

PROPOSED TECHNICAL SPECIFICATION CHANGE

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- 3.8.15* The spent fuel shipping cask shall not be carried by the Auxiliary Building crane pending the evaluation of the spent fuel cask drop accident and the crane design by AP&L and NRC review and approval. The provisions of Specifications 3.0.3 and 3.0.4 are not applicable.
- 3.8.16 Storage in the spent fuel pool shall be restricted to fuel assemblies having initial enrichment less than or equal to 4.1 w/o U-235. The provisions of Specifications 3.0.3 and 3.0.4 are not applicable.
- 3.8.17 Storage in Region 2 (as shown on Figure 3.8.1) of the spent fuel pool shall be further restricted by burnup and enrichment limits specified in Figure 3.8.2. In the event a checkerboard storage configuration is deemed necessary for a portion of Region 2, vacant spaces adjacent to the faces of any fuel assembly which does not meet the Region 2 burnup criteria (non-restricted) shall be physically blocked before any such fuel assembly may be placed in Region 2. This will prevent inadvertent fuel assembly insertion into two adjacent storage locations. The provisions of Specifications 3.0.3 and 3.0.4 are not applicable.
- 3.8.18 The boron concentration in the spent fuel pool shall be maintained (at all times) at greater than 1600 parts per million.

Bases

Detailed written procedures will be available for use by refueling personnel. These procedures, the above specifications, and the design of the fuel handling equipment as described in Section 9.6 of the FSAR incorporating built-in interlocks and safety features, provide assurance that no incident could occur during the refueling operations that would result in a hazard to public health and safety. If no change is being made in core geometry, one flux monitor is sufficient. This permits maintenance on the instrumentation. Continuous monitoring of radiation levels and neutron flux provides immediate indication of an unsafe condition.

The requirement that at least one decay heat removal loop be in operation ensures that (1) sufficient cooling capacity is available to remove decay heat and maintain the water in the reactor pressure vessel at the refueling temperature (normally 140°F), and (2) sufficient coolant circulation is maintained through the reactor core to minimize the effects of a boron dilution incident and prevent boron stratification.⁽¹⁾

The requirement to have two decay heat removal loops operable when there is less than 23 feet of water above the core, ensures that a single failure of the operating decay heat removal loop will not result in a complete loss of decay heat removal capability. With the reactor vessel head removed and 23 feet of water above the core, a large heat sink is available for core cooling, thus in the event of a failure of the operating decay heat removal loop, adequate time is provided to initiate emergency procedures to cool the core.

The shutdown margin indicated in Specification 3.8.4 will keep the core subcritical, even with all control rods withdrawn from the core.⁽²⁾ Although the refueling boron concentration is sufficient to maintain the core $k_{eff} \leq 0.99$ if all the control rods were removed from the core, only a few control rods will be removed at any one time during fuel shuffling and

Note: *An exception to 3.8.15 is granted for the period of October 15, 1991, through January 31, 1992, for the movement of two spent fuel rods utilizing a 17 ton shipping cask.