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DOCKET

Docket Number 50-346

License Number NPF-3

Serial Number 2246

DOCKET NUMBER
PROPOSED RULE PR 72
(59FR 28496)

August 12, 1994

The Secretary, U.S. Nuclear Regulatory Commission
Attention: Docketing and Service Branch
Washington, D. C. 20555

Subject: Comments on Proposed Rule to Add the Standardized NUHOMS
Horizontal Modular Storage System to the List of Approved
Spent Fuel Storage Casks

Gentlemen:

On June 2, 1994, the Nuclear Regulatory Commission (NRC) published in the Federal Register (59 FR 28496) a proposed rule to add the Standardized NUHOMS Horizontal Modular Storage System to 10 CFR 72.214, List of Approved Spent Fuel Storage Casks. Comments on the proposed rule were solicited by the Federal Register Notice.

Toledo Edison welcomes the opportunity to comment on the proposed rule. Toledo Edison commends the NRC for moving forward with the certification of the standardized NUHOMS storage system which is selected for use at the Davis-Besse Nuclear Power Station (DBNPS) to augment on site fuel storage capacity beginning in the summer of 1995. Utilization of the NUHOMS system at the DBNPS will enable Toledo Edison to maintain sufficient capacity in the spent fuel pool to completely off load the reactor core following the refueling outage scheduled in early 1996. Because of this need, Toledo Edison encourages the NRC to complete this rulemaking in an expeditious fashion.

Toledo Edison has reviewed the proposed Certificate of Compliance and Draft Safety Evaluation Report for the Standardized NUHOMS system. Toledo Edison's comments are attached.

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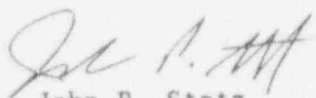
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Docket Number 50-346
License Number NPF-3
Serial Number 2246
Page 2

Should you have any questions or require additional information regarding Toledo Edison's comments, please contact Mr. William T. O'Connor, Manager - Regulatory Affairs, at (419) 249-2366.

Very truly yours,



John P. Stetz
Vice President - Nuclear
Davis-Besse Nuclear Power Station

PWS/eld

Attachment

cc: L. L. Gundrum, NRC Project Manager
J. B. Martin, Regional Administrator, NRC Region III
S. Stasek, DB-1 NRC Senior Resident Inspector
USNRC Document Control Desk
Utility Radiological Safety Board

Comments on the Proposed Certificate of Compliance

Page A-4

The requirement to load the first canister with a design basis fuel load should be modified to allow more latitude in the selection of fuel. It is likely that Toledo Edison will be the first use of the standardized NUHOMS system. Although, Toledo Edison currently has design basis spent fuel, our philosophy is to perform dry casking of the oldest fuel first, thereby minimizing both heat load and radiation dose. This philosophy is also consistent with our public information campaign which has always stated that the oldest fuel would be loaded first. The requirement for the first user to load design basis fuel seems contrary to the As Low As Reasonably Achievable (ALARA) principle.

Page A-6, first paragraph in Bases

The reference to Tables 12-1a and 1b appears to be in error. The reference should be to Tables 1-1a and 1-1b. Some clarification of the integrity of spent fuel permitted to be stored is requested. It should be made clear that fuel need not be specially inspected to be eligible for storage, that pinhole leaks do not constitute gross breeches, and that fuel is eligible for storage provided that it does not require special handling or storage provisions within the spent fuel pool.

Page A-8, Assembly Length

The specification for assembly length refers to Safety Analysis Report (SAR) Chapter 3. Chapter 3 addresses the length of as built new fuel. Irradiated fuel will be longer than new fuel. This should be clarified.

Page A-19, Basis paragraph

The sentence in the middle of the paragraph that begins "Acceptable damage may occur..." should read "Unacceptable damage may occur..."

Page A-25

The Action for Technical Specification 1.2.16, Yearly Average Ambient Temperature, appears to be a surveillance requirement versus an action statement. It is unclear what action should be taken if either of the two specified limits (Yearly average temperature < 70F or average daily ambient temperature < 100F) is exceeded.

Page A-27, first paragraph

The first paragraph states that the postulated adiabatic heatup would result in concrete temperatures being exceeded in approximately 40 hours. As a result, it is appropriate and conservative to perform the visual surveillance to verify no vent blockage on a daily basis to ensure that a blockage has not existed for 40 hours. The last sentence in the first paragraph should reflect that the module needs to be removed from service if it cannot be established that the blockage is less than 40 hours, not 24 hours. A 24 hour surveillance interval will adequately verify this.

Page A-28

Section 1.3 indicates that a module must be removed from service if a vent blockage is in existence for greater than 24 hours. Surveillance 1.3.2 indicates that a module must be removed from service if the concrete accident temperature criteria has been exceeded for greater than 24 hours. A vent blockage for less than 24 hours would not cause the temperature limit to be exceeded, as explained in Section 1.3 and the objective for the 24 hour frequency required by Surveillance 1.3.1. The apparent conflict between Section 1.3 and the action for Surveillance Requirement 1.3.2 needs to be resolved. It appears that the Surveillance Requirement 1.3.2 Actions are appropriate.