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September 30, 1996
C301-96-2045

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

Gentlemen,

Subject: Saxton Nuclear Experimental Corporation
Operating License No. DPR-4
Docket No. 50-146
SNEC Decommissioning

The purpose of this letter is to provide clarification of the approach GPU Nuclear proposes to fulfill the requirements specified in the new §50.82 as they apply to the SNEC facility.

The Saxton reactor ceased operation on May 1, 1972. The reactor core was defueled during June and the irradiated fuel was shipped off site between July and December 1972. On August 15, 1972 the Atomic Energy Commission issued Amendment 8 to the SNEC operating license, which amended license DPR-4 and the Technical Specifications appended thereto, allowing SNEC to possess but not operate the Saxton reactor. Given the status of the facility following these actions, §50.82(a)(1)(iii) applies to the SNEC facility and the certifications specified in §50.82(a)(i)(ii).

On February 16, 1996 the SNEC Facility Decommissioning Plan was submitted for NRC review and approval. In accordance with §50.82, the submitted plan has become the SNEC facility Post-Shutdown Decommissioning Activities Report (PSDAR). This submittal in combination with the submittal of the SNEC Environmental Report on April 17, 1996 meets the requirements of paragraph §50.82(a)(4) in that sections therein include a description of the planned decommissioning activities (section 2.3.1) along with a schedule for their accomplishment (figure 2.2-4), an estimate of expected costs (section 5.1) and a discussion providing the reasons for concluding that the environmental impacts associated with the site-specific decommissioning activities will be bounded by the Generic Environmental Impact Statement, NUREG -0586 (section 1.6 of the SNEC Environmental Report).

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Since the current Technical Specifications (TSs) do not authorize decommissioning activities at the SNEC facility, Technical Specification Change Request (TSCR) 58 was submitted on May 17, 1996. Under the pre-existing requirements, proposed TSs were considered a part of the decommissioning plan and issued with the license amendment allowing implementation of the plan. Although the prior administrative process has been revised with the issuance of the new decommissioning rule, the TSCR is still needed for SNEC facility decommissioning. Accordingly GPU Nuclear requests that the NRC continue its review of TSCR 58 and issue a license amendment approving TSCR 58 be issued to allow decommissioning of the SNEC facility to proceed.

Regarding environmental matters, GPU Nuclear has identified programs to be established and implemented to protect the environment in the TSCR 58 submittal. This submittal adequately addresses environmental concerns, and therefore, further environmental TSs under §50.36(b) are unnecessary. The SNEC Environmental Report evaluates the actual and potential impacts resulting from the decommissioning of the SNEC facility, including decontamination, dismantlement and site restoration activities. It was submitted in accordance with the requirements of §51.53(b) to address the post-operating license stage of the facility and to specifically address new information and significant environmental change associated with the decommissioning of the facility. Ultimately, the report demonstrates that the decommissioning of the SNEC facility will not result in significant impact to the health and safety of the workers involved, the public or the environment.

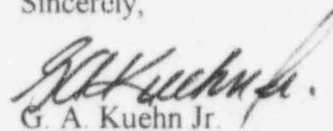
A site-specific cost estimate is being included as Attachment 2 to this submittal to satisfy the §50.82(a)(8)(ii) requirement for such a submittal prior to the use of funding in excess of the 23% permitted.

GPU Nuclear is establishing a fire protection program which meets the requirements of §50.48(f) and objectives of sub-paragraph (1) with regard to addressing the potential for fires which could cause the release or spread of radioactive materials.

With the Order Approving Transfer issued on May 10, 1996 GPU Nuclear became co-licensee of the SNEC facility and responsible for management-related activities. As a licensee, GPU Nuclear will apply its Commission approved Operational Quality Assurance Program to activities associated with packaging and transportation of radioactive material at the SNEC facility to satisfy the requirement of 10 CFR Part 71.101(c). A SNEC facility specific Quality Assurance Plan will be submitted which addresses all other SNEC facility decommissioning activities within the scope of the plan (with exception of 10 CFR 71) in October 1996.

During the monitored SAFSTOR period from 1972 to the present, the SNEC Facility Safety Analysis Report submitted in April 1972 was changed only as a result of License Amendments issued since Amendment 8. An updated SAR will be submitted in mid-October 1996 which will incorporate the accident analyses for decommissioning activities previously included in the Decommissioning Plan submittal. Further updates to the SAR will be submitted on 24-month intervals as required by §50.71(e)(4). The updated SAR and Decommissioning Technical Specifications will provide a documented licensing basis appropriate to support any determinations made pursuant to §50.59 and will provide assurance of the continued protection of public health and safety during decommissioning of the SNEC facility.

Sincerely,



G. A. Kuehn Jr.
Vice President SNEC

WGH

cc: Administrator, NRC Region I
NRC Project Manager NRR
NRC Project Scientist, Region I