



Long
Island
Power
Authority

Shoreham Nuclear Power Station
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LSNRC-1883

JAN 18 1992

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D.C. 20555

Application for an Amendment to Facility Operating
License NPF-82
Shoreham Nuclear Power Station - Unit 1
Docket No. 50-322

Ref: (1) Long Island Power Authority, Shoreham Nuclear Power
Station Decommissioning Plan (December 29, 1990)

I. Introduction

Pursuant to 10 CFR §50.90, Long Island Power Authority ("LIPA"), with the support of the Long Island Lighting Company ("LILCO"), hereby requests a conforming amendment to License No. NPF-82, the Possession Only License for the Shoreham Nuclear Power Station ("Shoreham"), to become effective as soon as possible after Nuclear Regulatory Commission ("NRC") approval of the pending Joint Application to Transfer the Shoreham Nuclear Power Station license from LILCO to LIPA, to reflect the NRC's approval of the Shoreham Decommissioning Plan (Ref. 1). The amendment would authorize implementation of the Shoreham Decommissioning Plan presently pending before the NRC.

By separate application dated June 28, 1990, LIPA and LILCO have jointly sought approval of a license amendment authorizing transfer of License No. NPF-82 from LILCO to LIPA. In addition, on December 29, 1990, LIPA submitted its Shoreham Decommissioning Plan, which LILCO requested the NRC to review and approve by letter dated January 2, 1991. After nearly a year of review, on December 23, 1991, the NRC published notice of its intent to approve the Shoreham Decommissioning Plan. See 56 Fed. Reg. 66459 (1991). The requested amendment would allow LIPA, after it has become the licensee, to implement that Shoreham Decommissioning Plan.

ADD 11

LIPA further requests that this license amendment be effective upon issuance pursuant to 10 CFR §50.91(a)(4), and that it be processed expeditiously in light of the Commission's previous notice of intent to approve the Decommissioning Plan and the cost increases and other harm outlined below that would occur if decommissioning is delayed.

II. Description of the Proposed Amendment

The proposed amendment would add a new provision to Section 2.C of License No. NPF-82, stating as follows:

"(4) Decommissioning Authorization

The licensee is authorized to decommission Shoreham in accordance with (a) the Shoreham Decommissioning Plan submitted on December 29, 1990, as supplemented by letters dated August 26, 1991, November 27, 1991 and December 6, 1991, and (b) the Commission's rules and regulations."

III. No Significant Hazards Determination

LIPA has performed a "no significant hazards consideration" analysis, assessing the proposed amendment using the standards set forth in 10 CFR §50.92(c). This analysis, as presented in an attachment hereto, demonstrates that the proposed amendment does not involve a significant hazards consideration.

IV. Request for Expedited Processing

LIPA requests that the Commission review and arrange for publication of the amendment at the earliest possible date. The Decommissioning Plan has been on file with the Commission for over a year. The public interest requires that LIPA be free to commence decommissioning as soon as possible for the following reasons:

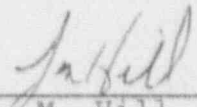
- 1) Decommissioning activities are prioritized to maximize the ability to dispose of radioactive waste materials in 1992 because of the potential for denial of access to licensed radioactive waste burial facilities as of January 1, 1993. This prioritization minimizes the quantity of radioactive waste that could be required to be stored at the Shoreham site on an interim basis after 1992, as well as the higher costs to ratepayers which would likely be associated with offsite disposal after 1992.

- 2) Prolonged delay in the initiation of decommissioning, and hence, in the completion of decommissioning, will increase the costs to ratepayers because of the need to maintain station staffing levels over a longer period of time. Also, a prolonged delay in the start of decommissioning could result in additional costs from contractors who are now preparing to mobilize at the Shoreham site, as well as in the potential loss of availability of selected contractor personnel and/or equipment to other projects.
- 3) The project schedule currently takes advantage of the near-term availability of the Reactor Building Polar Crane for activities other than fuel disposition. Once fuel disposition is underway (possibly as early as July 1992) the availability of the Polar Crane for other activities will be greatly reduced. Thus, the decommissioning project schedule would likely be extended.

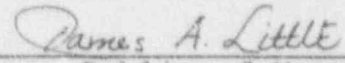
Therefore, LIPA respectfully requests that this matter be processed as expeditiously as possible and noticed promptly in the Federal Register, to avoid further delay in decommissioning.

Long Island Power Authority

By


L. M. Hill
Resident Manager
Shoreham Nuclear Power Station

Subscribed and sworn to me this 13th day of January, 1992.


Notary Public of New York

My Commission Expires: May 18, 1993

cc: D. Ross
S. Brown
T. T. Martin
L. Doerflein
J. D. Leonard, Jr.
L. Bell
B. Norris

JAMES A. LITTLE
NOTARY PUBLIC, State of New York
No. 4886267, Suffolk County
Term Expires May 18, 1993

APPENDIX

ANALYSIS OF NO SIGNIFICANT HAZARDS CONSIDERATION

LIPA has performed a "no significant hazards consideration" analysis, assessing the proposed amendment using the standards set forth in 10 CFR §50.92(c). This analysis demonstrates that the proposed amendment does not involve a significant hazards consideration.

A. Requirements of 10 C.F.R. § 50.92.

Section 50.92 provides that the NRC may make a determination "that a proposed amendment to an operating license . . . involves no significant hazards consideration" if "operation of the facility in accordance with the proposed amendment" would not

- "(1) Involve a significant increase in the probability or consequences of an accident previously evaluated, or
- (2) Create the possibility of a new or different kind of accident from any previously evaluated; or
- (3) Involve a significant reduction in a margin of safety."

Decommissioning activities at Shoreham would not involve a significant hazards consideration, as shown below.

B. Condition of Shoreham Confirms No Significant Hazards

Given the limited operating history of Shoreham (less than two effective full-power days), the levels of radioactivity and amounts of contamination at Shoreham are much lower than at a plant that has operated for a significant time at full power. This greatly reduces the scope and complexity of decommissioning activities. The Shoreham Decommissioning Plan contains an Accident Analysis for decommissioning activities and for Spent Fuel Storage and Handling. This analysis establishes that, given the defueled and non-operating status of the plant and the limitations in the Technical Specifications applicable to the plant, continued maintenance and decommissioning of Shoreham pose minimal radiological risk.

The radiologically bounding accident -- a fuel damage accident -- is described in Section 3.4.1.8 of the Decommissioning Plan. This same postulated event was analyzed by LILCO in its Defueled Safety Analysis Report and reviewed and approved by the NRC Staff in its Safety Evaluation Related to Amendment No. 7 To Facility Operating License NPF-82 dated June 14, 1991. Because this postulated event is still the applicable radiologically bounding accident, the previous findings of no significant hazard

consideration remain valid. (See Section 4.0 of NRC Staff Safety Evaluation referenced above.) As further evidence of the minimal radiological risk associated with this bounding postulated event, it is noted that the same bounding event also formed the basis for NRC authorization to cease offsite emergency preparedness activities at Shoreham, again, with a determination of no significant hazards consideration.

C. The Requirements of 10 CFR §50.92 Are Met

The following discussion provides a specific analysis of the proposed change against the three standards delineated in 10 CFR 50.92. It confirms that the proposed license amendment is administrative in nature, designed to achieve consistency with the Commission's Decommissioning Order to be issued in accordance with 10 CFR §50.82(e), and therefore involves no matters that would pose a significant hazards consideration.

1. The Proposed Changes Does Not Involve a Significant Increase in the Probability or Consequences of an Accident Previously Evaluated

The proposed amendment will do nothing more than authorize decommissioning of Shoreham in accordance with the NRC approved Shoreham Decommissioning Plan. The Decommissioning Plan contains accident analyses which already have been reviewed by the NRC. The amendment will in no way alter the probability or consequences of the accidents previously analyzed in the Decommissioning Plan, but will simply authorize that those decommissioning activities be performed according to the Plan.

The fuel will not be further irradiated. The non-operating, defueled condition of the reactor further reduces the probability of an operational accident. The potential accident consequences for the low burn-up fuel in the spent fuel pool have been analyzed assuming a fuel damage accident. Further, the analysis conservatively assumed maximum fission product release (release of all fuel gap activity). All of the postulated decommissioning accident analyses demonstrate that accident consequences would be substantially lower than the previous Updated Safety Analysis Report (USAR) accident analyses results and well within regulatory limits.

The fuel, radioactive waste and material will not be handled or treated in a different manner than assumed in previous safety analyses and evaluations. The small amounts of radioactive waste and materials at Shoreham are contained in systems and components specifically designed for their control. Fuel handling will be performed by certified personnel, with approved equipment and approved procedures. The low burn-up fuel is stored in the spent fuel pool. Storage of the fuel in any on-site location other than the spent fuel pool would require a further license amendment.

Therefore, the proposed amendment to NPF-82 does not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. The Proposed Changes Will Not Create The Possibility of a New or Different Kind of Accident from Any Accident Previously Evaluated

The proposed amendment as a permission to conduct activities in accordance with the decommissioning plan. Therefore, the amendment by itself does not create the possibility of a new or different kind of accident from any previously evaluated.

Because the reactor will not be operated, there is no possibility of any operation related accident. The only remaining potential accidents would involve fuel handling and radioactive material storage activities. The fuel and radioactive waste and material will be handled or treated in the manner described in the Decommissioning Plan, and the amendment involves no modification to spent fuel pool storage or handling systems. Licensee activities will include maintenance and decommissioning of certain systems according to the Shoreham Decommissioning Plan as approved by the NRC.

Therefore, the proposed amendment does not create the possibility of a new or different kind of accident from any accident previously evaluated by the NRC.

3. The Proposed Changes Do Not Involve a Significant Reduction in a Margin of Safety

The proposed amendment does not involve a reduction in any margin of safety. As noted, the license amendment will permit decommissioning to occur as planned and approved and will be consistent with the Commission's regulations and orders. The margin of safety reflected in the analyses presented in the Decommissioning Plan are unaltered by this proposed amendment.

The fuel handling and radioactive waste storage accidents were reanalyzed for the low-burn-up, decay heat, and radioactive inventory conditions of Shoreham in the Decommissioning Plan. These analyses confirmed a significant increase in the margin of safety from those analyzed for long-term, full power operations in the USAR. Further, the Defueled Technical Specifications and Environmental Protection Plan provide acceptable assurance to protect the public health and safety for the defueled condition. As indicated in the Decommissioning Plan, decommissioning activities will be conducted in accordance with the requirements of these documents.

Therefore, the proposed amendment does not involve a significant reduction in the margin of safety.