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MCDONALD, D. G. PWR Project Directorate 2

SUBJECT: Forwards comments & questions on IAEC Attachment 12 re safeguards agreement between US & IAEA, discussed in 860708 telcon. Info in document does not require withholding from public disclosure.

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FLORIDA POWER & LIGHT COMPANY

JUL 1 8 1986

L-86-301

Office of Nuclear Reactor Regulation
Attention: Mr. D. G. McDonald, Acting Director
PWR Project Directorate #2
Division of PWR Licensing - A
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Dear Mr. McDonald:

Re: Turkey Point Units 3 and 4
Docket Nos. 50-250 and 50-251
IAEA Facility Attachment

Your letter of June 5, 1986 forwarded IAEA Facility Attachment No. 12 for Turkey Point Unit 4 (Safeguards Agreement between the USA and the IAEA, Subsidiary Arrangements). Florida Power & Light Company (FPL) has reviewed that document and does not consider any of the information included in it to be 10 CFR 2.790 material which would require withholding from public disclosure.

Specific FPL comments and questions are attached. They were discussed with NRC staff in a conference call on July 8, 1986.

If you have any questions, please call us.

Very truly yours,

C. O. Woody
Group Vice President
Nuclear Energy

COW/TCG/gp

Attachment

cc: Dr. J. Nelson Grace, Region II, USNRC
Harold E. Reis, Esq.

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ATTACHMENT I

FPL COMMENTS ON TURKEY POINT UNIT 4 IAEA FACILITY ATTACHMENT

CODE	COMMENTS
1.4	Description
	The spent fuel storage capacity is 636 cells, but there are 26 cells considered as unusable due to piping, lighting, etc.
	The maximum fresh fuel enrichment U-235 is 4.10 w/o, not 3.45 w/o.
2.2	Changes in the information on the facility to be provided in advance
	IAEA should clarify the "type of fuel used". Does this section require that the IAEA be notified of the use of IFBA (Integral Fuel Burnable Absorber) design fuel as the fuel in IFBA rods is still UO_2.
	Revise "Change in the nuclear material accountancy and control procedures" to read "Change in the methodology for performing nuclear material accounting and control".
	How far in advance does FPL have to notify the IAEA of the intended changes? Through whom are notifications transmitted?
3.2.2	Installed Agency instruments and devices
	b) Cameras for surveillance of fuel movements into or out of the reactor vessel, the reactor containment and the fresh and spent fuel storages areas;
	- No camera surveillance is currently installed in the fresh fuel storage area. This should be reworded to indicate that it is not an installed device, and does the Agency plan to install one in the future?
	c) Seals on shipping casks with spent fuel and other containers as applicable;
	- A major transfer of spent fuel from Unit 4 to Unit 3 may take place while under the safeguards program. This evolution could take several months to complete. If this transfer occurs, what type of surveillance program will the agency institute to seal each cask?
	e) Seals on containers with fuel assemblies received at the facility;

CODE	COMMENTS
	- Will the Agency seal every fuel container prior to its being shipped from Westinghouse? Will the agency conform to the plant's schedule of opening and unloading the new fuel? If the containers are sealed, will a neutron collar be used again to check the assemblies?
4.1	Nuclear Material Flow KMPs

a) KMP 2/#3: Delete "Date of discharge"

b) KMP 2/#3: (Pu) Delete the words "discharge and" from "Date of discharge and shipment"

c) KMP 3/#2: Delete "Date of discharge"

d) KMP 3/#3: Delete "Burn-up (MWD/tU)"

FOR a) THROUGH d) ABOVE:

FPL will provide "Date of discharge" and "Burn-up (MWD/MTU)" information only one time per assembly. Assembly discharge date and discharged assembly burnups will be provided within 30 days of the date of discharge from the reactor for assemblies currently being irradiated, and within thirty days of the receipt of the final Facility Attachment for assemblies already discharged.

e) KMP 3/#4: Revise "Weights ... calculated as of the date of discharge" to read "as of the date of discharge from the reactor for uranium and as of the date of shipment from the facility for plutonium."

f) KMP 3/#5: Revise "Isotopic composition ... calculated as of the date of discharge" to read "as of the date of discharge from the reactor for uranium and as of the date of shipment from the facility for plutonium."

FOR e) AND f) ABOVE:

This change is requested to account for the decay of the plutonium in the assembly during the interval between discharge from the reactor and shipment from the facility. This change reflects current methodology in use for SNM reporting.

CODE	COMMENTS

4.2 KMPs for the physical inventory of nuclear material.

a) KMP C/#2: Revise "Weights of total and fissile uranium and of total plutonium calculated as of the date of discharge" to read

"Weights of total and fissile uranium to be calculated as of the date of discharge and weight of total plutonium calculated as of the date of inventory."

This change is requested to account for the decay of plutonium and is consistent with current SNM reporting practices.

b) KMP C/#3: Delete "Date of discharge"

c) KMP C/#4: Delete "Burn-up (MWD/tU)"

FOR b) AND c) ABOVE:

FPL will provide "Date of discharge" and "burn-up (MWD/MTU)" information only one time per assembly. Assembly discharge dates and discharge assembly burnups will be provided within 30 days of the date of discharge from the reactor for assemblies currently being irradiated, and within thirty days of the receipt of the final Facility Attachment for assemblies already discharged.

5.1 Specific Provisions for Accounting Records

5.1.1 Inventory Changes

Revise "Nuclear production and nuclear loss (burn-up): When calculated, including upon discharge, and in any case before shipment" to read "Nuclear production and nuclear loss (burn-up): When reported to the NRC according to 10 CFR 75.34 and 10 CFR 75.35, including upon shipment."

Revise "Nuclear loss (Pu-241 decay): When calculated, including upon discharge, and in any case before shipment" to read "Nuclear production and nuclear loss (burn-up): When reported to the NRC according to 10 CFR 75.34 and 10 CFR 75.35, including upon shipment."

5.2 Specific provisions for operating records

5.2.1 The relevant source data with respect to nuclear loss and production, including:

CODE	COMMENTS
	a) The monthly integrated thermal power produced by the reactor; and
	b) The estimated burn-up (in MWD/t of uranium) for each fuel assembly.
	- Will a monthly report containing the above information need to be submitted? Can the reporting frequency be reduced? What amount of detail is required?
	Date and duration of any reactor shutdown.
	- Is this to be reported for all reactor trips and shutdowns? What are the reporting requirements (time limits, detail, etc.)?
	Date and nature of the use of fuel handling and transport equipment for the movement or likely movement of fuel.
	- Records required to meet this requirement are not normally maintained, and to initiate a program to log this information would be difficult to implement. Can the Agency give some relief on this requirement, and perhaps remove the words "or likely movement"?
	Revise "The estimated burn-up (in MWD/t of uranium) for each assembly" to read "The burn-up (in MWD/MTU of uranium) is to be provided within 30 days of the date of discharge from the reactor."
6.	Reports System
6.2.1	Concise notes explaining the inventory changes
	a) Delete "they are to state the burn-up in MWD/t of initial U for each assembly discharged".
	FPL will provide data on assembly burn-ups only one time per assembly. For assemblies already discharged from the reactor this information will be provided 30 days after the final Facility Attachment is issued; for assemblies currently in process the burn-ups will be provided within 30 days after the assembly has been discharged from the reactor.
6.2.2	Concise notes describing the anticipated operations program; subject and time of dispatch

CODE	COMMENTS
	Planned operations involving refueling; fresh fuel receipts and spent fuel shipments: To be attached to each MBR (see Code 6.3.3 below) and to cover the period until the end of the next refueling, to be updated every six months.
	- Will a schedule of new fuel shipments for the next cycle on Unit 4 need to be sent to the Agency? When will first report be required?
	Precise forecasts for:
	a) Date of the next refueling, physical inventory taking including date when seals are expected to be removed from the reactor; and
	- Does this include annual physical inventory in the spent fuel pool? What about seal removal on the equipment hatch?
	b) Spent fuel shipments, including information about the shipping casks to be used, and the extent to which they are expected to be filled.
	- If fuel shipment from Unit 4 to Unit 3 occurs, what information will the Agency like to see? What minimum notification will be acceptable?
6.3	Specific Provisions for Material Balance Reports (MBR)
6.3.1	MBR Contents
	a) Clarify the term "consolidated inventory changes". Does this mean that MBRs are to be filled using total quantities of SNM vs. assembly-wise reporting?
6.3.2	PIL Contents
	a) Add "The batch data included in PIL's may be submitted in any form agreed upon between the facility and the IAEA, including computerized output from SNM tracking codes. When batch data is submitted in such a manner, consolidated inventories may be reported on DOE/NRC Form 742C (Physical Inventory Listing)".
6.4	Special Reports
	Specification of incidents or circumstances requiring submission of special reports.
	a) Losses:

[illegible]

[illegible]

[illegible]

[illegible]

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CODE	COMMENTS
	One or more fuel assemblies;
	b) Changes in containment:
	Physical integrity of a fuel assembly as an accounting unit is accidentally broken; any Agency containment and surveillance device, referrred to in Code 3.2.2 is interfered with or removed in the absence of Agency inspectors, unless the Agency has been informed in advance as provided.[4]
	- No time limits are specified for submission of special reports. Does this statement mean that if the Agency is notified in advance of a potential interference with or removal of their equipment, that a special report is not required? Note 4 states that this requirement (b) applies only while the cask remains in the facility. If a fuel transfer occurs, from Unit 4 to Unit 3, what will be the Agency requirements on Unit 3, which is not a safeguard facility?
8	Agency Statements
	A summary statement will be made on the result of each inspection within 30 days of its completion.
	A statement on the conclusions the Agency has drawn from its verification activities in respect of the facility will be made within 60 days after the end of the month in which the Agency has verified the physical inventory.
	- These reports have not yet been received and the time limits have been exceeded since the inspections were performed.
	General Comments
	1) Will the requirements of this be retroactive to January 1986? If so, will events that have already occurred, such as reactor trips, need to be reported?