R. Huey, NRC Senior Resident Inspector, San Onofre Units 1, 2 and 3

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181

1 one clarification. We've used the term "overexposure" and
2 I liked Mr. Cunningham's slide earlier. It had
3 "overexposure" in quote. And I think it's extremely
4 critical that we define that when we are saying
5 "overexposure" here we are talking about technically going
6 over the 7 1/2 or the 18 3/4 limit, not an overexposure in
7 the sense of really stochastic or non-stochastic risk. So I
8 think that's an important issue.

9 MR. MEDLING: Mike, I mentioned at that point in
10 time Unit 1 had not been operating with defective fuel
11 either.

12 I have one other comment to make. Our concern for
13 DRP seems to have also influenced our basic design process.
14 San Onofre, as you may be aware, is in the process of
15 designing a new spent fuel pool to accommodate more fuel
16 assemblies. And we were designing--we had planned to do
17 this using a wet re-rack method which we used hard hat
18 divers to do some hands on work occasionally when the
19 tooling did not work.

20 The design process was altered because of the
21 experience at Haddam Neck which was brought up earlier
22 today where a particle or something went by a diver and
23 caused a fairly large exposure. Because of this risk, which
24 we didn't feel confident we can, with 100 percent accuracy,
25 predict and avoid an incident of this nature, we very

182

1 seriously considered dry re-racking to the point that that
2 became the driving force which would have involved
3 transshipping all of the spent fuel from one unit, from Unit
4 2 to Unit 3, and then when we re-rack Unit 3, transshipping
5 all the Unit 3 fuel back to Unit 2. Basically moving 1600
6 bentalis at a whole-body exposure of 300 person rem.

7 And the idea that 300 person rem would be expended
8 to protect against the possibility of an exposure of a diver
9 to a discrete radioactive particle of a non-stochastic
10 effect I find personally distasteful.

11 MR. WILLIAMS: Okay. If I might hurry up in the
12 interest of time.

13 There are some additional considerations that we
14 think are important. First of all, because of enforcement,
15 the definition of the level of violations in 10CFR 2,
16 Appendix C, we believe that with what we saw in the Generic
17 Letter as to what would result in a Level 3, Level 4, or a
18 Level 1 violation, that's going to have a tremendous impact
19 on us, and I think it's important to point out that as
20 utilities--our main concern is not in avoiding a fine. And
21 if that was the only case, then we wouldn't be concerned
22 because through enforcement discretion, as NRC has already
23 mentioned, and most cases a fine hasn't resulted, and so
24 that's not our real concern.

25 Our concern is is that whenever we get above a