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SUBJECT: Comment on proposed generic ltr, "Boraflex Degradation in
 SPF Storage Racks."

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December 8, 1995



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RULES REVIEW DIV. JR.
USNRC

Chief
Rules Review and Directives Branch
U.S. Nuclear Regulatory Commission
Mail Stop T-6D-69
Washington, DC 20555-0001

SUBJECT: Boraflex Degradation in Spent Fuel Pool Racks

- REFS.: (1) Proposed Generic Communication; Boraflex Degradation in Spent Fuel Pool Storage Racks (M91447), 60 Fed. Reg. 56359.
- (2) Letter from R. O. Anderson (Northern States Power Company) to U.S. NRC, dated July 28, 1995; SUBJECT: License Amendment Request Dated July 28, 1995, Boron Credit in the Spent Fuel Pool.

Dear Sir:

This letter is in response to the Notice in the Federal Register on Boraflex Degradation (Reference 1).

RG&E believes that the NRC staff should consider in its proposed Generic Letter the efforts to account for the presence of borated water in the pool as reflected in submittal from Northern States Power Company to the NRC (Reference 2). Currently, the spent fuel pool at R. E. Ginna is maintained with boron concentrations above 2,000 PPM in the water. This minimum boron concentration is not expected to change significantly in the near future. The high level of boron concentration in the pool water would continue to provide assurance that the 5 percent subcriticality margin will be met without taking full credit for Boraflex in the spent fuel racks. Therefore, NRC is strongly encouraged to address in the draft Generic Letter the potential contribution of borated water towards the subcriticality margin.

Sincerely,


Robert C. Mecreddy

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