

YANKEE ATOMIC ELECTRIC COMPANY

Telephone (508) 779-6711
TWX 710-380-7619



580 Main Street, Bolton, Massachusetts 01740-1398

September 30, 1996
BYR 96 - 048

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

Attention: Mr. Morton B. Fairtile
Senior Project Manager
Non-Power Reactors and Decommissioning Project Directorate
Division of Operating Reactors

References: (a) License No. DPR-3 (Docket No. 50-29)
(b) USNRC Letter to YAEC, dated May 31, 1996
(c) Director's Decisions DD-96-01 and DD-96-02
(d) CLI-96-06, dated April 1, 1996
(e) USNRC Letter to J. Block, dated February 22, 1996
(f) Letters, K. Jaffe, Swindler & Berlin to L. Cashell, Federal Energy Regulatory Commission, Docket No. ER95-835-000, dated December 29, 1995

Subject: Pre-Notification of New Planned Activities

Dear Mr. Fairtile,

In accordance with Reference (d), this letter provides fourteen day notification prior to implementing additional minor decommissioning activities at YNPS. The scope of these activities, described in Enclosure A, was developed to maintain the trained and experienced staff engaged in decommissioning activities at Yankee without performing any major decommissioning activities. Yankee's staff has developed significant expertise in decommissioning, achieving an impressive radiological and occupational safety record including greater than 750,000 hours without a lost time accident. Regrettably, Yankee has already experienced a reduction of trained and experienced staff as a result of the completion of many of the previously noticed minor decommissioning activities. Regardless of further legal proceedings in this matter, proceeding with these minor activities is necessary to avoid a further reduction in staff and the attendant consequences.

Yankee has determined that the activities described in Enclosure A are "minor" decommissioning activities, consistent with established criteria, and do not foreclose the ability to place the remaining plant into a safe storage (i.e., SAFSTOR) condition. Furthermore, these activities are bounded by the types of activities previously considered permissible by NRC under a Possession-Only License (POL) prior to decommissioning plan approval [see Reference (e)]

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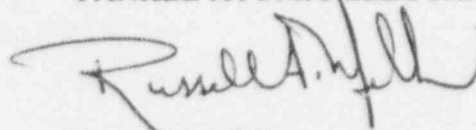
describing activities conducted at Fort St. Vrain and Shoreham]. These activities do not constitute major decommissioning activities since removal and/or implementation collectively represent a very small fraction of the remaining estimated occupational exposure. Enclosure A contains information previously requested by the NRC staff regarding the estimated curies to be removed, estimated occupational exposure, and cost.

None of the equipment or material being removed is required to support safe storage of spent fuel, future dismantlement, or safe storage of those portions of the facility which remain. These activities also do not increase the costs of decommissioning as these costs are already accounted for in the decommissioning cost estimate as filed and settled by FERC and collected in accordance with the FERC settlement [Reference (f)].

Should you have any questions regarding this information, please contact us.

Sincerely,

YANKEE ATOMIC ELECTRIC COMPANY

A handwritten signature in dark ink, appearing to read "Russell A. Mellor", is written over the company name.

Russell A. Mellor
Decommissioning Manager and
Manager of Operations

cc: USNRC Document Control Desk
Mort Fairtile, NRR
J. White, NRC Region I

Attachment A - Description of Planned Activities

The following provides descriptions of activities expected to commence between October 15, 1996 and November 15, 1996:

1. Removal of Motor Control Center (MCC) 4

This activity is bounded by the types of activities previously stated as permissible by NRC under a POL prior to decommissioning plan approval (see Reference (e) describing activities conducted at Fort St. Vrain and Shoreham). This activity does not constitute a major decommissioning activity since the removal involves only a small portion of the dose required to complete decommissioning. The total estimated dose associated with this activity is approximately 0.1 person-rem. The quantity of radioactivity has been estimated at less than 0.000002 Ci.

This activity removes a de-energized motor control center, MCC 4, located in the Primary Auxiliary Building (PAB), and includes the necessary electrical determinations and removal of associated electrical cable and conduit. MCC-4 was de-energized during the installation of the construction grade power system and is not required to support spent fuel pool cooling operation.

This activity does not increase the costs of decommissioning as its cost is already accounted for in the decommissioning cost estimate as filed and settled by FERC and collected in accordance with the FERC settlement (Reference (f)).

Anticipated start date: October 15, 1996.

2. Removal of Asbestos Insulation in the RCA

This activity is bounded by the types of activities previously stated as permissible by NRC under a POL prior to decommissioning plan approval (see Reference (e) describing activities conducted at Fort St. Vrain and Shoreham). This activity involves removal of asbestos insulation from the waste evaporator, certain building heating lines, and other miscellaneous equipment. This activity does not constitute a major decommissioning activity since the removal involves only a small portion of the dose required to complete decommissioning. The total estimated dose associated with this activity is approximately 3 person-rem. The amount of radioactivity has been estimated at less than 0.02 Ci.

**Attachment A - Description of Planned Activities
(continued)**

This activity does not increase the costs of decommissioning as its cost is already accounted for in the decommissioning cost estimate as filed and settled by FERC and collected in accordance with the FERC settlement (Reference (f)).

Anticipated start date: October 15, 1996.

3. Removal of Miscellaneous PAB Components

This activity is bounded by the types of activities previously stated as permissible by NRC under a POL prior to decommissioning plan approval (see Reference (e) describing activities conducted at Fort St. Vrain and Shoreham). This activity involves removal of miscellaneous small bore piping, electrical equipment, cable and conduit, miscellaneous steel, instrumentation, concrete block and concrete decontamination. This activity does not constitute a major decommissioning activity since the removal involves only a small portion of the dose required to complete decommissioning. The total estimated dose associated with this activity is approximately 2 person-rem. The amount of radioactivity has been estimated at approximately 1.3 curies.

This activity does not increase the costs of decommissioning as its cost is already accounted for in the decommissioning cost estimate as filed and settled by FERC and collected in accordance with the FERC settlement (Reference (f)).

Anticipated start date: October 15, 1996.

4. Removal of Miscellaneous Waste Disposal Building Components

This activity is bounded by the types of activities previously stated as permissible by NRC under a POL prior to decommissioning plan approval (see Reference (e) describing activities conducted at Fort St. Vrain and Shoreham). This activity does not constitute a major decommissioning activity since the removal involves only a small portion of the dose required to complete decommissioning. The total estimated dose associated with this activity is approximately 3 person-rem. The amount of radioactivity has been estimated at less than 0.3 Ci.

This activity involves removal of the obsolete evaporator and associated equipment, small bore piping, electrical equipment, cable and conduit, miscellaneous steel, instrumentation and concrete decontamination. This evaporator is redundant to the installed new temporary waste evaporator and is not required to support operation of the spent fuel pool cooling system.

This activity does not increase the costs of decommissioning as its cost is already accounted

**Attachment A - Description of Planned Activities
(continued)**

for in the decommissioning cost estimate as filed and settled by FERC and collected in accordance with the FERC settlement (Reference (f)).

Anticipated start date: November 4, 1996.

5. Removal of the Waste Hold-up and Test Tanks

This activity is bounded by the types of activities previously stated as permissible by NRC under a POL prior to decommissioning plan approval (see Reference (e) describing activities conducted at Fort St. Vrain and Shoreham). This activity does not constitute a major decommissioning activity since the removal involves only a small portion of the dose required to complete decommissioning. The total estimated dose associated with this activity is approximately one person-rem. The amount of radioactivity has been estimated at less than one curie.

This activity involves removal of the obsolete waste hold-up tank and test tanks and concrete decontamination. These tanks are redundant to the installed new temporary waste evaporator system and waste water storage tanks and are not required to support operation of the spent fuel pool cooling system.

This activity does not increase the costs of decommissioning as its cost is already accounted for in the decommissioning cost estimate as filed and settled by FERC and collected in accordance with the FERC settlement (Reference (f)).

Anticipated start date: October 15, 1996.

6. Decontamination of the Safety Injection Building Concrete Surfaces

This activity is a decontamination activity. Decontamination is a specifically allowed activity by the 1988 decommissioning rule (Statements of Consideration) and NRC letter transmitting the YNPS POL. The interior building surfaces and structural steel will be decontaminated. Concrete encased drain lines which cannot be decontaminated and verified clean will be removed. Decontamination does not materially and demonstrably affect the methods or options available for decommissioning because decontamination does not preclude safe storage or dismantlement.

This activity involves removal of a very small quantity of radioactivity, estimated at less than 0.001 curies. The total estimated dose associated with these activities is approximately 0.3 person-rem.

**Attachment A - Description of Planned Activities
(continued)**

This activity does not increase the costs of decommissioning as its cost is already accounted for in the decommissioning cost estimate as filed and settled by FERC and collected in accordance with the FERC settlement (Reference (f)).

Anticipated start date: November 4, 1996

Summary

These activities are "minor" decommissioning activities, consistent with established criteria, and collectively represent a small fraction of the remaining estimated exposure for the decommissioning of the plant. The conduct of these activities has no impact on the ability of the remaining plant to achieve a SAFSTOR configuration should such an option be desired or required in the future for the remaining portion of the facility.

Planned Activities

Activity	Description	Radioactivity (Ci)	Dose (person-rem)	Cost (\$)
MCC 4 Removal	MCC determinations, MCC removal, cable/conduit removal	<0.000002	0.1	93,000
Primary Side ACM Removal	Waste evaporator, heating lines, & misc components	<0.02	3	342,000
PAB Clean out	Remove misc small bore piping, electrical conduit & cable, miscellaneous steel, concrete block, and instrumentation	1.3	2	301,000
Waste Disposal Building Clean out	Remove obsolete evaporator, small bore piping, electrical cable and conduit, miscellaneous steel, concrete block, and instrumentation	0.3	3	205,000
Waste Hold-up Tank and Test Tank Removal	Remove the obsolete waste hold-up tank and test tanks (2) and decontaminate the retaining moat walls	<1	1	\$186,000
Safety Injection Building Decontamination	Decontaminate the interior building, structural steel, and roof surfaces	<0.001	0.3	\$125,000
Total		< 2.6	9.4	\$1,252,000