

**From:** Robert Skelton *RR*  
**To:** Glenn Tracy *RR*  
**Date:** 10/26/00 9:16AM  
**Subject:** TECHNICAL STUDY COMMENTS

As requested, attached are the comments to the spent fuel pool technical study for Section 4.2.2., Security. Insert first paragraph (attachment) at the end of the first paragraph, top of page 4-15 and the second paragraph at the end of the Section.

**CC:** Richard Rosano

*B/12*

As a result of the conclusions from this study, the granting of exemptions for defueled facilities and the devitalization of the spent fuel pool at operating reactors will need to be reconsidered. The findings may require the staff to take new regulatory actions at the affected facilities, as the historic use of specific periods of time for the devitalization of spent fuel pools at operating reactors may be invalidated by this technical study.

new paragraph:

As previously stated the findings of this technical study may impact the practice of devitalization of spent fuel pools at operating reactors and the use of exemptions at decommissioned sites.