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August 26, 1992  
NRC-92-0088

U. S. Nuclear Regulatory Commission  
Mr. Samuel J. Chilk, Secretary  
Washington, D.C. 20555

Attention: Docketing and Service Branch

Reference: Fermi 2  
NRC Docket No. 50-341  
NRC License No. NPF-43

Subject: Detroit Edison Comments on the Nuclear Regulatory  
Commission's "Proposed Concentration Averaging and  
Encapsulation Technical Position, Revision in Part"

Detroit Edison is participating in the industry's review of this proposed Branch Technical Position through the Edison Electric Institute/Utility Nuclear Waste and Transportation Program. In addition, Detroit Edison wishes to present additional comments, as discussed below.

Detroit Edison is conducting a fuel pool cleanup campaign at its Fermi 2 nuclear power plant. As part of this campaign, control rod blades and neutron monitors which had been removed from the core were packaged in liners for shipment to a low level radioactive disposal facility. Since no such facilities are presently open to Michigan radwaste generators, these liners are being stored in the Fermi 2 spent fuel pool.

Under accepted practices at the time of packaging, which allow averaging of activity over the total waste volume, each of these liners is acceptable as Class C waste. Under the proposed BTP, however, one of these liners may be considered as greater than Class C due to the presence of neutron monitors. Although these monitors comprise less than 4% of the total volume, some of them may be greater than Class C. Under the proposed BTP, the entire liner must be considered as greater than Class C.

Since the liner may not be acceptable for disposal as packaged and the repackaging of this liner would create significant and unnecessary personnel exposures, it may require long-term storage in the spent fuel pool. This would occupy space that will be needed for spent fuel storage.

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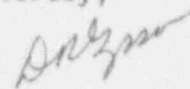
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Detroit Edison thus requests that, as a minimum, if the proposed BTP is issued, a "grandfather" provision be included to allow previously packaged radwaste to be classified in accordance with accepted practices at the time of packaging.

If you have any questions concerning our comments, please contact Joseph Penderast at (313) 586-1682.

Sincerely,



cc: T. G. Colburn  
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