

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

ATOMIC SAFETY AND LICENSING BOARD

Before Administrative Judges:

Charles Bechoefer, Chairman
Dr. Richard F. Cole
Dr. Charles N. Kelber

DOCKETED
NRC

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OFFICE OF SECRETARY
RULEMAKING AND
ADJUDICATION STAFF

In the Matter of : Docket No. 50-423-LA-3
:
NORTHEAST NUCLEAR ENERGY :
COMPANY : ASLBP No. 00-771-01-LA
:
(Millstone Nuclear Power :
Station, Unit No. 3; :
Facility Operating License :
NPF-49) : November 17, 1999

SUPPLEMENTAL PETITION TO INTERVENE
IN BEHALF OF
CONNECTICUT COALITION AGAINST MILLSTONE AND
LONG ISLAND COALITION AGAINST MILLSTONE

I. INTRODUCTION

Pursuant to 10 C.F.R. §2.714(b)(1) and the Licensing Board's Memorandum and Order on Intervention Petition of October 28, 1999, the petitioners, Connecticut Coalition Against Millstone ("CCAM") and Long Island Coalition Against Millstone ("CAM"), hereby supplement their request for hearing and petition to intervene by filing affidavits in support of representational standing and contentions in the above-captioned license amendment proceeding. The petitioners' contentions challenge the adequacy of the application submitted by Northeast Nuclear Energy Company ("NNECO"), which seeks modification of the license to allow an increase in capacity of the spent fuel storage pool at Millstone Unit No. 3. The contentions

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also challenge the Nuclear Regulatory Commission ("NRC") staff's failure to comply with the National Environmental Policy Act ("NEPA") in considering the application.

The petitioners' contentions are based on the license amendment application and related documents. The application was submitted on March 19, 1999. The contentions are also based on the NRC staff's proposed No Significant Hazards determination, which was published in the Federal Register on September 7, 1999, 64 Fed. Reg. 172 ("Federal Register Notice"). Other documents relied on by petitioners are referenced in each specific contention.

The contentions are supported by the Declaration of David A. Lochbaum (October 4, 1999) ("Lochbaum Declaration"), previously submitted. In addition, the contentions are supported by a document previously submitted by Dr. Gordon Thompson ("A report on Risks and Alternative Options Associated With Spent Fuel Storage at the Shearon Harris Nuclear Power Plant" dated February 1999") in behalf of Orange County, North Carolina, in proceedings before the Atomic Safety and Licensing Board¹, which is attached as Exhibit 1. Finally, the contentions are supported by the Declaration of David Lochbaum (November 17, 1999) ("Supplemental Lochbaum Declaration") and the Declaration of Dr. Gordon Thompson (November 16, 1999) ("Thompson Declaration"), attached respectively as Exhibits 2 and 3.

II. STANDARD FOR REPRESENTATIONAL STANDING

As set forth in 10 C.F.R. §2.714, a petition for leave to intervene must set forth with particularity the interest

¹In the Matter of Carolina Power & Light, Docket No. 50-400-LA, ASLBP No. 99-762-02-LA.

of the petitioner in the proceeding and how that interest may be affected by the results of the proceeding. The petition must also identify the specific aspects of the subject matter of the proceeding as to which the petitioner wishes to intervene.

The petitioners, CCAM and CAM, have each submitted an affidavit of a member of the respective organization in order to assert representational standing. CCAM has submitted the affidavit of Joseph H. Besade, whose statement recites that he has resided for many years, and presently resides, with his family at 21 Fifth Avenue in Waterford, Connecticut, a location which is less than two miles away from the Millstone Nuclear Power Station. The organization of which he is a member, CCAM, maintains an office at 13 Water Street in Mystic, Connecticut, which is located approximately ten miles from Millstone. Both Mr. Besade and his family and the CCAM staff are subject to emergency evacuation due to their proximity to Millstone.

CAM has submitted the affidavit of Jacqueline Williamson, whose statement recites that she resides during much of the year upon property which she owns which is located on the north shore of Fishers Island approximately ten miles from Millstone. Fishers Island is part of the Town of Southold, New York, which is located on the North Fork of Long Island, New York, approximately twelve miles to the southwest of Orient Point, which itself is located at the farthest northeast point of Long Island. All of Fishers Island is subject to emergency evacuation

due to its proximity to Millstone. In the event of an emergency, the Millstone evacuation plan approved by the NRC calls for the residents of Fishers Island to board a ferry to travel to New London, Connecticut, and toward Millstone, rather than away from Millstone.

Both Mr. Besade and Mrs. Williamson assert in their affidavits concerns that approval of the proposed activity would significantly increase the risk of serious accidental release of radioactivity. Each affidavit identifies the technical basis for such concern. Each affidavit attests to a personal concern on the part of Mr. Besade and Mrs. Williamson that approval of the proposed activity will significantly reduce the margin of safety at Millstone and thereby expose each to significantly greater risk of injury. Each affiant asserts the longstanding involvement and participation in hearings, meetings, litigation and other proceedings of member organizations of the respective coalitions. Finally, Mr. Besade and Mrs. Williamson attest to their authorization of CCAM and CAM, respectively, to represent their interests in these proceedings.

The petitioning organizations, CCAM and CAM, have sufficiently presented declarations of representative members to support their standing to intervene in these proceedings. Yankee Atomic Electric Company (Yankee Nuclear Power Station), CLI-98-21, 48 NRC 185, 195-96 (1998); Georgia Institute of Technology, CLI-95-12, 42 NRC 111, 115 (1995); Vermont Yankee Nuclear Power Corp. (Vermont Yankee

Nuclear Power Station), LBP-87-7, 25 NRC 116, 118 (1987).

III. STANDARD FOR ADMISSIBILITY OF CONTENTIONS

The standard for admissibility of contentions is set forth in 10 C.F.R. §2.714(b)(i)-(iii). As summarized by the Licensing Board in Private Fuel Storage, L.L.C. (Independent Spent Fuel Storage Installation), LBP-98-7, 47 NRC 142, 178 (1998):

For a proffered legal or factual contention to be admissible, it must be pled with specificity. In addition, the contention's sponsor must provide: (1) a brief explanation of the bases for the contention; (2) a concise statement of the alleged facts or expert opinion that will be relied on to prove the contention, together with the source references that will be relied on to establish those facts or opinion; and (3) sufficient information to show there is a genuine dispute with the applicant on a material issue of law or fact, which must include (a) references to the specific portions of the application (including the accompanying environmental and safety reports) that are disputed and the supported reasons for the dispute, or (b) the identification for any purported failure of the application to contain information on a relevant matter as required by law and reasons supporting the deficiency allegation.

In evaluating whether this standard is satisfied, the Licensing Board may not reach the merits of a contention, as parties should not be required to prove their contentions before they are admitted to the proceeding. Sierra Club v. NRC, 862 F.2d 222, 228 (9th Cir. 1988).

IV. CONTENTIONS

The Connecticut Coalition Against Millstone (CCAM) and Long Island Coalition Against Millstone (CAM) have eleven contentions. These contentions are supported by the Lochbaum Declaration previously submitted and the Supplemental Lochbaum Declaration. Mr. Lochbaum, a nuclear engineer with the Union of

Concerned Scientists, is highly experienced in nuclear safety matters and is also the author of Nuclear Waste Disposal Crisis, a book published in 1996 about spent fuel storage problems at nuclear power plants. The contentions are further supported by the Thompson Declaration. Dr. Thompson, executive director of the Institute for Resource & Security Studies (IRSS) in Cambridge, Massachusetts, is a highly experienced analyst of nuclear power and spent fuel issues.² In conformance with 10 C.F.R. §2.714(b)(2)(ii), the assertions in each contention regarding noncompliance with NRC safety requirements constitute a summary of the facts and professional opinions to which Mr. Lochbaum and/or Dr. Thompson would testify in a hearing, and the documents identified in the contentions and expert declarations constitute the sources and documents on which they would rely.³

The petitioners note that the following contentions would be moot had NNECO elected to pursue an independent fuel storage installation (ISFSI) at Millstone instead of expanding the capacity of the Unit 3 spent fuel pool. The petitioners believe that NNECO put economics and schedule ahead of safety considerations in the proposed actions it is seeking.

Contentions 1, 2, 4 and 5 involve non-conservative and/or defective safety evaluations performed by or for NNECO. Rather than duplicating the safety implications associated with these

³Dr. Thompson's curriculum vitae is attached heretofore as Exhibit 4. Mr. Lochbaum's curriculum vitae appears as an attachment to the Lochbaum Declaration, previously submitted and incorporated herein.

contentions, the petitioners are addressing them here with the provision that they apply to Contentions 1, 2, 4 and 5.

Brookhaven National Laboratory (BNL) evaluated the consequences from a postulated accident in the spent fuel pool.⁴ Four cases were examined:

1. Complete draining of the spent fuel pool occurs twelve days after shutdown. Rapid cladding oxidation starts in the last full core discharge and propagates throughout the pool.

2. Complete pool drainage occurs, again at twelve days. The rapid zircaloy oxidation is limited to the last full core discharge (plus the last refueling offload for PWRs).

3. Complete pool drainage occurs one year after shutdown. The lowered decay heat does not cause rapid oxidation; however, the assemblies reach high temperatures and 50 per cent of the fuel rods in the pool fail, resulting in a gap release.

4. Partial pool drainage occurs at twelve days, exposing the upper portion of the fuel assemblies. This case assumes all fuel rods in the last full core discharge experience cladding failure, again resulting in a gap release.

Table 4.1 of NUREG/CR-6451 documented the results from BNL's evaluation. For the least serious case, BNL reported 1,500 additional cancer deaths to the population living within 50 miles of the plant.

⁴ Nuclear Regulatory Commission, "A Safety and Regulatory Assessment of Generic BWR and PWR Permanently Shutdown Nuclear Power Plants," NUREG/CR-6451, August 1997.

With respect to criticality accidents in the spent fuel pool, a search of publicly available records in the NRC's Public Document Room by the petitioners' expert, Mr. Lochbaum, failed to identify any previous evaluation. From his experience in the industry, Mr. Lochbaum is aware of procedural restrictions against being within line-of-sight of the open reactor vessel when subcritical checks of nuclear instrumentation or shutdown margin demonstrations are conducted during refueling. Such restrictions are provided to protect plant workers from radiation exposures in event of an inadvertent criticality.

~~Content~~ Petitioners' contentions are divided into those concerning drop of rack or cask, channel blockage, criticality, accidents potentially involving exothermic reaction of cladding, consideration of alternatives, and environmental impact assessment.

Channel Blockage

Contention #1: Failure to Consider Credible Scenarios of Fully Blocked Flow Channels

In its application,⁵ NNECO described the evaluation performed of flow channel⁶ blockage as follows:

The peak local water and fuel clad temperatures were computed for the rerack license amendment for the partially blocked hottest channel. The peak local water temperature was well below the boiling temperature at the top of the fuel with fuel pool water at its low level alarm. This analysis assures that flow will remain⁷ subcooled which minimizes the potential for fuel damage.

⁵ Petitioners note that with the exception of their experts' declarations and Exhibits 1 and 4, all of the documents upon which they rely are published by the NRC or included within the licensee's amendment request submittal and therefore are available to the Board and parties. Therefore, petitioners have not attached copies

The petitioners challenge the scope of NNECO's evaluation because there are numerous credible scenarios that could cause an entire flow channel, or multiple flow channels, to become completely blocked.

Basis: Materials could fall into the spent fuel storage pool and land on top of the storage racks, thus completely blocking the exit of one or more flow channels. While NNECO might be able to take steps to remove any such material from the top of the racks, the fact remains that the application is not supported by a proper analysis showing that the irradiated fuel assembly or assemblies will remain adequately cooled in case of this credible event.

In addition, there are also credible scenarios that could result in the inlet to one or more flow channels becoming completely blocked. For example, a piece of plastic or cloth sheeting could fall into the spent fuel pool water, sink to the bottom of the pool, and be drawn beneath the storage racks by the circulating cooling water. The material could then plug the entry to one or more flow channels. Again, NNECO's application is not supported by a proper analysis showing that the irradiated fuel assembly or assemblies will remain adequately cooled in case of this credible event.

of these documents. If the Board or parties have any difficulty obtaining documents, the petitioners will provide copies.

⁶ For the purposes of this section, a flow channel is defined as a single one of the cylindrical metal boxes within a spent fuel storage rack. The bottom of the storage rack is elevated off the floor of the spent fuel pool, allowing cooling water to enter the flow channel from the bottom and pass up through an irradiated fuel assembly to remove its decay heat.

⁷ Page 5 of Attachment 3 to the Application dated March 19, 1999.

Finally, the petitioners have provided the above scenarios as examples of credible events which could result in complete block of one or more channels. Petitioners note that the evaluation performed for the applicant assumed non-mechanistic partial blockage of a single flow channel. Absent that justification, the petitioners contend that NNECO's evaluation is non-conservative and thus defective.

Drop of Rack or Cask

Contention #2: Failure to Consider Dropping an Empty Rack onto Irradiated Fuel

NNECO's application reported the results of an evaluation of the inadvertent drop of an empty fuel storage rack. Based on this evaluation, NNECO concluded that "the consequences of an installation accident are not increased from any previously analyzed accident."⁸ This evaluation might have been valid, except for the fact that NNECO does not plan to install all of the high density racks at the same time as illustrated by this statement:

As shown in Figure 1, Millstone Unit No. 3 does not plan to install the southern most Region 2 rack at this time; it will be installed if and when necessary.⁹

Figure 1 shows the southern-most Region 2 rack to be adjacent to one Region 2 rack and between two Region 3 and two Region 1 racks. An empty Region 2 rack weighs between 10,450 pounds and 14,410 pounds.¹⁰

Basis: NNECO's application, if approved as submitted, will

⁸ Page 2 of Attachment 4 to the Application dated March 19, 1999.

⁹ Page 2 of Attachment 3 to the Application dated March 19, 1999.

¹⁰ Tables 2.2 and 2.3 of Attachment 5 to the Application dated March 19, 1999.

not ensure that the five adjacent fuel storage racks will be empty when the southern-most Region 2 rack is installed at Millstone Unit 3. Thus, it is conservative to assume that all five racks will be completely loaded with irradiated fuel assemblies at the time. Given the proximity of the southern-most Region 2 rack to these five adjoining racks, it is reasonable to assume that it would strike one or more of these racks if dropped during installation. Dropping this rack weighing more than five (5) tons onto another storage rack or racks filled with irradiated fuel assemblies could result in significant fuel damage and/or criticality problems. This potential consequence conflicts directly with the design and licensing basis of the spent fuel pool as stated by NNECO in the application:

The function of the spent fuel pool is to store the fuel assemblies in a subcritical and coolable configuration through all environmental and abnormal loadings, such as an earthquake, fuel assembly drop, fuel pool gate drop, or drop of another heavy object.¹¹

The petitioners contend that NNECO's application is deficient because it fails to properly account for the safety implications of a credible accident -- namely, the drop of a rack during installation.

Contention #3: No Evaluation of Cask Drop

NNECO has not properly evaluated potential mechanical loads under accident conditions because it has not considered the drop of a shipping cask into the cask pit or fuel pool. A cask drop could potentially: (1) cause a criticality accident; (2) release radioactive material from irradiated fuel into the pool water, the pool building atmosphere and the environment outside the pool building;

¹¹ Page 3 of Attachment 4 to the Application dated March 19, 1999

or (3) cause loss of water from the pool. The argument offered by NNECO for not considering a cask drop is frivolous.

Basis: In its license amendment application,¹² NNECO admits that it has not considered a cask drop. NNECO's sole justification for this omission is that "Millstone Unit 3 is not currently licensed to transport a cask into the spent fuel building," Yet, NNECO envisions that spent fuel will eventually be removed from the pool. Thus, movement of a cask within the building will eventually occur, and a cask drop will then be possible.

Many analyses have shown a potential at U.S. nuclear power plants for significant consequences from a cask drop within a spent fuel building. Potential consequences include criticality, release of radioactive material, and loss of water from a pool. Administrative and other measures have been introduced at U.S. nuclear power plants to reduce the probability of a cask drop or to limit the areas where a drop could occur. Measures of this kind may not have been developed by NNECO for Millstone Unit 3. In that event, it should be assumed that a cask drop could occur at any point within the spent fuel building and under the crane rails. The consequences of such a drop should be evaluated. Alternatively, if NNECO seeks to take credit for administrative or other measures, and thereby limit the evaluation of a cask drop, then NNECO should specify those measures and obtain NRC approval of them.

¹² Page 9 of Attachment 3 to the Application dated March 19, 1999.

Criticality

Contention #4: Undue and Unnecessary Risk to Worker and Public Health and Safety

The existing spent fuel storage racks at Millstone Unit 3 rely on physical separation to ensure that new and irradiated fuel assemblies are maintained in a subcritical configuration. Dry storage methods also rely on physical protection to guard against criticality accidents.

NNECO's application seeks to maximize the irradiated fuel assembly capacity in the Millstone Unit 3 spent fuel pool by trading physical protection against criticality for a complex array of administrative controls. This trade-off increases the likelihood of a criticality accident.

Basis: The following statements represent, but are not fully inclusive, of the "new" administrative controls proposed by NNECO:

After the expansion, the pool will contain three distinct administratively controlled storage regions as shown in attached Figure 1.¹³

and

Region 2 racks will be licensed to store 754 assemblies. The storage in Region 2 will have more restrictive burnup/enrichment restrictions than Region 1 racks and use a 4-out-of-4 storage configuration.¹⁴

¹³ Page 1 of Attachment 3 to the Application dated March 19, 1999.

¹⁴ Page 2 of Attachment 3 to the Application dated March 19, 1999.

and

1.40 STORAGE PATTERN refers to the blocked location in a Region 1 fuel storage rack and all adjacent and diagonal Region 1 (or Region 2) cell locations surrounding the blocked location. The blocked location is for criticality control.

1.41 Region 1 spent fuel racks can store fuel in either of 2 ways:

- (a) Areas of Region 1 spent fuel racks with fuel allowed in every storage location are referred to as the 4-out-of-4 Region 1 storage area.
- (b) Areas of the Region 1 spent fuel racks which contain a cell blocking device in every 4th location for criticality control, are referred to as 3-out-of-the-4 Region 1 storage area. A STORAGE PATTERN is a subset of the 3-out-of-4 Region 1 storage area.¹⁵

and

Region 3 racks can store 756 assemblies. The storage in Region 3 racks will have more restrictive burnup/enrichment restriction than Region 2 racks. Region 3 racks will allow credit for decay of fissile plutonium and buildup of americium, which reduce reactivity, as a function of decay time credit.¹⁶

Thus, the "new" administrative controls -- which are presently not needed to protect plant workers and the public from irradiated fuel assemblies stored at Millstone Unit 3 -- rely on a complicated array of factors such as burnup, enrichment, and decay time. As the September 1999 criticality accident in Japan tragically demonstrated, administrative controls are not fool-proof. As the September 1999 loss of a U.S. spacecraft due to a mathematical error dramatically demonstrated, even highly trained

¹⁵ Attachments 1 and 2 to the Application dated March 19, 1999.

¹⁶ Page 2 of Attachment 3 to the Application dated March 19, 1999.

and experienced rocket scientists can make mistakes. As the March 1996 issue of TIME magazine and the December 1997 civil penalty imposed on NNECO¹⁷ demonstrated, workers at the Millstone Nuclear Power Station have failed in the past to adhere to far simpler administrative controls governing spent fuel pool activities. Therefore, the proposed activity represents an undue and unnecessary risk because of all the additional administrative controls.

Finally, the first and third violations listed by the NRC in the December 1997 notice of violation -- which NNECO did not contest and paid on December 19, 1997 -- involved spent fuel pool problems. The third violation specifically involved NNECO's failure to maintain the plant's spent fuel pool configuration in conformance with design and accident analyses performed by Holtec International.¹⁸ Thus, this licensee has failed in the past to effectively invoke administrative controls. This failure clearly demonstrates that trading physical protection for administrative controls represents an undue and unnecessary risk. NNECO could provide sufficient onsite spent fuel storage capacity to satisfy its needs without this increased reliance on administrative controls.

Contention #5: Significant Increase in Probability of Criticality Accident

NNECO proposes to eliminate an existing barrier against

¹⁷ L. Joseph Callan, Executive Director for Operations, NRC, to B.D. Kenyon, President and Chief Executive Officer Nuclear Group, NNECO, "Notice of Violation and Proposed Imposition of Civil Penalties - \$2,100,000 (NRC Inspection Report Nos. 50-245/50-336/50-423; 95-44, 95-82, 96-01, 96-03, 96-04, 96-05, 96-06, 96-08, 96-09, 96-201)," December 10, 1997.

¹⁸ The role of Holtec International in the application receives further attention in Contention #9, infra.

inadvertent criticality in the spent fuel pool at Millstone Unit 3. The present Technical Specifications require soluble boron to be maintained in the spent fuel pool's water at all times. NNECO proposes to change the requirement for soluble boron in the spent fuel pool as follows:

The proposed Technical Specifications will require a minimum concentration of 800 ppm [parts per million] of soluble boron in the pool water during fuel movement to assure K_{eff} will remain less than or equal to 0.95 assuming a dropped or misloaded fuel assembly. The surveillance interval for this soluble boron concentration in the proposed Technical Specifications is consistent with Westinghouse improved STS [Standard Technical Specifications] 3.7.16.¹⁹

The petitioners contend that NNECO's proposal represents a significant increase in the probability of a criticality accident.

Basis: The present Technical Specifications for Millstone Unit 3 require soluble boron to be maintained within the spent fuel pool water any time irradiated fuel assemblies are stored in the pool. The proposed change would require soluble boron to be maintained only during fuel movements - not at times between fuel movements while irradiated fuel assemblies are stored in the pool. The evaluation submitted by NNECO clearly stated that a single fuel movement error, which is a credible event within the plant's design and licensing bases, can result in the required criticality margin being violated unless there is soluble boron in the spent fuel pool water.

The inadvertent misplacement of fresh fuel assembly has the potential for exceeding the limiting activity, should there be a concurrent and independent accident condition

¹⁹ Page 5 of Attachment 3 to the Application dated March 19, 1999.

resulting in the loss of all soluble poison. Assuring the presence of soluble poison during fuel handling operations will preclude the possibility of the simultaneous occurrence of the two independent accident conditions. The largest reactivity increase would occur if a fresh fuel assembly of 5.0 wt%²³⁵U enrichment were to be inadvertently loaded into an empty cell in Region 3 with the remainder of the rack fully loaded with fuel of the highest permissible reactivity. Under this accident condition, credit for the presence of soluble poison is permitted by the NRC guidelines. Calculations indicate that 800 ppm soluble boron, that is to be required by the Technical Specifications during fuel handling operations, is more than adequate to assure that the limiting k_{eff} of 0.945 is not exceeded.²⁰

and

With the assumption that Boraflex panels are replaced by water, the moderator temperature coefficient of reactivity in Region 3 is positive. Therefore, an increase in spent fuel pool temperature above the normal operating conditions (i.e., above 160 F), has the potential for exceeding the limiting reactivity in Region 3, should there be a concurrent and independent accident condition resulting in the loss of all soluble poison. . . . Calculations indicate that 100 ppm soluble boron is more than adequate to assure that the limiting k_{eff} of 0.945 is not exceeded for temperatures greater than 160 F and boiling.²¹

If the Technical Specifications for Millstone Unit 3 are changed as requested by NNECO, it is credible that a human error could result in the wrong fuel assembly being loaded into a Region 3 rack. That such an error is credible is implicitly conceded by NNECO's evaluation for such an event. With the soluble boron concentrations required by the "revised" Technical Specifications during fuel movements, this loading error would not cause a criticality.

²⁰ Page 4-8 of Attachment 5 to the Application dated March 19, 1999.

²¹ Page 4-9 of Attachment to the Application dated March 19, 1999.

But, once the fuel movements are stopped, the "revised" Technical Specifications no longer require soluble boron to be maintained in the spent fuel pool water. If the misloaded fuel assembly remains undetected and the soluble boron concentration drops, a criticality could occur.

The NRC's records include reports of misloaded fuel assemblies remaining undetected for long periods of time.²² Thus, the proposed activity significantly increases the probability of a criticality accident in the spent fuel pool because it removes the present requirement to always maintain soluble boron in the pool's water.

The surveillance requirement that NNECO proposes with respect to the soluble boron concentration in the spent fuel pool water is as follows:

4.9.1.2 Verify that the soluble boron concentration is greater than or equal to 800 ppm [part per million] prior to any movement of a fuel assembly into or within the spent fuel pool, and every 7 days thereafter during fuel movement.²³

NNECO's application posits that a misloading error may be made in the Millstone Unit 3 spent fuel pool. NNECO's evaluation of such a misloading error determined that a configuration which could yield criticality if it were not for the soluble boron in the water. Yet, NNECO proposes to remove the soluble boron

²²Stewart D. Ebnetter, Regional Administrator, NRC, to J.W. Hampton, Vice President-Oconee Site, Duke Power Company, "Notice of Violation and Proposed Imposition of Civil Penalty - \$50,000 (NRC Inspection Report Nos. 50-269/96-02, 50-270/96-02 and 50-287/96-02),"

Technical Specification without at least providing a surveillance requirement to check for misloaded fuel assemblies at the termination of fuel movements.

Contention #6: Proposed Criticality Control Measures Would Violate NRC Regulations

The criticality control measures proposed by NNECO would violate Criterion 62 of the General Design Criteria (GDC) set forth in Part 50, Appendix A. GDC 62 requires that: "Criticality in the fuel storage and handling system shall be prevented by physical systems or processes, preferably by use of geometrically safe configurations." In violation of this requirement, NNECO proposes to seek to prevent criticality at Millstone Unit 3 by the use of ongoing administrative measures.

Basis: GDC 62 is the sole regulatory foundation for criticality control in fuel pools. The NRC staff has employed other documents in its consideration of criticality, but these documents are not regulations. For example, the NRC has repeatedly referred to a Draft for Comment of Proposed Revision 2 to Regulatory Guide 1.13, dated December 1981, titled "Spent Fuel Storage Facility Design Basis." That document, in addition to being a draft, is not a regulation.

The NRC staff has on various occasions allowed nuclear power plant licensees to rely upon administrative measures for criticality

March 5, 1996, and M.E. Reddemann, General Manager - Hope Creek Operations, Public Service Electric & Gas Company, to NRC, "Hope Creek Generating Station Licensee Event Report No. 95-042-00," March 25, 1996, and Tennessee Valley Authority, Licensee Event Report No. 50-260/80-037-01, October 9, 1980.

control, as NNECO proposes in this application. Such reliance violates GDC 62, and therefore violates NRC regulations.

NNECO proposes to rely upon the following administrative measures for criticality control at Millstone Unit 3: (1) maintenance of a given content of soluble boron in pool water; (2) limits on fuel enrichment/fuel burnup in Region 1 4-out-of-4 racks and Region 2 racks; and (3) limits on fuel enrichment/fuel burnup and fuel decay time in Region 3 racks.

GDC 62 requires reliance on physical systems or processes, rather than administrative measures, under both normal conditions and accident conditions. For practical application of GDC 62, a "credible" range of accident conditions must be defined. The NRC has not formally provided such a definition. A potentially useful definition of credible accident conditions is provided, by implication, in Draft Regulatory Guide 1.13, cited above. Paragraph 1.4 of Appendix A of Draft Regulatory Guide 1.13 states: "At all locations in the LWR spent fuel storage facility where spent fuel is handled or stored, the nuclear criticality safety analysis should demonstrate that criticality could NOT occur without at least two unlikely, independent and concurrent failures or operating limit violations." This statement could be interpreted as saying that the set of non-credible accident scenarios, for the purposes of criticality control, encompasses scenarios involving at least two unlikely, independent and concurrent failures or violations. All other accident scenarios would then be regarded as credible.

Experience at U.S. nuclear power plants shows that failure of

administrative measures that seek to limit fuel enrichment/fuel burnup or fuel decay time is a likely occurrence. Moreover, it is likely that these administrative measures will fail in such a manner that more than one fuel assembly is out of compliance with specified limits. Also, failure of administrative measures that seek to limit fuel enrichment/fuel burnup or fuel decay time can precede or follow, rather than being concurrent with, failure of administrative measures that seek to maintain a given content of soluble boron in pool water. As a result, if the Millstone Unit 3 fuel pool were to operate as NNECO proposes in this application, a variety of accident scenarios involving criticality could occur that are credible according to the definition of credibility which is implied by Paragraph 1.4 of Appendix A of Draft Regulatory Guide 1.13. Thus, GDC 62 would be violated under accident conditions.

**Accidents Potentially Involving
Exothermic Reaction of Cladding**

**Contention #7: Significant Increase in Probability and
Consequences of Overheating Accident**

NNECO proposes to significantly increase both the irradiated fuel assembly inventory and the associated decay heat levels in Millstone Unit 3 spent fuel pool. The decay heat load increase has the inherent consequence of reducing the time available to respond to a loss of spent fuel pool cooling event. Reduced coping time corresponds to greater probability of failure to restore

cooling in time to prevent overheating damage. The inventory increase has the inherent consequence of increasing the amount of radioactive material (i.e., source terms) in the spent fuel pool. Greater source term inventory corresponds to greater consequences in event of fuel damage because more radioactive material is released.

Basis: NNECO proposes to more than double the amount of spent fuel stored in the Millstone Unit 3 spent fuel pool:

The pool presently contains 756 storage cells which were installed during original plant construction This license application addresses installation of fifteen high-density racks in the MP3 pool. These fifteen high density racks have a maximum capacity of 1,104 storage cells.²⁵

NNECO concedes that the proposed activity will increase the decay heat load in the spent fuel pool:

"With the expanded capacity, the spent fuel pool cooling system will be required to remove an increased heat load while maintaining the pool water temperature within the design limit."²⁶

If this proposed activity is implemented, there will be significantly less water available in the spent fuel pool. The fifteen (15) large storage racks and the 1,104 additional fuel assemblies will displace a considerable amount of water that would otherwise be in the pool.

Higher heat loads with reduced water inventory inevitably means that there will be less time to cope with a loss of spent fuel cooling than is available at the present time. NNECO has not

²³ Page 1-2 of Attachment 5 to the Application dated March 19, 1999.

²⁴ Page 2 of Attachment 3 to the Application dated March 19, 1999.

demonstrated in its application that sufficient time remains if the proposed activity is allowed. For example, NNECO stated:

Piping penetrations are at least 11 feet above the top of the spent fuel so that failure of inlets, outlets or accident piping leaks cannot reduce the water below this level.²⁵

Thus, the spent fuel pool at Millstone Unit 3 can be drained down to approximately 11 feet above the top of the irradiated fuel following a postulated design and licensing basis event. The spent fuel pool cooling system is disabled in that condition, so the spent fuel pool water will begin to heat up. NNECO stated:

The bulk peak temperature of the spent fuel pool is limited to 200F for structural qualification of the spent fuel pool.²⁶

Therefore, the proposed activity significantly increases the probability that the spent fuel pool water temperature will exceed the structural qualification temperature and also reach the boiling point.

Contention #8: Increased Probability and Consequences of Severe Accidents

NNECO proposed to modify the Millstone Unit 3 pool in a manner that will significantly increase the probability and offsite consequences of "severe" accidents, defined here as accidents which involve partial or total uncovering of fuel assemblies and exothermic reaction of fuel cladding. A severe accident could release to the environment an amount of long-lived radioactive material, especially cesium-137, which exceeds the release from the 1986 Chernobyl reactor

²⁵ Page 5-3 of Attachment 5 to the Application dated March 19, 1999.

²⁶ Page 5-2 of Attachment 5 to the Application dated March 19, 1999.

accident.

Basis: Installation of high-density racks in fuel pools introduces the potential for exothermic reaction of fuel cladding if fuel assemblies are partially or totally uncovered. This potential does not exist with low-density racks. The technical factors underlying this potential are described in the February 1999 report by petitioners' expert, Gordon Thompson, which appears here as Exhibit 1. Although the report focusses on the Shearon Harris plant, it also provides generic information which applies to Millstone Unit 3.

Existing conditions at Millstone Unit 3 provide "baseline" levels of probability and consequences of severe accidents. The actions proposed by NNECO will increase both the probability and the consequences.

The probability of severe accidents will increase above the baseline level because: (1) center-center distances in the fuel racks will decrease from the present 10.35 inches in the Region 3 racks to 9.017 inches in the new Region 2 racks; (2) convective circulation of water, air or steam will be further suppressed by the presence of additional racks in the pool; and (3) the greater heat load and reduced water mass in the pool will reduce the timescale of an accident in which interruption of cooling leads to evaporation of water and the uncovering of fuel assemblies.

A reduction in center-center distance will have the effect of increasing the number of fuel uncover scenarios that will proceed to a point where exothermic reaction of fuel cladding is initiated.

Thus, a reduction in center-center distance will cause an increase in the probability of a severe accident. The same effect will arise from the installation of additional racks in the pool. In this instance, the effect will arise because convective circulation of water, air or steam will be further suppressed by the presence of additional racks in the pool.

A greater heat load and reduced water mass in the pool will have the effect of increasing the number of accident scenarios wherein water loss proceeds to a point where fuel is partially or totally uncovered. Thus, a greater heat load and reduced water mass will cause an increase in the probability of severe accidents.

The offsite consequences of severe accidents will increase above the baseline level because more long-lived radioactive material, especially cesium-137, will be present in the pool and available for release to the environment.

Consideration of Alternatives

Contention #9: Failure to Conduct a Sound and Prudent Evaluation of Alternatives to High Density Storage Racks

In the Background and Safety Summary provided with its license amendment request (Attachment 3, page 1), NNECO stated: "the plant [Millstone] must increase onsite fuel storage capacity." NNECO additionally stated:

NNECO has evaluated spent fuel storage alternatives that have been licensed by the NRC and could be feasible for use at Millstone Unit 3. The result of the evaluation is that reracking the Millstone Unit 3 spent fuel pool is currently the most cost effective alternative.

The petitioners contend that NNECO's evaluation was defective because it was conducted by a subcontractor with a conflict of interest and because it relied on outdated information.

Basis for Conflict-of-Interest Contention: The evaluation of spent

fuel storage alternatives is contained in Section 12.0,

"Environmental Cost-Benefit Assessment," of Attachment 5 to NNECO's application. The following conclusion was stated in the evaluation:

Dry storage could be a technically feasible alternative to wet storage. However, the least expensive type of dry storage has been evaluated to entail a capital expenditure that is approximately 3.5 times as large as that associated with wet storage.²⁷

This evaluation was prepared by Holtec International, a company which specializes in wet-pool storage options. Holtec's financial interest in the wet-pool storage option is illustrated by these statements:

The new high density racks proposed for MPS [Millstone Unit 3] have been designed by Holtec International of Marlton, New Jersey.²⁸

and

The manufacturing of the racks will be carried out by Holtec's designated manufacturer (U.S. Tool & Die, Inc.)²⁹

None of the dry storage options currently certified/licensed by the NRC is manufactured by Holtec International.³⁰ It is a clear conflict-of-interest for a company with a financial interest in wet-pool storage to evaluate the cost-benefit options of dry storage technologies. NNECO may have established the conditions for a self-fulfilling prophecy by determining that it wanted wet-pool storage and then awarding the work to Holtec.

In any case, NNECO's application failed to demonstrate that the evaluation of spent fuel storage alternatives was free from conflict

²⁷ Page 12-2 of Attachment 5 to the Application dated March 19, 1999.

²⁸ Page 1-1 of Attachment 5 to the Application dated March 19, 1999.

²⁹ Page 2-8 of Attachment 5 to the Application dated March 19, 1999.

³⁰ Appendix G, "Approved Dry Spent Fuel Storage Designs," to NRC, NUREG-1350 Vol. 9, "Information Digest."

power plant owners are currently buying dry casks and using them to store spent fuel onsite is prima facie evidence that this option is not prohibitively expensive.

Thus, NNECO's application is defective because the evaluation of alternatives to the proposed spent fuel storage method relied exclusively on outdated, obsolete information.

Contention #10: Failure to Consider the Severe Accident Implications of Alternative Options

NNECO has not properly evaluated the alternative options available for managing spent fuel at Millstone Unit 3, and the implications of those options for the probability and consequences of severe accidents. A severe accident is defined here as an accident which involves partial or total uncovering of fuel assemblies and exothermic reaction of fuel cladding. Severe accidents are not remote and speculative events. Moreover, they can have very large, long-term offsite consequences. Finally, severe accidents can be avoided by adoption of dry storage of spent fuel, using technology already approved by the NRC.

Basis: A severe accident could occur in the manner, and with the consequences, described in the February 1999 Thompson report (Exhibit 1).

A severe accident is not a remote and speculative event because, among other reasons, it is an almost certain outcome of a severe reactor accident which involves substantial containment failure or bypass. The occurrence of such a reactor accident is assumed for purpose of emergency response planning and for other regulatory purposes. Dry storage technology is available; see, e.g., Exhibit 1.

Environmental Impact

Contention #11: An Environmental Impact Statement Is Required.

The NRC published an Environmental Assessment and Finding of No Significant Impact in the Federal Register³¹ on September 7, 1999. Insofar as the Environmental Assessment is significantly flawed and incomplete, and the proposed activity will significantly increase the probability and offsite radiological consequences of accidents and thus have a significant effect on the quality of the human environment, an Environmental Impact Statement is required.

Basis: This contention incorporates by reference Contentions Nos. 1 through 10 and adopts by reference the expert opinion rendered by Mr. Lochbaum and Dr. Thompson as set forth therein.

More particularly, in its Environmental Assessment, the NRC staff reached an incorrect conclusion in that its analysis failed to consider:

- (1) Credible scenarios of fully blocked flow channels;
- (2) The drop of an empty fuel storage rack during installation;
- (3) The drop of a cask during cask movement;
- (4) Enhanced risk of a criticality accident due to the improper implementation of "new" administrative controls;
- (5) Significant increase in the probability of a criticality accident as a consequence of removal of an existing barrier

³¹ 64 Fed.Reg. No. 172 at 48675.

against inadvertent criticality in the spent fuel pool;

(6) The fact that the proposed criticality control measures violate NRC regulations and, hence, are impermissible..

(7) Significant increase in the probability and consequences of an overheating accident;

(8) Significant increase in probability and offsite consequences of accidents involving partial or total uncovering of fuel assemblies and exothermic reaction of fuel cladding (severe accidents);

(9) Failure to conduct a sound and prudent evaluation of the alternatives to the proposed use of high density storage racks; and

(10) The severe accident implications of alternative options.

The proposed license amendment is not supported by an Environmental Impact Statement (EIS), in violation of NEPA and NRC's implementing regulations. An EIS should examine the effects of the proposed license amendment on the probability and consequences of accidents at the Millstone Unit 3 spent fuel pool. Further, as required by NEPA and NRC policy, the EIS should also examine the costs and benefits of the proposed action in comparison with alternatives, including the alternative of dry storage.

NEPA requires federal agencies to prepare an EIS before undertaking any major federal action which may significantly affect the quality of the human environment. 42 U.S.C. §4332(C).

The NRC's implementing regulations at 10 C.F.R. §51.20(a) also require the NRC to prepare an EIS for any licensing or regulatory action which is a major federal action significantly affecting the quality of the human environment.

As previously discussed, Brookhaven National Laboratory (BNL) evaluated the consequences from a postulated accident in the spent fuel pool, examining four cases.³² For the least serious case, BNL reported 1,500 additional cancer deaths to the population living within 50 miles of the plant. With respect to criticality accidents in the spent fuel pool, a search of publicly available records in the NRC's Public Document Room by petitioners' expert, David Lochbaum, failed to identify any previous evaluation.

The petitioners contend that the proposed activity will significantly increase the risk of criticality at the Millstone Unit 3 spent fuel pool. The petitioners contend that the proposed activity involves a heightened risk of partial or total uncovering of fuel assemblies and exothermic reaction of fuel cladding, for which no accident evaluation has been conducted and, hence, no environmental evaluation performed. In proposing to implement "new" administrative controls which are not permissible under NRC regulation, and to eliminate an existing barrier against inadvertent criticality, as the license amendment proposes, the activity significantly increases the probability of a criticality accident with significant environmental and radiological consequences

³² See discussion at pages 7-8, *supra*.

which have not been evaluated.

The environmental and radiological consequences of a severe accident at a spent fuel pool are discussed in Exhibit 1, the report submitted by petitioners' expert, Dr. Gordon Thompson, in proceedings involving the Shearon Harris nuclear power plant. See particularly discussion at pages 5 -14.

The Environmental Assessment and Finding of No Significant Impact concludes that " . . . the results of the previously analyzed and NRC-accepted design basis accident [have] bound the radiological consequences of accidents analyzed for the spent fuel pool rerack."

However, since there has been no previous evaluation of criticality accidents in the spent fuel pool, and the Environmental Assessment is seriously flawed and incomplete for the reasons stated, the Finding of No Significant Impact is unsupported and incorrect.

An EIS must also examine the costs and benefits of the proposed action and compare them to other reasonable alternatives. 10 C.F.R. §51.71. Dry cask storage is one such reasonably available alternative. In addition, the EIS must consider Severe Accident Design Mitigation Alternatives, such as dry cask storage; low-density pool storage; and installation of safety grade equipment for restoring cooling and water makeup to the spent fuel pool in the event of a severe reactor accident that prevents access to the pool. Consideration of Severe Accident Design Mitigation Alternatives is required in a NEPA analysis for an initial licensing decision.

Limerick Ecology Action v. NRC, 869 F.2d 719, 736-741 (3rd Cir. 1989). Similarly, a SAMDA must be required in any EIS prepared for the present license amendment.

Even if the Licensing Board determines that an EIS is not required under NEPA and 10 C.F.R. §51.20(a), the Board should nevertheless require an EIS as an exercise of its discretion, as permitted by 10 C.F.R. §§51.20(b)(14) and 51.22(b).

NRC regulations in 10 C.F.R. §§51.20(b)(14) and 51.22(b) provide for the preparation of an EIS where, upon its own initiative or request from any party, the Commission finds that "special circumstances" exist. Special circumstances "include the circumstances where the proposed action involved unresolved conflicts concerning alternative uses of available resources within the meaning of section 102(2)(E) of NEPA."

The petitioners respectfully submit that the application does present such "special circumstance."

The petitioners accept the NRC's statement in its Environmental Assessment that

Loss of full core off-load capability will occur as a result of refueling outage 6 (RFO 6), that started on May 1, 1999.

During a "community breakfast" sponsored by NNECO on November 16, 1999, Leon J. Olivier, Chief Nuclear Officer of the Millstone Nuclear Power Station, stated that RFO 6 was completed in June, 1999.

In consequence, the petitioners recognize that during the intervening five months, and for the foreseeable future, Millstone

Unit 3 has suffered and will continue to suffer a loss of capability to conduct a full core off-load should such event be required for safety or maintenance purposes.

The petitioners well recall the issues regarding full core off-loading at Millstone Unit 1; the petitioners are informed by the TIME magazine cover story which appeared in March 1996.

The petitioners are very concerned that the very serious environmental consequences of an unevaluated criticality or other accident event at the Millstone Unit 3 spent fuel pool have not been subjected to scrutiny. The petitioners include families with young children who live within two miles of the Millstone Station and hence are vulnerable to serious injury in the event of such an unevaluated accident.

On September 27, 1999, NNECO pleaded guilty to felonies under the Atomic Energy Act which involved a course of conduct of wilfully providing false information to the NRC. According to newspaper accounts, in this instance, NNECO once again set industry records for its conduct in operations at Millstone.

Public records maintained by the State of Connecticut show heightened levels of cancer incidences, including childhood leukemia, malignant melanoma, breast cancer, prostate cancer, in New London County, in the vicinity of Millstone, above levels elsewhere in the state.


The petitioners believe that the present application to more than double the density of spent fuel assemblies at Millstone

Unit 3 -- an application remarkable for its insufficiencies and disregard for NRC regulations which require physical barriers to protect the public health and safety -- presents a "special circumstance" calling for the exercise of the Board's discretion to require an Environmental Impact Statement.

V. Conclusion

For the foregoing reasons, the contentions of the Connecticut Coalition Against Millstone and the Long Island Coalition Against Millstone should be admitted for litigation in this proceeding.

Respectfully submitted,



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**RISKS AND ALTERNATIVE OPTIONS
ASSOCIATED WITH
SPENT FUEL STORAGE
AT THE
SHEARON HARRIS NUCLEAR POWER PLANT**

A report

prepared for

**Orange County
North Carolina**

by

Gordon Thompson

February 1999

Ex. 1

Acknowledgements

This report was prepared as part of a program of work by the Institute for Resource and Security Studies (IRSS) pursuant to a contract between IRSS and Orange County, North Carolina. The report was written by Gordon Thompson, the executive director of IRSS.

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Gordon Thompson is the executive director of IRSS. He received an undergraduate education in science and mechanical engineering, in Australia. Subsequently, he studied at Oxford University and received from that institution a doctorate of philosophy in mathematics in 1973.

During his professional career, Dr Thompson has performed technical and policy analyses on a range of issues related to international security, energy supply, environmental protection, and the sustainable use of natural resources. Since 1977, a significant part of his work has consisted of technical analyses of safety and environmental issues related to nuclear facilities. These analyses have been sponsored by a variety of nongovernmental organizations and local, state and national governments, predominantly in north America and western Europe. Dr Thompson has provided expert testimony in legal and regulatory proceedings, and has served on committees advising US government agencies.

About IRSS

The Institute for Resource and Security Studies is an independent, non-profit corporation. It was founded in 1984 to conduct technical and policy analysis and public education, with the objective of promoting international security and sustainable use of natural resources. IRSS projects always reflect a concern for practical solutions to resource, environment and security problems, and can range from detailed technical studies to preparing educational materials accessible to the public. IRSS actively seeks collaborative relationships with other organizations as it pursues its goals.

Abstract

Orange County, North Carolina, commissioned this report because the licensee of the Shearon Harris nuclear plant has requested an amendment of its operating license. The amendment would permit the activation of two currently unused spent fuel pools at Harris.

This report examines the risks and alternative options associated with spent fuel storage at Harris. The report identifies a potential for severe accidents at the Harris pools. Such accidents could release to the atmosphere an amount of cesium-137 an order of magnitude larger than the release from the 1986 Chernobyl accident. A severe accident at the Harris PWR, with containment failure or bypass, can be expected to initiate a large release from the fuel pools.

Alternative, safer options for spent fuel management are available. These options include dry storage of spent fuel, which is a well-established practice.

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1. Introduction

Carolina Power & Light Company (CP&L) requested, in December 1998, an amendment of its operating license for the Shearon Harris nuclear plant. The amendment, if granted by the Nuclear Regulatory Commission (NRC), would permit the activation of two currently unused spent fuel pools at Harris. In January 1999, Orange County commissioned this report, which examines the risks and alternative options associated with spent fuel storage at Harris.

Structure of this report

This report has two major components. One component is a main report which is comparatively brief and is intended for a non-specialist audience. The second component is a set of five appendices. These appendices contain detailed, technical material and citations to technical literature. Unless otherwise indicated, discussion in the main report rests upon the more detailed discussion in the appendices.

What is spent fuel?

Figure 1 shows a fuel assembly of the type that is used in the Harris reactor.¹ The fuel rods are 12 feet long, and the assembly is 8.4 inches square. After a fuel assembly is discharged from a reactor, it is "spent" in the sense that it can no longer be used to generate power. However, at this point in its life the assembly is much more dangerous than when it entered the reactor. It emits heat and intense radiation, and contains a large inventory of radioactive material.

Remainder of this report

The remainder of this main report begins with descriptions of the Harris plant (Section 2) and CP&L's intentions regarding the fuel pools at Harris (Section 3). Then, categories of potential accident at Harris are identified (Section 4), followed by descriptions of potential design-basis (Section 5) and severe (Section 6) accidents at the Harris pools. The offsite consequences of potential pool and reactor accidents are addressed in Section 7. Alternative options for spent fuel management are presented (Section 8), followed by a discussion of regulatory processes (Section 9). Conclusions are presented in Section 10.

¹ Figure 1 is adapted from: A V Nero, A Guidebook to Nuclear Reactors, University of California Press, 1979, page 79.

2. Present status of the Harris nuclear plant

The Harris plant features one pressurized-water reactor (PWR). The core of this reactor contains 157 fuel assemblies, with a center-center distance of about 8.5 inches. The Harris plant was to have four units but only the first unit was built. (A unit consists of a reactor, a turbine-generator and associated equipment.) A fuel handling building was built to serve all four units. This building contains four fuel pools (A, B, C, D), a cask loading pool and three fuel transfer canals, all interconnected but separable by gates.

These pools and transfer canals allow spent fuel to be moved around and stored while remaining under water. The water provides cooling and also shields personnel and equipment from the radiation emitted by the fuel. Shipping casks can carry spent fuel to or from Harris. Casks are loaded and unloaded while submerged in the cask loading pool.

Pools A and B

Pools A and B contain fuel racks, and are in regular use. CP&L says that fresh fuel, and spent fuel recently discharged from the Harris reactor, is stored in pool A. Fuel examination and repair are performed in an open space in pool B. At present, pools C and D are flooded but do not contain racks. The cooling and water cleanup systems for pools C and D were never completed.

Currently, pools A and B store spent fuel from the Harris reactor and from CP&L's Brunswick plant and Robinson plant. The Brunswick plant has two boiling-water reactors (BWRs) while the Robinson plant has one PWR. Shipment of spent fuel from Brunswick and Robinson to Harris is said by CP&L to be necessary to allow sufficient capacity in the pools at Brunswick and Robinson so that the entire core can be removed from the reactor.

Pools A and B now have a combined, potential capacity of 3,669 fuel assemblies. The center-center distance in the racks in pools A and B is 10.5 inches for PWR fuel and 6.25 inches for BWR fuel. This is a much more compact pool storage configuration than was used when nuclear plants first entered service. The United States has no national storage site or repository for spent fuel, so CP&L is currently obliged to store fuel at its plant sites. Compact storage in the existing pools is a comparatively cheap option for on-site storage.

3. Proposed activation of fuel pools C and D

CP&L seeks an amendment to its operating license so that it can activate pools C and D at Harris. By activating these pools, CP&L expects to have sufficient storage capacity at its three nuclear plants to accommodate all the spent fuel discharged by the four CP&L reactors (the Harris and Robinson PWRs and the two Brunswick BWRs) through the ends of their current operating licenses.

Capacity and configuration of pools C and D

CP&L plans to install racks in pool C in three campaigns (approximately in 2000, 2005 and 2014), to create a total capacity in this pool of 3,690 fuel assemblies. Thereafter, CP&L plans to install racks in pool D in two campaigns (approximately in 2016 and at a date to be determined), to create 1,025 spaces. Thus, the ultimate capacity of pools C and D will be 4,715 fuel assemblies. The center-center distance in the racks used in these pools will be 9.0 inches for PWR fuel and 6.25 inches for BWR fuel. In pool C, the space between the outermost racks and the pool wall will be 1-2 inches.

The PWR racks in pools C and D will have a smaller center-center distance than the racks in pools A and B (9.0 inches instead of 10.5 inches). This highly compact arrangement allows more PWR fuel to be placed in a given pool area but also has adverse implications for safety.

Cooling and electrical supply for pools C and D

The water in a spent fuel pool must be cooled and cleaned. Cooling is performed by circulating pool water through heat exchangers, where its heat is transferred to a secondary cooling system. At Harris, the secondary cooling system is the component cooling water (CCW) system. When the Harris plant was designed, the intention was that pools C and D would be cooled by the CCW system for Unit 2. Also, electricity would have been supplied to the circulating pumps at pools C and D from the electrical systems of Unit 2. However, Unit 2 was never built and its CCW and electrical systems do not exist.

CP&L's current plan is to cool pools C and D by completing their partially built cooling systems and connecting those systems to the Unit 1 CCW system. Electricity will be supplied to pools C and D from the electrical systems of Unit 1. The Unit 1 CCW system already provides cooling to pools A and B and serves other, important safety functions. For example, the Unit 1 CCW system provides cooling for the residual heat removal (RHR) system and reactor coolant pumps of the Unit 1 reactor.

Independent support systems for pools C and D

During CP&L's planning for the activation of pools C and D, the company considered the construction of an independent system to cool these pools. Within that option, CP&L considered the further possibility of providing dedicated emergency diesel generators to meet the electrical needs of pools C and D if normal electricity supply were unavailable. Construction of an independent cooling system for pools C and D, supported by dedicated emergency diesel generators, could provide the level of safety that was associated with the original design concept for Harris. However, CP&L has not proceeded with this option.

Capacity of the Unit 1 CCW system

In its present form, the Unit 1 CCW system cannot absorb the additional heat load that will ultimately arise from activation of pools C and D. Over the first few years of pool use, while the heat load is comparatively small, CP&L proposes to exploit the margin in the Unit 1 CCW system. Subsequently, CP&L intends to upgrade the Unit 1 CCW system so that it can accommodate the full heat load from pools C and D, and can also accommodate an anticipated power uprate for the Unit 1 reactor.

Safety implications

In order to exploit the margin in the existing CCW system so as to cool pools C and D, CP&L may be obliged to require its operators to divert some CCW flow from the RHR heat exchangers during the recirculation phase of a design-basis loss-of-coolant accident (LOCA) event at the Harris reactor. This is a safety issue because, during the recirculation phase of a LOCA, operation of the RHR system is essential to keeping the reactor core and containment in a safe condition. CP&L's exploitation of the margin in the existing CCW system is deemed by CP&L and NRC to constitute an "unreviewed safety question".

Lack of QA documentation

Activation of pools C and D will require the completion of their cooling and water cleanup systems, and the connection of their cooling systems to the Unit 1 CCW system. CP&L states that approximately 80 percent of the necessary piping was completed before the second Harris reactor was cancelled. However, some of the quality assurance (QA) documentation for the completed piping is no longer available. Much of the completed piping is embedded in concrete and is therefore difficult or impossible to inspect. To

address this situation, CP&L proposes an "alternative plan" to demonstrate that the previously completed piping and other equipment is adequate for its purpose. Nevertheless, the cooling systems for pools C and D will not satisfy prevailing code requirements.

4. Types of potential accident at the Harris plant

Most of the radioactive material at the Harris plant is either in the reactor or in the spent fuel pools. Thus, these locations are of primary concern when one considers the potential for accidents. This report focusses on the potential for accidents in the reactor or the pools. At present, pools C and D at Harris pose no accident potential, because they are unused.

Some potential accidents could cause injury to plant personnel, without causing any offsite effects. Other potential accidents could release radioactive material beyond the plant boundary, causing offsite effects. The radioactive material could be released as an atmospheric plume, or into ground or surface waters. This report focusses on accidents that release an atmospheric plume which travels beyond the plant boundary. Such a plume will contain radioactive material in the form of gases and small particles. As the plume travels downwind, the small particles will be deposited onto land, bodies of water, structures and vegetation.

Design-basis and severe accidents

A nuclear plant is designed to accommodate the effects of a specified set of accidents, known as "design-basis" accidents. If the plant is properly designed and constructed, if its equipment and operators function in the required manner, and if external influences (e.g., earthquakes) do not exceed specified levels, then the offsite effects of a design-basis accident will be small. Design-basis accidents and their anticipated effects are described in a Final Safety Analysis Report (FSAR) prepared and regularly updated by the licensee.

In the early years of the nuclear industry, some people equated design-basis accidents with "credible" accidents. However, research and operating experience soon revealed that accidents more severe than the design basis are credible. The first systematic study of the potential for severe accidents was the Reactor Safety Study, completed and published by the NRC in 1975. "Severe" accidents are conventionally defined as accidents involving substantial damage to fuel, with or without a substantial release of radioactivity to the environment.

The Three Mile Island (TMI) reactor accident of 1979 was a demonstration of the potential for severe accidents. Soon thereafter, the NRC promulgated

regulations which require an emergency response plan for each nuclear plant. These plans allow for large releases of radioactive material, of the kind that were identified in the Reactor Safety Study. The Chernobyl reactor accident of 1986 further demonstrated the potential for severe accidents. While the TMI accident released a small fraction of the reactor core's inventory of radioactivity, the release fraction during the Chernobyl accident was large.

Since the TMI accident, the NRC's safety regulation of nuclear plants has been guided by a hybrid set of assumptions. Many areas of safety regulation rely upon the assumption that accidents will remain within the design basis. Other areas, such as emergency response planning, assume that severe accidents can occur.

Pool-reactor interactions

At the Harris plant, the reactor and the fuel pools are adjacent, and they share support systems such as the Unit 1 CCW system and the emergency diesel generators. Thus, it is important to understand if an accident at the Harris reactor could accompany, initiate or exacerbate an accident at the Harris pools, or vice versa. The NRC has been slow to examine the potential for safety interactions between reactors and fuel pools. Neither CP&L nor the NRC has assessed the potential for these interactions at Harris.

PRAs and IPEs

A discipline known as probabilistic risk assessment (PRA) has been developed to examine the probabilities and consequences of potential accidents at nuclear facilities. PRA techniques are most highly developed in their application to reactor accidents, but can be applied to fuel pool accidents. Appendix B describes the characteristics, strengths and limitations of PRA.

CP&L has prepared a Level 2, internal-events PRA for the Harris reactor, in the form of an Individual Plant Examination (IPE). Also, CP&L has performed a limited assessment of the vulnerability of the Harris reactor to earthquakes and in-plant fires, in the form of an Individual Plant Examination for External Events (IPEEE).

The Harris IPE and IPEEE could be extended to encompass fuel pool accidents as well as reactor accidents. Such an extension would be logical, because there are various ways in which a severe accident or a design-basis accident at the Harris reactor might accompany, initiate or exacerbate an accident at the Harris fuel pools, or vice versa. However, there is no current indication that CP&L will extend the IPE or IPEEE, or will otherwise apply PRA techniques to potential accidents at the Harris fuel pools.

5. Design-basis pool accidents

The Harris FSAR considers two types of design-basis accident in the Harris fuel pools. One type of accident involves the dropping of a fuel assembly, while the other type involves the dropping of a shipping cask (but not into a fuel pool). In both cases, the FSAR estimates that the release of radioactivity would be relatively small. This report does not review the FSAR analysis.

In its license amendment application, CP&L has considered some other potential accidents, including the dropping of a rack or a fuel pool gate.² CP&L's analysis of these accident scenarios is limited in scope. Accidents of this type may be in an intermediate class of severity, and that potential class deserves further analysis.³ This report focusses on the potential for severe accidents.

It should be noted that the use of pools C and D at Harris will involve many additional cask, fuel and rack movements. These additional movements will increase the cumulative probability of accidents associated with such movements.

6. Severe pool accidents

Spent fuel is stored in a compact, high-density configuration in pools A and B at Harris. CP&L's proposed activation of pools C and D will involve an even higher density of storage. Such high-density configurations inhibit heat loss from the fuel if water is partially or totally lost from a pool. As a result, partial or total loss of water can lead to an exothermic (heat-producing) reaction of the fuel cladding with air or steam. Such a reaction could liberate a large amount of radioactive material from the fuel.

Thus, two questions become important. First, what circumstances could cause a partial or total loss of water? This question is addressed in Appendix C. Second, will an exothermic reaction be initiated if water is lost? That question is addressed in Appendix D.

Potential for loss of water

A variety of events could cause partial or total loss of water from the Harris pools. These events deserve the level of analysis that would be provided by a thorough PRA. Performing a pool accident PRA is beyond the scope of our

² License amendment application, Enclosure 7.

³ A potential accident in this class, which deserves analysis, would involve the placement of a low-burnup or high-enrichment PWR assembly in the racks in pools C or D.

present work for Orange County. Here, the focus is on two types of event — a reactor accident, and a sabotage/terrorism event. Consideration of these events demonstrates clearly that loss of water from the Harris pools is a credible accident.

The Harris IPE — prepared by CP&L — examines the potential for severe accidents at the Harris reactor. It identifies a category of severe accidents that would involve failure or bypass of the reactor containment. The IPE estimates the collective probability of accidents in this category to be 1 per 100,000 reactor-years.⁴ Occurrence of accidents in this category would contaminate the plant with radioactivity, to the point where personnel access would almost certainly be precluded. Water would then be evaporated from the fuel pools, and fuel would be uncovered after a delay of perhaps 10 days.

A credible sabotage/terrorism event at Harris would involve a group taking control of the fuel handling building, shutting down the pool cooling systems, and siphoning water from the pools. The group would require military skills and equipment to take control of the fuel handling building. Siphoning water from the pools would be a comparatively easy task. Escape by the group would be difficult but not impossible. The probability of this event cannot be predicted by PRA techniques.

Initiation of exothermic reactions, given water loss

Since the late 1970s, the NRC has sponsored and performed a variety of studies that have examined the outcomes of a loss of water from a fuel pool. These studies have focussed almost entirely on the instantaneous, total loss of water from a pool. Computer models have been developed to investigate this situation. For a high-density pool configuration, current models suggest that an exothermic reaction will be initiated in fuel aged up to 1-2 years after discharge from a reactor. These models have not been applied to the specific configuration of the Harris pools.

Partial loss of water can be expected in many scenarios, rather than instantaneous, total loss of water. Partial loss of water can be a more severe situation, because convective heat transfer from fuel assemblies is inhibited. The NRC has neglected this issue. Preliminary analysis suggests that partial water loss could initiate an exothermic reaction in fuel aged 10 years after discharge.

⁴ This probability estimate should be accompanied by a range of uncertainty. Even with the inclusion of uncertainties, PRA-derived estimates represent lower bounds to actual accident probabilities.

An exothermic reaction could propagate from one set of fuel assemblies to an adjacent set of assemblies that might not otherwise suffer such a reaction. The NRC's studies of propagation are incomplete, but they acknowledge the potential for propagation.

Exothermic reactions in the Harris pools

CP&L representatives have stated that spent fuel assemblies will not be placed in pools C and D at Harris until the assemblies have aged for 5 years after discharge. However, there is nothing in CP&L's license amendment application that prohibits the placement of more recently-discharged fuel in pools C and D. In any case, preliminary analysis suggests that partial water loss could initiate an exothermic reaction in fuel aged 10 years after discharge. Thus, exothermic reactions could occur in pools C and D.

For the purpose of estimating the potential consequences of a pool accident at Harris, this report considers two scenarios for exothermic reactions. One scenario involves fuel aged up to 3 years after discharge from a reactor, while the second scenario involves fuel aged up to 9 years after discharge from a reactor. In both cases, it is assumed that the entire inventory of cesium in the affected fuel assemblies would be released to the atmosphere. This assumption is consistent with NRC studies.

7. Consequences of potential pool and reactor accidents

This report focusses on accidents that release an atmospheric plume which travels beyond the plant boundary. The consequences of such a release can be estimated by site-specific computer models. Here, a simpler approach is used, but this approach is adequate to show the nature and scale of expected consequences. The approach is described in Appendix E.

The role of cesium-137

The consequences of a pool accident can be adequately illustrated by examining a release of only one radioisotope -- cesium-137. This isotope has a half-life of 30 years and is liberally released from damaged fuel. It dominates the offsite radiation exposure from the 1986 Chernobyl accident, and is a major contributor to radiation exposure attributable to fallout from the atmospheric testing of nuclear weapons in the 1950s and 1960s.

Three atmospheric releases of cesium-137 are postulated here for the purpose of examining consequences. First, a release of about 2 million Curies (2 MCi) corresponds to the most severe reactor accident identified in the Harris IPE. Second, a release of about 20 million Curies (20 MCi) corresponds to a pool

accident affecting fuel aged up to 3 years after discharge from a reactor. Third, a release of about 70 million Curies (70 MCi) corresponds to a pool accident affecting fuel aged up to 9 years after discharge from a reactor.

Land contamination by cesium-137

Accident consequences are illustrated here by estimating the area of land that would be contaminated by cesium-137 to a level such that inhabitants would suffer an external radiation dose in excess of 10 rem over 30 years.⁵ An exposure of 10 rem over 30 years would represent about a three-fold increase above the typical level of background radiation (which is about 0.1 rem/year). In its Reactor Safety Study, the NRC used a threshold of 10 rem over 30 years as an exposure level above which populations were assumed to be relocated from rural areas. The same study used a threshold of 25 rem over 30 years as a criterion for relocating people from urban areas, to reflect the assumed greater expense of relocating urban inhabitants.

In an actual case of land contamination in the United States, the steps taken to relocate populations and pursue other countermeasures (decontamination of surfaces, interdiction of food supplies, etc.) would reflect a variety of political, economic, cultural, legal and scientific influences. It is safe to say that few citizens would calmly accept a level of radiation exposure which substantially exceeds background levels.

For typical meteorology, a release of 2 MCi would contaminate 4,000-5,000 square kilometers of land, A release of 20 MCi would contaminate 50,000-60,000 square kilometers. Finally, a release of 70 MCi would contaminate about 150,000 square kilometers of land. Note that the total area of North Carolina is 136,000 square kilometers and the state's land area is 127,000 square kilometers.

Health effects of radiation

There is ongoing debate about the health effects of radiation at comparatively low doses. According to estimates by the National Research Council's BEIR V committee, a continuous exposure throughout life at a rate of 0.1 rem/year (above background) will increase the number of fatal cancers, above the normally expected level, by 2.5 percent for males and 3.4 percent for females, with an average of 16-18 years of life lost per excess death. If the dose-response function were linear, it would follow that continuous, lifetime exposure to 1 rem/year would increase the number of fatal cancers by 25

⁵ Without countermeasures such as interdiction of food supplies, the internal dose could be of a similar magnitude to the external dose.

percent for males and 34 percent for females. The shape of the dose-response function is a subject of debate.

8. Alternative options for spent fuel management

The present mode of spent fuel storage in Harris pools A and B poses a major hazard. This hazard will be substantially increased if pools C and D are activated. CP&L has not properly characterized the present and potential hazard, nor has the company provided a systematic assessment of alternative options.

A situation like this calls for a systematic, comprehensive assessment of alternative options and their impacts. A full range of alternatives should be identified, and their impacts and other characteristics should be assessed. Performance of such an analysis is beyond the scope of the author's current work for Orange County. An abbreviated discussion is presented here.

Options not reviewed here

One option would be to cease operation of CP&L's nuclear plants. That option, which could be combined with other options for storage of CP&L's present stock of spent fuel, is not reviewed here. Another set of options would employ high-density pool storage but would introduce technical measures that sought to increase the reliability of the cooling systems for some or all of the Harris pools, or to decrease the potential for safety interactions between the pools and the reactor. Independent support systems for pools C and D, as mentioned in Section 3, would be in this class of options. Such options are not reviewed here.

Options reviewed here

This report focusses on two classes of options for spent fuel storage. One class involves dry storage of spent fuel, using proven technology. The second class, which could complement dry storage, involves low-density storage in pools. A combination of dry storage and low-density pool storage could offer a practical, proven means of dramatically decreasing the hazard posed by high-density pool storage at Harris.

Dry storage

The NRC has approved a variety of designs for the dry storage of spent fuel. These designs are described in Table 1, and their current use by licensees is

described in Table 2.⁶ It will be noted from Table 2 that a dry storage installation is licensed at CP&L's Robinson plant. This installation employs eight NUHOMS-7P modules, each of which can hold 7 fuel assemblies. All eight modules are fully loaded.⁷

Dry storage could be implemented at any of CP&L's three plant sites. This report does not recommend any particular design, but notes that the designs vary in their level of safety and other features. For example, some designs are more resistant to sabotage than others.

All of the approved dry storage designs are safe in the event that access to the plant site is precluded by the release of radioactive material during a reactor accident. None of the designs requires active cooling, electricity or operator attention. A sabotage/terrorism event at a dry storage installation could release only a small fraction of the radioactive material that could be released by a sabotage/terrorism event at the Harris pools in their present and proposed configuration. Overall, dry storage poses a much lower level of hazard than high-density pool storage, for the same quantity of fuel.

At present, the NRC licenses dry storage installations for only 20 years. However, the technology is capable of storing fuel for much longer periods. If CP&L employs the dry storage option, they should choose a design that has this capability. This choice, properly documented and supported by ongoing testing, would establish the basis for a license extension in the future.

Low-density pool storage

Spent fuel can be stored in pools in a low-density, open-rack configuration, as was common practice when nuclear plants were first operated. Given a sufficiently low-density configuration, partial or total uncovering of the fuel will not initiate an exothermic reaction in the fuel cladding, even for recently discharged fuel. The fuel would remain vulnerable to consolidation through a cask drop into a pool or a severe earthquake which disrupts the fuel racks. If such consolidation were accompanied by partial or total uncovering, an exothermic reaction could occur in the consolidated region. However, it is unlikely that this reaction would be propagated to other regions of a pool.

⁶ Tables 1 and 2 are adapted from: US Nuclear Regulatory Commission, Information Digest, 1998 Edition, NUREG-1350, Volume 10, November 1998.

⁷ M G Raddatz and M D Waters, Information Handbook on Independent Spent Fuel Storage Installations, NUREG-1571, December 1996.

Summary

CP&L could employ a spent fuel storage strategy which combines dry storage with low-density pool storage. Some or all of pools A, B, C and D at Harris would be used in a low-density configuration. If appropriately designed and implemented, this strategy could dramatically reduce the hazard posed by present and proposed fuel storage arrangements at Harris.

9. Addressing risks and alternatives in the regulatory arena

Orange County has requested the NRC to hold a hearing regarding CP&L's license amendment application, and the NRC has established a Licensing Board for this case. These actions have initiated a regulatory process which has been employed many times before. A review of this process is beyond the scope of this report, but some brief observations may be helpful.

The licensing process will typically assume that regulatory decisions taken in the past were correct. Thus, the existing operations at Harris pools A and B might be held to establish a precedent for the proposed operations at pools C and D. However, this report shows that the NRC has not properly analyzed the potential for severe pool accidents at a generic level. This point may or may not influence the NRC's regulatory process, but it deserves continuing emphasis through all available channels.

At Harris, and nationwide, there is a need for a thorough assessment of the hazards associated with high-density pool storage, and of alternative options which could pose a lower hazard. Orange County would provide an important public service if it could persuade the NRC or another body to conduct such an assessment, perhaps in the form of an environmental impact statement. There has been discussion about the US Department of Energy taking title to the nation's spent fuel, while the fuel remains at plant sites. This move could provide an opportunity for a thorough assessment of risks and options, and for the adoption of safer means of fuel storage.

10. Conclusions

C1 Given the present and proposed configuration of spent fuel storage in the Harris pools, partial or total loss of water from the pools could initiate exothermic reactions of fuel cladding, in any or all of pools A, B, C and D.

C2 Partial or total loss of water from the Harris pools could occur through a variety of events including acts of malice, and would be an almost certain outcome of a severe reactor accident at Harris involving containment failure

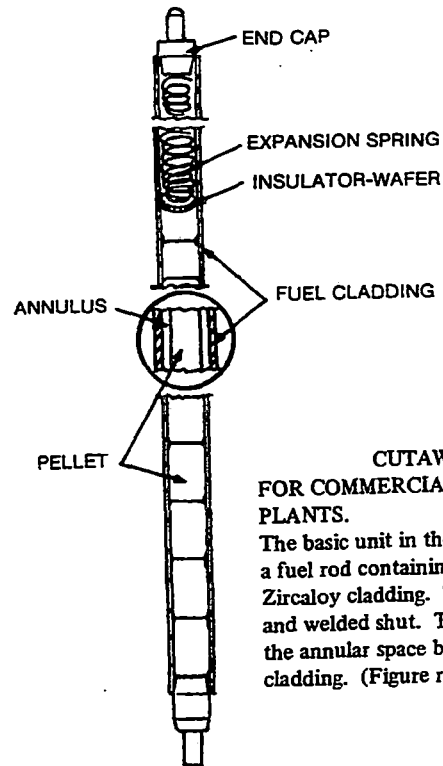
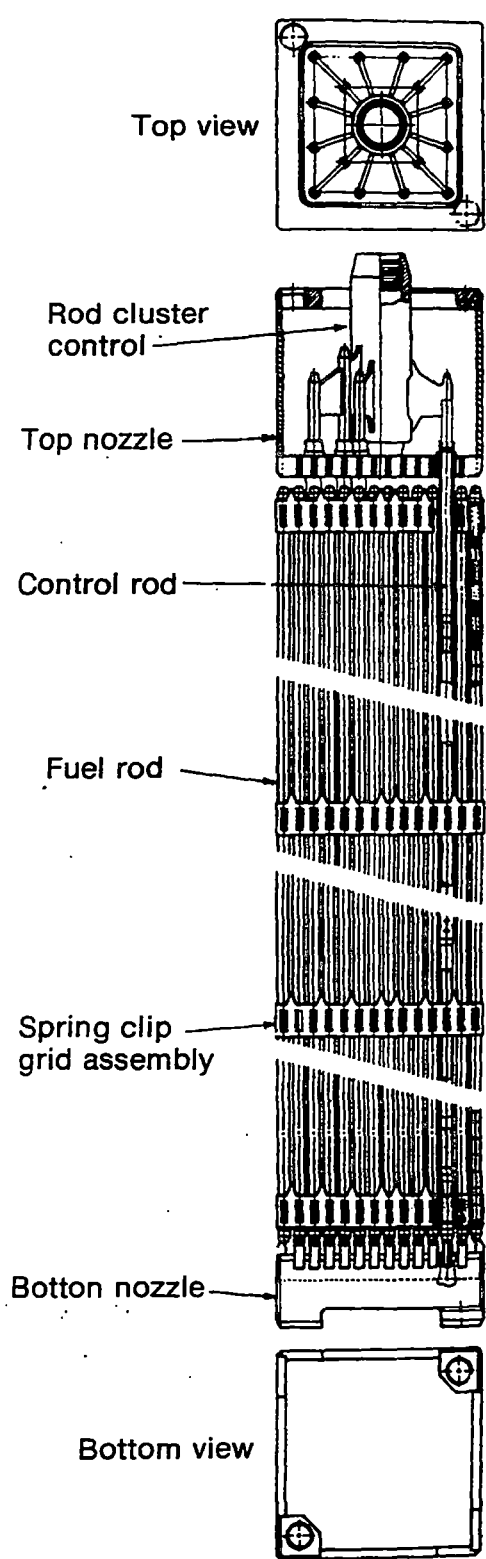
or bypass; CP&L estimates the probability of the latter event as 1 per 100,000 reactor-years.

C3 Exothermic reactions in the Harris pools could release to the environment an amount of cesium-137 at least an order of magnitude larger than the amount released by the most severe potential accident at the Harris reactor.

C4 A large release of cesium-137, as could occur from exothermic reactions in the Harris pools, could significantly contaminate an area of land equal to the area of North Carolina.

C5 The probability and magnitude of a potential release from Harris of radioactive material in spent fuel could be dramatically reduced if CP&L adopted a fuel storage strategy which combines dry storage with low-density pool storage; this strategy would employ proven technology.

C6 Activation of pools C and D at Harris could increase the probability and magnitude of design-basis or severe accidents at the Harris fuel pools or reactor.



**CUTAWAY VIEW OF OXIDE FUEL
FOR COMMERCIAL LWR POWER
PLANTS.**

The basic unit in the core of a light-water reactor is a fuel rod containing uranium oxide pellets in a Zircaloy cladding. The rod is filled with helium gas and welded shut. The circled portion exaggerates the annular space between the pellet and the cladding. (Figure reproduced from WASH-1250.)

**FUEL ASSEMBLY FOR A
PRESSURIZED-WATER REACTOR.**

In a pressurized-water reactor, fuel rods are assembled into a square array, held together by spring clip assemblies and by nozzles at the top and bottom. The structure is open, permitting flow of coolant both vertically and horizontally. All the assemblies in the reactor may have the same mechanical design, including provision for passage of a control rod cluster (shown in the figure). Where there is no cluster, these positions may have neutron sources, burnable poison rods, or plugs. (Figure reproduced from WASH-1250.)

Figure 1

Fuel for a pressurized-water reactor

Risks & alternative options re. spent fuel storage at Harris
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Vendor	Storage Design Model	Capacity (Assemblies)	Storage Design Approval Date	Certificate of Compliance Approval Date
General Nuclear Systems, Incorporated	Metal Cask			
	CASTOR V/21	21 PWR	09/30/1985	08/17/1990
	CASTOR X/28	28 PWR	04/22/1994	
	CASTOR X/33	33 PWR	11/24/1995	
Transnuclear, West Incorporated	Concrete Module NUHOMS-7P	7 PWR	03/28/1986	
Westinghouse Electric	Metal Cask MC-10	24 PWR	09/30/1987	08/17/1990
FW Energy Applications, Incorporated	Concrete Vault Modular Vault Dry Storage (MVDS)	83 PWR or 150 BWR	03/22/1988	
NAC International, Inc.	Metal Cask NAC S/T	26 PWR	03/29/1988	08/17/1990
NAC International, Inc.	Metal Cask NAC-C28 S/T	28 Canisters (fuel rods from 56 PWR assemblies)	09/29/1988	08/17/1990
Transnuclear, Incorporated	Metal Cask TN-24	24 PWR	07/05/1989	11/04/1993
	TN-32	32 PWR	11/07/1996	
NAC International, Inc.	Metal Cask NAC-128/ST	28 PWR	02/01/1990	
Sierra Nuclear Corporation	Ventilated Cask VSC-24	24 PWR	03/29/1991	05/03/1993
Transnuclear West, Inc.	Concrete Module Standardized		04/21/1989	01/18/1995
	NUHOMS-24P	24 PWR		
	NUHOMS-52B	52 BWR		
NAC International, Inc.	NAC-STC	26 PWR	07/17/1995	

Note: PWR - Pressurized-Water Reactor; BWR - Boiling-Water Reactor

Table 1

NRC-approved dry spent fuel storage designs

Risks & alternative options re. spent fuel storage at Harris
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Reactor Name Utility	Date Issued	Vendor	Storage Model
Surry 1, 2 Virginia Electric & Power Company	07/02/1986	Generals Nuclear Systems, Incorporated	Metal Cask CASTOR V/21 TN-32 NAC-128 CASTOR X/33 MC-10
H. B. Robinson 2 Carolina Power & Light Company	08/13/1986	Transnuclear West, Incorporated	Concrete Module NUHOMS-7P
Oconee 1, 2, 3 Duke Energy Company	01/29/1990	Transnuclear West, Incorporated	Concrete Module NUHOMS-24P
Fort St. Vrain* Public Service Company of Colorado	11/04/1991	FW Energy Applications, Incorporated	Modular Vault Dry Store
Calvert Cliffs 1, 2 Baltimore Gas & Electric Company	11/25/1992	Transnuclear West, Incorporated	Concrete Module NUHOMS-24P
Palisades Consumers Energy	Under General License	Pacific Sierra Nuclear Associates	Ventilated Cask VSC-24
Prairie Island 1, 2 Northern States Power Company	10/19/1993	Transnuclear West, Incorporated	Metal Cask TN-40
Point Beach Wisconsin Electric Power Company	Under General License	Sierra Nuclear Corporation	Ventilated Cask VSC-24
Davis-Besse Toledo Edison Company	Under General License	Transnuclear West, Incorporated	Concrete Module NUHOMS-24P
Arkansas Nuclear One Entergy Operations	Under General License	Sierra Nuclear Corporation	Ventilated Cask VSC-24
North Anna Virginia Electric & Power Company	06/30/98	Transnuclear West, Incorporated	Metal Cask TN-32

*Plant undergoing decommissioning

Table 2

NRC dry spent fuel storage licensees

RISKS AND ALTERNATIVE OPTIONS
ASSOCIATED WITH SPENT FUEL STORAGE AT THE
SHEARON HARRIS NUCLEAR POWER PLANT

Appendix A

Spent fuel management at the Harris plant

1. Introduction

This appendix summarizes present and proposed arrangements for managing spent fuel at the Shearon Harris plant. Carolina Power & Light Company (CP&L), the licensee for the plant, proposes to introduce new arrangements for spent fuel management. For that purpose, CP&L seeks an amendment to the plant's operating license. Unless specified otherwise, information presented here is drawn from CP&L's application to amend the Harris license, from CP&L's Final Safety Analysis Report (FSAR) for the Harris plant, or from viewgraphs shown by CP&L personnel during meetings with staff of the Nuclear Regulatory Commission (NRC).¹

2. Present and proposed spent fuel storage capacity

The Harris plant features one pressurized-water reactor (PWR). The core of this reactor contains 157 fuel assemblies, with a center-center distance of about 8.5 inches. The Harris plant was to have four units but only the first unit was built. (A unit consists of a reactor, a turbine-generator and associated equipment.) A fuel handling building was built to serve all four units. This building contains four fuel pools (A, B, C, D), a cask loading pool and three fuel transfer canals, all interconnected but separable by gates. Figure A-1 shows a plan view of the interior of the fuel handling building.

Pools A and B

Pools A and B contain fuel racks, and are in regular use. CP&L says that fresh fuel, and spent fuel recently discharged from the Harris reactor, is stored in pool A. Fuel examination and repair are performed in an open space in pool

¹ Meetings between NRC staff and CP&L representatives, to discuss the proposed license amendment, were held on 3 March 1998 and 16 July 1998.

B. Pools C and D are flooded but do not contain racks. The cooling and water cleanup systems for pools C and D were never completed.

Pool A now contains six racks (360 fuel assembly spaces) for PWR fuel and three racks (363 spaces) for boiling-water reactor (BWR) fuel, for a total pool capacity of 723 fuel assemblies. Pool B contains twelve PWR racks (768 spaces) and seventeen BWR racks (2,057 spaces), and is licensed to store one additional BWR rack (121 spaces), for a total, potential pool capacity of 2,946 fuel assemblies. Thus, pools A and B now have a combined, potential capacity of 3,669 fuel assemblies. The center-center distance in the racks in pools A and B is 10.5 inches for PWR fuel and 6.25 inches for BWR fuel.

Pools A and B store spent fuel from the Harris reactor and from CP&L's Brunswick plant and Robinson plant. The Brunswick plant has two BWRs while the Robinson plant has one PWR. Shipment of spent fuel from Brunswick and Robinson to Harris is said by CP&L to be necessary to allow core offload capacity in the pools at Brunswick and Robinson.

Pools C and D

CP&L seeks an amendment to its operating license so that it can activate pools C and D at Harris. By activating these pools, CP&L expects to have sufficient storage capacity at its three nuclear plants to accommodate all the spent fuel discharged by the four CP&L reactors (the Harris and Robinson PWRs and the two Brunswick BWRs) through the ends of their current operating licenses.

CP&L plans to install racks in pool C in three campaigns (approximately in 2000, 2005 and 2014), to create 927 PWR spaces and 2,763 BWR spaces, for a total capacity in this pool of 3,690 fuel assemblies. Thereafter, CP&L plans to install racks in pool D in two campaigns (approximately in 2016 and at a date to be determined), to create 1,025 PWR spaces. Thus, the ultimate capacity of pools C and D will be 4,715 fuel assemblies. The center-center distance in the racks used in these pools will be 9.0 inches for PWR fuel and 6.25 inches for BWR fuel.

The PWR racks in pools C and D have a smaller center-center distance than the racks in pools A and B (9.0 inches instead of 10.5 inches). This arrangement allows more PWR fuel to be placed in a given pool area but also means that PWR fuel in pools C and D is more prone to undergo criticality. In response, CP&L proposes to include in the Technical Specifications for Harris a provision that PWR fuel will not be placed in pools C and D unless it has relatively low enrichment and high burnup.²

² License amendment application, Enclosure 5.

Summary

Table A-1 summarizes the present and proposed storage capacity in the Harris pools. At present, pools A and B have a combined, potential capacity of 3,669 assemblies. The proposed, combined capacity of pools C and D will be 4,715 assemblies. Thus, activation of pools C and D will represent an increase of about 130 percent in the number of fuel assemblies that could be stored at Harris.

3. Support services for pools C and D

The water in a spent fuel pool must be cooled and cleaned. Figure A-2 provides a schematic view of typical cooling and cleanup systems. It will be noted that pool water is circulated through heat exchangers, where its heat is transferred to a secondary cooling system. At Harris, the secondary cooling system is the component cooling water (CCW) system. Water in the secondary system is in turn circulated through heat exchangers, where its heat is transferred to a tertiary cooling system. At Harris, the tertiary cooling system is the service water (SW) system.

When the Harris plant was designed, the intention was that pools C and D would be cooled by the CCW system for the second unit. That unit was never built and its CCW system does not exist. Thus, CP&L plans to cool pools C and D by completing their partially built cooling systems and connecting those systems to the CCW system of the first unit. The Unit 1 CCW system already provides cooling to pools A and B and serves other, important safety functions. For example, the Unit 1 CCW system provides cooling for the residual heat removal (RHR) system and reactor coolant pumps of the Unit 1 reactor.

The original design concept for Harris

In the Harris plant's original design concept, pools A and B would have served Units 1 and 4, while pools C and D would have served Units 2 and 3. There would have been a separate, fully-redundant, 100 percent-capacity cooling and water cleanup system for each pair of pools (A+B and C+D). Cooling of pools C and D would have been provided by the CCW system of Unit 2. Electrical power for the pumps that circulate water from the C and D pools through heat exchangers (see Figure A-2) would have been supplied by the Unit 2 electrical systems. Pools A and B would have been supported by the CCW and electrical systems of Unit 1.

During CP&L's planning for the activation of pools C and D, the company considered the construction of an independent system to cool these pools. Within that option, CP&L considered the further possibility of providing dedicated emergency diesel generators to meet the electrical needs of pools C and D if normal electricity supply were unavailable. Construction of an independent cooling system for pools C and D, supported by dedicated emergency diesel generators, could provide the level of safety that was associated with the original design concept for Harris. However, CP&L has not proceeded with this option.

Capacity of the Unit 1 CCW system

According to CP&L's license amendment application, the bounding heat load from the fuel in pools C and D will be 15.6 million BTU/hour (4.6 MW).³ At present, the Unit 1 CCW system cannot absorb this additional heat load. Thus, CP&L proposes to include in the Technical Specifications for Harris an interim provision that the heat load in pools C and D will not be allowed to exceed 1.0 million BTU/hour.⁴ CP&L claims that an additional heat load of 1.0 million BTU/hour can be accommodated by the Unit 1 CCW system, and that the fuel to be placed in pools C and D will not create a heat load exceeding 1.0 million BTU/hour through 2001.

CP&L contemplates a future upgrade of the Unit 1 CCW system, so that this system can accommodate an additional heat load of 15.6 million BTU/hour from pools C and D. This contemplated upgrade is not described in the present license amendment application. Apparently, CP&L intends to perform the upgrade of the Unit 1 CCW system concurrent with a power uprate for the Unit 1 reactor. A 4.5 percent power uprate of the reactor will be associated with steam generator replacement, and will take effect in about 2002. About two years later, there will be a further power uprate of 1.5 percent. CP&L projects that the Unit 1 CCW heat load, including the reactor power uprate and the ongoing use of pools C and D, will substantially exceed the capability of the present CCW system.

To summarize, CP&L's short-term plan (through 2001) for cooling pools C and D is to exploit the margin in the Unit 1 CCW system, so as to accommodate an additional heat load of 1.0 million BTU/hour. CP&L's longer-term plan is to upgrade the CCW system, in a manner not yet specified, so as to accommodate an additional heat load of 15.6 million BTU/hour. The CCW upgrade must also accommodate an increase in the rated power of the Harris reactor. CP&L expects that the design of the CCW

³ License amendment application, Enclosure 7, page 5-16.

⁴ License amendment application, Enclosure 5.

upgrade will commence in mid-1999 and will be completed in early 2001, one year after the company expects pool C to enter service.

Safety implications

In order to exploit the margin in the existing CCW system so as to cool pools C and D, CP&L may be obliged to require its operators to divert some CCW flow from the RHR heat exchangers during the recirculation phase of a design-basis loss-of-coolant accident (LOCA) event at the Harris reactor.⁵ This is a safety issue because, during the recirculation phase of a LOCA, operation of the RHR system is essential to keeping the reactor core and containment in a safe condition. CP&L's exploitation of the margin in the existing CCW system is deemed by CP&L and NRC to constitute an "unreviewed safety question".⁶

In Enclosure 9 of its license amendment application, CP&L provides a brief description of the analysis that it has performed to demonstrate that an additional load of 1.0 million BTU/hour is within the marginal capacity of the Unit 1 CCW system. That analysis is said by CP&L to take the form of a 10CFR50.59 Safety Evaluation. The description in Enclosure 9 raises more questions than it answers, and does not address the practical issues that affect an analysis of a cooling system's thermal margin. For example, CP&L has mentioned elsewhere that exploitation of the margin in the Unit 1 CCW system could involve changes in design assumptions that include fouling factors and tube plugging limits.⁷ These matters are not addressed in Enclosure 9.

As background, note that the Unit 1 CCW system has two heat exchangers, each with a design heat transfer rate of 50 million BTU/hour. During the recirculation phase of a design-basis LOCA, the estimated maximum heat load to be extracted from the CCW system by the SW system is 160 million BTU/hour.⁸ These numbers suggest that accommodating a design-basis LOCA will already exploit the margin of the CCW system, without any additional load from pools C and D.

Lack of QA documentation

Activation of pools C and D will require the completion of their cooling and water cleanup systems, and the connection of their cooling systems to the

⁵ License amendment application, Enclosure 9.

⁶ Ibid; Federal Register: January 13, 1999 (Volume 64, Number 8), pages 2237-2241.

⁷ Viewgraphs for presentation by CP&L to the NRC staff, 3 March 1998.

⁸ Harris FSAR, section 9.2, Amendment No. 40.

existing CCW system. CP&L states that approximately 80 percent of the necessary piping was completed before the second Harris reactor was cancelled.⁹ However, some of the quality assurance (QA) documentation for the completed piping is no longer available. Much of the completed piping is embedded in concrete and is therefore difficult or impossible to inspect. To address this situation, CP&L proposes an Alternative Plan to demonstrate that the previously completed piping and other equipment is adequate for its purpose.¹⁰ Nevertheless, the cooling systems for pools C and D will not satisfy ASME code requirements.

Electrical power

The cooling systems for pools C and D will draw electrical power from the electrical systems of Unit 1. If electricity supply to the cooling pumps for pools C and D is interrupted, the pools will heat up and eventually boil. CP&L says that pools C and D will begin to boil after a time period "in excess of 13 hours", assuming a bounding decay heat load of 15.6 million BTU/hour.¹¹ To prevent the onset of pool boiling in the event of a loss of offsite power, the Harris operators may be obliged to provide electrical power to pools C and D from the existing emergency diesel generators, which also serve pools A and B and the Unit 1 reactor. In its license amendment application, CP&L does not address the ability of the emergency diesel generators to meet the additional electrical loads associated with pools C and D. CP&L does mention in the Harris FSAR the potential for connecting "portable pumps" to bypass the pool cooling pumps should the latter be inoperable.¹² However, the characteristics, capabilities and availability of such portable pumps are not addressed in the license amendment application.

4. Potential cesium-137 inventory of the Harris pools

For the purposes of Appendix E of this report, it is necessary to estimate the potential inventory of the radioisotope cesium-137 in the Harris pools. As a starting point, consider the inventory of cesium-137 in a typical PWR spent fuel assembly, represented here by an average assembly in batch 16 from the Ginna plant, discharged in April 1987. At discharge, the Ginna assembly contained 1.4×10^5 Curies of cesium-137 per metric ton of heavy metal (MTHM).¹³

⁹ License amendment application, Enclosure 1, page 4.

¹⁰ License amendment application, Enclosure 8.

¹¹ License amendment application, Enclosure 7, page 5-8.

¹² Harris FSAR, page 9.1.3-6, Amendment No. 48.

¹³ V L Sailor et al, Severe Accidents in Spent Fuel Pools in Support of Generic Safety Issue 82, NUREG/CR-4982, July 1987, Appendix A.

A Harris PWR assembly has a mass of 0.461 MTHM. Thus, one can estimate that a typical Harris assembly contains, at discharge, 0.65×10^5 Curies of cesium-137. The assembly's content of cesium-137 will decline exponentially, with a half-life of 30 years. At the same age after discharge, a typical BWR assembly in the Harris pools will contain about 1/4 of the amount of cesium-137 in a Harris PWR assembly.¹⁴

Potential stock of assemblies in the Harris pools

Table A-2 shows CP&L's projection of the stock of assemblies in Harris pools C and D, for the purposes of bounding analysis. A CP&L representative has stated that CP&L will not ship fuel to Harris until it has aged for 3 years, and will not place fuel in pools C and D until it has aged for 5 years.¹⁵ Accepting that fuel aged less than 3 years will not be shipped to Harris, one can assume, to supplement Table A-2, that the Harris pools will contain 456 BWR assemblies aged for 3 years, 172 PWR assemblies aged for 3 years, and 96 PWR assemblies aged for 1 year. Hereafter, these assumptions and Table A-2 are taken to represent the potential stock of fuel assemblies in the Harris pools.

On this basis, the Harris pools' stock of spent fuel aged 3 years or less will be 268 PWR assemblies and 456 BWR assemblies. All of this fuel might be in pools A and B, although there is nothing in CP&L's present or proposed Technical Specifications which prohibits placement of recently discharged fuel in pools C and D. On the same basis, the Harris pools' stock of spent fuel aged 9 years or less will be 784 PWR assemblies and 1,824 BWR assemblies.

Inventory of cesium-137

Now consider the inventory of cesium-137 in the Harris pools. Assume that a newly discharged PWR assembly contains 0.65×10^5 Curies of cesium-137, neglect the difference between Harris and Robinson assemblies, allow for radioactive decay, and assume that a BWR assembly contains 1/4 of the amount of cesium-137 in a PWR assembly of the same age. Then, the Harris pools' stock of spent fuel aged 3 years or less will contain 2.3×10^7 Curies (870,000 TBq) of cesium-137, with a mass of 260 kilograms. Also, the Harris pools' stock of spent fuel aged 9 years or less will contain 7.1×10^7 Curies (2,600,000 TBq) of cesium-137, with a mass of 790 kilograms.

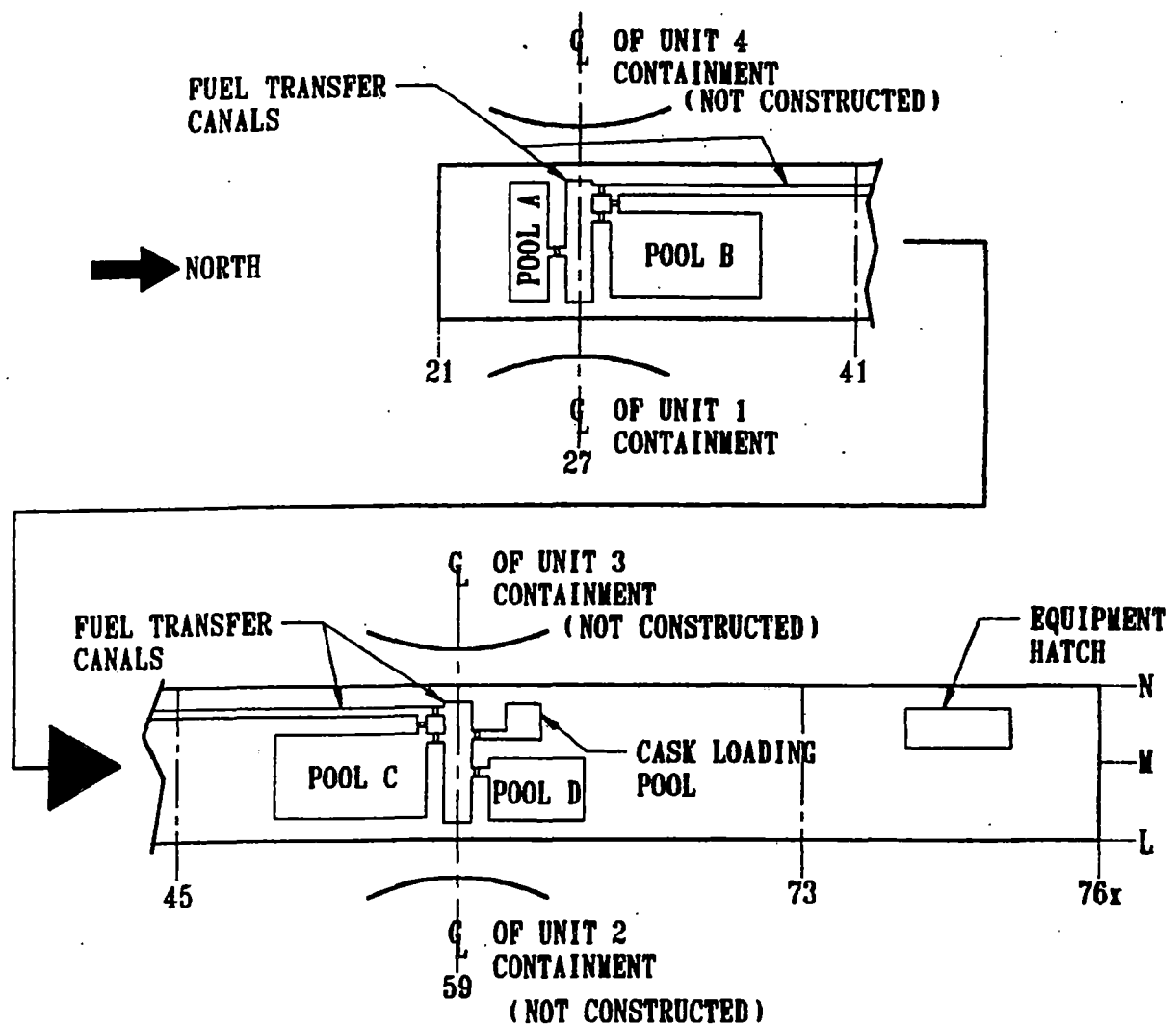
¹⁴ The ratio of 1/4 derives from the parameters shown in the license amendment application, Enclosure 7, page 5-15.

¹⁵ J Scarola of CP&L, presentation to Orange County Board of Commissioners, 9 February 1999.

CP&L could provide a more precise projection of the cesium-137 inventory in the Harris pools over coming years. However, our estimate will be a reasonable indication of cesium-137 inventory during the next two decades, assuming pools C and D are used as CP&L intends.

For comparison with the pools' inventory of cesium-137, note that the NRC has estimated the inventory of cesium-137 in the Harris reactor core, during normal operation, to be 4.2×10^6 Curies (155,000 TBq, or 47 kilograms).¹⁶ This represents an average inventory of 0.27×10^5 Curies in each of the reactor's 157 fuel assemblies. Note that an average assembly in the core will have a lower cesium-137 content than an assembly at discharge, and that the NRC's estimate may have assumed a relatively low fuel burnup.

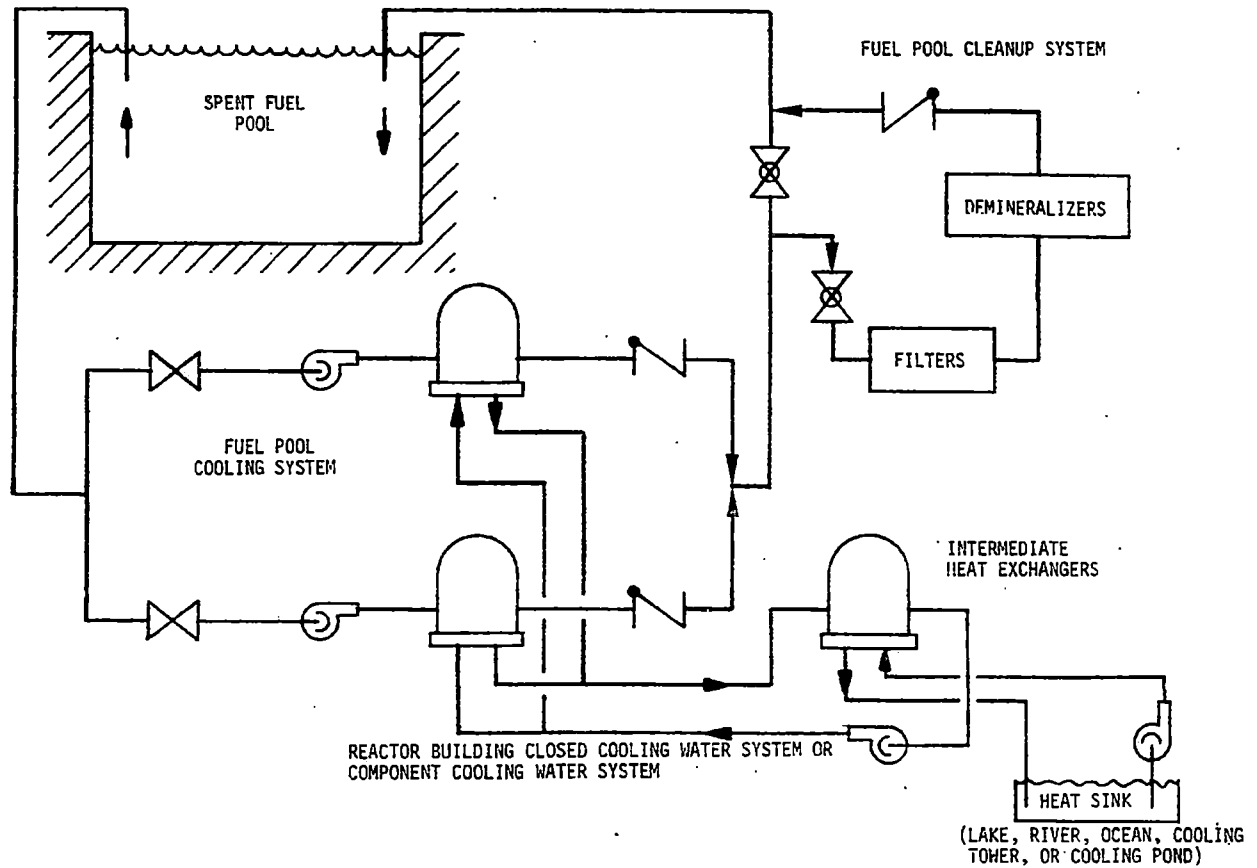
¹⁶ US Nuclear Regulatory Commission, Final Environmental Statement Related to the Operation of Shearon Harris Nuclear Power Plant Units 1 and 2, NUREG-0972, October 1983.



Source: License amendment application

Figure A-1

Interior of the Harris Fuel Handling Building



Source: NUREG-0404

Figure A-2

Typical cooling and cleanup systems for a spent fuel pool

Pool	PWR spaces	BWR spaces	Total
'A'	360	363	723
'B'	768	2178	2946
'C'	927	2763	3690
'D'	1025	0	1025
Total	3080	5304	8384

Source: License amendment application

Table A-1

Present and proposed storage capacity in the Harris pools

DECAY PERIODS FOR A BOUNDING POOLS C AND D STORAGE CONFIGURATION			
PWR Fuel Assemblies		BWR Fuel Assemblies	
Number of Assys	Decay Period	Number of Assys	Decay Period
172	5 years	456	5 years
172	7 years	456	7 years
172	9 years	456	9 years
172	11 years	456	11 years
172	13 years	456	13 years
172	15 years	483	15 years
172	17 years		
172	19 years		
172	21 years		
172	23 years		
232	25 years		

Source: License amendment application

Table A-2

Projected stock of fuel assemblies in Harris pools C and D

**RISKS AND ALTERNATIVE OPTIONS
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Appendix B

Potential for severe accidents at the Harris reactor

1. Introduction

In examining the risks associated with spent fuel storage at Harris, one must consider the potential for accidents at the Harris reactor. Such consideration is necessary for two reasons. First, a reactor accident could accompany, initiate or exacerbate a spent fuel pool accident. Second, modification of the Harris plant to increase its spent fuel storage capacity could increase the probability or consequences of accidents at the Harris reactor.

This appendix addresses the potential for severe accidents at the Harris reactor. "Severe" reactor accidents have two major defining characteristics. First, they involve substantial damage to the reactor core, with a corresponding release of radioactive material from the fuel assemblies. Second, they extend the envelope of potential accidents beyond the "design basis" accidents that were considered when US reactors were first licensed.

During a severe reactor accident, radioactive material may be released to the environment, as an atmospheric plume or by entry into ground or surface waters. The release may be large or small. In illustration, the 1979 TMI accident and the 1986 Chernobyl accident were both severe accidents, involving substantial damage to the reactor core. However, the TMI release was comparatively small and the Chernobyl release was comparatively large.

2. Probabilistic risk assessment

The probabilities and consequences of potential accidents at nuclear facilities can be estimated through the techniques of probabilistic risk assessment (PRA). Nuclear facility PRAs are performed at three levels. At Level 1, a PRA will estimate the probability of a specified type of accident (e.g., severe core damage at a reactor). At Level 2, which builds upon Level 1 findings, a PRA will estimate the nature of potential radioactive releases from the facility. In

turn, the Level 2 findings can be used in a Level 3 exercise, which will estimate the offsite consequences (health effects, economic effects, etc.) of radioactive releases. For all three levels, a PRA can be performed for "internal" accident-initiating events (equipment failure, operator error, etc.) and for "external" accident-initiating events (earthquakes, floods, etc.).¹

PRA methodology is used for non-reactor nuclear facilities, but is most highly developed in its application to reactors. The first PRA was the Reactor Safety Study (WASH-1400), which was published by the US Nuclear Regulatory Commission (NRC) in 1975.² The present state of the PRA art is exemplified by a study of five nuclear power plants (NUREG-1150) published by the NRC in 1990.³

Uncertainty and incompleteness of PRA findings

An in-depth PRA such as NUREG-1150 can provide useful insights regarding a reactor's accident potential. However the findings of any PRA will inevitably be accompanied by substantial uncertainty and incompleteness. Uncertainty arises from the intrinsic difficulties of modelling complex systems, and from limited understanding of some of the physical processes that accompany severe accidents. Incompleteness arises from the potential for unanticipated accident sequences, gross human errors, undetected structural flaws, and acts of malice or insanity.⁴ Thus, a PRA's finding about the probability of an accident should be viewed with two caveats. First, the accident probability, as found in the PRA, will fall within some range of uncertainty. Second, the accident probability, as found in the PRA, will be a lower bound to the true probability, which will be impossible to determine.

NUREG-1150 findings for the Surry PWRs

Figures B-1 and B-2 illustrate the findings of NUREG-1150. These figures show the estimated core damage frequency for the Surry nuclear reactors. These reactors are 3-loop Westinghouse pressurized-water reactors (PWRs), as is the Harris reactor. Core damage frequency is shown per reactor-year of

¹ In PRA practice, it is common for analysis of externally-initiated accidents to build upon previous analysis of internally-initiated accidents.

² US Nuclear Regulatory Commission, Reactor Safety Study, WASH-1400 (NUREG-75/014), October 1975.

³ US Nuclear Regulatory Commission, Severe Accident Risks: An Assessment for Five US Nuclear Power Plants, NUREG-1150 (2 vols), December 1990.

⁴ H Hirsch, T Einfalt, O Schumacher and G Thompson, IAEA Safety Targets and Probabilistic Risk Assessment, Gesellschaft fur Okologische Forschung und Beratung, Hannover, August 1989.

operation. Figure B-1 shows core damage frequency for internal events, fires and earthquakes (seismic events). Two estimates are shown for seismic events, one drawing on an estimate of earthquake frequency by Lawrence Livermore National Laboratory, the other on an estimate by the Electric Power Research Institute (EPRI). The bars in Figure B-1 span an estimated uncertainty range from the 5th to the 95th percentile. An alternative portrayal of estimated uncertainty is provided by the probability densities shown in Figure B-2.

The authors of NUREG-1150 made a considerable effort to estimate the uncertainty associated with their findings. However, their uncertainty estimates relied heavily on expert opinion, rather than on a statistical analysis of data. Thus, the uncertainty estimates in NUREG-1150 should be viewed with caution. The reader will observe a cautionary statement attached to Figures B-1 and B-2. Finally, the NUREG-1150 findings of accident probability must be viewed as lower bounds, as explained above.

Acts of malice

Nuclear reactor PRAs do not consider malicious acts such as sabotage, terrorism or acts of war. Such acts are less susceptible to probabilistic analysis than are accident initiators such as human error. Nevertheless, sabotage and terrorism pose a significant threat to US nuclear plants.⁵ NRC regulations oblige reactor licensees to take certain precautions against this threat, but these precautions do not preclude the possibility of successful acts of sabotage or terrorism.

The US government is increasing the level of attention and the expenditure that it devotes to the threat of terrorism. Many observers argue that greater effort is required. For example, three authors with high-level government experience have recently written:⁶

Long part of the Hollywood and Tom Clancy repertory of nightmarish scenarios, catastrophic terrorism has moved from far-fetched horror to a contingency that could happen next month. Although the United States still takes conventional terrorism seriously, as demonstrated by the response to the attacks on its embassies in Kenya and Tanzania in August, it is not yet prepared for the new threat of catastrophic terrorism.

⁵ G Thompson, War, Terrorism and Nuclear Power Plants, Peace Research Centre, Australian National University, October 1996.

⁶ A Carter, J Deutch and P Zelikow, "Catastrophic Terrorism", Foreign Affairs, November/December 1998, page 80.

The effectiveness of licensees' arrangements to resist terrorist attacks on nuclear plants has recently been a subject of public debate. According to the head of the NRC's Operational Safeguards Response Evaluation program, plant security arrangements have failed in at least 14 of the 57 mock assaults which the NRC has conducted since 1991. Nevertheless, the NRC intends to weaken its oversight of licensees' antiterrorism efforts.⁷

3. The Harris IPE and IPEEE

The NRC requires each holder of a reactor license to perform an Individual Plant Examination (IPE), to assess the severe accident potential of that reactor. Carolina Power and Light (CP&L) submitted an IPE for the Harris reactor in 1993.⁸ This was a Level 2 PRA for internal events, including in-plant flooding but neglecting in-plant fires.

The NRC also requires each licensee to perform an Individual Plant Examination for External Events (IPEEE). CP&L submitted an IPEEE for the Harris reactor in 1995.⁹ This study did not follow PRA practice. Instead, it consisted of a seismic margins analysis and a limited analysis of in-plant fires.

IPE estimate of core damage frequency

According to the IPE performed by CP&L, the frequency of severe core damage at Harris is 7×10^{-5} per reactor-year. This must be considered a "point" estimate, because the Harris IPE does not provide an uncertainty band or probability density function of the kind shown in Figures B-1 and B-2. The IPE predicts that accident sequences involving a loss-of-coolant accident (LOCA) will account for 40 percent of Harris' core damage frequency, while sequences involving station blackout (loss of electrical power) will account for 26 percent of the core damage frequency. The 40 percent contribution of LOCAs to core damage frequency is due to LOCAs with injection failure (17 percent) and LOCAs with recirculation failure (23 percent).

⁷ S Allen, "NRC to cut mock raids on atom plants", The Boston Globe, 25 February 1999, page A6.

⁸ Carolina Power & Light Company, Shearon Harris Nuclear Power Plant, Unit No. 1: Individual Plant Examination Submittal, August 1993.

⁹ Carolina Power & Light Company, Shearon Harris Nuclear Power Plant, Unit No. 1: Individual Plant Examination for External Events Submittal, June 1995.

The NRC has compiled and compared IPE findings for all US commercial nuclear reactors.¹⁰ Some of the results are shown in Figures B-3 and B-4. Figure B-3 shows that the reported core damage frequencies tend to be significantly higher for PWRs than for boiling-water reactors (BWRs). Figure B-4 shows that the reported core damage frequencies tend to be higher for 3-loop Westinghouse (W-3) PWRs than for 2-loop and 4-loop Westinghouse PWRs and PWRs made by Combustion Engineering (CE) and Babcock & Wilcox (B&W). The Harris reactor is a 3-loop Westinghouse PWR.

From its compilation of IPE findings, the NRC concluded that sequences involving LOCAs (especially LOCAs with recirculation failure) and station blackout are major contributors to estimated core damage frequency at 3-loop Westinghouse PWRs. This conclusion is consistent with the Harris IPE findings outlined above. The NRC noted that the 3-loop Westinghouse PWRs exhibit a relatively high dependence of front-line safety systems on service water (SW), component cooling water (CCW) and heating, ventilating & air conditioning (HVAC) systems.

IPEEE findings

The Harris IPEEE consisted of a seismic margins analysis and a limited analysis of in-plant fires. The seismic margins analysis examined the Harris reactor's ability to withstand a review level earthquake (RLE) of 0.3g. Note that the reactor's safe shutdown earthquake (SSE) is 0.15g and its operating basis earthquake is 0.075g. According to the IPEEE, the only actions required to make the Harris reactor safe against the RLE involved housekeeping and minor modifications, and these actions have been taken. The IPEEE did not investigate the implications of an earthquake more severe than the RLE.

A limited analysis of in-plant fires appears in the IPEEE. This analysis identified four fire scenarios as significant contributors to core damage frequency. One scenario would take place in each of switchgear rooms A and B, and two scenarios would take place in the control room. The combined core damage frequency, summed over all four scenarios, would be 1×10^{-5} per reactor-year, but the IPEEE argues that a summation of this kind would be inaccurate without further refinement of the analysis.

Figures B-1 and B-2 illustrate the findings that can be generated by the systematic application of PRA techniques to accident sequences initiated by external events. In comparison, the Harris IPEEE is a relatively crude study.

¹⁰ US Nuclear Regulatory Commission, Individual Plant Examination Program: Perspectives on Reactor Safety and Plant Performance, NUREG-1560 (3 vols), December 1997.

Release of radioactive material

The Harris IPE analyzes the potential for accident sequences to release radioactive material to the environment. The IPE only considers releases to the atmosphere during accident sequences that are initiated by internal events. Potential releases are described by a set of release categories.

Release category RC-5 represents the largest release identified in the IPE. This release would include 100 percent of the noble gas inventory in the reactor core, 59 percent of the CsI inventory, and 53 percent of the CsOH inventory. The IPE does not describe how cesium would be distributed between CsI and CsOH. Thus, one can interpret the RC-5 release as including 59 percent of iodine isotopes in the core and 53-59 percent of cesium isotopes.

Accident sequences contributing to release category RC-5 would involve steam generator tube rupture (SGTR) with a stuck-open safety relief valve (SRV), or an inter-system LOCA (ISLOCA). The SGTR could occur as an accident initiating event or through overheating of steam generator tubes during an accident sequence initiated by some other event. A stuck-open SRV, concurrent with a SGTR, would create a direct pathway from the reactor core to the atmosphere, bypassing the containment. In an ISLOCA sequence, reactor cooling water would be lost from a breach in a piping system outside the containment. This loss of water would initiate the accident, and the water's escape pathway would provide a route for the escape of radioactivity after core damage began.

An accident in release category RC-5 would cause substantial offsite exposure to radioactivity. In addition, the Harris plant and its immediate surroundings would become radioactively contaminated to the point where access by personnel would be precluded. Accidents in other release categories would release smaller amounts of radioactive material, but could also contaminate the Harris plant to the point where access by personnel would be precluded. This matter is addressed further in Appendix C.

The Harris IPE estimates the probability of release category RC-5 as 3×10^{-6} per reactor-year. Note that the overall probability of core damage is estimated to be 7×10^{-5} per reactor-year. Thus, the IPE predicts that 4 percent of core damage sequences would yield a release in category RC-5. Overall, the IPE predicts that 15 percent of core damage sequences would be accompanied by a

significant degree of containment failure or bypass, with a total probability of about 1×10^{-5} per reactor-year.¹¹

4. Pool-reactor interactions

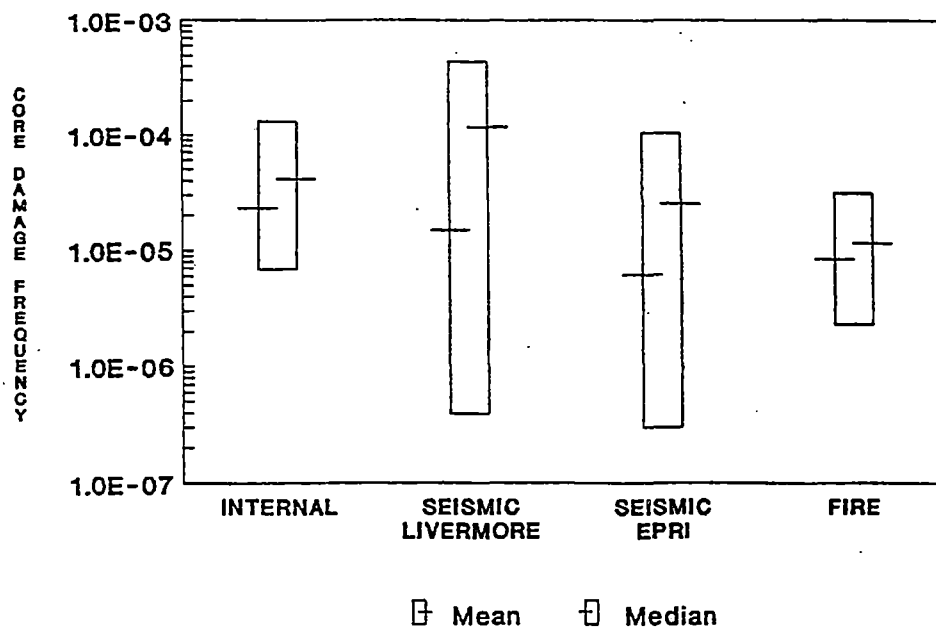
Neither CP&L nor NRC have performed an analysis to determine how a severe accident or a design-basis accident at the Harris reactor might accompany, initiate or exacerbate an accident at the Harris fuel pools, or vice versa.¹² Appendix C shows how a severe reactor accident could initiate a pool accident by precluding personnel access. From Appendix E it can be inferred that a pool accident could similarly preclude access to the reactor.

The Harris IPE does not analyze the implications that activation of pools C and D at Harris might have for severe accidents at the Harris reactor. Appendix A points out that activation of pools C and D will raise two safety issues that could increase the probability of core damage at Harris. First, cooling of pools C and D and a planned uprate in reactor power will place an increased heat load on the component cooling water (CCW) system of Harris Unit 1, thus adding stress to operators and equipment at Harris, potentially increasing the probability of core damage. Second, cooling of pools C and D will create an increased load on the electrical systems at Harris, thereby adding stress to operators and equipment and potentially increasing the probability of core damage. Before activation of pools C and D is permitted, these effects should be examined through a supplement to the Harris IPE.

¹¹ Release categories involving significant containment failure or bypass are, in descending order of estimated probability, RC-4, RC-5, RC-6, RC-1B, RC-4C and RC-3. Each of these categories involves a 100 percent release of noble gases. The CsI release fraction ranges from .001 percent (RC-6) to 59 percent (RC-5).

¹² As examples of literature relevant to potential safety interactions between fuel pools and reactors, see: D A Lochbaum, Nuclear Waste Disposal Crisis, PennWell Books, Tulsa, OK, 1996; and N Siu et al, Loss of Spent Fuel Pool Cooling PRA: Model and Results, INEL-96/0334, Idaho National Engineering Laboratory, September 1996.

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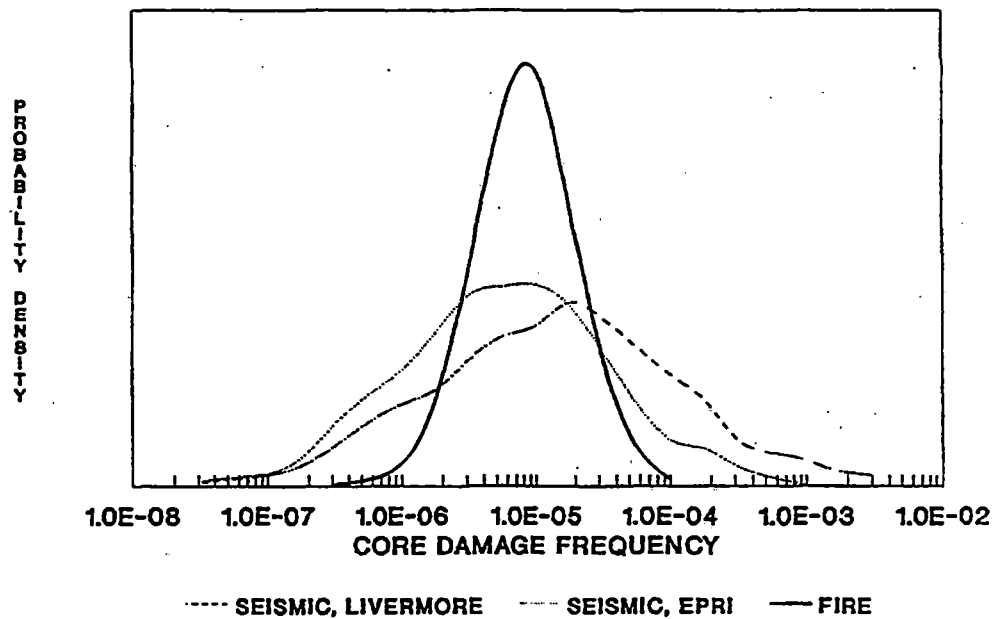


Note: As discussed in Reference 8.7, core damage frequencies below $1\text{E}-5$ per reactor year should be viewed with caution because of the remaining uncertainties in PRA (e.g., events not considered).

Source: NUREG-1150

Figure B-1

Estimated core damage frequency for the Surry PWRs

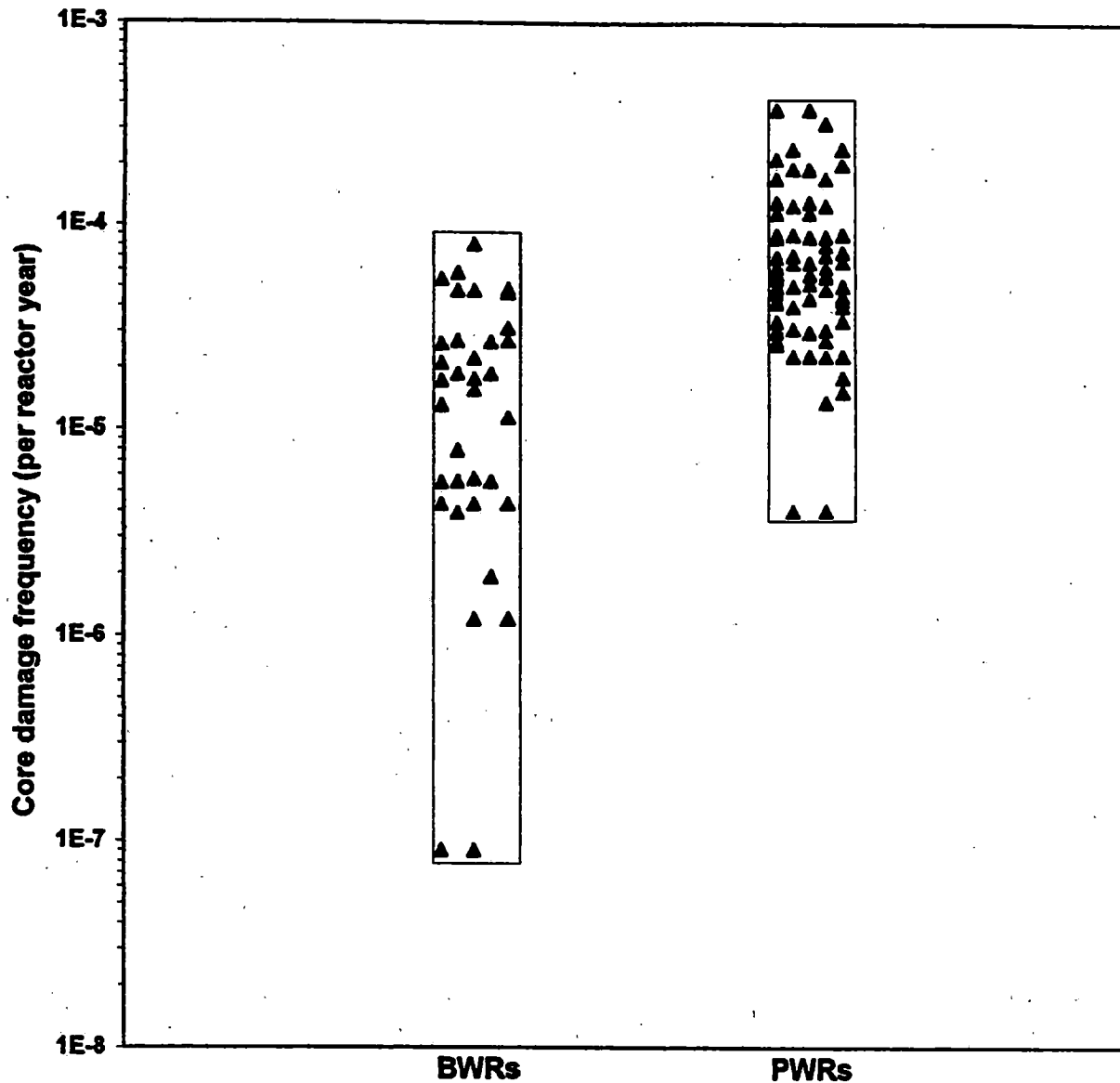


Note: As discussed in Reference 8.7, core damage frequencies below $1\text{E}-5$ per reactor year should be viewed with caution because of the remaining uncertainties in PRA (e.g., events not considered).

Source: NUREG-1150

Figure B-2

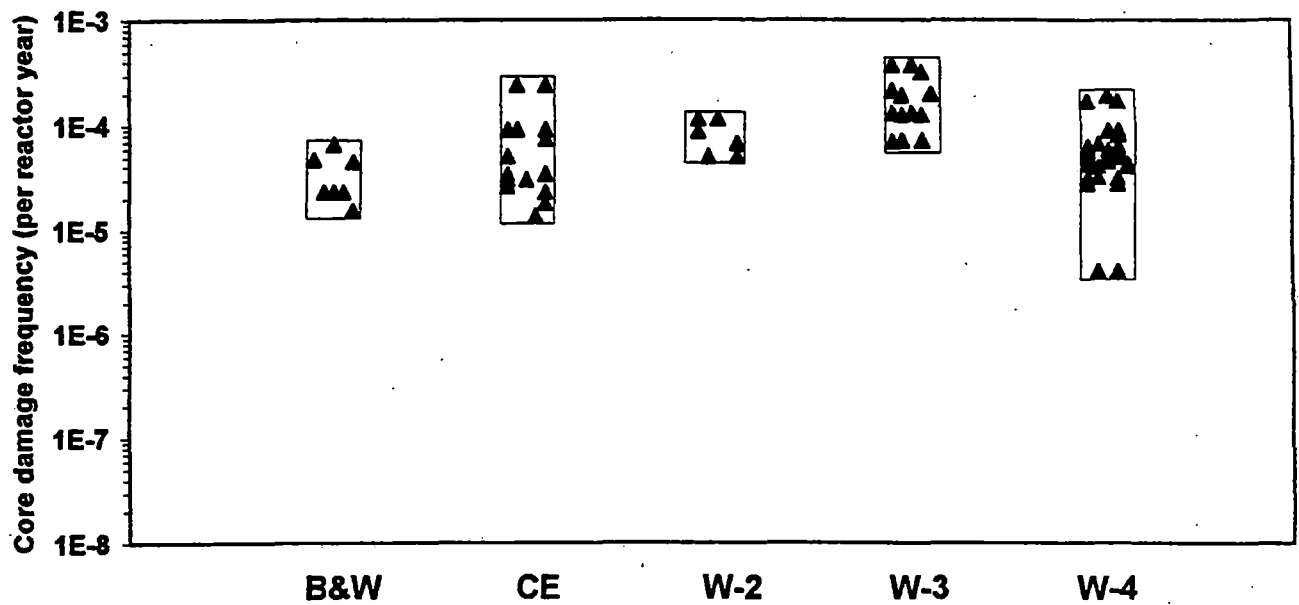
Probability density of estimated external-events core damage frequency for the Surry PWRs



Source: NUREG-1560

Figure B-3

Summary of core damage frequencies as reported in IPEs



Source: NUREG-1560

Figure B-4

Core damage frequencies reported in IPEs for types of PWR

**RISKS AND ALTERNATIVE OPTIONS
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Appendix C

Potential for loss of water from the Harris pools

1. Introduction

This appendix considers the potential for partial or total loss of water from one or more of the Harris fuel pools. The arrangement and use of these pools are described in Appendix A. If a loss of water occurs, then exothermic reactions could occur in the affected pools, as described in Appendix D.

2. Types of event that might cause water loss

A variety of events, alone or in combination, might lead to partial or complete uncovering of spent fuel in the Harris pools. Relevant types of event include:

- (a) an earthquake, cask drop, aircraft crash, human error, equipment failure or sabotage event that leads to direct leakage from the pools;
- (b) siphoning of water from the pools through accident or malice;
- (c) interruption of pool cooling, leading to pool boiling and loss of water by evaporation; and
- (d) loss of water from active pools into adjacent pools or canals that have been gated off and drained.

3. Assessing the potential for water loss: the role of PRA

A discipline known as probabilistic risk assessment (PRA) has been developed to examine the probabilities and consequences of potential accidents at nuclear facilities. PRA techniques are most highly developed in their application to reactor accidents, but can be applied to fuel pool accidents. Appendix B describes the characteristics, strengths and limitations of PRA.

Carolina Power & Light Company (CP&L) has prepared a Level 2, internal-events PRA for the Harris reactor, in the form of an Individual Plant

Examination (IPE). CP&L has also performed a limited assessment of the vulnerability of the Harris reactor to earthquakes and in-plant fires, in the form of an Individual Plant Examination for External Events (IPEEE). The findings of the IPE and IPEEE are described in Appendix B.

The Harris IPE and IPEEE could be extended to encompass fuel pool accidents as well as reactor accidents. Such an extension would be logical, because there are various ways in which a severe accident or a design-basis accident at the Harris reactor might accompany, initiate or exacerbate an accident at the Harris fuel pools, or vice versa.¹ However, there is no current indication that CP&L will extend the IPE or IPEEE, or will otherwise apply PRA techniques to potential accidents at the Harris fuel pools.

As an indication of the need for an extended IPE and IPEEE at Harris, covering fuel pool accidents, consider a study performed for the NRC by analysts at the Idaho National Engineering Laboratory.² These analysts examined a two-unit boiling-water reactor (BWR) plant based on the Susquehanna plant. They estimated that the plant's probability of spent fuel pool (SFP) boiling events is 5×10^{-5} per year. From Appendix B it will be noted that the Harris IPE predicts a core damage frequency of 7×10^{-5} per year. (Years and reactor-years are equivalent for Harris.) The similar magnitudes of these probabilities suggests that pool accidents could be a major contributor to risk at Harris, especially considering the large inventory of long-lived radioisotopes in the Harris pools.

A comprehensive application of PRA techniques to the Harris fuel pools is a task beyond the scope of the author's present work for Orange County. In the remainder of this appendix, selected issues are discussed. These discussions illustrate the need for a comprehensive PRA approach.

4. Analyses of earthquake and cask drop at the Robinson plant

Analysts sponsored by the Nuclear Regulatory Commission (NRC) have examined the effects of a severe earthquake and a cask drop on the fuel pool at CP&L's Robinson plant.³ The Robinson plant features one pressurized-water reactor (PWR) and a single fuel pool. By examining the vulnerability of

¹ As examples of literature relevant to potential safety interactions between fuel pools and reactors, see: D A Lochbaum, Nuclear Waste Disposal Crisis, PennWell Books, Tulsa, OK, 1996; and N Siu et al, Loss of Spent Fuel Pool Cooling PRA: Model and Results, INEL-96/0334, Idaho National Engineering Laboratory, September 1996.

² N Siu et al, op cit.

³ P G Prassinis et al, Seismic Failure and Cask Drop Analyses of the Spent Fuel Pools at Two Representative Nuclear Power Plants, NUREG/CR-5176, January 1989.

this pool, the NRC sought to obtain knowledge that would be relevant to other PWRs.

Earthquake

The NRC's analysis of the Robinson pool showed that there is high confidence (95 percent) of a low probability (5 percent) of structural failure of the pool in the event of an earthquake of 0.65g. A more severe earthquake could cause structural failure and water loss, and the mean probability of such an event was estimated to be 1.8×10^{-6} per reactor-year.

Cask drop

The NRC's analysts examined a four-foot drop of a 68-ton fuel shipping cask onto the wall of the Robinson fuel pool. They estimated that the wall would suffer significant damage. Cracking of the concrete, yield of reinforcing steel, and tearing of the liner could be expected. Loss of pool water could follow. The probability of this cask drop was not estimated.

Relevance of these findings to Harris

Each nuclear plant has specific design features. Thus, the findings from Robinson cannot be applied uncritically to Harris. Nevertheless, the Robinson findings suggest that the Harris fuel pools may be vulnerable to water loss in the event of a severe earthquake or a cask drop.

The Harris pools are partly below the site's grade level, and the tops of the fuel racks are at grade level. However, there are rooms and passages below the pools. Also, there are three deep cavities adjacent to the fuel handling building, where the containments for Units 2-4 were to have been constructed. Thus, the pools could drain below the tops of the fuel racks, partially or completely, if damaged by an earthquake or cask drop.

Administrative and technical measures are employed at Harris to prevent a cask drop onto a pool wall or into a pool. There is some probability that these measures will fail and a cask drop will occur. No PRA estimate of this probability is available. An NRC-sponsored analysis found the probability of structural failure from a cask drop at the Millstone and Ginna plants, prior to improvements, to be 3×10^{-5} per reactor-year.⁴ After improvements, the

⁴ V L Sailor et al, Severe Accidents in Spent Fuel Pools in Support of Generic Safety Issue 82, NUREG/CR-4982, July 1987, Table 2.10.

probability was estimated to be lower than 2×10^{-8} per reactor-year. Such a low probability is beyond the range of credibility of PRA techniques.

5. A pool accident induced by a reactor accident

The Harris IPE predicts a core damage frequency of 7×10^{-5} per reactor-year. It further predicts that 15 percent of core damage sequences would be accompanied by a significant degree of containment failure or bypass, with a total probability of about 1×10^{-5} per reactor-year.⁵ The resulting releases could initiate a pool accident by precluding personnel access.

Radiation levels close to the plant

Figure C-1 shows the estimated whole-body dose to exposed persons following a severe reactor accident.⁶ The dose shown is averaged over a range of meteorological conditions and a set of potential atmospheric releases (PWR 1-5) from the NRC's 1975 Reactor Safety Study. Those releases involved a cesium release fraction ranging from 1-50 percent. A similar figure could be drawn for the releases predicted by the Harris IPE, with a qualitatively similar result.

From Figure C-1 it will be seen that an unprotected person one mile from the plant will receive a whole-body dose of about 1,000 rem over one day. Closer to the plant, the dose will be much higher, as shown in Figure C-2.⁷ It has been estimated that the dose rate within a reactor containment, following a severe accident, will be 4 million rem per hour.⁸ Given containment failure or bypass, doses approaching this level could be experienced outside the containment, in locations such as the fuel handling building.

Health effects of high dose levels

A radiation dose of 500-1,000 rem will normally kill an adult person within a few weeks, due to bone marrow damage. Doses of 1,000-5,000 rem will damage the gastro-intestinal tract, causing extensive internal bleeding and

⁵ Release categories involving significant containment failure or bypass are, in descending order of estimated probability, RC-4, RC-5, RC-6, RC-1B, RC-4C and RC-3. Each of these categories involves a 100 percent release of noble gases. The CsI release fraction ranges from .001 percent (RC-6) to 59 percent (RC-5).

⁶ Figure C-1 is adapted from Figure 3.5-10 of: B Shleien, Preparedness and Response in Radiation Accidents, US Department of Health and Human Services, August 1983.

⁷ Figure C-2 is adapted from Slide 16 of: J A Martin et al, Pilot Program: NRC Severe Reactor Accident Incident Response Training Manual, NUREG-1210, February 1987, Volume 4.

⁸ R P Burke et al, In-Plant Considerations for Optimal Offsite Response to Reactor Accidents, NUREG/CR-2925, November 1982, Table B.2.

death within a few days. Doses above 10,000 rem will lead to failure of the central nervous system, causing death within a day.⁹

Prevention of access, and its implications

It is clear that a severe accident at the Harris reactor, accompanied by containment failure or bypass, would preclude personnel access to the plant. To this author's knowledge, CP&L has made no preparations to maintain pool cooling after such an event. It can be assumed that pool cooling would cease during the accident, and would not resume.

In CP&L's application for a license amendment to activate pools C and D at Harris, the bounding decay heat load for pools C and D is estimated to be 15.6 million BTU/hour (4.6 MW). CP&L states that the mass of water in these two pools, above the racks, will be 2.9 million pounds (1,320 tonnes). Then, CP&L estimates that the pools will begin to boil, if pool cooling systems become inoperative, after a period "in excess of 13 hours".¹⁰ If we assume that cooling remains inoperative, and that 4.6 MW of heat is solely devoted to boiling off 1,320 tonnes of water, then this water will be entirely evaporated over a period of 180 hours (7.5 days). In practice, a slightly longer period will be required, accounting for heat losses.

Thus, a severe reactor accident with containment failure or bypass would lead to uncovering of spent fuel in the Harris pools, after a time delay of perhaps 10 days. Heroic efforts would be needed to restore cooling or to replace evaporated water. If these efforts involved addition of water to the pools after the fuel had been uncovered, they would run the risk of exacerbating the accident by inhibiting convective circulation of air in the pools (see Appendix D).

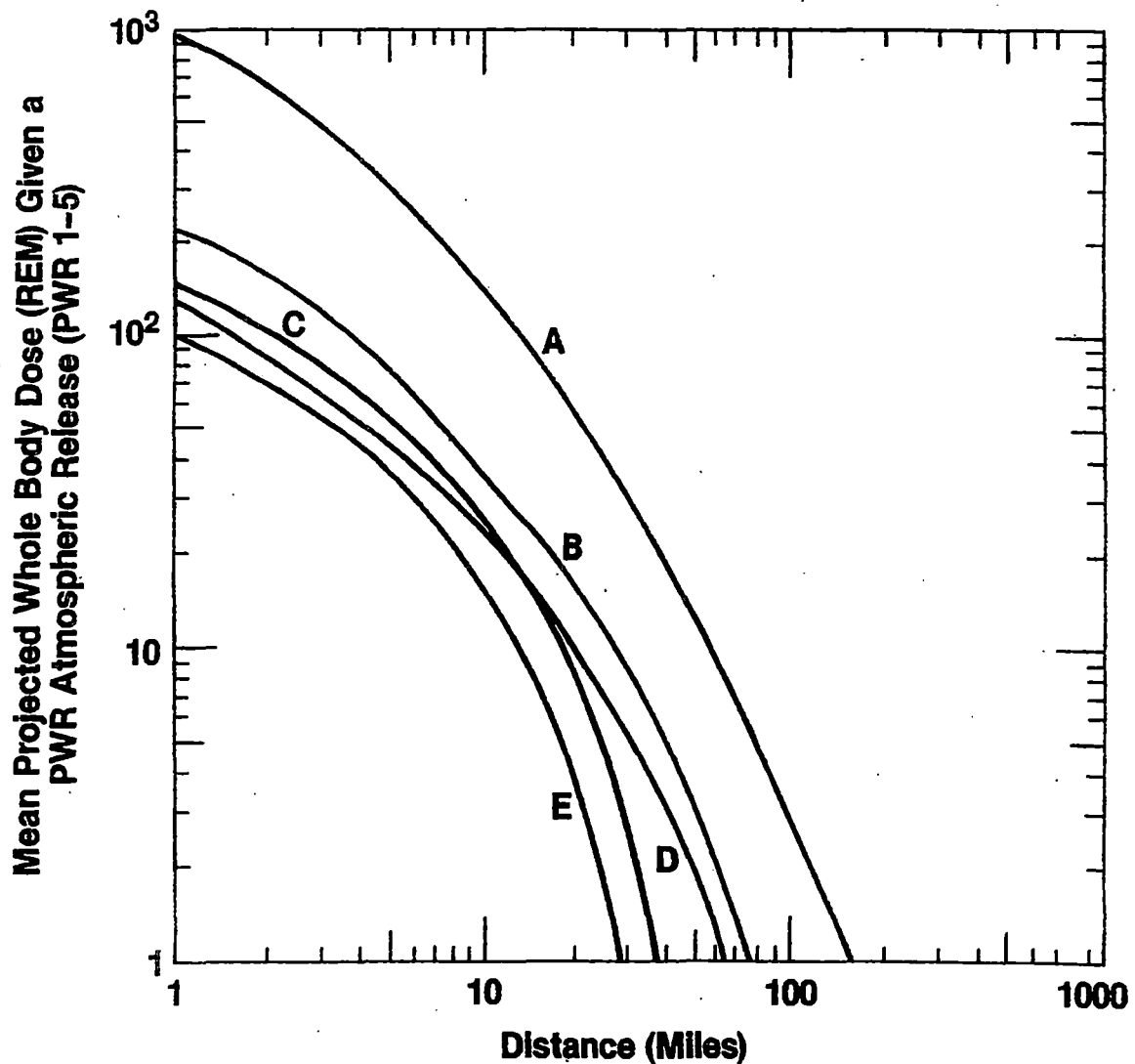
6. A sabotage/terrorism event involving siphoning

Appendix B discusses the potential for acts of malice at nuclear plants. A potential act of this kind at Harris would involve a group taking control of the fuel handling building, shutting down the pool cooling systems, and siphoning water from the pools. The consequent uncovering of fuel could initiate an exothermic reaction in recently discharged fuel within a few hours (see Appendix D). Once such a reaction was initiated, access to the fuel handling building would be precluded. Over the subsequent hours, exothermic reactions would be initiated in older fuel.

⁹ B Flowers et al, Royal Commission on Environmental Pollution, Sixth Report, Cmnd. 6618, Her Majesty's Stationery Office, London, September 1976, page 23.

¹⁰ License amendment application, Enclosure 7, page 5-8.

The group would require military skills and equipment to take control of the fuel handling building. Siphoning water from the pools would be a comparatively easy task. Escape by the group would be difficult but not impossible. The probability of this scenario cannot be predicted by PRA techniques.



- Curve A Individual located outdoors without protection. SF's (1.0, 0.7). 1-day exposure to radionuclides on ground.
- Curve B Sheltering, SF's (0.75, 0.33), 6-hour exposure to radionuclides on ground.
- Curve C Evacuation, 5-hour delay time, 10 mph.
- Curve D Sheltering, SF's (0.5, 0.08), 6-hour exposure to radionuclides on ground.
- Curve E Evacuation, 3-hour delay time, 10 mph.

Figure C-1

Estimated whole-body dose after a severe PWR accident

**GENERAL RELATIONSHIP OF DOSE RATE AND DISTANCE
FOR AN ATMOSPHERIC RELEASE**

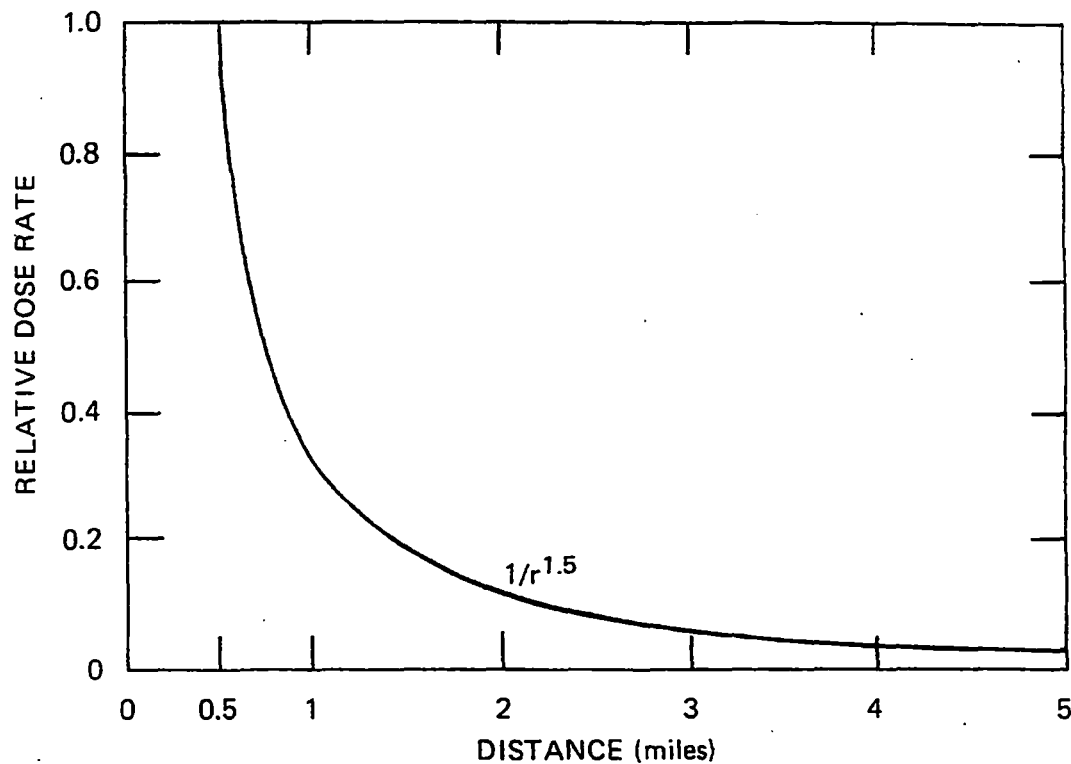


Figure C-2

Dose-distance relationship for a severe reactor accident

RISKS AND ALTERNATIVE OPTIONS
ASSOCIATED WITH SPENT FUEL STORAGE AT THE
SHEARON HARRIS NUCLEAR POWER PLANT

Appendix D

Potential for exothermic reactions in the Harris pools

1. Introduction

If water is totally or partially lost from one or more of the Harris fuel pools, the potential exists for an exothermic reaction between the fuel cladding and air or steam. The cladding is a zirconium alloy that begins to react vigorously with air or steam when its temperature reaches 900-1,000 degrees C. Partial or total loss of water could cause the cladding to reach this temperature, because water is no longer available to remove decay heat from the fuel. If the cladding temperature reaches 900-1,000 degrees C and air or steam remain available, a runaway reaction can occur. Heat from the exothermic reaction can increase cladding temperature, which will in turn increase the reaction rate, resulting in a runaway reaction.

The steam-zirconium reaction will be familiar to many observers of the 1979 TMI accident. During that accident a steam-zirconium reaction contributed to the partial melting of the reactor core, and generated hydrogen gas. Accumulation of this gas in the upper part of the reactor pressure vessel was a cause of concern during the accident. Hydrogen entered the containment and exploded about 10 hours into the accident, yielding a pressure spike of 28 psig.¹

The potential for a partial or total loss of water from the Harris pools is addressed in Appendix C. Here, the consequent potential for exothermic reactions is considered. Also, this appendix considers the potential for exothermic reactions to release radioactive material -- especially the radioisotope cesium-137 -- from spent fuel to the atmosphere outside the Harris plant.

¹ G Thompson, Regulatory Response to the Potential for Reactor Accidents: The Example of Boiling-Water Reactors, Institute for Resource and Security Studies, Cambridge, MA, February 1991.

2. Configuration of the Harris pools

A plan view of the Harris fuel handling building is provided in Figure A-1 of Appendix A. Figure D-1 shows a typical rack used in the Harris fuel pools. Carolina Power & Light Company (CP&L) has not published detailed information about the dimensions and configuration of the Harris racks, claiming that this information is proprietary. The center-center distances in the Harris racks are described in Appendix A.

Figure D-2 shows CP&L's intentions regarding placement of racks in pool C at Harris. It will be noted that the largest gap between the racks and the pool wall will be 2.4 inches, while the gap between racks will typically be 0.6 inches. In other words, the pool will be tightly packed with racks. Moreover, the racks will be tightly packed with fuel.

Effect of pool configuration on convective heat transfer

Examination of Figures D-1 and D-2 shows that convective circulation of air or water through the racks is limited to one pathway. Water (if the pool is full) or air (if the pool is empty) must enter the racks from below and pass upward through the fuel spaces. During Phases I and II of rack placement in pool C, air or water could reach the base of the racks from parts of the pool without racks. After racks are placed in Phase III, air or water must pass downward in the gap (1.4-2.4 inches) between the racks and the pool wall, and then travel horizontally across the bottom of the pool before entering racks from below.

It is further evident that the presence of residual water in the lower part of the pool would prevent convective circulation of air through the racks, in any of the three phases of rack placement. In this case, the only significant source of convective cooling would be from steam rising through the racks. This steam would be generated by the passage of heat from fuel assemblies to residual water, via conduction or thermal radiation.

Heat transfer pathways

Heat will be generated in the fuel assemblies by radioactive decay. Also, heat will be generated by exothermic reactions with zirconium, if these reactions are initiated. In the event of partial or total loss of water from a pool, the following pathways will be available to remove heat from the fuel assemblies, assuming that the assemblies remain intact:

- (a) upward convection of air (for total loss of water) or steam (for partial loss of water);
- (b) upward or downward conduction along the fuel rods and rack structure;
- (c) upward or downward thermal radiation along the narrow passages between fuel rods, and between assemblies and rack walls;
- (d) upward thermal radiation from the top of the racks to the interior of the fuel handling building;
- (e) downward thermal radiation from the bottom of the racks to the base of the pool or to residual water (if present); and
- (f) lateral conduction and thermal radiation across the racks to the pool wall.

For a fuel assembly separated from the pool wall by more than a few spaces, pathway (f) will be ineffective. Thus, only pathways (a) through (e) need to be considered. In the event of total loss of water, the effectiveness of pathway (a) will depend upon the extent of ventilation in the fuel handling building.

3. A scoping approach to heat transfer

To assess the effectiveness of the above-mentioned heat transfer pathways, it is appropriate to begin with a scoping analysis. Detailed calculations, especially if they involve computer modelling, must be guided by physical insight. Scoping calculations can help to provide that insight.

Decay heat output

The first parameter to be considered – designated here as Q – is the decay heat in a spent fuel assembly. The unit of Q is kW per metric ton of heavy metal (MTHM) in the assembly. For PWR fuel, Q is about 10 kW/MTHM for fuel aged 1 year from discharge, and about 1 kW/MTHM for fuel aged 10 years.²

Upper bound of temperature rise

Now consider a fuel pellet which is in complete thermal isolation. Due to decay heat, this pellet will experience a temperature rise of $11Q$ degrees C per hour.³ Thus, if $Q=10$, the temperature rise will be 110 degrees C per hour (2,640 degrees C per day). A temperature rise of $11Q$ degrees C per hour is the

² For fuel burnups typical of current practice, Q will actually be 10-20 percent higher than the values shown here.

³ Assuming that a uranium dioxide pellet has a specific heat of 300 J/K per kg of pellet (340 J/K per kg of HM).

upper bound to the temperature rise that could be experienced by a fuel assembly, absent the initiation of an exothermic reaction of the cladding.

Heat transfer by conduction

Next, consider conduction along the fuel rods. A Harris PWR assembly has 264 rods, each containing 1.74 kg of HM. Each rod is 12 ft long, with an outer diameter of 0.374 inches, a cladding thickness of 0.0225 inches, and a pellet diameter of 0.3225 inches.⁴ Assume that decay heat is generated uniformly along the length of the rod, conduction along the rod is the only heat transfer mechanism, and the two ends of the rod have the same temperature, Y (degrees C). Then, the temperature at the middle of the rod will be $Y + 2,000Q$ degrees C.⁵ This result could be viewed as counter-intuitive, because the decay heat in each rod is only 0.48Q Watts per meter of rod.

Convective cooling by steam

Now consider convective cooling of a fuel assembly by upward motion of steam that is generated from residual water at the lower end of the assembly. Neglect other heat transfer mechanisms, assume that decay heat is generated uniformly along the length of the fuel rods, and assume that the temperature of the residual water is 100 degrees C. Define S as the submerged fraction of the assembly and T (degrees C) as the temperature of steam leaving the top of the fuel assembly. Neglect the thermal inertia of the pellets and cladding. Then, the amount of steam generated is proportional to S, while the decay heat captured by this steam is proportional to (1-S). It follows that:⁶

$$T = 100 + (2,260/2.1) \times [(1-S)/S]$$

Note that Q does not enter this equation. If one-tenth of a fuel assembly is submerged ($S = 0.1$), this equation yields a T of 9,800 degrees C. A temperature of this magnitude would not be generated in practice, because of thermal inertia and the operation of other heat transfer mechanisms.⁷ However, the calculation establishes an important point. Convective cooling of fuel assemblies by steam from residual water will be ineffective when the submerged fraction of the assemblies is small.

⁴ Harris FSAR, Section 1.3, Amendment No. 30.

⁵ Assuming that the cladding's thermal conductivity is 17.3 W/mK, the pellets' conductivity is 1.99 W/mK, and pellets are in perfect contact with each other and the cladding.

⁶ Assuming that the latent heat of evaporation of water is 2,260 kJ/kg and the specific heat of steam is 2.1 kJ/kgK.

⁷ The singularity of the T equation at $S=0$ reflects the lack of consideration of other heat transfer mechanisms.

Cooling by thermal radiation

If residual water is present, there remains only one potentially effective mechanism of heat transfer from the mid-length of a fuel assembly -- thermal radiation along the axis of the assembly. Note that a Harris PWR assembly has an active length of 12 feet, a cross-section 8.4 inches square, and contains 264 fuel rods plus other longitudinal structures. In the Harris fuel pools, the assembly will be surrounded by continuous sheets of neutron-absorbing material (Boral), and the center-center distance in pool C will be 9.0 inches. In this configuration, axial heat transfer by thermal radiation will be strongly inhibited. However, calculations more detailed than those above are required to estimate the amount of heat that can be transferred by this pathway.

Note that downward heat transfer by radiation will increase the generation of steam from residual water, thus improving the effectiveness of convective cooling by steam. A detailed analysis should consider such effects through coupled calculations.

Summary

The preceding scoping calculations show that conduction and convective cooling by steam will be relatively ineffective. These cooling mechanisms cannot prevent fuel cladding from reaching a temperature of at least 1,000 degrees C -- the initiation point for a runaway exothermic reaction -- even for fuel aged in excess of 10 years. An estimate of the effectiveness of axial radiation cooling -- the only remaining cooling mechanism if residual water is present -- would require more detailed calculations. However, this author does not expect that such calculations would show axial radiation cooling to be more effective than conduction or convective cooling by steam.

If residual water is not present, a fuel assembly can be cooled by convective circulation of air. Estimation of the effectiveness of this mechanism requires an analysis of convective circulation through the pool and the fuel handling building, reflecting practical factors such as constrictions at the base of fuel racks.

4. Specifications for an adequate, practical analysis

There has been no site-specific analysis of the potential for exothermic reactions in the Harris pools. Generic analyses have been performed for and by the US Nuclear Regulatory Commission (NRC). Before addressing the findings and adequacy of the NRC's generic analyses, let us consider the

ingredients that are necessary if an analysis is to provide practical guidance about the potential for exothermic reactions in the Harris spent fuel pools. Sections 2 and 3 of this appendix provide a basis for specifying those ingredients.

Partial and complete uncovering of fuel

First, the analysis should not be limited to instantaneous, complete loss of water from a pool. Such a condition is unrealistic in any accident scenario which preserves the configuration of the spent fuel racks. If water is lost by drainage or evaporation and no makeup occurs, then complete loss of water will always be preceded by partial uncovering of the fuel. If makeup is considered, the water level could fall, rise or remain static for long periods.

Partial uncovering of the fuel will often be a more severe condition than complete loss of water. As shown above, convective heat loss is suppressed by residual water at the base of the fuel assemblies. As a result, longer-discharged fuel with a lower Q may undergo a runaway steam-zirconium reaction during partial uncovering while it would not undergo a runaway air-zirconium reaction if the pool were instantaneously emptied.

In a situation of falling water level, a fuel assembly might first undergo a runaway steam-zirconium reaction, then switch to an air-zirconium reaction as water falls below the base of the rack and convective air flow is established. In this manner, a runaway air-zirconium reaction could occur in a fuel assembly that is too long-discharged (and therefore has too low a Q) to suffer such a reaction in the event of instantaneous, complete loss of water. Conversely, a rising water level could precipitate a runaway steam-zirconium reaction in a fuel assembly that had previously been completely uncovered but had not necessarily suffered a runaway air-zirconium reaction while in that condition. The latter point is highly significant in the context of emergency measures to recover control of a pool which has experienced water loss. Inappropriate addition of water to a pool could exacerbate the accident.

Computer modelling

An adequate analysis of the potential for exothermic reactions will require computer modelling. The modelling should consider both partial and complete uncovering and the transition from one of these states to the other. Also, the modelling should cover: (a) thermal radiation, conduction, and steam or air convection; (b) air-zirconium and steam-zirconium reactions; (c) variations along the fuel rod axis; (d) radial variations within a representative fuel rod, including effects of the pellet-cladding gap; and (e) clad swelling and

rupture. Experiments will probably be required to support and validate the modelling.

Site-specific factors

The analysis can be strongly influenced by site-specific factors. For convective cooling by air, these factors include the detailed configuration of the racks, the pools and the fuel handling building. All relevant factors should be accounted for. This could be done through site-specific modelling.

Alternatively, generic modelling could be performed across the envelope of site-specific parameters, with sensitivity analyses to show the effects of varying those parameters.

Propagation of exothermic reactions to adjacent assemblies

After an exothermic reaction has been initiated in a group of fuel assemblies, this reaction might propagate to adjacent assemblies. Due to their lower Q or to other factors, the adjacent assemblies might not otherwise suffer an exothermic reaction. An analysis of propagation should consider the potential for reactions involving not only the fuel cladding but also material (e.g., Boral) in the fuel racks. The analysis should examine the implications of clad and pellet relocation after a reacting assembly has lost its structural integrity. Those implications include the heating of adjacent assemblies and racks by direct contact, thermal radiation, convection, and the inhibition of air circulation. A bed of relocated material at the base of the pool could have all these effects.

5. The 1979 Sandia study

An initial analysis of the potential for exothermic reactions was made for the NRC by Sandia Laboratories in 1979.⁸ This was a respectable analysis as a first attempt. It considered partial drainage of a pool, although it used a crude heat transfer model to study that problem, and neglected to consider the steam-zirconium reaction. It did not address the potential for propagation of exothermic reactions to adjacent assemblies. The Sandia authors were careful to state their assumptions and to specify the technical basis for their computer modelling.

Figure D-3 illustrates the findings of the Sandia study. The three lower curves in Figure D-3 show the sensitivity of convective air cooling to the diameter of the hole in the base of the fuel racks. The next higher curve -- the

⁸ A S Benjamin et al, Spent Fuel Heatup Following Loss of Water During Storage, NUREG/CR-0649, March 1979.

"blocked inlets" case -- shows the suppression of convective air cooling due to the presence of residual water. The dashed curve shows the effect of an air-zirconium reaction. The runaway nature of that reaction is evident.

Note that the analysis underlying Figure D-3 assumed a cylindrical rack arrangement with a center-center distance of about 13 inches. Also, the analysis assumed a gap of 16 inches between the racks and the pool wall. The Harris racks are more compact and are packed more tightly into their pools. These factors will tend to inhibit convective air cooling at Harris.

6. Subsequent studies

The 1979 Sandia study could have been the first of a series of studies that moved toward the level of adequacy specified in Section 4. Since 1979 the NRC has sponsored or performed a variety of studies related to the initiation of exothermic reactions in fuel pools.⁹ However, the scope of these studies has narrowed, and their potential for building on the 1979 study has not been realized.

Failure to consider partial uncovering

A major weakness of the NRC's studies since 1979 has been their focus on a postulated scenario of total, instantaneous loss of water. This appendix shows clearly that partial uncovering of fuel will often be a more severe condition than complete loss of water. Thus, however sophisticated the NRC's modelling of spent fuel heatup might be, the findings have limited relevance to the practical potential for exothermic reactions.

Brookhaven National Laboratory (BNL) has developed the SHARP code to replace the SFUEL code first developed at Sandia. BNL authors have claimed that the SHARP code can more accurately predict spent fuel heatup in realistic spent fuel pool configurations.¹⁰ A review of the SHARP code is beyond the scope of this report. Applied to spent fuel in a generic, high-density configuration in an instantaneously emptied pool, the SHARP code finds that the fuel cladding will reach a "critical" temperature (565 degrees C) if aged less than 17 months for PWR fuel or 7 months for BWR fuel.¹¹ The relevance of this finding to the Harris pools is unclear.

⁹ See, for example: V L Sailor et al, Severe Accidents in Spent Fuel Pools in Support of Generic Safety Issue 82, NUREG/CR-4982, July 1987; and R J Travis et al, A Safety and Regulatory Assessment of Generic BWR and PWR Permanently Shutdown Nuclear Power Plants, NUREG/CR-6451, August 1997.

¹⁰ R J Travis et al, page 3-4.

¹¹ Ibid.

Propagation of exothermic reactions

Pursuant to a Freedom of Information request, the NRC released in 1984 a so-called draft report by MIT and Sandia authors on the propagation of an air-zirconium reaction in a fuel pool.¹² This document has been repeatedly cited in subsequent years, although it should properly be regarded as notes toward a draft report. Those notes were submitted to the NRC after the project ran out of funds; it was never completed.

The MIT-Sandia group concluded from computer modelling and experiments that an air-zirconium reaction in fuel assemblies could propagate to adjacent, lower-Q assemblies. They expressed the view that propagation would be quenched in regions of a pool where fuel is aged 3 years or more, but noted the presence of "large uncertainties" in their analysis.

BNL analysts subsequently reviewed these experiments and conducted their own modelling using the same code (SFUEL). In their modelling the BNL analysts chose to terminate the air-zirconium reaction when the cladding reached its melting point.¹³ Neither the MIT-Sandia group nor the BNL group examined the implications of clad and pellet relocation after a reacting assembly has lost its structural integrity. The author is not aware of other analyses which address this problem. Thus, the specifications set forth in Section 4 for analysis of propagation have not been met.

7. The potential for an atmospheric release of radioactive material

Spent fuel at Harris which suffers an exothermic reaction will release radioactive material to the fuel handling building. That building is not designed as a containment structure, and is not likely to be effective in this role, given the occurrence of exothermic reactions in one or more pools. A BNL study has concluded that a reasonable, generic estimate of the release fraction of cesium isotopes, from affected fuel to the atmosphere outside the plant, is 100 percent.¹⁴ This release fraction is used in Appendix E.

The amount of fuel that will suffer an exothermic reaction, given a loss of water from the Harris pools, will depend upon the particular scenario. For scenarios which involve partial uncovering of fuel, the reaction could affect fuel aged 10 or more years. For scenarios which involve total loss of water,

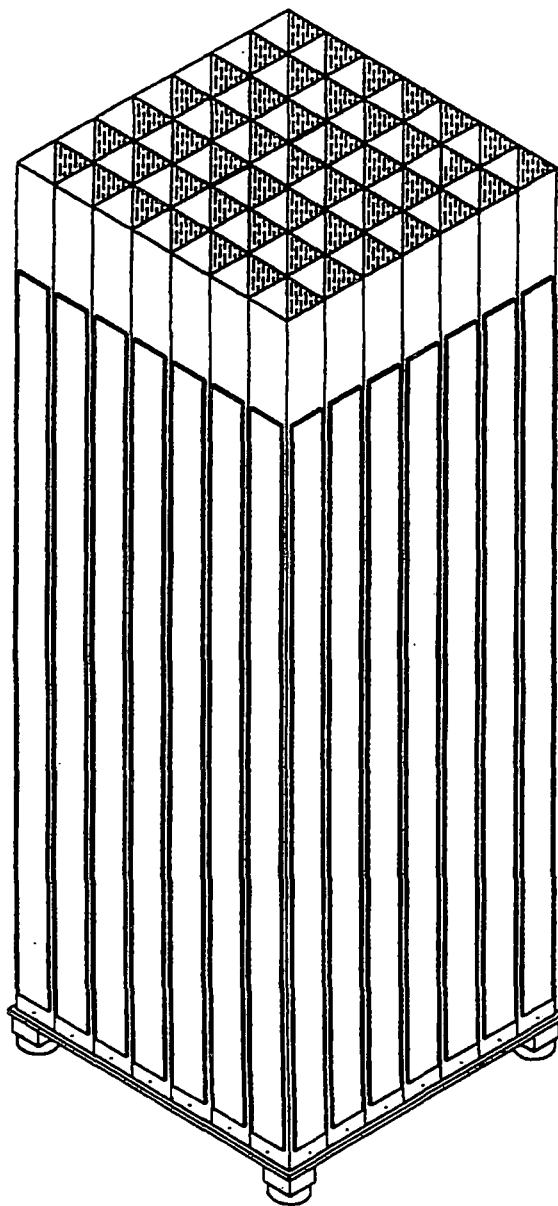
¹² N A Pisano et al, The Potential for Propagation of a Self-Sustaining Zirconium Oxidation Following Loss of Water in a Spent Fuel Storage Pool, Draft Report, January 1984.

¹³ V L Sailor et al.

¹⁴ Ibid.

the reaction will be initiated only in younger fuel, perhaps aged no more than 1-2 years. However, if clad/pellet relocation is properly factored into a propagation analysis, this analysis may show that a reaction will propagate to much older fuel.

Appendix E considers two potential releases of cesium-137 from the Harris pools. One release corresponds to an exothermic reaction in fuel aged 9 years or less. The other release corresponds to a reaction in fuel aged 3 years or less.



Source: License amendment application

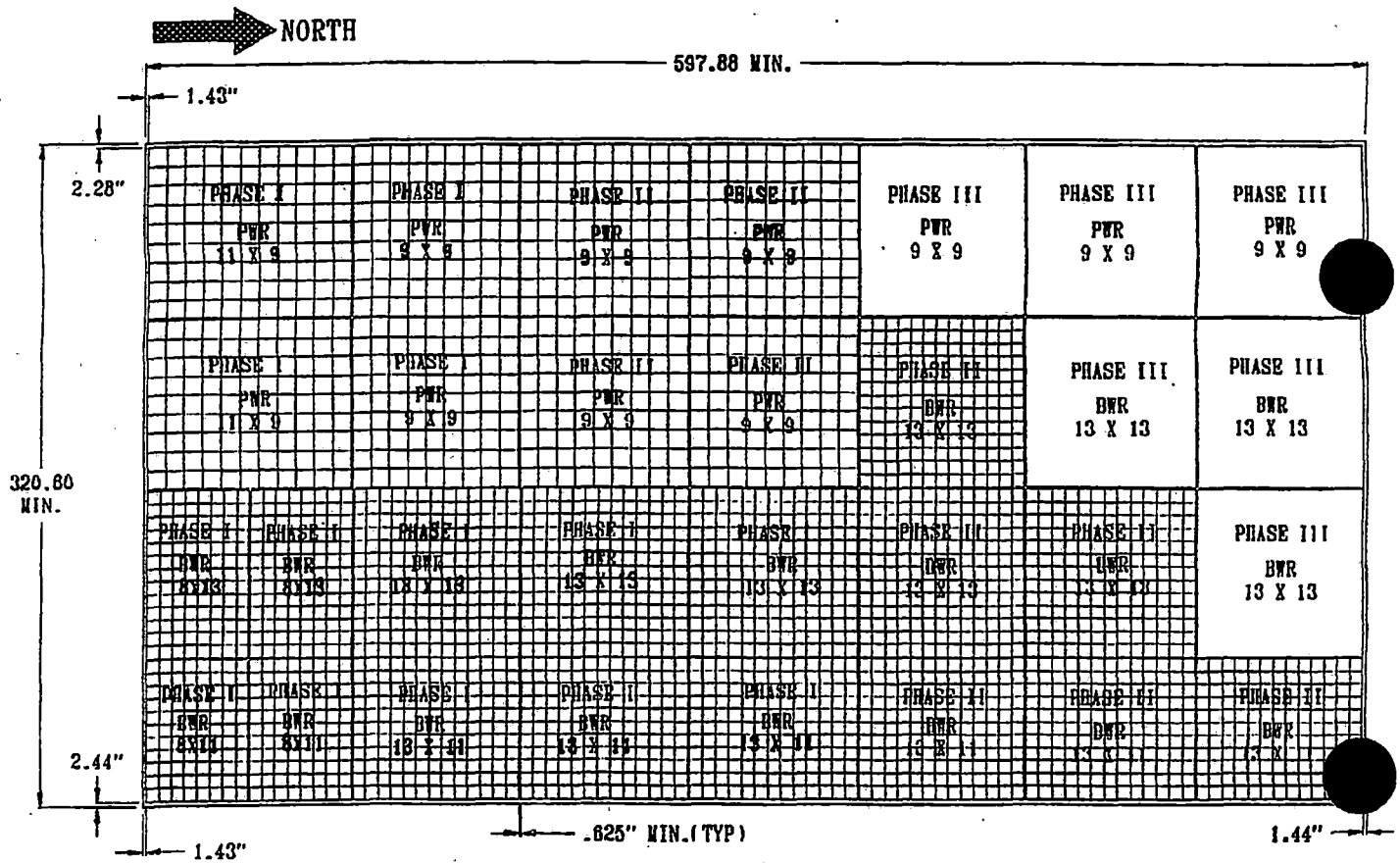
Figure D-1

Typical rack used in the Harris pools

Risks & alternative options re. spent fuel storage at Harris

Appendix D

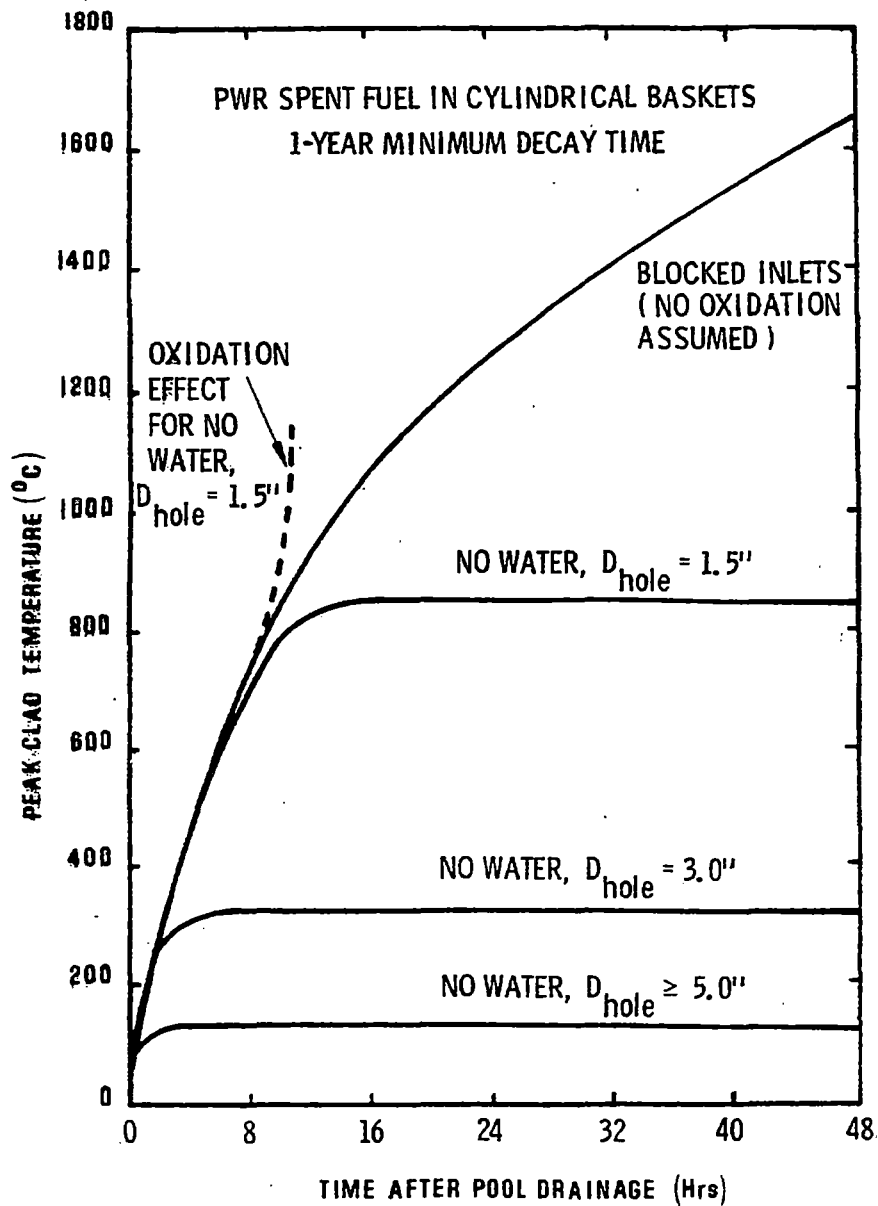
Page D-12



Source: License amendment application

Figure D-2

Proposed rack placement in Harris pool C



Source: NUREG/CR-0649

Figure D-3

Estimated heatup of PWR spent fuel after water loss

**RISKS AND ALTERNATIVE OPTIONS
ASSOCIATED WITH SPENT FUEL STORAGE AT THE
SHEARON HARRIS NUCLEAR POWER PLANT**

Appendix E

Consequences of a large release of cesium-137 from Harris

1. Introduction

This appendix outlines some of the potential consequences of postulated large releases of cesium-137 from the Harris plant to the atmosphere. Such consequences can be estimated by site-specific computer models. A simpler approach is used here, but this approach is adequate to show the nature and scale of expected consequences.

2. Characteristics of postulated releases

Two spent fuel release scenarios are postulated here. The first scenario involves a release of 2.3×10^7 Curies (870,000 TBq) of cesium-137, with a mass of 260 kilograms.¹ This represents the cesium-137 inventory in Harris' stock of spent fuel aged 3 years or less, as estimated in Appendix A. The second scenario involves a release of 7.1×10^7 Curies (2,600,000 TBq) of cesium-137, with a mass of 790 kilograms. This represents the cesium-137 inventory in Harris' stock of spent fuel aged 9 years or less. Note that all of the cesium-137 in the affected fuel is assumed to reach the atmosphere, an assumption which is explained in Appendix D.

Releases of the postulated magnitude could occur as a result of exothermic reactions in the Harris fuel pools. Appendix D discusses the potential for such reactions. Cesium-137 would not be the only radioisotope released to the atmosphere if exothermic reactions occurred in the pools. However, cesium-137 is likely to be the dominant cause of offsite radiological exposure,

¹ 1 Curie is equivalent to 3.7×10^{10} TBq. 1 TBq of cesium-137 is equivalent to 0.3 grams.

just as it dominates the offsite exposure attributable to the 1986 Chernobyl reactor accident.² Note that cesium-137 has a half-life of 30 years.

A severe accident at the Harris reactor could also release cesium-137 to the atmosphere. Appendix A notes that the US Nuclear Regulatory Commission (NRC) has estimated the inventory of cesium-137 in the core of the Harris reactor, during normal operation, to be to be 4.2×10^6 Curies (155,000 TBq, or 47 kilograms). As summarized in Appendix B, an individual plant examination (IPE) study by Carolina Power & Light Company (CP&L) has identified six categories of potential significant release due to severe accidents at the Harris reactor. Release category RC-5, the most severe release category, would involve a release to the atmosphere of 53-59 percent of the cesium isotopes in the reactor core. Thus, given the NRC's estimate of core inventory, release category RC-5 would involve an atmospheric release of $2.2\text{--}2.5 \times 10^6$ Curies (82,000-92,000 TBq, or 25-28 kilograms) of cesium-137.

Chernobyl and weapons testing releases

For comparison with the above-mentioned potential releases, consider two actual releases -- from the Chernobyl accident and from atmospheric testing of nuclear weapons. The 1986 Chernobyl reactor accident released about 90,000 TBq (27 kilograms) of cesium-137 to the atmosphere, representing 40 percent of the cesium-137 in the reactor core.³ Through 1980, about 740,000 TBq (220 kilograms) of cesium-137 were deposited as fallout in the Northern Hemisphere, as a result of atmospheric testing of nuclear weapons.⁴ Note that the fallout from weapons testing was distributed over a larger area than the fallout from the Chernobyl accident, and a larger fraction of it descended on oceans and lightly inhabited areas.

3. Contamination of land

A useful indicator of the consequences of a cesium-137 release is the area of contaminated land. Here, contamination is measured by the external (whole-body) radiation dose that people will receive if they live in a contaminated area. When cesium-137 is deposited from an airborne plume, it will adhere to the ground, vegetation and structures. From these locations, it will emit gamma radiation which provides an external radiation dose to an exposed person. Cesium-137 will also enter the food chain and water sources, thereby

² US Department of Energy, Health & Environmental Consequences of the Chernobyl Nuclear Power Plant Accident, DOE/ER-0332, June 1987; A S Krass, Consequences of the Chernobyl Accident, Institute for Resource & Security Studies, Cambridge, MA, December 1991.

³ Krass, op cit.

⁴ US Department of Energy, op cit.

providing an internal radiation dose to a person living in the contaminated area. Absent any countermeasures, the internal dose could be of a similar magnitude to the external dose.

Figure E-1 shows the relationship between contaminated land area and the size of an atmospheric release of cesium-137. This figure is adapted from a 1979 study by Jan Beyea, then of Princeton University.⁵ The threshold of contamination is an external dose of 10 rem over 30 years, assuming a shielding factor of 0.25 and accounting for weathering of cesium. The "typical meteorology" case in Figure E-1 assumes a wind speed of 5 m/sec, atmospheric stability in class D, a 0.01 m/sec deposition velocity, a 1,000 m mixing layer and an initial plume rise of 300 m (although the results are not sensitive to plume rise). A Gaussian, straight-line plume model was used, providing an estimate of contaminated land area that will approximate the area contaminated during a range of actual meteorological conditions. The lower and upper limits of land contamination in Figure E-1 represent a range of potential meteorological conditions.

The threshold for land contamination

An external exposure of 10 rem over 30 years would represent about a three-fold increase above the typical level of background radiation (which is about 0.1 rem/year). In its 1975 Reactor Safety Study, the NRC used a threshold of 10 rem over 30 years as an exposure level above which populations were assumed to be relocated from rural areas. The same study used a threshold of 25 rem over 30 years as a criterion for relocating people from urban areas, to reflect the assumed greater expense of relocating urban inhabitants.

In an actual case of land contamination in the United States, the steps taken to relocate populations and pursue other countermeasures (decontamination of surfaces, interdiction of food supplies, etc.) would reflect a variety of political, economic, cultural, legal and scientific influences. It is safe to say that few citizens would calmly accept a level of radiation exposure which substantially exceeds background levels.

Land contamination from potential Harris releases

Three potential Harris releases of cesium-137 are shown in Figure E-1. Releases of 70 million Curies and 20 million Curies correspond to liberation

⁵ J Beyea, "The Effects of Releases to the Atmosphere of Radioactivity from Hypothetical Large-Scale Accidents at the Proposed Gorleben Waste Treatment Facility", in Chapter 3 of Report of the Gorleben International Review, presented (in German) to the Government of Lower Saxony, March 1979.

of cesium-137 from spent fuel aged up to 9 years or up to 3 years, respectively. A release of 2 million Curies corresponds to the most severe reactor accident identified in the Harris IPE.

For typical meteorology, Figure E-1 indicates that a release of 2 million Curies would contaminate 4,000-5,000 square kilometers of land. A release of 20 million Curies would contaminate 50,000-60,000 square kilometers. Finally, a release of 70 million Curies would contaminate about 150,000 square kilometers of land. Note that the total area of North Carolina is 136,000 square kilometers and the state's land area is 127,000 square kilometers.⁶

Potentially exposed population

According to CP&L's Final Safety Analysis Report (FSAR) for the Harris plant, an estimated 1.8 million people will live within 50 miles of the plant in 2000, while 2.2 million people will live within that radius in 2020.⁷ A 50 mile-radius circle encompasses an area of 20,300 square kilometers.

If a substantial release of cesium-137 occurs at Harris, the shape and size of the resulting contaminated area will depend on the size of the release and the meteorological conditions during the period of the release. If the wind direction is constant during the release and the atmosphere remains stable, the contaminated area will be comparatively narrow and extended downwind. Changing wind direction during the release period and a less stable atmosphere will produce a more "smeared out" pattern of contamination.

A computer modelling exercise could be performed, to predict patterns of contamination under different meteorological conditions. This exercise could ascribe a probability, assuming a postulated release, that a particular population falls within an area contaminated above a specified threshold.

4. Health effects of radiation

The health effects of exposure to ionizing radiation can be broadly categorized as early and delayed effects. For our postulated releases of cesium-137, early health effects could be suffered by some people in the immediate vicinity of the plant. However, most of the health effects would be delayed effects, especially cancer, which are manifested years after the initial exposure.

⁶ The World Almanac and Book of Facts 1991, Pharos Books, New York, 1990.

⁷ Harris FSAR, Section 2.1.3, Amendment No. 2.

Note that a release during a reactor accident (e.g., release category RC-5 at Harris) will contain short-lived radioisotopes as well as cesium-137. Under certain conditions of meteorology and emergency response, the presence of these short-lived radioisotopes in the release could cause many early health effects. Spent fuel contains comparatively small amounts of short-lived radioisotopes. Thus, early health effects are comparatively unlikely if a release occurs from a spent fuel pool.

Table E-1 shows an estimate of the excess cancer mortality attributable to continuous exposure to a relatively low radiation dose rate. This estimate was made by the BEIR V committee of the National Research Council.⁸ In Table E-1, a continuous exposure of 1 mSv/year (0.1 rem/year) is assumed to occur throughout life.⁹ Such an exposure is estimated to increase the number of fatal cancers, above the normally expected level, by 2.5 percent for males and 3.4 percent for females, with an average of 16-18 years of life lost per excess death. If the dose-response function were linear, it would follow that continuous, lifetime exposure to 10 mSv/year (1 rem/year) would increase the number of fatal cancers by 25 percent for males and 34 percent for females. The shape of the dose-response function is a subject of ongoing debate.

If people continued to occupy urban areas contaminated with cesium-137 to an external exposure level just below 25 rem over 30 years, as was assumed in the Reactor Safety Study, their average exposure during this 30-year period would be 8 mSv/year (0.8 rem/year). An additional, internal exposure would arise from contamination of food and water. After 30 years, rates of external and internal exposure would decline, consistent with the decay of cesium-137. Note that over a period of 300 years (10 half-lives), the activity of cesium-137 will decay to one-thousandth of its initial level.

5. Economic consequences of a release of radioactivity

Computer models have been developed for estimating the economic consequences of large atmospheric releases of radioactive materials. Findings from such models have been used by the NRC to evaluate the cost-benefit ratio of introducing measures to reduce the probabilities or consequences of spent fuel pool accidents.¹⁰ A review of these models, findings and cost-

⁸ National Research Council, Health Effects of Exposure to Low Levels of Ionizing Radiation: BEIR V, National Academy Press, Washington, DC, 1990. Table E-1 is adapted from Table 4-2 of the BEIR V report.

⁹ The exposure of 1 mSv/year is additional to background radiation, whose effects are accounted for in the normal expectation of cancer mortality.

¹⁰ See, for example: E D Throm, Regulatory Analysis for the Resolution of Generic Issue 82, "Beyond Design Basis Accidents in Spent Fuel Pools, NUREG-1353, April 1989; and J H Jo et al,

benefit analyses is beyond the scope of this report. However, a brief examination of the NRC's literature reveals that findings in this area rest on assumptions and value judgements that are not clearly articulated and deserve thorough public review.

Previous sections of this appendix have shown that potential releases of cesium-137 from the Harris spent fuel pools could lead to the relocation of large populations and ongoing radiation exposure to large, unrelocated populations. Relocation implies abandonment of large amounts of land, other natural resources and fixed capital. Political and social effects would be significant, and would have economic implications. Useful analysis of these matters would require a more sophisticated approach than is evident in literature generated by and for the NRC.

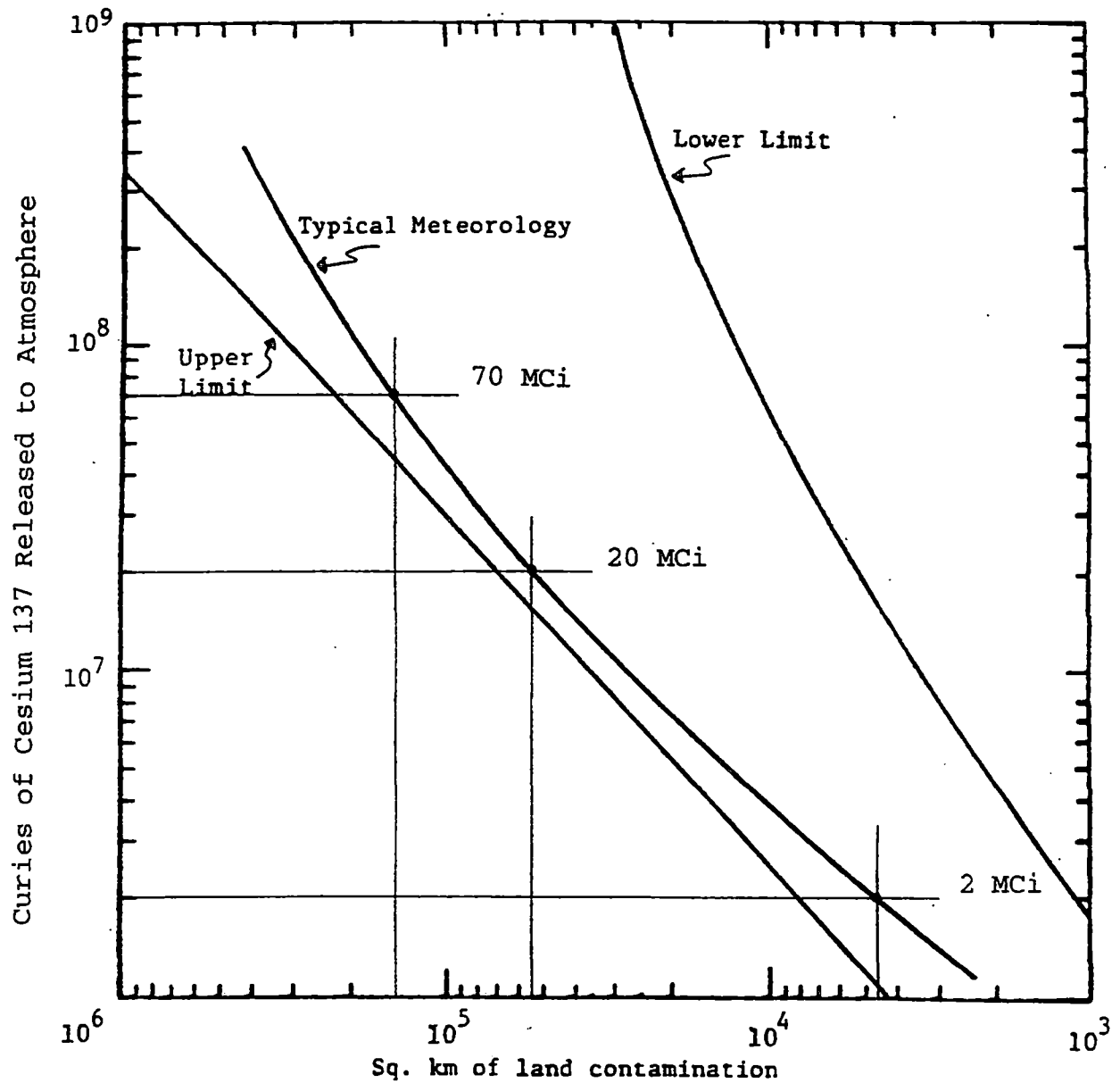


Figure E-1

Contaminated land area as a function of cesium-137 release

**ESTIMATED LIFETIME RISK PER 100,000 PERSONS EXPOSED TO 1 mSv
PER YEAR, CONTINUOUSLY THROUGHOUT LIFE**

	Males	Females
• Point estimate of excess mortality	520	600
• 90 percent confidence limits	410-980	500-930
• Normal expectation	20,560	17,520
• Excess as percent of normal	2.5	3.4
• Average years of life lost per excess death	16	18

Table E-1

**Excess cancer mortality from continuous exposure to radiation:
BEIR V estimate**

**UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION
Before the Atomic Safety and Licensing Board**

In the Matter of

**NORTHEAST NUCLEAR ENERGY COMPANY
(Millstone Nuclear Power Station,
Unit No. 3;
Facility Operating License NPF-49)**

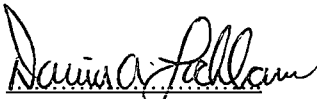
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Docket No. 50-423-LA-3

ASLBP No. 00-771-01-LA

DECLARATION OF DAVID A. LOCHBAUM

I, David A. Lochbaum, hereby declare under penalty of perjury and pursuant to 28 U.S.C. § 1746, that the factual statements contained in Connecticut Coalition Against Millstone's contentions and filing dated November 17, 1999, are true and correct to the best of my knowledge, information and belief; and that any expert opinions expressed therein are based on my best professional judgement.



David A. Lochbaum
November 16, 1999

Exhibit 2

INSTITUTE FOR RESOURCE AND SECURITY STUDIES

Curriculum Vitae: GORDON R. THOMPSON

July 1999

Professional expertise

Consulting technical and policy analyst in the fields of energy, environment, sustainable development, and international security.

Education

- D.Phil. in applied mathematics, Oxford University (Balliol College), 1973.
- B.E. in mechanical engineering, University of New South Wales, Sydney, Australia, 1967.
- B.Sc. in mathematics & physics, University of New South Wales, 1966.

Current appointment

- Executive director, Institute for Resource & Security Studies (IRSS), Cambridge, MA.

Project sponsors and tasks (selected)

- Orange County, NC, 1999: assessed safety issues associated with spent fuel storage at the Harris nuclear plant.
- Government of Ireland, 1998-1999: developed framework for assessment of impacts and alternative options associated with nuclear fuel reprocessing.
- Clark University, Worcester, MA, 1998-1999: participated in review of a foundation's grant-making related to climate change.
- UN High Commissioner for Refugees, 1998: developed a strategy for conflict management in the CIS region.
- General Council of County Councils (Ireland), W Alton Jones Foundation (USA), and Nuclear Free Local Authorities (UK), 1996-1998: assessed safety and economic issues of nuclear fuel reprocessing in the UK; assessed alternative options.
- Environmental School, Clark University, Worcester, MA, 1996: session leader at the Summer Institute, "Local Perspectives on a Global Environment".
- Greenpeace Germany, Hamburg, 1995-1996: a study on war, terrorism and nuclear power plants.

Ex 4

Curriculum Vitae for Gordon R. Thompson
July 1999

- HKH Foundation, New York, and Winston Foundation for World Peace, Washington, DC, 1994-1996: studies and workshops on preventive action and its role in US national security planning.
- Carnegie Corporation of New York, Winston Foundation for World Peace, Washington, DC, and others, 1995: collaboration with the Organization for Security and Cooperation in Europe to facilitate improved coordination of activities and exchange of knowledge in the field of conflict management.
- World Bank, 1993-1994: a study on management of data describing the performance of projects funded by the Global Environment Facility (joint project of IRSS and Clark University).
- International Physicians for the Prevention of Nuclear War, 1993-1994: a study on the international control of weapons-usable fissile material.
- Government of Lower Saxony, Hannover, Germany, 1993: analysis of standards for radioactive waste disposal.
- University of Vienna (using funds supplied by the Austrian government), 1992: review of radioactive waste management at the Dukovany nuclear plant, Czech Republic.
- Sandia National Laboratories, 1992-1993: advice to the US Department of Energy's Office of Foreign Intelligence.
- US Department of Energy and Battelle Pacific Northwest Laboratories, 1991-1992: advice for the Intergovernmental Panel on Climate Change regarding the design of an information system on technologies that can limit greenhouse gas emissions (joint project of IRSS, Clark University and the Center for Strategic and International Studies).
- Winston Foundation for World Peace, Boston, MA, and other funding sources, 1992-1993: development and publication of recommendations for strengthening the International Atomic Energy Agency.
- MacArthur Foundation, Chicago, IL, W. Alton Jones Foundation, Charlottesville, VA, and other funding sources, 1984-1993: policy analysis and public education on a "global approach" to arms control and disarmament.
- Energy Research Foundation, Columbia, SC, and Peace Development Fund, Amherst, MA, 1988-1992: review of the US government's tritium production (for nuclear weapons) and its implications.
- Coalition of Environmental Groups, Toronto, Ontario (using funds supplied by Ontario Hydro under the direction of the Ontario government), 1990-1993: coordination and conduct of analysis and preparation of testimony on accident risk of nuclear power plants.
- Greenpeace International, Amsterdam, Netherlands, 1988-1990: review of probabilistic risk assessment for nuclear power plants.
- Bellerive Foundation, Geneva, Switzerland, 1989-1990: planning for a June 1990 colloquium on disarmament and editing of proceedings.

Curriculum Vitae for Gordon R. Thompson
July 1999

- Iler Research Institute, Harrow, Ontario, 1989-1990: analysis of regulatory response to boiling-water reactor accident potential.
- Winston Foundation for World Peace, Boston, MA, and other funding sources, 1988-1989: analysis of future options for NATO (joint project of IRSS and the Institute for Peace and International Security).
- Nevada Nuclear Waste Project Office, Carson City, NV (via Clark University, Worcester, MA), 1989-1990: analyses of risk aspects of radioactive waste management and disposal.
- Ontario Nuclear Safety Review (conducted by the Ontario government), Toronto, Ontario, 1987: review of safety aspects of CANDU reactors.
- Washington Department of Ecology, Olympia, WA, 1987: analysis of risk aspects of a proposed radioactive waste repository at Hanford.
- Natural Resources Defense Council, Washington, DC, 1986-1987: preparation of testimony on hazards of the Savannah River Plant.
- Lakes Environmental Association, Bridgton, ME, 1986: analysis of federal regulations for disposal of radioactive waste.
- Greenpeace Germany, Hamburg, 1986: participation in an international study on the hazards of nuclear power plants.
- Three Mile Island Public Health Fund, Philadelphia, PA, 1983-1989: studies related to the Three Mile Island nuclear plant.
- Attorney General, Commonwealth of Massachusetts, Boston, MA, 1984-1989: analyses of the safety of the Seabrook nuclear plant.
- Union of Concerned Scientists, Cambridge, MA, 1980-1985: studies on energy demand and supply, nuclear arms control, and the safety of nuclear installations.
- Conservation Law Foundation of New England, Boston, MA, 1985: preparation of testimony on cogeneration potential at a Maine papermill.
- Town & Country Planning Association, London, UK, 1982-1984: coordination and conduct of a study on safety and radioactive waste implications of the proposed Sizewell nuclear plant.
- US Environmental Protection Agency, Washington, DC, 1980-1981: assessment of the cleanup of Three Mile Island Unit 2 nuclear plant.
- Center for Energy & Environmental Studies, Princeton University, Princeton, NJ, and Solar Energy Research Institute, Golden, CO, 1979-1980: studies on the potentials of renewable energy sources.
- Government of Lower Saxony, Hannover, FRG, 1978-1979: coordination and conduct of studies on safety aspects of the proposed Gorleben nuclear fuel cycle center.

Curriculum Vitae for Gordon R. Thompson
July 1999

Other experience (selected)

- Principal investigator, project on "Exploring the Role of 'Sustainable Cities' in Preventing Climate Disruption", involving IRSS and three other organizations, 1990-1991.
- Visiting fellow, Peace Research Centre, Australian National University, 1989.
- Principal investigator, Three Mile Island emergency planning study, involving IRSS and Clark University, Worcester, MA, 1987-1989.
- Co-leadership (with Paul Walker) of a study group on nuclear weapons proliferation, Institute of Politics, Harvard University, 1981.
- Foundation (with others) of an ecological political movement in Oxford, UK, which contested the 1979 Parliamentary election.
- Conduct of cross-examination and presentation of evidence, on behalf of the Political Ecology Research Group, at the 1977 Public Inquiry into proposed expansion of the reprocessing plant at Windscale, UK.
- Conduct of research on plasma theory (while a PhD candidate), as an associate staff member, Culham Laboratory, UK Atomic Energy Authority, 1969-1973.
- Service as a design engineer on coal-fired plants, New South Wales Electricity Commission, Sydney, Australia, 1968.

Publications (selected)

- *Risks and Alternative Options Associated with Spent Fuel Storage at the Shearon Harris Nuclear Power Plant*, a report for Orange County, NC, February 1999.
- *High Level Radioactive Liquid Waste at Sellafield: Risks, Alternative Options and Lessons for Policy*, IRSS, Cambridge, MA, June 1998.
- "Science, democracy and safety: why public accountability matters", in F. Barker (ed), *Management of Radioactive Wastes: Issues for local authorities*, Thomas Telford, London, 1998.
- "Conflict Management and the OSCE" (with Paula Gutlove), *OSCE/ODIHR Bulletin*, Volume 5, Number 3, Fall 1997.
- *Safety of the Storage of Liquid High-Level Waste at Sellafield* (with Peter Taylor), Nuclear Free Local Authorities, UK, November 1996.
- *Assembling Evidence on the Effectiveness of Preventive Actions, their Benefits, and their Costs: A Guide for Preparation of Evidence*, IRSS, Cambridge, MA, August 1996.
- *War, Terrorism and Nuclear Power Plants*, Working Paper No. 165, Peace Research Centre, Australian National University, Canberra, October 1996.

Curriculum Vitae for Gordon R. Thompson
July 1999

- "The Potential for Cooperation by the OSCE and Non-Governmental Actors on Conflict Management" (with Paula Gutlove), *Helsinki Monitor*, Volume 6 (1995), Number 3.
- "Potential Characteristics of Severe Reactor Accidents at Nuclear Plants", "Monitoring and Modelling Atmospheric Dispersion of Radioactivity Following a Reactor Accident" (with Richard Sclove, Ulrike Fink and Peter Taylor), "Safety Status of Nuclear Reactors and Classification of Emergency Action Levels", and "The Use of Probabilistic Risk Assessment in Emergency Response Planning for Nuclear Power Plant Accidents" (with Robert Goble), in D. Golding, J. X. Kaspersen and R. E. Kaspersen (eds), *Preparing for Nuclear Power Plant Accidents*, Westview Press, Boulder, CO, 1995.
- *A Data Manager for the Global Environment Facility* (with Robert Goble), Environment Department, The World Bank, June 1994.
- *Preventive Diplomacy and National Security* (with Paula Gutlove), Winston Foundation for World Peace, Washington, DC, May 1994.
- *Opportunities for International Control of Weapons-Usable Fissile Material*, ENWE Paper #1, International Physicians for the Prevention of Nuclear War, Cambridge, MA, January 1994.
- "Article III and IAEA Safeguards", in F. Barnaby and P. Ingram (eds), *Strengthening the Non-Proliferation Regime*, Oxford Research Group, Oxford, UK, December 1993.
- *Risk Implications of Potential New Nuclear Plants in Ontario* (prepared with the help of eight consultants), a report for the Coalition of Environmental Groups, Toronto, submitted to the Ontario Environmental Assessment Board, November 1992 (3 volumes).
- *Strengthening the International Atomic Energy Agency*, Working Paper No. 6, IRSS, Cambridge, MA, September 1992.
- *Design of an Information System on Technologies that can Limit Greenhouse Gas Emissions* (with Robert Goble and F. Scott Bush), Center for Strategic and International Studies, Washington, DC, May 1992.
- *Managing Nuclear Accidents: A Model Emergency Response Plan for Power Plants and Communities* (with six other authors), Westview Press, Boulder, CO, 1992.
- "Let's X-out the K" (with Steven C. Sholly), *Bulletin of the Atomic Scientists*, March 1992, pp 14-15.
- "A Worldwide Programme for Controlling Fissile Material", and "A Global Strategy for Nuclear Arms Control", in F. Barnaby (ed), *Plutonium and Security*, Macmillan Press, UK, 1992.
- *No Restart for K Reactor* (with Steven C. Sholly), Working Paper No. 4, IRSS, Cambridge, MA, October 1991.

Curriculum Vitae for Gordon R. Thompson
July 1999

- *Regulatory Response to the Potential for Reactor Accidents: The Example of Boiling-Water Reactors*, Working Paper No. 3, IRSS, Cambridge, MA, February 1991.
- *Peace by Piece: New Options for International Arms Control and Disarmament*, Working Paper No. 1, IRSS, Cambridge, MA, January 1991.
- *Developing Practical Measures to Prevent Climate Disruption* (with Robert Goble), CENTED Research Report No. 6, Clark University, Worcester, MA, August 1990.
- "Treaty a Useful Relic", *Bulletin of the Atomic Scientists*, July/August 1990, pp 32-33.
- "Practical Steps for the 1990s", in Sadruddin Aga Khan (ed), *Non-Proliferation in a Disarming World*, Proceedings of the Groupe de Bellerive's 6th International Colloquium, Bellerive Foundation, Geneva, Switzerland, 1990.
- *A Global Approach to Controlling Nuclear Weapons*, Occasional Paper published by the Institute for Resource and Security Studies, October 1989.
- *IAEA Safety Targets and Probabilistic Risk Assessment* (with three other authors), Greenpeace International, Amsterdam, August 1989.
- *New Directions for NATO* (with Paul Walker and Pam Solo), published jointly by IRSS and the Institute for Peace and International Security (both of Cambridge, MA), December 1988.
- "Verifying a Halt to the Nuclear Arms Race", in F. Barnaby (ed), *A Handbook of Verification Procedures*, Macmillan Press, UK, 1990.
- "Verification of a Cutoff in the Production of Fissile Material", in F. Barnaby (ed), *A Handbook of Verification Procedures*, Macmillan Press, UK, 1990.
- "Severe Accident Potential of CANDU Reactors," Consultant's Report in *The Safety of Ontario's Nuclear Power Reactors*, Ontario Nuclear Safety Review, Toronto, February 1988.
- *Nuclear-Free Zones* (edited with David Pitt), Croom Helm Ltd, Beckenham, UK, 1987.
- *Risk Assessment Review For the Socioeconomic Impact Assessment of the Proposed High-Level Nuclear Waste Repository at Hanford Site, Washington* (edited; written with five other authors), prepared for the Washington Department of Ecology, December 1987.
- *The Nuclear Freeze Revisited* (written with Andrew Haines), Nuclear Freeze and Arms Control Research Project, Bristol, UK, November 1986. Variants of the same paper have appeared as Working Paper No. 18, Peace Research Centre, Australian National University, Canberra, February 1987, and in *ADIU Report*, University of Sussex, Brighton, UK, Jan/Feb 1987, pp 6-9.

Curriculum Vitae for Gordon R. Thompson
July 1999

- *International Nuclear Reactor Hazard Study* (with fifteen other authors), Greenpeace, Hamburg, Federal Republic of Germany (2 volumes), September 1986.
- "What happened at Reactor Four" (the Chernobyl reactor accident), *Bulletin of the Atomic Scientists*, August/September 1986, pp 26-31.
- *The Source Term Debate: A Report by the Union of Concerned Scientists* (with Steven C. Sholly), Union of Concerned Scientists, Cambridge, MA, January 1986.
- "Checks on the spread" (a review of three books on nuclear proliferation), *Nature*, 14 November 1985, pp 127-128.
- Editing of *Perspectives on Proliferation*, Volume I, August 1985, published by the Proliferation Reform Project, IRSS.
- "A Turning Point for the NPT ?", *ADIU Report*, University of Sussex, Brighton, UK, Nov/Dec 1984, pp 1-4.
- "Energy Economics", in J. Dennis (ed), *The Nuclear Almanac*, Addison-Wesley, Reading, MA, 1984.
- "The Genesis of Nuclear Power", in J. Tirman (ed), *The Militarization of High Technology*, Ballinger, Cambridge, MA, 1984.
- *A Second Chance: New Hampshire's Electricity Future as a Model for the Nation* (with Linzee Weld), Union of Concerned Scientists, Cambridge, MA, 1983.
- *Safety and Waste Management Implications of the Sizewell PWR* (prepared with the help of six consultants), a report to the Town & Country Planning Association, London, UK, 1983.
- *Utility-Scale Electrical Storage in the USA: The Prospects of Pumped Hydro, Compressed Air, and Batteries*, Princeton University report PU/CEES #120, 1981.
- *The Prospects for Wind and Wave Power in North America*, Princeton University report PU/CEES # 117, 1981.
- *Hydroelectric Power in the USA: Evolving to Meet New Needs*, Princeton University report PU/CEES # 115, 1981.
- Editing and part authorship of "Potential Accidents & Their Effects", Chapter III of *Report of the Gorleben International Review*, published in German by the Government of Lower Saxony, FRG, 1979--Chapter III available in English from the Political Ecology Research Group, Oxford, UK.
- *A Study of the Consequences to the Public of a Severe Accident at a Commercial FBR located at Kalkar, West Germany*, Political Ecology Research Group report RR-1, 1978.

Curriculum Vitae for Gordon R. Thompson
July 1999

Expert presentations and testimony (selected)

- UK Consensus Conference on Radioactive Waste Management, 1999: provided invited testimony on information and decision-making.
- Joint Committee on Public Enterprise and Transport, Irish Parliament, 1999: provided invited testimony on nuclear fuel reprocessing and international security.
- UK and Irish Parliaments, 1998: gave members' briefings on risks and alternative options associated with nuclear fuel reprocessing in the UK.
- Center for Russian Environmental Policy, Moscow, 1996: presentation at a forum in parallel with the G-7 Nuclear Safety Summit.
- Lacey Township Zoning Board, New Jersey, 1995: testimony regarding radioactive waste management.
- Ontario Court of Justice, Toronto, Ontario, 1993: testimony regarding Canada's Nuclear Liability Act.
- Oxford Research Group, seminar on "The Plutonium Legacy", Rhodes House, Oxford, UK, 1993: presentation on nuclear safeguards.
- Defense Nuclear Facilities Safety Board, Washington, DC, 1991: testimony regarding the proposed restart of K-reactor, Savannah River Site.
- Conference to consider amending the Partial Test Ban Treaty, United Nations, New York, 1991: presentation on a global approach to arms control and disarmament.
- US Department of Energy, hearing on draft EIS for new production reactor capacity, Columbia, SC, 1991: presentation on tritium need and implications of tritium production options.
- Society for Risk Analysis, 1990 annual meeting, New Orleans, special session on nuclear emergency planning: presentation on real-time techniques for anticipating emergencies.
- Parliamentarians' Global Action, 11th Annual Parliamentary Forum, United Nations, Geneva, 1990: presentation on the potential for multilateral nuclear arms control.
- Advisory Committee on Nuclear Facility Safety, public meeting, Washington, DC, 1989: submission on public access to information and on government accountability.
- Peace Research Centre, Australian National University, seminar on "Australia and the Fourth NPT Review Conference", Canberra, 1989: proposal of a universal nuclear weapons non-proliferation regime.
- Carnegie Endowment for International Peace, Conference on "Nuclear Non-Proliferation and the Role of Private Organizations", Washington, DC, 1989: options for reform of the non-proliferation regime.
- US Department of Energy, EIS scoping hearing, Columbia, SC, 1988: appropriate scope of an EIS for new production reactor capacity.

Curriculum Vitae for Gordon R. Thompson
July 1999

- International Physicians for the Prevention of Nuclear War, 6th and 7th Annual Congresses, Koln, FRG, 1986 and Moscow, USSR, 1987: relationships between nuclear power and the threat of nuclear war.
- County Council, Richland County, SC, 1987: implications of severe reactor accidents at the Savannah River Plant.
- Maine Land Use Regulation Commission, 1985: cogeneration potential at facilities of Great Northern Paper Company.
- Interfaith Hearings on Nuclear Issues, Toronto, Ontario, 1984: options for Canada's nuclear trade and Canada's involvement in nuclear arms control.
- Sizewell Public Inquiry, UK, 1984: safety and radioactive waste implications of the proposed Sizewell nuclear plant.
- New Hampshire Public Utilities Commission, 1983: electricity demand and supply options for New Hampshire.
- Atomic Safety & Licensing Board, US Nuclear Regulatory Commission, 1983: use of filtered venting at the Indian Point nuclear plants.
- US National Advisory Committee on Oceans and Atmosphere, 1982: implications of ocean disposal of radioactive waste.
- Environmental & Energy Study Conference, US Congress, 1982: implications of radioactive waste management.

Miscellaneous

- Married, two children.
- Extensive experience in public speaking before professional and lay audiences, and in interviews with print and broadcast journalists.
- Author of numerous newspaper, newsletter, and magazine articles and book reviews.

Contact information

Institute for Resource and Security Studies
27 Ellsworth Avenue, Cambridge, Massachusetts 02139, USA
Phone: (617) 491-5177 Fax: (617) 491-6904 E-mail: irss@igc.org

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

ATOMIC SAFETY AND LICENSING BOARD

Before Administrative Judges:

Charles Bechoefer, Chairman
Dr. Richard F. Cole
Dr. Charles N. Kelber

In the Matter of	: Docket No. 50-423-LA-3
	:
NORTHEAST NUCLEAR ENERGY	:
COMPANY	: ASLBP No. 00-771-01-LA
	:
(Millstone Nuclear Power	:
Station, Unit No. 3 $\frac{1}{2}$)	:
Facility Operating License	:
NPF-49)	: November 15, 1999

DECLARATION OF JOSEPH H. BESADE,
MEMBER OF CONNECTICUT COALITION AGAINST MILLSTONE,
SUPPORTING ORGANIZATIONAL STANDING

I, Joseph H. Besade, having been duly sworn, do hereby depose as follows:

1. I am above the age of eighteen years and I believe in the obligation of an oath.

2. I own and reside upon property located at 21 Fifth Avenue in Waterford, Connecticut.

3. I have resided with my family at such address for many years.

4. Such property is located within two miles of the Millstone Nuclear Power Station in Waterford, Connecticut.

5. Such property is located within the priority emergency evacuation zone of Millstone.

6. I am a member of the Connecticut Coalition Against Millstone ("CCAM") which advocates for permanent closure of Millstone.

7. CCAM is a coalition of environmental and citizens groups and individuals who share a common objective of closing Millstone because of its persistent history of regulatory violations which have subjected CCAM's members and the public generally to untoward risk of peril to health and safety.

8. CCAM members include: Connecticut Citizens Awareness Network (CAN), People's Action for Clean Energy (PACE), the Connecticut Green Party, Toxics Action Center, Don't Waste Connecticut and James Plumb, a former chemistry technician at Millstone whose disclosures of environmental crimes led to felony charges brought against Northeast Utilities by the U.S. Department of Justice.

9. CCAM's concern for the permanent closure of Millstone was heightened when Northeast Utilities, owner and operator of the Millstone reactors, pleaded guilty in the U.S. District Court in Connecticut on September 27, 1999 to 25 felony counts for criminal violations in its nuclear and environmental operations.

10. In pleading guilty to felonies committed in violation of the Atomic Energy Act, Northeast Utilities was assessed the largest penalty imposed in the history of commercial nuclear power, according to an article in the Hartford Courant.

11. CCAM maintains a headquarters office located at 13 Water Street, Mystic, which location is within approximately ten miles of Millstone, and within the 10-mile emergency evacuation zone.

12. CCAM opposes the application of Northeast Utilities through Northeast Nuclear Energy Company ("NNECO") to rerack spent fuel assemblies that can be stored in the spent fuel pool from 756 assemblies to 1,860 assemblies (an increase of 1,104).

13. According to the Environmental Assessment and Finding of No Significant Impact prepared by the U.S. Nuclear Regulatory Commission ("NRC") and submitted on August 27, 1999,

"An increase in spent fuel storage capacity is needed to maintain the capability for a full core off-load. Loss of full core off-load capability will occur as a result of refueling outage 6 (RFO 6) that started on May 1, 1999."

14. CCAM opposes the present licensing amendment, in part, because, if granted, it would significantly increase the risk of serious accidental release of radioactivity into the environment, according to the expert opinion of David A. Lochbaum and Gordon Thompson.

15. The expert opinions of Messrs. Lochbaum and Thompson are expressed in materials submitted by CCAM and its New York counterpart, Coalition Against Millstone ("CAM"), in support of their Supplemental Petition to intervene dated November 15, 1999, and in their original Petition to Intervene.

16. The present application should be denied for the following reasons, as supported by Messrs Lochbaum and Thompson in their submissions:

a. It will significantly increase the probability and offsite consequences of accidents involving partial or total uncovering of fuel assemblies and exothermic reaction of fuel cladding;

b. In considering the proposed action and its alternatives, NNECO has not evaluated accidents involving partial or total uncovering of fuel assemblies and exothermic reaction of fuel cladding;

c. The criticality control measures proposed by NNECO would violate Criterion 62 of the General Design Criteria (GDC) set forth in 10 CFR, Part 50, Appendix A by seeking to prevent criticality at Millstone Unit 3 by the use of ongoing administrative measures;

d. NNECO has not properly evaluated potential mechanical loads under accident conditions because it has not considered the drop of a shipping cask into the cask pit or fuel pool, which activity could potentially cause a criticality accident and release of radioactive material;

e. NNECO has not properly evaluated the alternatives to the proposed action because its evaluation was conducted by a subcontractor with a conflict of interest and its evaluation relied

on outdated information;

f. NNECO has not properly evaluated a channel blockage event because its evaluation did not consider complete blockage of one or more channels;

g. The probability of a criticality accident will be increased because NNECO will rely on administrative measures, rather than physical measures, to prevent criticality;

h. The proposed action will increase the probability and consequences of an accident in which fuel overheats due to an interruption of pool cooling; and

i. An Environmental Impact Statement and analysis are called for.

17. I believe that CCAM's participation in a hearing on the licensing amendment application will introduce an informed inquiry which is compelled by the potential of the application, if granted, to expose the public to a significant increase in the probability and offsite consequence of serious accident.

18. CCAM member organizations have participated extensively in NRC public meetings and hearings on Millstone.

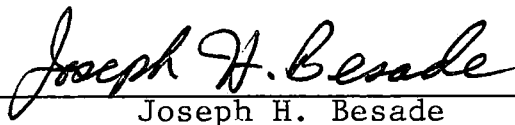
19. Don't Waste Connecticut, a member organization of CCAM, has participated as a party in litigation in the Superior Court and the Appellate Court of the State of Connecticut (Fish Unlimited v. Northeast Utilities I and II) and successfully obtained a judicial order restraining the restart of Millstone Unit 2 in 1999.

20. Connecticut Citizens Awareness Network has participated extensively before the NRC on Millstone issues.

21. I believe that if the proposed action is allowed, it will significantly reduce the margin of safety and expose me to significantly greater risk of serious injury to myself, my family and my property.

22. I wish to have my rights and interests represented in these proceedings by and through Connecticut Coalition Against Millstone and its attorneys and experts.

23. I believe that my rights and interests will be well served by such representation.



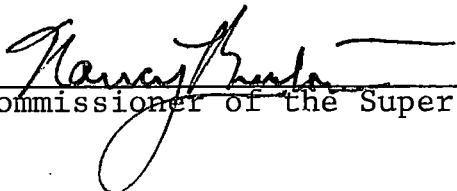
Joseph H. Besade

STATE OF CONNECTICUT

ss: Mystic

COUNTY OF NEW LONDON

Sworn to and subscribed before me this 14th day of November, 1999.



Commissioner of the Superior Court

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

ATOMIC SAFETY AND LICENSING BOARD

Before Administrative Judges:

Charles Bechhoefer, Chairman
Dr. Richard F. Cole
Dr. Charles N. Kelber

In the Matter of	:	Docket No. 50-423-LA-3
	:	
NORTHEAST NUCLEAR ENERGY	:	
COMPANY	:	ASLBP No. 00-771-01-LA
	:	
(Millstone Nuclear Power	:	
Station, Unit No. 3;	:	
Facility Operating License	:	
NPF-49)	:	November 15, 1999

DECLARATION OF JACQUELINE WILLIAMSON,
MEMBER OF COALITION AGAINST MILLSTONE,
SUPPORTING ORGANIZATIONAL STANDING

I, Jacqueline Williamson, having been duly sworn, do hereby depose as follows:

1. I am above the age of eighteen years and I believe in the obligation of an oath.

2. I own and reside during much of the year upon property located on Fishers Island, New York.

3. Such property is more particularly identified as Town of Southold, New York, Tax Map No. 4738893.1-4.

4. Such property is also more particularly identified as Lot 25-8 of the General Plan on file with the Suffolk County Clerk in Riverhead, New York.

5. Such property is located on the waterfront at Chocomount Cove near Clay Point on the northern side of Fishers Island.

6. Fishers Island is part of the Town of Southold, New York, which is located on the North Fork of Long Island, New York, approximately 12 miles to the southwest of Orient Point,

which itself is located at the farthest northeast point of Long Island.

7. My Fishers Island home is located approximately 10 miles from the Millstone Nuclear Power Generating Station ("Millstone") in Waterford, Connecticut.

8. My Fishers Island home is located within the 10-mile emergency evacuation zone of Millstone.

9. In the event of an emergency, the Millstone evacuation plan calls for residents of Fishers Island, such as myself, to board a ferry to travel to New London, Connecticut, and toward Millstone, rather than away from Millstone.

10. I have resided in my home on Fishers Island for many years and my associations with the property are deep and abiding.

11. I am a member of the Long Island-based Coalition Against Millstone ("CAM"), which advocates for permanent closure of Millstone.

12. CAM is a coalition of environmental and citizens groups which share a common objective of permanently closing Millstone because of its persistent history of regulatory violations which have subjected CAM's members and the public generally to untoward risk of peril to health and safety.

13. CAM's concern for the permanent closure of Millstone was heightened when Northeast Utilities, owner and operator of the Millstone reactors, pleaded guilty in the U.S. District Court in Connecticut on September 27, 1999 to 25 felony counts for criminal violations in its nuclear and environmental operations.

14. In pleading guilty to felonies committed in violation of the Atomic Energy Act, Northeast Utilities was assessed the largest penalty imposed in the history of commercial nuclear power, according to an article in the Hartford Courant.

15. CAM opposes the application of Northeast Utilities through Northeast Nuclear Energy Company ("NNECO") to rerack spent fuel assemblies to more than double their density in the Millstone Unit 3 spent fuel pool.

16. NNECO proposes to increase the number of fuel assemblies that can be stored in the spent fuel pool from 756 assemblies to 1,860 assemblies (an increase of 1,104).

17. According to the Environmental Assessment and Finding of No Significant Impact prepared by the U.S. Nuclear Regulatory Commission ("NRC") and submitted on August 27, 1999,

"An increase in spent fuel storage capacity is needed to maintain the capability for a full core off-load. Loss of full core off-load capability will occur as a result of refueling outage 6 (RFO 6) that started on May 1, 1999."

18. CAM opposes the present licensing amendment, in part, because, if granted, it would significantly increase the risk of serious accidental release of radioactivity into the environment, according to the expert opinion of David A. Lochbaum and Gordon Thompson.

19. The expert opinions of Messrs. Lochbaum and Thompson are expressed in materials submitted by CAM and its Connecticut counterpart, Connecticut Coalition Against Millstone ("CCAM"), in support of their Supplemental Petition to Intervene dated

November 15, 1999, and in their original Petition to Intervene.

20. The present application should be denied for the following reasons, as supported by Messrs Lochbaum and Thompson in their submissions:

a. It will significantly increase the probability and offsite consequences of accidents involving partial or total uncovering of fuel assemblies and exothermic reaction of fuel cladding;

b. In considering the proposed action and its alternatives, NNECO has not evaluated accidents involving partial or total uncovering of fuel assemblies and exothermic reaction of fuel cladding;

c. The criticality control measures proposed by NNECO would violate Criterion 62 of the General Design Criteria (GDC) set forth in Part 50, 10 CFR, Appendix A by seeking to prevent criticality at Millstone Unit 3 by the use of ongoing administrative measures;

d. NNECO has not properly evaluated potential mechanical loads under accident conditions because it has not considered the drop of a shipping cask into the cask pit or fuel pool, which activity could potentially cause a criticality accident and release of radioactive material;

e. NNECO has not properly evaluated the alternatives to the proposed action because its evaluation was conducted by a subcontractor with a conflict of interest and its evaluation relied

on outdated information;

f. NNECO has not properly evaluated a channel blockage event because its evaluation did not consider complete blockage of one or more channels;

g. The probability of a criticality accident will be increased because NNECO will rely on administrative measures, rather than physical measures, to prevent criticality;

h. The proposed action will increase the probability and consequences of an accident in which fuel overheats due to an interruption of pool cooling; and

i. An Environmental Impact Statement and analysis are called for.

21. I endorse denial of the application for the reasons above stated.

22. I believe that CAM's participation in a hearing on the licensing amendment application will introduce an informed inquiry which is compelled by the potential of the application, if granted, to expose the public to a significant increase in the probability and offsite consequence of serious accident.

23. Member organizations and individuals of CAM include STAR Foundation, located in East Hampton, New York.

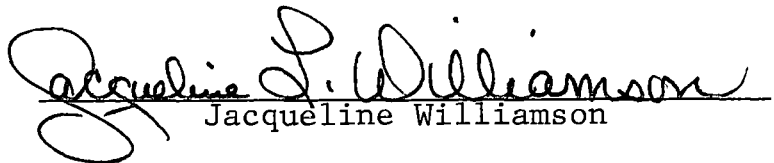
24. STAR Foundation has participated extensively in NRC public meetings and hearings on Millstone; it has petitioned the NRC on Millstone issues; it has conducted workshops and seminars on Millstone issues, including Y2K and the health effects of exposure to low-level ionizing radiation.

25. STAR Foundation and other members of CAM have participated as parties in litigation in the Superior Court of the State of Connecticut (Fish Unlimited v. Northeast Utilities I and II) and before the Appellate Court of the State of Connecticut on issues relative to Millstone predation of fish and fish larvae in the Niantic Bay; STAR Foundation and other members of CAM successfully restrained the restart of Millstone Unit 2 after the NRC gave approval for restart following a three-year unprecedented shutdown.

26. I believe that if the proposed action is allowed, it will significantly reduce the margin of safety and expose me to significantly greater risk of serious injury to myself, my family and my property.

27. I wish to have my rights and interests represented in these proceedings by and through Coalition Against Millstone and its attorneys and experts.

28. I believe that my rights and interests will be well served by such representation.



Jacqueline Williamson

STATE OF NEW YORK

ss: New York

COUNTY OF NEW YORK

Sworn to and subscribed before me this 12th day of November, 1999.



Commissioner of the Superior Court
Of the State of Connecticut

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION
ATOMIC SAFETY AND LICENSING BOARD

Before Administrative Judges:

Charles Bechoefer, Chairman
Dr. Richard F. Cole
Dr. Charles N. Kelber

In the Matter of : Docket No. 50-423-LA-3
:
NORTHEAST NUCLEAR ENERGY COMPANY:
:
(Millstone Nuclear Power : ASLBP No. 00-771-01-LA
Station, Unit No. 3 :
Facility Operating License :
NPF-49) : November 17, 1999

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing Supplemental Petition to Intervene dated November 17, 1999, with Exhibits and with supporting affidavits of Joseph H. Besade and Jacqueline Williamson, in behalf of Connecticut Coalition Against Millstone and Long Island Coalition Against Millstone, have been served upon the following persons on November 17, 1999 by U.S. Mail, first class, and a copy transmitted by telefax on November 17, 1999, in accordance with the requirements of 10 C.F.R. Sec. 2.712:

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