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SUBJECT: Forwards comments on NRC draft regulatory guide DG-3010,  
 "Spent Fuel Heat Generation in ISFSI."

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January 2, 1998

Rules and Directives Branch  
Division of Administrative Services  
Office of Administration  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

**Subject: Comments on Draft Regulatory Guide DG-3010, "Spent Fuel Heat Generation In An Independent Spent Fuel Storage Installation," (62 FR 52599)**

Dear Sir or Madam:

Attached are the comments of Carolina Power & Light Company (CP&L) on the NRC Draft Regulatory Guide DG-3010, "Spent Fuel Heat Generation In An Independent Spent Fuel Storage Installation." This draft regulatory guide was published in the Federal Register (62 FR 52599) on October 8, 1997. In general, CP&L supports this change as an improvement in the regulatory process. However, CP&L is concerned that the limited applicable ranges of fuel burnup and average initial enrichment threaten to render this methodology out-of-date before the regulatory guide is even issued.

Please contact me at (919) 546-6901 if you have questions.

Sincerely,

*Harold G. Stiles for D.B. Alexander*

D.B. Alexander, Manager  
Performance Evaluation & Regulatory Affairs

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**Comments on Draft Regulatory Guide DG-3010, "Spent Fuel Heat Generation In An  
Independent Spent Fuel Storage Installation," (62 FR 52599)**

cc: Mr. L.J. Callan, Executive Director for Operations  
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**Comments on Draft Regulatory Guide DG-3010, "Spent Fuel Heat Generation In An Independent Spent Fuel Storage Installation," (62 FR 52599)**

1. Appendix B, "Acceptability and Limits on the Guide," reads, in part:

*"In general, the guide should not be applied outside the parameters of Tables 1 through 8."*

Accordingly, the maximum values of fuel burnup and average initial enrichment parameters as specified in Tables 1 through 8 are:

Parameter	BWR	PWR
Fuel Burnup (MWd/kgU)	45	50
Average Initial Enrichment (wt-% U-235)	3.8	4.2

- a) CP&L understands that fuel vendors are licensed to fabricate fuel assemblies designed for fuel burnup closer to 60 MWd/kgU. CP&L routinely discharges fuel assemblies with fuel burnup greater than the maximum value of Tables 1 through 8. CP&L suggests that the draft regulatory guide be revised to address higher fuel burnup, preferably approaching the limit for what the fuel vendors can produce.
- b) CP&L understands that fuel vendors are licensed to fabricate fuel assemblies with average initial enrichment closer to 5% U-235. CP&L routinely buys fuel with average initial enrichment greater than the maximum value of Tables 1 through 8. CP&L suggests that the draft regulatory guide be revised to address a maximum average initial enrichment of 5% U-235. That value would be consistent with the revisions to 10CFR50.68 and 10CFR70.24 that were recently proposed by the NRC.
2. Appendix B, "Acceptability and Limits on the Guide," further reads, in part:

*"Whenever there is a unique difference in either the design or operating conditions of a spent fuel assembly that is more extreme than that accepted here, another well-qualified method of analysis that accounts for the difference should be used."*

The draft regulatory guide does not reference any other method and does not define the requirements for a method being considered "well-qualified." CP&L suggests that some additional guidance is needed. This is especially important if the regulatory guide retains the limited range of parameters in Tables 1 through 8.

