

TEXAS UTILITIES GENERATING COMPANY

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September 20, 1985

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WILLIAM G. COUNCIL
EXECUTIVE VICE PRESIDENT

Secretary of the Commission
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555
Attn: Docketing and Service Branch

OFFICE OF THE
DOCKETING & SERVICE
BRANCH

SUBJECT: PROPOSED REGULATORY GUIDE FOR CRITICALITY
SAFETY FOR HANDLING, STORING AND TRANSPORTING
LWR FUEL OUTSIDE REACTORS, COMMENTS ON

REF: Task CE 407-4

DIV 1

Dear Sir:

We have reviewed the proposed regulatory guide for preventing criticality accidents in operations involving LWR fuel outside reactors and have developed some comments which we feel ought to be considered in the development of the final regulatory guide. These comments are the following:

Though the regulatory guide strongly recommends detailed nuclear criticality safety analyses for specific operations, it does not offer specific guidance for the selection of suitable data and methodology applicable to the performance of such analyses. The proposed regulatory guide does endorse ANSI/ANS-8.17-1984 as an acceptable source of guidance for preventing criticality accidents; however, it specifically does not endorse the other standards referenced in ANSI/ANS-8.17-1984. These other standards provide the principal substance of ANSI/ANS-8.17-1984; that is, together they provide:

- guidance for general administrative practices
- methods used to calculate subcriticality
- guidance to determine the need for and use of criticality alarms
- methods which may be used to ensure subcriticality
- in situ measurements which may be used to confirm subcriticality.

The regulatory guide should be clear as to what options are available to the licensee regarding these areas. If by not specifically endorsing these other standards, it is intended that licensees may use other methods to demonstrate compliance with the regulatory guide, this should be clearly stated in the guide itself. In addition, the essential elements which constitute an acceptable methodology for a licensee's criticality safety program should also be included. If these elements are those contained in the standards referenced in ANSI/ANS-8.17-1984, the regulatory guide should say so. Without such guidance, it is not clear to what criteria compliance with the regulatory guide would be measured.

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PDR REGGD
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A DIVISION OF TEXAS UTILITIES ELECTRIC COMPANY

Authorized by card

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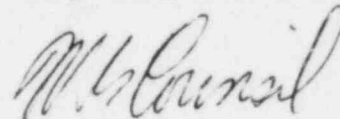
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Add'l Hill, 113055

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We consider this to be an appropriate area for the NRC to provide guidance to nuclear plant licensees. However, it should be recognized that satisfactory methods of assuring subcriticality in operations involving LWR fuel are currently employed at nuclear reactor sites, and that these methods are adequate to assure the safety of operators and the general public. Should the proposed regulatory guide subsequently be approved, it will be at some time necessary for operating reactor licensees to demonstrate compliance. Therefore, the guide should be specific enough to be of real aid to the licensee in evaluating his plant specific program for compliance, yet general enough to ensure that currently acceptable methods are not arbitrarily excluded.

Very truly yours,

A handwritten signature in cursive script, appearing to read "W. G. Council".

W. G. Council

SDK/grr