

From: Tim McGinty
To: Jack Guttman, Ron Parkhill
Date: Fri, Jun 30, 2000 3:08 PM
Subject: Initial NAC reaction to our Maine Yankee RAI's

Ron and Jack: As a data point-

NAC called me to confirm that they got our RAI's. The questions that got their attention were, as expected, 4-2 (demonstrate controls or analyze a mis-load) and 4-9. The reaction to 4-2 was typical..."we the applicant consider the fuel handling and selecting capabilities to be a Part 50 responsibility...they use the same provisions for loading a reactor....this is precedent setting."

More interesting, they also called 4-9 precedent setting. 4-9 is below:

4-9 Provide an explanation in the SAR of how assemblies with a variable radial enrichment, as described in Section 4.5.1.1.6, determine the assembly enrichment for use in Technical Specification Tables 12B2-8 and 12B2-9.

The aforementioned technical specification tables are used to determine the spent fuel cooling time requirements and loading arrangements. Enrichment is used as an input for this determination. For thermal considerations regarding variable radial enrichments, the lower enrichment should be used for the cooling time determination, rather than an average enrichment, to ensure enough cooling time for the larger decay heat values associated with lower enrichments. Section 72.24(c)(3) states the application must provide information on the design in sufficient detail to support staff findings that the ISFSI will satisfy the design bases with an adequate margin of safety.

They did not think other applicants were expected to look at variable radial enrichments on a "pin by pin" basis, thereby the "precedent" comment.

I just simply asked them whether the source term/thermal heat load for a given assembly, when chosen based on average enrichment, is in fact bounding for variably radially enriched assemblies. If so, then there shouldn't be a problem. He was not able to answer that.

CC: Eric Leeds

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