

March 14, 2001

MEMORANDUM TO: Susan Frant, Deputy Director
 Licensing and Inspection Directorate
 Spent Fuel Project Office, NMSS

FROM: Mary Jane Ross-Lee, Project Manager /RA/ original signed by /s/
 Licensing Section
 Licensing and Inspection Directorate
 Spent Fuel Project Office, NMSS

SUBJECT: SUMMARY OF FEBRUARY 7, 2001, PRE-SUBMITTAL
 MEETING WITH BFS ON FUELSOLUTION™ STORAGE
 SYSTEM AMENDMENT NO. 2

On February 7, 2001, the Nuclear Regulatory Commission (NRC) staff met with representatives of BNFL Fuel Solutions (BFS) and Consumers Energy (CE) at NRC Headquarters in Rockville, Maryland. The purpose of this meeting was to discuss the BFS FuelSolutions™ storage system (Certificate of Compliance No. 1026) technical specification (TS) amendment. BFS is proposing to submit this amendment in April 2001. The attendance list is included as Attachment 1. A meeting agenda is included as Attachment 2. BFS handout is included as Attachment 3. This meeting was noticed on January 26, 2001.

The focus of the meeting was for BFS to discuss their proposed amendment to the FuelSolutions™ TS that include required actions related to returning the canister to the fuel building if the TS for thermal performance in storage is not met. CE plans to begin dismantlement of the fuel building at Big Rock Point (BRP) in Summer of 2002. This TS amendment would only be for the W74 canister for BRP. In discussions with the staff it was agreed that a proposed alternative to returning to the fuel building must be presented, as opposed to just elimination of the action. In addition, the logistics of any proposed alternative must be presented to facilitate the timely review necessary to meet BFS and CE schedule. They need the amendment by July 2002 to meet their decommissioning schedule.

No proprietary information was disseminated or presented at this meeting. No regulatory decisions were requested or made.

If you have any questions regarding this meeting summary, or concerning the FuelSolutions™ amendment application, please contact me.

Docket No.: 72-1026

- Attachments: 1. Attendance List
 2. Meeting agenda
 3. BFS meeting handout

cc: John Broschak,
 Consumers Energy

Distribution: * with Attachments
 Docket *NRC File Center *PUBLIC NMSS R/F SFPO R/F
 NJensen, OGC EWBrach FLYon, NRR NRC attendees
 PHarris, NRR RSchaaf, NRR SGagner, OPA

G:\WESFLEX\MEETINGS\Feb01\SUM.WPD * *see previous concurrences

OFC	SFPO	C	SFPO	E	SFPO	C	
NAME	MJRoss-Lee*		EZiegler*		TM 3/14/01		
DATE	03/08/01		03/08/01				

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UNITED STATES
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

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cc: John Broschak,
Consumers Energy

Meeting with BNFL Fuel Solutions
and Consumers Energy

02/07/2001 ATTENDANCE LIST

<u>Name</u>	<u>Affiliation</u>
Jack Guttman	NRC/SFPO
Paul Harris	NRC/NRR
Wayne Hodges	NRC/SFPO
Tim McGinty	NRC/SFPO
Mary Jane Ross-Lee	NRC/SFPO
Mahendra Shah	NRC/SFPO
Bernie White	NRC/SFPO
Robert Quinn	BNFL
Michael Bourassa	CE
John Broschak	CE
Dave Waters	CE
Steve Schulin	The Ibx Group

Agenda
NRC SFPO/ BNFL Fuel Solutions/ Consumers Energy
FuelSolutions™ Storage System Technical Specification Amendment
Docket 72-1026

February 7, 2001
9:30 a.m. - 11:00 a.m.
One White Flint North
Room O-13-B-4

- Introductions
- Discussion of the FuelSolutions™ Tech Specs (LCOs) that include required actions related to the return to the fuel building, and the need for such action
- Discussion of the CoC Amendment Request Content
- Schedule



**FuelSolutions™ W74
Amendment #2
Pre-Submittal Meeting**

February 7, 2001

FuelSolutions™ Amendment #2 Presubmittal Meeting



Agenda

- Introductions
- Discussion of FuelSolutions™ Tech Specs (LCOs) that include required actions related to return to the fuel building, and the need for such action
- Discussion of CoC Amendment Request Content
- Schedule

Technical Specification Discussion



LCO 3.3.2 - Storage Cask Temperatures During Storage

- Required Action B.2:

LCO 3.3.3 - Storage Cask Temperatures During Horizontal Transfer

- Required Action C.1:

"Return CANISTER to the fuel building and remove all fuel assemblies."

We want to eliminate this requirement

Technical Specification Discussion



Purpose of TS Required Action

- To provide for an ultimate disposition if prior actions did not correct the situation

Basis for Elimination of Required Action - LCO 3.3.2 & 3.3.3

- There is no mechanistic failure which would lead to the loss of canister thermal performance during storage or horizontal transfer
- If an increase in temperatures is observed, then, it would be due to issues with the storage cask
- Therefore the prior required actions should be sufficient to mitigate any failure

Technical Specification Discussion



Proposed Alternative Required Action

- Begin appropriate actions to repair or replace the components necessary to restore normal cooling function

Technical Specification Discussion



Summary

- No mechanistic failure of the heat removal ability of the canister has been identified
- Blockages or failures of the storage cask are discoverable and usually repairable
- Alternate means are available to maintain canister temperatures within limits during storage cask repair or replacement
- Other means are available to remove fuel *if necessary*
 - transportation (application to be submitted in April)
 - portable hot cell (dry transfer system)

Technical Specification Discussion



Conclusion

- Return of the canister to the fuel building and removal of the fuel assemblies is not an appropriate or necessary action
- Return of the canister to the fuel building is not the only option available to retrieve fuel
- The current LCOs are unnecessarily restrictive and have a significant negative impact on the BRP decommissioning schedule

CoC Amendment Request Content



The CoC Amendment Application Will Include

- Proposed revised Technical Specifications for LCO 3.3.2 and LCO 3.3.3
- Revised Bases for LCO 3.3.2 and LCO 3.3.3
- No additional analyses are required - plan to implement within current analyzed conditions

Schedule

Amendment Application Submittal

- Planned for April 2001

Big Rock Point Decommissioning

- Plan to begin dismantlement of fuel building / SFP in summer 2002

- Need amended CoC by July 2002