

February 21, 1997

Ernest C. Hadley, Esq.
1040 B Main Street
P.O. Box 549
West Wareham, MA 02576

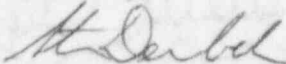
Dear Mr. Hadley:

This letter provides an update of the 10 CFR 2.206 Petition you submitted on August 21, 1995, as supplemented August 28, 1995, on behalf of Mr. George Galatis and the group, We the People, Inc. The staff has not completed its review of the Petitioners' remaining request for enforcement action pursuant to 10 CFR 50.5 and 50.9.

During a February 5, 1997 meeting with the public, two staff members of the NRC's Office for Analysis and Evaluation of Operational Data presented their generic assessment of spent fuel cooling. Copies of the slides used by the presenters (Enclosure 1) and their September 1996 report (Enclosure 2) are provided for your information.

Please call me at (301) 415-1455, if you have any questions concerning this issue.

Sincerely,


Stephen Dembek, Project Manager
Special Projects Office - Licensing
Office of Nuclear Reactor Regulation

Docket No. 50-245

Enclosures: As stated

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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

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Sincerely,

A handwritten signature in dark ink, appearing to read "Stephen Dembek", is written over the typed name.

Stephen Dembek, Project Manager
Special Projects Office - Licensing
Office of Nuclear Reactor Regulation

Docket No. 50-245

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ENCLOSURE 1



ASSESSMENT OF SPENT FUEL COOLING

Jose G. Ibarra

Hal Ornstein

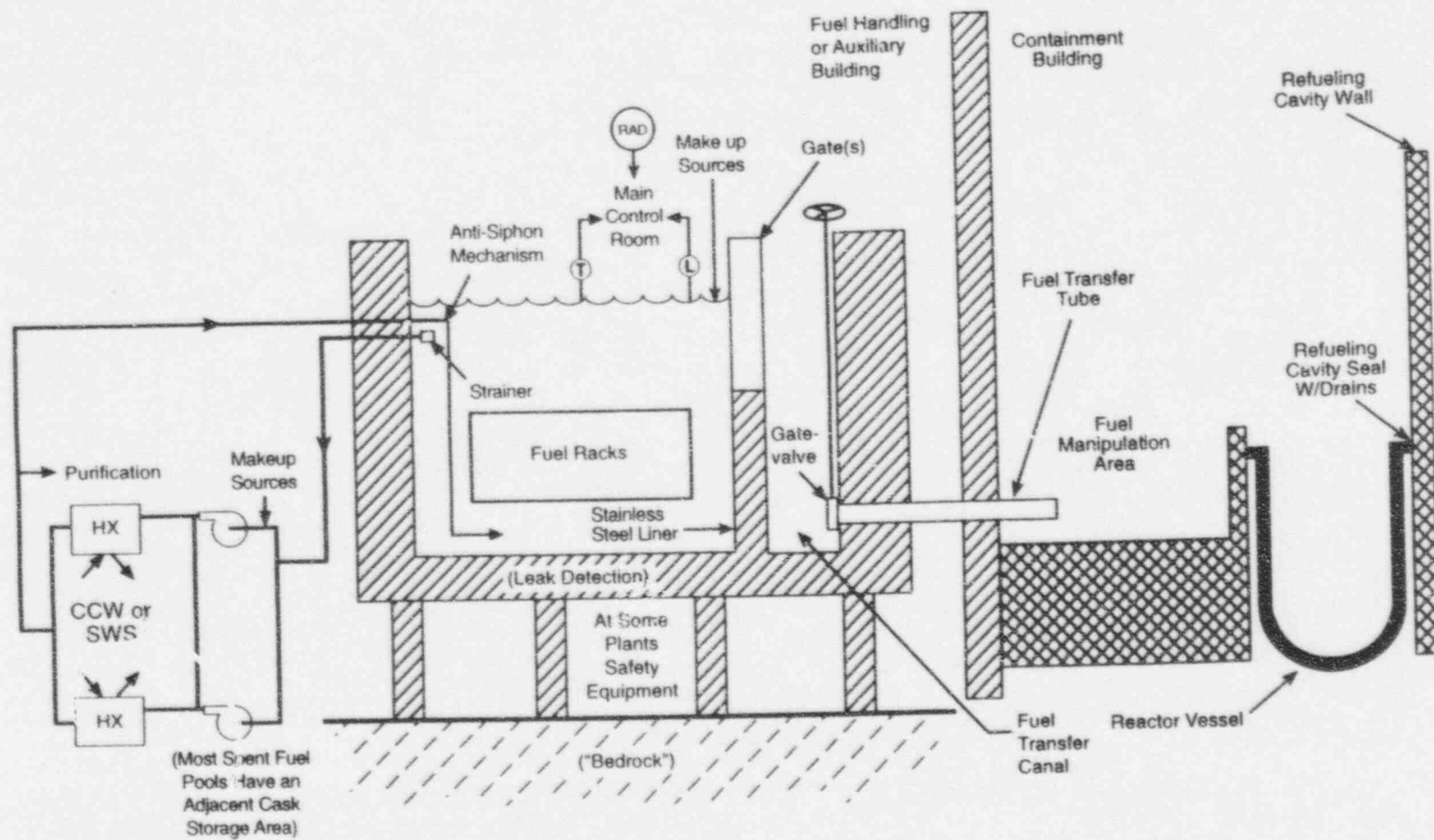
Office for Analysis and Evaluation of Operational Data (AEOD)

February 5, 1997

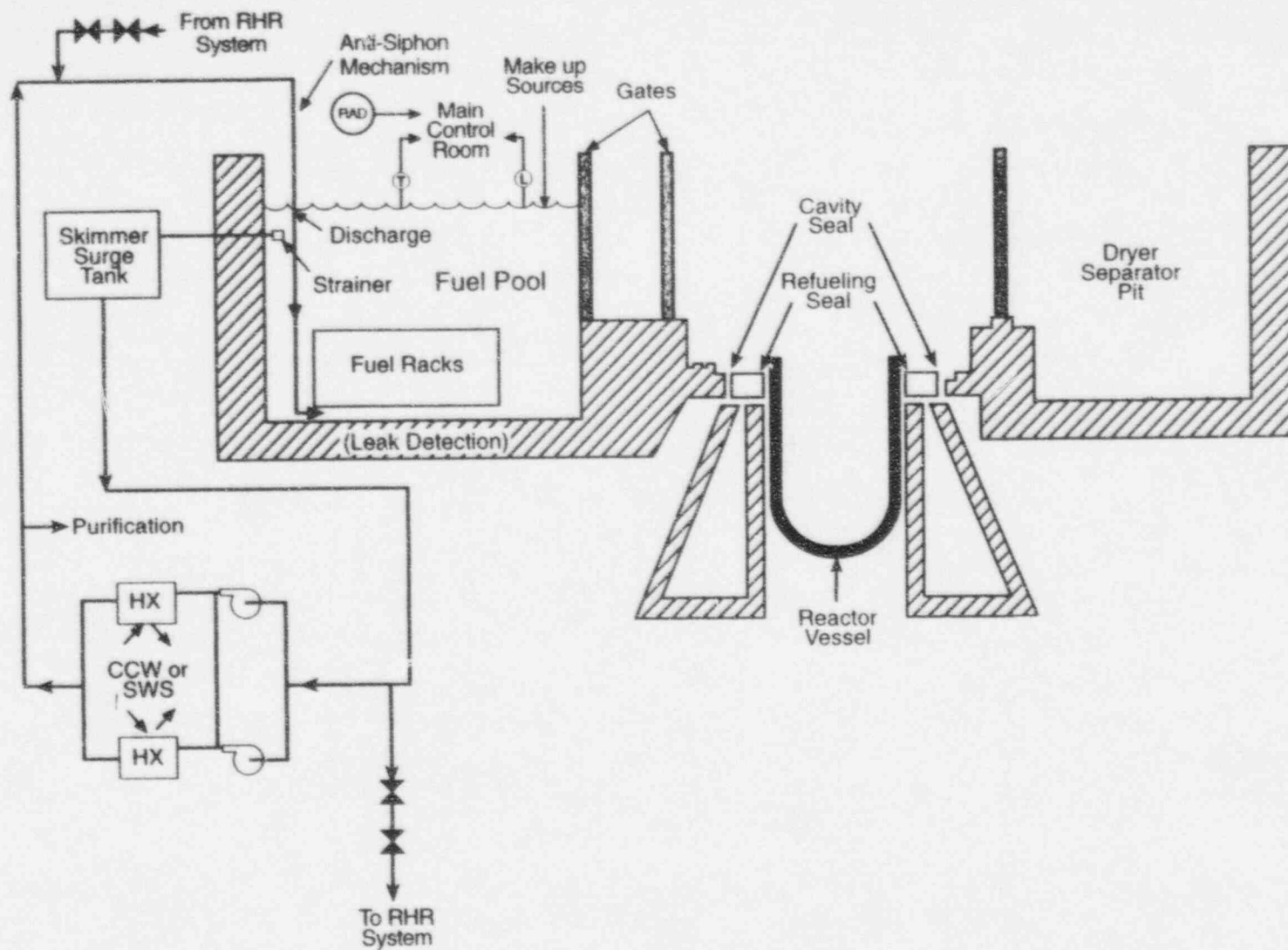
SPENT FUEL COOLING ASSESSMENT

- **AEOD study requested by Executive Director for Operations.**
- **Developed generic configurations to assess loss of spent fuel pool cooling and inventory.**
- **Assessed 12 years of operational experience.**
- **Performed site visits to gather information on physical configuration, practices, and procedures.**
- **Performed assessments of electrical systems, instrumentation, heat loads, and radiation.**
- **Evaluated risk of losing spent fuel cooling.**

PWR SPENT FUEL COOLING SYSTEMS



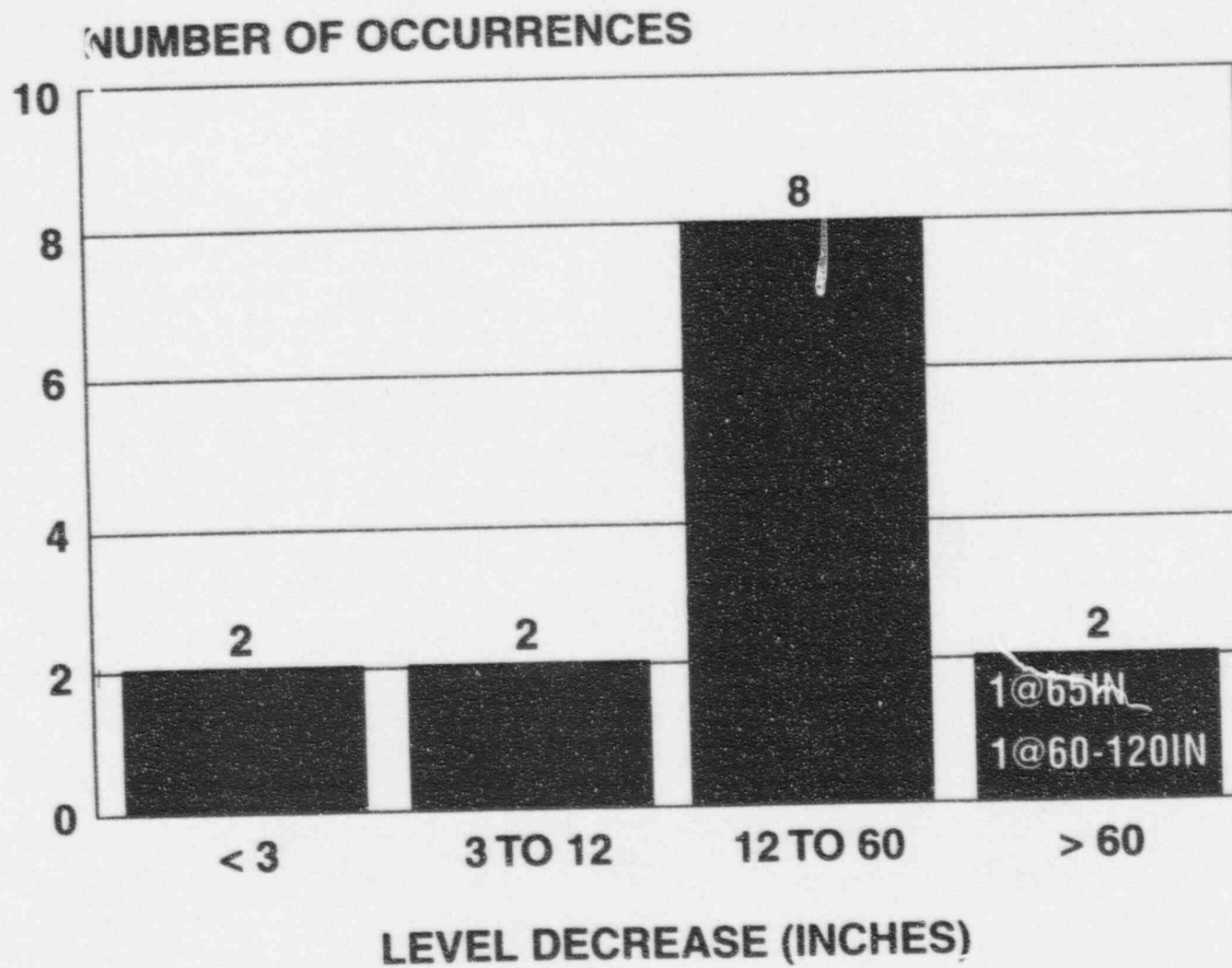
BWR SPENT FUEL COOLING SYSTEMS



SPENT FUEL POOL EVENTS

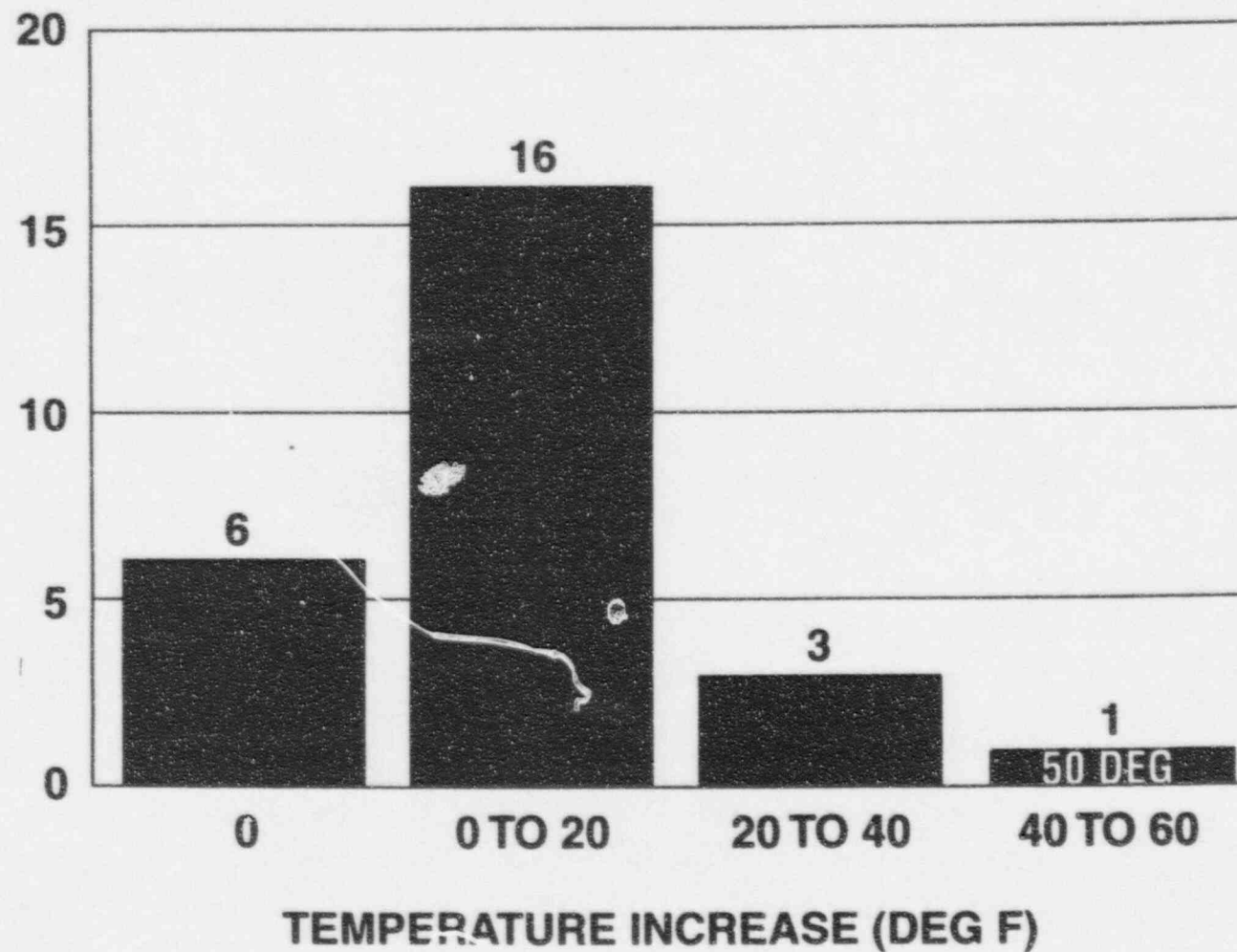
TYPE OF EVENT	NUMBER OF EVENTS
<u>SFP Inventory</u>	<u>38</u>
Connected Systems	20
Gates & Seals	10
Structure or Liner	8
<u>SFP Cooling</u>	<u>56</u>
Cooling Flow	50
Heat Sink	6

LOSS OF INVENTORY LEVELS

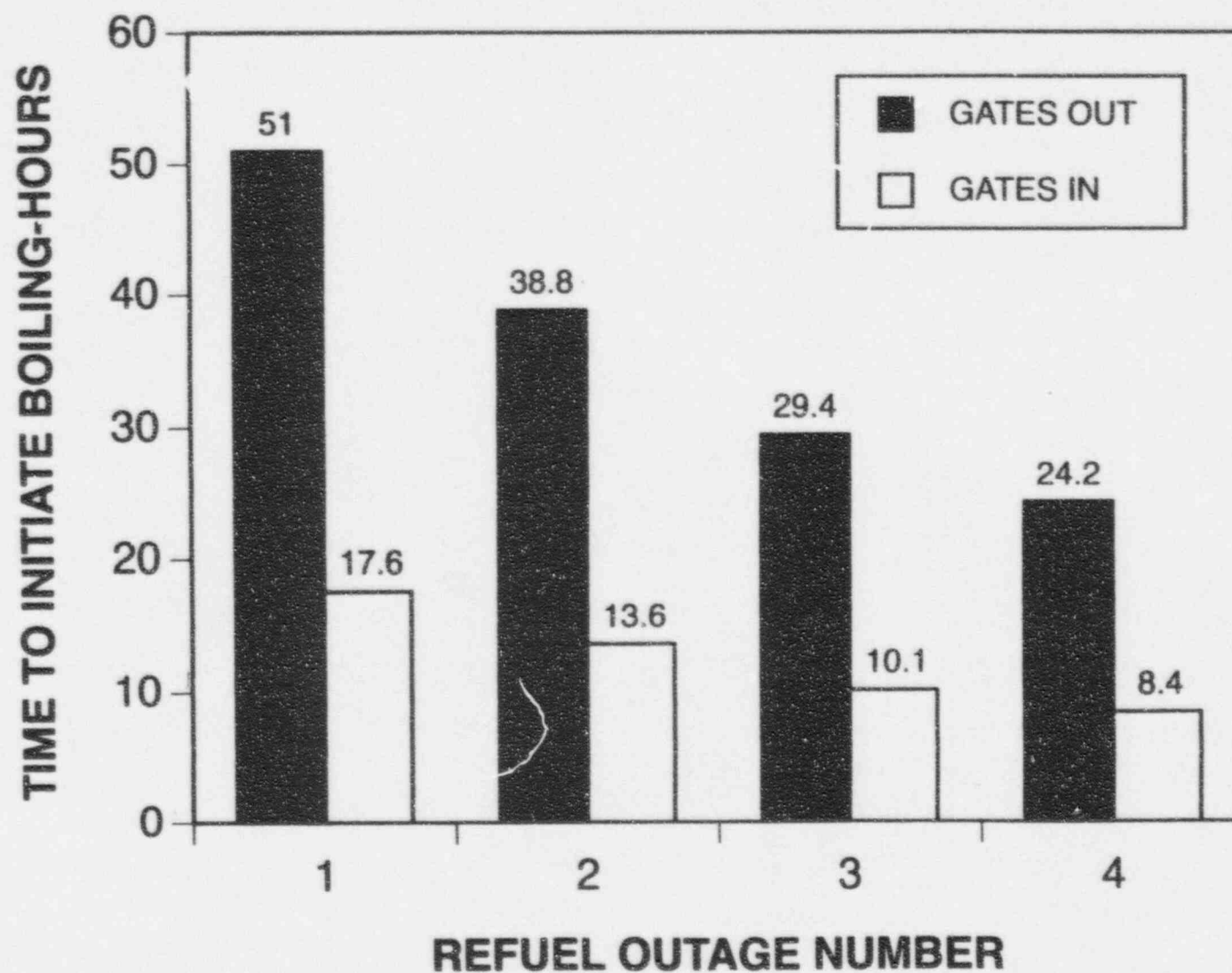


LOSS OF COOLING EVENTS

NUMBER OF OCCURRENCES



NINE MILE POINT UNIT 2



FINDINGS AND CONCLUSIONS

Likelihood and Consequences

- **Consequences of actual events have not been severe.**
- **Primary cause of events has been human error.**
- **Relative risk of fuel damage is low compared with other reactor events.**
- **Highly dependent on human performance and plant design.**
- **Frequency of coolant loss > 1 foot, 1/100 reactor years.**
- **Frequency of cooling loss > 20 °F, 2-3/1000 reactor years.**

FINDINGS AND CONCLUSIONS (CONT.)

Prevention

- **Configuration control improvements can prevent and/or mitigate SFP events.**
- **Evaluations may be needed at some multiunit sites for potential SFP boiling effects on safe shutdown.**

Response

- **Attention to time to boil with shorter outages.**
- **Improved procedures and training may be needed.**
- **Improvements to instrumentation and power supplies may be needed.**

ENCLOSURE 2