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 RECIP. NAME: VISSING, G.S.      RECIPIENT AFFILIATION:

SUBJECT: Forwards response to 970430 RAI re license amend request for proposed mod to Ginna spent fuel storage pool.

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Nuclear Operations

June 18, 1997

U.S. Nuclear Regulatory Commission  
Document Control Desk  
Attn: Guy S. Vissing  
Project Directorate I-1  
Washington, D.C. 20555

Subject: Response to Questions from NRC Staff on Proposed  
Modification of the Ginna Spent Fuel Storage Pool (TAC  
No. M95759)  
R.E. Ginna Nuclear Power Plant  
Docket No. 50-244

Ref.(1): Letter from G. S. Vissing (NRC) to R. C. Mecredy (RG&E),  
Subject: Request for Additional Information concerning  
License Amendment Request of March 31, 1997, relating to  
a proposed Modification of the Ginna Spent Fuel Storage  
Pool (TAC No. M95759), dated April 30, 1997.

Dear Mr. Vissing:

By Reference 1, the NRC staff requested additional information  
regarding the proposed Modification of the Ginna Spent Fuel Storage  
Pool dated March 31, 1997. Enclosed are responses to each of the  
questions submitted by the NRC staff.

Very truly yours,

  
Robert C. Mecredy

JPO

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xc: Mr. Guy S. Vissing (Mail Stop 14B2)  
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**Question No. 1:**

*Discuss the remote tools which would be used during dry and wet operation during the spent fuel modification.*

**Response:**

The following is a list and description of the long-handle tools that RG&E anticipates using during the rerack effort:

1. Tool for installation and removal of the old and new rack lift fixture, approximately 35 feet long.
2. Tool for the adjustment of rack pedestals/feet, approximately 50 feet long.
3. Tool for removal of existing rack hold-down bolts.
4. Tool for underwater T.V. system.
5. Tool for underwater vacuum system operation, as required.

All long-handle tools will be of stainless steel, aluminum, or fiberglass. All pipes will have drilled holes to allow flooding to prevent radiation streaming to the workers. Joints will have positive locking devices with lanyards, if applicable, to prevent separation and loss of these devices into the pool. Each device may have multiple uses, e.g., the long-handled rack foot adjustment tool can be used to take elevation readings at rack foot locations or pads, and also to take rack-to-rack or rack-to-wall measurements with an attachment.



Question No. 2:

*NRC experiences have shown that when the storage racks are added, the radioactivity concentrations in the spent fuel pool may be expected to increase due to crud deposits spalling from spent fuel assemblies which are shuffled. This crud (spalling) has a loose fluffy layer that falls off the fuel assemblies to the floor of the fuel pools and canals. This additional crud material has caused the activity of Mn-54 and Co-60 to exceed the values in the TS for spent fuel pool activities. Provide a detailed explanation of the ALARA considerations that will be used to combat spalling during spent fuel rerack.*

Response:

During previous refueling outages, the potential radiological effects of such spalling were controlled by use of an underwater vacuum and fine pore filters. The filters were changed based on dose rate and increased loss of pressure across the filters (dose rate being the first criterion). The dose rates incorporated beta and alpha emitters which had correlations produced from historical spent fuel pool resin ratios based on 10 CFR 61. The clarity of the pool was maintained, and there were no indications of high dose rates created by excessive fuel assembly movement. The underwater vacuum has also proven successful during the full core offloads which have occurred. RG&E has sufficient experience in the use of this device to ensure control of spalling in the spent fuel pool.

In addition to the use of the underwater vacuum, spalling will be controlled by minimizing the number of fuel assembly shuffles required to establish the geometric configurations set forth in the proposed amendment to the Technical Specifications. Limited fuel shuffles will be performed to remove fuel from cells on the eastern side of boraflex rack numbers 1E and 1F during removal of existing racks and installation of new racks.

The activity on the floor will be monitored by an additional underwater probe (RO 7A) dedicated to check for changes caused by the result of workers' actions. Because of the use of two underwater probes (one for the use of underwater workers and the second one for the use of the radiological technician), an additional layer of assurance consistent with ALARA objectives is incorporated.