Glenn, received 1/24/2001

I took a look at your study. WOW, lots of work. I did see something you may need to know. See the comment below.

APPENDIX 6
STAKEHOLDER CONCERNS RAISED DURING THE PUBLIC COMMENT PERIOD

On February 15, 2000, the Nuclear Regulatory Commission (NRC) released the "Draft Final Technical Study of Spent Fuel Pool Accident Risk at Decommissioning Plants," for public comment. The NRC encouraged stakeholders to review the draft study and to formally submit comments for review. Appendix 7 of that report included a list of public meetings and how the staff addressed stakeholder comments received on the draft report, issued June 1999, in various technical areas. After review of the February 2000 study, several public groups commented that it appeared that the NRC did not address some of the public's comments. While all stakeholder comments were considered and many resulted in changes in the study, the staff did not include a discussion for some of the comments in Appendix 7. In order to ensure that adequate consideration had been given to public comments, the staff reviewed comments which had been received prior to February 15, 2000, as well as comments received as a result of a review of the draft final report. Comments received prior to February 15 were identified by reviewing transcripts of publically attended meetings, letters from the public, and other available documentation related to the staff's efforts in completing the draft final report.

This appendix provides the NRC's responses to the comments and concerns received as described above. In most cases, responses are documented in this appendix. However, in other cases, comments or concerns identified in this appendix are referred to other parts of the report where the identified issues are addressed. For cases where similar comments were received by more than one commenters, the comments were combined for one response. The comments are grouped in the following technical categories: Criticality, Consequences, Probability and Human Reliability, Seismic, Security/Safety Culture/EP, Thermal hydraulics, Insurance, and Rulemaking/ NRC Process Concerns.

CRITICALITY

Comment #1: A commenter stated that the potential criticality should be addressed.

Response: The staff agrees. The issue of nuclear criticality is addressed in Section 3.6 and Appendix 3.

Comments #2 and 3: A commenter raised several concerns related to SFP criticality. (a) Can a criticality occur due to chemical stripping of primary piping? (b) During primary system decontamination at decommissioning reactors, is it possible to misalign the valves and send corrosive chemicals into the SFP? Could these chemicals precipitate boron from the SFP water? Is there a potential for criticality? Is there a potential for fuel damage?

Response: [redacted] The main connection between the spent fuel pool and primary system is the transfer tube used to transfer fuel for refueling. After a plant ceases to operate, this tube is sealed on both ends with flanges. As a result, there is no communication between the primary system and SFP from this connection. Support systems connected to the SFP vary from one plant to another. At most decommissioning plants, there would be no communication between the SFP and the primary reactor systems, while others may use a primary support water system to add water to the pool. In any event, even if fuel damage did occur, the shielding provided by the large volume of water above the fuel (usually 23 feet of water) would preclude any significant radiation release. In addition, decommissioning activities are performed according to procedures, which reduces the possibility of operator error. For

This may have been true in the past, but is not true now. Boroflex degradation has forced some utilities to credit Boron. 1/26

Mark B