

June 20, 2000

The Honorable Richard A. Meserve
Chairman
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001

Dear Chairman Meserve:

SUBJECT: PROPOSED RESOLUTION OF GENERIC SAFETY ISSUE-173A, "SPENT FUEL STORAGE POOL FOR OPERATING FACILITIES"

During the 473rd meeting of the Advisory Committee on Reactor Safeguards, June 7-9, 2000, we met with representatives of the NRC staff to discuss the proposed resolution of Generic Safety Issue (GSI)-173A, "Spent Fuel Storage Pool for Operating Facilities." We also had the benefit of the referenced documents.

Recommendations

1. The staff should defer closing out GSI-173A until the re-evaluation associated with spent fuel pool (SFP) accidents for decommissioning plants has been completed.
- ② The staff should develop screening criteria for regulatory analyses that are appropriate for SFP accidents at operating reactors.

Discussion

The principal concerns of GSI-173A involve the potential for a sustained loss of SFP cooling capability and a potential for a substantial loss of SFP coolant inventory.

The staff had previously developed and implemented a generic spent fuel storage pool action plan to resolve concerns related to GSI-173A. This plan included plant-specific evaluations and regulatory analyses for safety enhancement backfits for plants that are more vulnerable to the GSI-173A concerns.

The staff has completed the review and evaluation of design features related to the SFP associated with each operating reactor. It found that existing structures, systems, and components related to storage of irradiated fuel provide adequate protection of public health and safety. Consequently, the staff pursued regulatory analyses for safety enhancement backfits on a plant-specific basis. For these regulatory analyses, the staff used screening criteria for the frequency of "uncovery to within one foot of the top of fuel" or "loss of cooling for eight hours."

The screening criteria were:

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