

*received
from R. Barrett*

November 9, 1999

Richard J. Barrett
Chief,
Probabilistic Safety Assessment Branch
US NRC
Washington, DC 20555

Dear Mr. Barrett,

Industry is committed to performing decommissioning with same high level of commitment to safety for its workers and the public that was present during operation of the plants. To that end, industry is making several commitments for procedures and equipment which would reduce the probability of spent fuel pool events during decommissioning and would mitigate the consequences of those events while fuel remains in the spent fuel pool. Most of these commitments are already in place in the emergency plans, FSAR requirements, technical specifications or regulatory guidance that decommissioning plants must follow.

These commitments were initially presented at the NRC public workshop on decommissioning, July 15-16, 1999, in Gaithersburg, Maryland. They were further discussed in detailed industry comments prepared by Erin Engineering. At a recent public meeting with NRC management it was determined that a letter clearly delineating these commitments could be useful to NRC as it considers inputs to its technical analyses.

I am hereby transmitting those industry commitments as follows.

1. Cask drop analyses will be performed or single failure proof cranes will be in use for handling of heavy loads (i.e., phase II of NUREG 0612).
1. Procedures and training of personnel will be in place to ensure that on site and off site resources can be brought to bear during an event.
1. Procedures will be in place to establish communication between on site and off site organizations during severe weather and seismic events.
1. An off site resource plan will be developed which will include access to portable pumps and emergency power to supplement on site resources. The plan would

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principally identify organizations or suppliers where off site resources could be obtained in a timely manner.

1. Spent fuel pool instrumentation will include readouts and alarms in the control room (or where personnel are stationed) for spent fuel pool temperature, water level, and area radiation levels.
1. Spent fuel pool boundary seals that could cause leakage leading to fuel uncover in the event of seal failure shall be self limiting to leakage or otherwise engineered so that drainage cannot occur.
1. Procedures or administrative controls to reduce the likelihood of rapid drain down events will include (1) prohibitions on the use of pumps that lack adequate siphon protection; or (2) controls for pump suction and discharge points. The functionality of anti-siphon devices will be periodically verified.
1. An on site restoration plan will be in place to provide repair of the spent fuel pool cooling systems or to provide access for makeup water to the spent fuel pool. The plan will provide for remote alignment of the makeup source to the spent fuel pool without requiring entry to the refuel floor.
1. Procedures will be in place to control spent fuel pool operations that have the potential to rapidly decrease spent fuel pool inventory. These administrative controls may require additional operations or management review, management physical presence for designated operations or administrative limitations such as restrictions on heavy load movements.
1. Routine testing of the alternative fuel pool makeup system components will be performed and administrative controls for equipment out of service will be implemented to provide added assurance that the components would be available, if needed.

If you have any questions regarding industry's commitments please contact me at 202 739-8109, or at LXH@NEI.org.

Sincerely,

Lynnette Hendricks