

DCS

FEB 19 1986

Docket Nos. 50-277  
and 50-278

Mr. Edward G. Bauer, Jr.  
Vice President and General Counsel  
Philadelphia Electric Company  
2301 Market Street  
P.O. Box 8699  
Philadelphia, Pa. 19101

Dear Mr. Bauer:

The Commission has issued the enclosed Amendment No. 116 to Facility Operating License No. DPR-44 and Amendment No. 120 to Facility Operating License No. DPR-56 for the Peach Bottom Atomic Power Station, Units 2 and 3. The amendments consist of changes to the Technical Specifications (TSs) in response to your letter dated June 13, 1985, as supplemented.

These amendments allow spent fuel pool storage capacity expansion from 2,608 to 3,819 for each Unit's spent fuel pool. The expansion is to be achieved by reracking with newer higher density racks.

The request for these amendments was individually noticed on December 12, 1985 (50 FR 50873). No comments were received relevant to these amendments.

By letter dated December 26, 1985, you provided revised thermal-hydraulic calculations based upon a new estimate of the number of fuel assembly moves made per day. These revised calculations are currently under staff review and will be the subject of a future NRC action. The current license amendments authorizing the spent fuel pool storage capacity expansion from 2,608 to 3,819 storage spaces for each unit have been issued based on the assumed thermal loadings and the thermal-hydraulics calculations contained in your June and August 1985 submittals.

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Mr. Edward G. Bauer, Jr.

-2-

Copies of the Safety Evaluation and Environmental Assessment related to this action are also enclosed. Notice of Issuance will be included in the Commission's Bi-Weekly Federal Register Notice.

Sincerely,

Original signed by/

Gerald E. Gears, Project Manager  
BWR Project Directorate #2  
Division of BWR Licensing

Enclosures:

- 1. Amendment No. 116 to DPR-44
- 2. Amendment No. 120 to DPR-56
- 3. Safety Evaluation

cc: w/enclosures  
See next page

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Mr. E. G. Bauer, Jr.  
Philadelphia Electric Company

Peach Bottom Atomic Power Station,  
Units 2 and 3

cc:

Mr. Eugene J. Bradley  
Assistant General Counsel  
Philadelphia Electric Company  
2301 Market Street  
Philadelphia, Pennsylvania 19101

Troy B. Conner, Jr., Esq.  
1747 Pennsylvania Avenue, N.W.  
Washington, D.C. 20006

Thomas A. Deming, Esq.  
Assistant Attorney General  
Department of Natural Resources  
Annapolis, Maryland 21401

Philadelphia Electric Company  
ATTN: Mr. R. Fleishmann  
Peach Bottom Atomic  
Power Station  
Delta, Pennsylvania 17314

Mr. M. J. Cooney, Superintendent  
Generation Division - Nuclear  
Philadelphia Electric Company  
2301 Market Street  
Philadelphia, Pennsylvania 19101

Mr. Anthony J. Pietrofitta, General Manager  
Power Production Engineering  
Atlantic Electric  
P. O. Box 1500  
1199 Black Horse Pike  
Pleasantville, New Jersey 08232

Resident Inspector  
U.S. Nuclear Regulatory Commission  
Peach Bottom Atomic Power Station  
P.O. Box 399  
Delta, Pennsylvania 17314

Regional Administrator, Region J  
U.S. Nuclear Regulatory Commission  
631 Park Avenue  
King of Prussia, Pennsylvania 19406

Mr. R. A. Heiss, Coordinator  
Pennsylvania State Clearinghouse  
Governor's Office of State Planning  
and Development  
P.O. Box 1323  
Harrisburg, Pennsylvania 17120

Mr. Thomas M. Gerusky, Director  
Bureau of Radiation Protection  
Pennsylvania Department of  
Environmental Resources  
P.O. Box 2063  
Harrisburg, Pennsylvania 17120

Mr. Albert R. Steel, Chairman  
Board of Supervisors  
Peach Bottom Township  
R. D. #1  
Delta, Pennsylvania 17314



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D. C. 20555

PHILADELPHIA ELECTRIC COMPANY  
PUBLIC SERVICE ELECTRIC AND GAS COMPANY  
DELMARVA POWER AND LIGHT COMPANY  
ATLANTIC CITY ELECTRIC COMPANY

DOCKET NO. 50-277

PEACH BOTTOM ATOMIC POWER STATION, UNIT NO. 2

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 116  
License No. DPR-44

1. The Nuclear Regulatory Commission (the Commission) has found that:
  - A. The application for amendment by Philadelphia Electric Company, et al. (the licensee) dated June 13, 1985, as supplemented by letters dated August 1, 1985, October 9, 1985 and January 30, 1986 complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I;
  - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
  - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
  - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
  - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.
2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 2.C.(2) of Facility Operating License No. DPR-44 is hereby amended to read as follows:

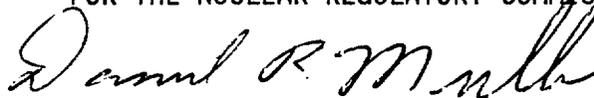
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Technical Specifications

The Technical Specifications contained in Appendices A and B, as revised through Amendment No. 116, are hereby incorporated in the license. PECO shall operate the facility in accordance with the Technical Specifications.

3. This license amendment is effective as of its date of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION



Daniel R. Muller, Director  
BWR Project Directorate #2  
Division of BWR Licensing

Attachment:  
Changes to the Technical  
Specifications

Date of Issuance: February 19, 1986

ATTACHMENT TO LICENSE AMENDMENT NO. 116

FACILITY OPERATING LICENSE NO. DPR-44

DOCKET NO. 50-277

Replace the following page of the Appendix "A" Technical Specifications with the attached page. The revised page is identified by Amendment number and contain vertical lines indicating the area of change.

Remove

242

Insert

242

242a

### 5.5 FUEL STORAGE

- A. The new fuel storage facility shall be such that the  $K_{eff}$  dry is less than 0.90 and flooded is less than 0.95.
- B. The  $K_{eff}$  of the spent fuel storage pool shall be less than or equal to 0.95.
- C. Spent fuel shall only be stored in the spent fuel pool in a vertical orientation in approved storage racks.
- D. The average fuel assembly loading shall not exceed 17.3 grams U-235 per axial centimeter of total active fuel height of the assembly.

### 5.6 SEISMIC DESIGN

The station Class I structures and systems have been designed for ground accelerations of 0.05g (design earthquake) and 0.12g (maximum credible earthquake)

\*By letter dated February 19, 1986, The Commission's granted approval limited to certain specific high density storage racks and methods of storage for Unit 2 spent fuel pool.

PBAPS

5.5.C BASES

This approval is limited to those storage racks and methods of storage described in Licensee's application dated August 1, 1985, October 9, 1985 and January 30, 1986 and in Commission staff documents "Safety Evaluation by Office of Nuclear Reactor Regulation Supporting Amendment Evaluation by the Office of Nuclear Reactor Regulation Supporting Amendment Nos. 116 and 120 to Facility Operating Licenses Nos. DPR-44 and DPR-56" and "Environmental Assessment by the Office of Nuclear Reactor Regulation Relating to the Modification of the Spent Fuel Storage Racks, Facility Operating Licenses Nos. DPR-44 and DPR-56" for Peach Bottom Atomic Power Station Units 2 and 3, Docket Nos. 50-277 and 50-278, dated February 18, 1986.



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D. C. 20555

PHILADELPHIA ELECTRIC COMPANY  
PUBLIC SERVICE ELECTRIC AND GAS COMPANY  
DELMARVA POWER AND LIGHT COMPANY  
ATLANTIC CITY ELECTRIC COMPANY

DOCKET NO. 50-278

PEACH BOTTOM ATOMIC POWER STATION, UNIT NO. 3

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 120  
License No. DPR-56

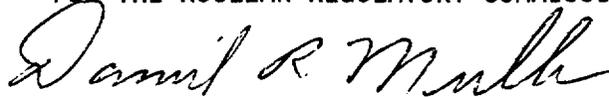
1. The Nuclear Regulatory Commission (the Commission) has found that:
  - A. The application for amendment by Philadelphia Electric Company, et al. (the licensee) dated June 13, 1985, as supplemented by letters dated August 1, 1985, October 9, 1985 and January 30, 1986 complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I;
  - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
  - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
  - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
  - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.
2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 2.C.(2) of Facility Operating License No. DPR-56 is hereby amended to read as follows:

Technical Specifications

The Technical Specifications contained in Appendices A and B, as revised through Amendment No. 120, are hereby incorporated in the license. PECO shall operate the facility in accordance with the Technical Specifications.

3. This license amendment is effective as of its date of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION



Daniel R. Muller, Director  
BWR Project Directorate #2  
Division of BWR Licensing

Attachment:  
Changes to the Technical  
Specifications

Date of Issuance: February 19, 1986

ATTACHMENT TO LICENSE AMENDMENT NO. 120

FACILITY OPERATING LICENSE NO. DPR-56

DOCKET NO. 50-278

Replace the following page of the Appendix "A" Technical Specifications with the attached page. The revised page is identified by Amendment number and contain vertical lines indicating the area of change.

Remove

242

Insert

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242a

**5.5 FUEL STORAGE**

- A. The new fuel storage facility shall be such that the  $K_{eff}$  dry is less than 0.90 and flooded is less than 0.95.
- B. The  $K_{eff}$  of the spent fuel storage pool shall be less than or equal to 0.95.
- C. Spent fuel shall only be stored in the spent fuel pool in a vertical orientation in approved storage racks.
- D. The average fuel assembly loading shall not exceed 17.3 grams U-235 per axial centimeter of total active fuel height of the assembly.

**5.6 SEISMIC DESIGN**

The station Class I structures and systems have been designed for ground accelerations of 0.05g (design earthquake) and 0.12g (maximum credible earthquake)

\*By letter dated February 19, 1986, The Commission's granted approval limited to certain specific high density storage racks and methods of storage for Unit 3 spent fuel pool.

PBAPS

5.5.C BASES

This approval is limited to those storage racks and methods of storage described in Licensee's application dated August 1, 1985, October 9, 1985 and January 30, 1986 and in Commission staff documents "Safety Evaluation by Office of Nuclear Reactor Regulation Supporting Amendment Evaluation by the Office of Nuclear Reactor Regulation Supporting Amendment Nos. 116 and 120 to Facility Operating Licenses Nos.DFR-44 and DPR-56" and "Environmental Assessment by the Office of Nuclear Reactor Regulation Relating to the Modification of the Spent Fuel Storage Racks, Facility Operating Licenses Nos.DFR-44 and DPR-56" for Peach Bottom Atomic Power Station Units 2 and 3, Docket Nos. 50-277 and 50-278, dated February 18, 1986.



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D. C. 20555

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION SUPPORTING  
AMENDMENTS NOS. 116 AND 120 TO FACILITY OPERATING LICENSES NOS. DPR-44 AND DPR-56

PHILADELPHIA ELECTRIC COMPANY  
PUBLIC SERVICE ELECTRIC AND GAS COMPANY  
DELMARVA POWER AND LIGHT COMPANY  
ATLANTIC CITY ELECTRIC COMPANY

PEACH BOTTOM ATOMIC POWER STATION, UNITS NOS. 2 AND 3

DOCKETS NOS. 50-277 AND 50-278

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## 1.0 INTRODUCTION

By letter dated June 13, 1985, Philadelphia Electric Company (the licensee or PECO) made application for approval to install and use new high density spent fuel racks at Peach Bottom Atomic Power Station, Units 2 and 3. Revision 1 to the application was submitted by letter dated August 1, 1985 in order to include some confirmatory calculations. Further information in response to staff questions was provided in letters dated October 9, 1985 and January 30, 1986. The proposed action would increase the spent fuel pool storage capacity in each unit from 2608 to 3819 storage cells by replacing existing storage racks with higher density storage racks.

### 1.1 Discussion

There are two spent fuel pools (SFPs) at Peach Bottom; one for each unit. The existing racks in each of these pools have 2608 total storage cells. Amendment Nos 49 and 48 for Units 2 and 3, respectively, dated November 30, 1978, increased the original SFP storage capacity from 1110 fuel assemblies to the present design of 2608 assemblies per pool. In the 1987-1988 time frame, these SFP units will lose their full-core discharge reserve storage capacity (764 fuel assemblies); and in the 1991-1992 time frame, they will no longer have the capacity to store additional fuel discharges from the operating units. The licensee, therefore, is proposing to replace the existing spent fuel storage racks with new spent fuel storage racks whose design will allow for more fuel in the same space as occupied by the current racks. The new rack structures will increase the existing spent fuel storage capacity from 2,608 to 3,819 storage cells for each unit. The following general description of the proposed action is based upon the licensee's August 1, 1985 submittal.

The proposed new racks are being designed and fabricated by Westinghouse Electric Company located in Pensacola, Florida. The new racks, designed to be free standing, will be installed by setting them on the spent fuel pool floor as the old racks are removed.

As in the previous storage rack replacement at Peach Bottom in 1978, some of the pool floor swing bolts (no longer functional) will be removed to within one inch of the fuel pool liner to avoid interference with the support feet on the new racks. Also, to avoid rack feet interference with the pool liner seam welds, leak detection trenches, sparger support brackets and support bases of removed swing bolts, some stainless steel plates will be set in place to span these items and provide a surface for the rack feet to rest. Also the end sections and diffusers of the spent fuel pool (SFP) cooling discharge piping will be removed.

## 2.0 EVALUATION

The "Spent Fuel Storage Capacity Modification Safety Analysis Report" provided by the licensee on June 13, 1985 and revised on August 1, 1985, in support of this application for approval was the basis for the NRC staff evaluation. Supplemental information provided by the licensee is also reflected in

the following Safety Evaluation which summarizes the NRC staff effort.

## 2.1 Criticality Considerations

The rack design consists of square stainless steel cylinders which are fastened together in an egg crate-like structure. A Boraflex sheet is located on each outer surface and held in place by a stainless steel wrapper which is welded to the cylinder.

The calculations of rack reactivity (K-effective) were performed by the licensee with the KENO-IV Monte Carlo code. Cross sections were generated with the AMPX system of codes using the ENDF/B-IV data base. This code package has been used in numerous fuel rack calculations and the NRC staff finds it acceptable.

The licensee's fuel rack designer (Westinghouse) has verified the application of the code by calculating a number of critical experiment configurations and comparing calculated results with the experiment. These comparisons showed essentially zero bias for the calculations with an uncertainty of 0.0032 at the 95 percent level with 95 percent confidence interval. We conclude that the calculation procedure has been suitably qualified. Calculations of the K-effective value of the racks were performed for the three types of BWR fuel assemblies to be stored in the racks - 7x7, 8x8 and 8x8R. Calculations were done for an enrichment of 3.5 w/o U-235 for each type. It was determined that 7x7 assembly was the most reactive.

Uncertainties were treated either by assuming worst case conditions or by performing sensitivity studies and obtaining appropriate values. Worst case assumptions were made for asymmetric fuel assembly position and material properties (e.g., boron loading). Uncertainty values were obtained for material thickness, and spacing and bowing tolerances. Poison particle self-shielding effects were treated as a bias in the calculations. This treatment of uncertainties meets our requirements and is acceptable.

Postulated accidents which were considered include the loss of cooling systems, dropping a fuel assembly on top of the racks and dropping of an assembly outside the periphery of the racks. These accidents either do not cause an increase in the K-effective value or the increase is small compared to the margin between the nominal K-effective and the acceptance criterion of 0.95. We conclude that proper analyses of the accident conditions have been performed.

The maximum value of K-effective for normal storage or a postulated accident condition is 0.936 including uncertainties at a 95/95 probability/confidence level. This meets our acceptance criterion of 0.95 for this quantity and is acceptable.

We conclude that the proposed high density spent fuel storage racks are acceptable with respect to criticality. This conclusion is based on the following:

1. Calculations are performed for the fuel having the maximum reactivity.
2. The calculation method has been verified against experiment.

3. Uncertainties in the calculations have been properly treated.
4. Credible accidents have been analyzed.
5. The results of the analyses meet NRC acceptance criterion for K-effective.

Finally, the Technical Specifications (TSs) for Peach Bottom limit storage in the pool to fuel having less than 17.3 grams of U-235 per centimeter of assembly length. The licensee has confirmed that this is equivalent to 3.5 w/o U-235 enrichment in the most reactive (7x7) assembly. We conclude that the proposed rack design is acceptable for storage of assemblies meeting the TS requirements.

## 2.2 Spent Fuel Pool Cooling and Makeup

The licensee calculated 13.14 MBTU/hr as the maximum "normal" heat load, to the pool (all spent fuel storage locations full with fuel from successive cyclic discharge) following the last refueling. The staff performed an independent calculation for the maximum "normal" heat load to the pool in accordance with the guidelines of Branch Technical Position ASB 9-2, "Residual Decay Energy for Light Water Reactors for Long Term Cooling," and Standard Review Plan Section 9.1.3, "Spent Fuel Pool Cooling and Cleanup System" which resulted in a value of 16.69 MBTU/hr. The licensee indicated that two of the three existing spent fuel pool cooling heat exchanger trains have a combined heat removal capability of 17.33 MBTU/hr when maintaining the bulk pool temperature at 150°F. The 150°F pool temperature is the upper limit previously approved by the staff. Thus, the heat load calculated by the licensee results in a maximum bulk pool temperature of 135°F. This value is based on assuming a single failure in the spent fuel pool cooling system which leaves two fuel pool cooling system heat exchangers in operation. This value is below the 150°F upper limit for bulk pool temperature for normal storage conditions. The pool temperature will also be below 150°F based on the staff calculated maximum "normal" heat load. Thus, we have verified that the pool temperature is maintained within acceptable limits for the maximum "normal" heat load condition. In addition, the licensee has concluded based on their analysis that no boiling would occur within the storage racks when the normal fuel pool cooling system is in operation or whenever the pool temperature is maintained at or below 150°F. The licensee calculated 23.12 MBTU/hr as the maximum "abnormal" heat load following a full core discharge, with the remaining storage spaces full with fuel from successive cyclic discharges. This "abnormal" heat load results in a maximum bulk pool temperature of 143°F, with all cooling train heat exchangers operating. Assuming the loss of all cooling, boiling would occur after 82 hours for the maximum "abnormal" heat load condition. This is a substantial time period for actions to be taken such as initiating makeup to the spent fuel pool. No upper limit for the maximum "abnormal" storage condition is established in the staff criteria, and therefore, the above temperatures are acceptable.

The spent fuel pool cooling system is normally cooled by the service water system. The licensee proposed no modifications to this system as part of this spent fuel pool expansion project.

Under emergency conditions, the reactor building cooling water heat exchangers can be manually connected to provide cooling to the spent fuel pool cooling system. It is in turn cooled by the emergency service water system. The residual heat removal system can also be utilized to supplement the spent fuel pool cooling system under abnormal heat load conditions.

The licensee has also analyzed the effects of spent fuel pool boiling on the outside environment. The licensee utilized a model similar to that previously employed for a comparable analysis on the Limerick Station to determine the offsite radiological consequences of pool boiling. The results indicated that the resulting offsite dose was a very small fraction of 10 CFR Part 100 limits and was a negligible offsite contribution. We find this analysis and its conclusion to be acceptable.

### 2.3 Installation of Racks and Load Handling

Currently, there is spent fuel in the Peach Bottom Units 2 and 3 spent fuel pools. However, the licensee has stated that at no time will the cask handling crane carry a spent fuel storage rack module over stored spent fuel. The licensee has committed to employ heavy load handling procedures, safe load paths and installation procedures as part of the administrative controls to preclude the potential for the mishandling of rack modules and miscellaneous heavy load items during the rerack operation over the spent fuel pool.

The licensee has also performed a load drop analysis for the rack module. The results of that analysis indicate that the proposed spent fuel pool modifications will not result in fuel damage and that the resulting radiological consequences will not be in excess of the fuel handling accident previously evaluated in the updated Peach Bottom FSAR. The postulated rack drop also would not change the minimum separation distance between the stored fuel assemblies or the concentration of fixed neutron absorbing material between the adjacent fuel assemblies. Therefore, the margin of safety to criticality will also not be affected by the postulated rack drop accident.

The licensee has committed to use the main hook of the reactor building crane for lifting the existing spent fuel storage racks and the new storage racks. The main hook and its associated load lifting system on the reactor building crane are of a single failure proof design, such that a single failure will not result in dropping the load. The auxiliary hook on the reactor building crane will be used only for lifting small miscellaneous items whose weights are less than that of a fuel assembly. This will ensure that the consequences of their being dropped is bounded by the existing FSAR fuel handling accident analysis. The refueling bridge crane will be used for lifting fuel assemblies and transferring them within the pool in accordance with the existing station approved procedures.

The licensee has stated that the cask handling crane meets the design and operational criteria of NUREG-0612, "Control of Heavy Loads at Nuclear Power Plants" and NUREG-0554, "Single Failure Proof Cranes for Nuclear Power Plants." We have verified that the staff's previous safety evaluation report for NUREG-0612 has found this crane in compliance with the applicable guidelines for the control of heavy loads. Therefore, we conclude that the handling of heavy loads during the spent fuel pool expansion modification will be in conformance with staff criteria and is acceptable.

Based upon the discussions in Sections 2.2 and 2.3 above, we conclude that the proposed SFP modifications for each SFP with respect to the developed heat loads, pool water temperatures, and load handling practices are in accordance with applicable criteria and are, therefore, acceptable.

## 2.4 Structural Design

Our evaluation of the structural aspects of the proposed modifications are based on a review performed by the staff's consultant, Franklin Research Center (FRC). The FRC Technical Evaluation Report (TER) is appended to this safety analysis and provides additional details relating to the structural evaluation.

The SFPs are reinforced concrete structures located inside the Reactor Building in an elevated position adjacent to the North (Unit 2) and South (Unit 3) sides of the drywell shield walls. The walls and floor of the SFP are lined with a stainless steel liner. This liner serves only as a water tight boundary, and it is not a structural member.

The new high density racks are stainless steel "egg-crate" structures. Each cell would contain a spent fuel assembly. Weight of the rack and fuel is transmitted to the floor of the pool through supporting legs. The racks are each free-standing on the pool floor and a gap is provided between the racks and between racks to pool wall so as to preclude impact during an earthquake.

Load combinations and acceptance criteria were compared with those found in the "Staff Position for Review and Acceptance of Spent Fuel Storage and Handling Applications" dated April 14, 1978 and amended January 18, 1979. The existing concrete pool structure was evaluated for the new loads in accordance with the requirements of the applicable portions of NRC Regulatory Guides 1.12, 1.142, and Standard Review Plan 3.8.4. The pool structure re-analysis also uses ACI 318-83, ACI 349-80, and AISC Standards.

Loads and load combinations for the racks and the pool structure were reviewed and found to be in agreement with the applicable portions of the staff position. Additional details are provided in the appended TER.

Seismic loads for the rack design are based on the original design floor acceleration response spectra calculated for the plant at the licensing stage. The seismic loads were applied to the model in three orthogonal directions. Loads due to a fuel bundle drop accident were considered in a separate analysis. The postulated loads from these events were found to be acceptable.

The dynamic response and internal stresses and loads are obtained from a seismic analysis which is performed in two phases. The first phase is a time history analysis on a nonlinear finite element model. The second phase is a response spectrum analysis of a detailed linear three dimensional finite element model of the rack assembly. Further details on the methodology may be found in the appended TER.

Calculated stresses for the rack components were found to be within allowable limits. The racks were found to have adequate margins against sliding and tipping.

An analysis was conducted to assess the potential effects of a dropped fuel assembly on the racks and results were considered satisfactory.

An analysis was conducted to assess the potential effects of a stuck fuel assembly causing an uplift load on the racks and a corresponding downward load on the lifting device as well as a tension load in the fuel assembly. Resulting stresses were found to be within acceptable limits by the staff.

The existing structures were analyzed for the modified fuel rack loads using a finite element computer program. Original plant response spectra and damping values were used in consideration of the seismic loadings, and the existing SFPs are determined to safely support the loads generated by the new fuel racks.

We, therefore, conclude that the proposed rack installation will satisfy the requirements for 10 CFR Part 50, Appendix A (General Design Criteria 2, 4, 61, and 62), as applicable to structures.

## 2.5 Materials

The safety function of the SFPs and storage rack system is to maintain the spent fuel assemblies in a sub-critical array during all credible storage conditions. We have reviewed the compatibility and chemical stability of the materials, except the fuel assemblies, wetted by the pool water.

The spent fuel racks in the proposed expansion would be constructed entirely of Type 304 LN stainless steel, except for leveling screws which are Type 17-4 PH stainless steel and the neutron absorber material. The high density spent fuel storage racks will utilize Boraflex sheets as a neutron absorber. Boraflex consists of boron carbide powder in a rubber-like silicone polymeric matrix. The spent fuel storage rack configuration is composed of individual storage cells interconnected to form an integral structure.

The space which contains the Boraflex is vented to the pool. Venting will allow gas generated by the chemical degradation of the silicone polymer binder during heating and irradiation to escape, and will prevent bulging or swelling of the stainless steel tube.

The pool liner, rack lattice structure and fuel storage tubes are stainless steel which is compatible with the storage pool environment. In this environment of oxygen-saturated borated water, the corrosive deterioration of the Type 304 stainless steel should not exceed a depth of  $6.00 \times 10^{-5}$  inches in 100 years, which is negligible relative to the initial thickness. Dissimilar metal contact corrosion (galvanic attack) between the stainless steel of the pool liner, rack lattice structure, fuel storage tubes, and the Zircaloy in the spent fuel assemblies will not be significant because the materials are either similar or the materials are protected by highly passivating oxide films and are therefore at similar potentials. The Boraflex is composed of non-metallic materials and therefore will not develop a galvanic potential in contact with the metal components. Boraflex has undergone extensive testing to study the effects of gamma irradiation in various environments, and to verify its structural integrity and suitability as a neutron absorbing material. The evaluation tests have shown that the Boraflex is unaffected by the pool water environment and will not be degraded by corrosion (1).

Tests were performed at the University of Michigan (2), exposing Boraflex to  $1 \times 10^{11}$  rads of gamma radiation with substantial concurrent neutron flux in deionized water. Irradiation will cause some loss of flexibility, but will not lead to break up of the Boraflex.

The annulus space in each cell assembly which contains the Boraflex is vented to the pool. Venting of the annulus will allow gas generated by the chemical degradation of the silicone polymer binder during heating and irradiation to escape, and will prevent bulging and swelling of the inner stainless steel tube.

The tests (1) have shown that neither irradiation, environment nor Boraflex composition has a discernible effect on the neutron transmission of the Boraflex material. The tests also show that Boraflex does not possess leachable halogens that might be released into the pool environment in the presence of radiation. Similar conclusions are reached regarding the leaching of elemental boron from the Boraflex. Boron carbide of the grade normally present in the Boraflex will typically contain 0.1 wt percent of soluble boron. The tests results have confirmed the encapsulation function of the silicone polymer matrix in preventing the leaching of soluble species from the boron carbide.

To provide added assurance that no unexpected corrosion or degradation of the materials will compromise the integrity of the racks, the licensee has committed to conduct a long term fuel storage cell inservice surveillance program. Surveillance samples are in the form of removable stainless steel clad Boraflex sheets, which are proto-typical of the fuel storage cell walls. These specimens will be removed and examined periodically over the expected service life.

From our evaluation as discussed above, we conclude that the corrosion that will occur in the spent fuel storage pool environment should be of little significance during the life of the plant. Components in the spent fuel storage pool are constructed of alloys which have a low differential galvanic potential between them and have a high resistance to general corrosion, localized corrosion, and galvanic corrosion. Tests under irradiation and at elevated temperatures in deionized water indicate that the Boraflex material will not undergo significant degradation during the expected service life.

We further conclude that the environmental compatibility and stability of the materials used in the expanded spent fuel storage pool is adequate based on the test data cited above, and the actual service experience in operating reactors. We have reviewed the surveillance program and we conclude that the monitoring of the materials in the SFPs, as proposed by the licensee, will provide reasonable assurance that the Boraflex material will continue to perform its function for the design life of the pool. The materials surveillance program delineated by the licensee will reveal any instances of deterioration of the Boraflex that might lead to the loss of neutron absorbing power during the life of the new spent fuel racks. This monitoring program will ensure that, in the unlikely situation that the Boraflex will deteriorate in this environment, the licensee and the NRC will be aware of it in sufficient time to take corrective action.

We, therefore, find that the implementation of an inservice surveillance program and the selection of appropriate materials of construction by the licensee meets the requirements of 10 CFR 50 Appendix A, Criterion 61, having a capability to permit appropriate periodic inspection and testing of components, and Criterion 62, preventing criticality by maintaining structural integrity of components and of the boron neutron absorber and is, therefore, acceptable.

## 2.6 Spent Fuel Pool Cleanup System

The SFP cleanup system is part of the pool cooling system. It consists of a full flow (550 gpm) filter-demineralizer composed of a filter precoat powdered ion exchange resin. This cleanup system is similar to such systems at other nuclear plants which maintain concentrations of radioactivity in the pool water at acceptably low levels. The staff expects only a small increase in radioactivity released to the pool water as a result of the proposed modification. We, therefore, conclude that the spent fuel pool cleanup system is adequate for the proposed modification and will keep the concentrations of radioactivity in the pool water to acceptably low levels.

## 2.7 Occupational Radiation Exposure

The staff has reviewed the licensee's plan for the modification of the Peach Bottom SFP racks with respect to occupational radiation exposure. The licensee estimates that the exposure for this operation will be approximately 36 man-rems. This estimate is based on the licensee's breakdown of occupational exposure for each phase of the modification. The licensee considered the number of individuals performing a specific job, their occupancy time while performing this job, and the average dose rate in the area where the job is being performed. The spent fuel assemblies themselves contribute a negligible amount to dose rates in the pool area because of the depth of water shielding the fuel.

One potential source of radiation is radioactive activation of corrosion products, termed "crud". Crud may be released to the pool water because of fuel movement during the proposed SFP rack modifications. This could increase radiation levels in the vicinity of the pool. During refuelings, when the spent fuel is first moved into the fuel pool, the addition of crud to the pool water from the fuel assembly and from the introduction of primary coolant to the pool water is greatest. However, the licensee, based upon previous experience from performing similar modifications, does not expect to have significant releases of crud to the pool water during modification of the SFP racks. In addition, the purification system for the pool (SFP Cleanup System), which has maintained radiation levels in the vicinity of the pool at low levels during normal operations, will be operating during the modification of the SFP racks. The staff has evaluated the licensee's proposed crud reduction program in the SFP and finds it acceptable.

The presently installed racks will be individually lifted from the SFP and will be rinsed either with low or high pressure water to remove any loose radioactivity. The racks will then be moved to a receiving area for appropriate disposal. Currently, the licensee has proposed decontaminating the racks and then disposing of the clean material as industrial waste. Material that cannot be decontaminated will be disposed of as normal radioactive waste. Either disposal method used will follow ALARA (as-low-as-reasonably-achievable) guidelines.

Divers will be used during the SFP rack modification. The licensee has developed specific procedures using the recommendations of Regulatory Guide 8.8 to ensure that doses to the divers will be within the requirements of 10 CFR Part 20 and ALARA guidelines. The ALARA procedures for divers include: reshuffling of the spent fuel; radiation surveys after the fuel is reshuffled to map radiation zones; instruction to divers on their travel limits within the pool; and constant monitoring of divers' radiation dose.

The staff's evaluation of the Peach Bottom's proposed SFP rack modification includes a review of the manner in which the licensee will perform the modification, the radiation protection program, including the use of area and airborne radioactivity monitoring, and the use of relevant experience from other operating reactors that have performed similar SFP rack modifications. Based on this review, the staff concludes that the Peach Bottom SFP rack modification can be performed in a manner that will ensure ALARA exposures to workers.

In addition, the staff has estimated the increment in onsite occupational dose during normal operations after the pool modifications resulting from the proposed increase in stored fuel assemblies. This estimate is based upon information supplied by the licensee for occupancy times and for dose rates in the SFP area from radionuclides concentrations in the SFP water. The spent fuel assemblies themselves contribute a negligible amount to dose rates in the pool area because of the depth of water shielding the fuel. Based on present and projected operations in the SFP area, the staff estimates that the proposed modification should add less than one (1) percent to the total annual occupational radiation exposure at the plant. The small increase in radiation exposure should not affect the licensee's ability to maintain individual occupational dose to ALARA levels and within the limits of 10 CFR Part 20. Thus, the staff concludes that storing additional fuel in the SFP will not result in any significant increase in dose received by workers.

## 2.8 Radioactive Waste Treatment

The plant contains waste treatment systems designed to collect and process the gaseous, liquid and solid waste that might contain radioactive material. The waste treatment systems were evaluated in the Final Environment Statement (FES) dated April 1973. There will be no change in the waste treatment systems described in Section III.2 of the FES because of the proposed modifications. There will be an expected modest increase in the loadings on the Spent Fuel Cleanup system ( refer to Section 2.6-Spent Fuel Pool Cleanup System).

## 2.9 Radiological Consequences of Cask Drop and Fuel Handling Accidents

This portion of the staff's review was conducted in accordance with the guidance in NUREG-0800, "Standard Review Plan", Sections 15.7.4 and 15.7.5, Regulatory Guide 1.25 and NUREG-0612 with respect to accident assumptions.

The licensee has committed to follow existing technical specifications regarding allowable loads carried over stored spent fuel during the reracking procedure, and during normal operation after its completion. The staff agrees with the licensee that the change in radiological conditions which can influence accident conditions in the SFP after the increase in storage capacity will be negligible compared with that prior to the modifications. The fuel burn-up (assumed to be 40,000 MWD/MTU), pool water level, and iodine decontamination factor will remain unchanged. The Peach Bottom Safety Evaluation Report, dated August 1972, was evaluated for a less tightly packed pool. However, even though more assemblies could possibly be impacted in a dropped assembly accident with more dense arrangement, the radiological consequences of this accident will not significantly increase. Therefore, the radiological analysis of the cask drop, fuel assembly, and heavy load accident is unchanged from that previously analyzed for the existing spent fuel pool configuration (Safety Evaluation Report for Peach Bottom Units 2 and 3, August 1972). In addition, the staff has performed an independent bounding analysis based upon this modification which shows that the doses at the Exclusion Boundary and Low Population Zone will be well within the SRP 15.7.4 dose guidelines. Therefore, the staff concludes that proposed modification is acceptable.

## 3.0 Summary

Our evaluation supports the conclusion that the proposed modification to the Peach Bottom SFP is acceptable because:

- (1) The physical design of the new storage racks will preclude criticality for any credible moderating condition.
- (2) The SFP cooling system has adequate cooling capacity.
- (3) The installation and use of the proposed fuel handling racks can be accomplished safely with the limit that no rack modules will be moved over any spent fuel assemblies.
- (4) The installation and use of the new spent fuel racks can be done safely and will not alter the consequences of the design basis accident for the SFP, i.e., the dropping and rupture of a fuel assembly and subsequent release of the assembly's radioactive inventory within the gap.

- (5) The likelihood of an accident involving heavy loads in the vicinity of the SFP is negligible.
- (6) The structural design and materials of construction are adequate to function normally for the duration of the plant lifetime and to withstand the seismic loading of the design basis earthquake.
- (7) The increase in occupational radiation exposure to individuals due to the storage of additional fuel in the SFP would be negligible.

#### 4.0 Environmental Considerations

A separate Environmental Assessment has been prepared pursuant to 10 CFR Part 51.

#### 5.0 Conclusions

We have concluded, based on the consideration discussed above, that:  
(1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, and  
(2) such activity will be conducted in compliance with the Commission's regulations and the issuance of these amendments will not be inimical to the common defense and security or to the health and safety of the public.

Dated: February 19, 1986

The following NRC personnel have contributed to this Safety Evaluation: W. Brooks, J. Raval, S. Kim, R. Fell, M. Lamastra, H. Gilpin, F. Witt and G. Gears

#### 6.0 References

1. J.S. Anderson, "Boraflex Neutron Shielding--Product Performance Data", Brand Industries, Inc., Report 748-30-1, August 1979.
2. J.S. Anderson, "Irradiation Study of Boraflex Neutron Shielding Materials", Brand Industries, Inc., Report 748-10-1, August 1981.

APPENDIX A

TECHNICAL EVALUATION REPORT

NRC DOCKET NO. 50-277, 50-278

FRC PROJECT C5508

NRC TAC NO. 59012, 59013

FRC ASSIGNMENT 26

NRC CONTRACT NO. NRC-03-81-130

FRC TASK 585

EVALUATION OF SPENT FUEL RACKS STRUCTURAL ANALYSIS

PHILADELPHIA ELECTRIC COMPANY

PEACH BOTTOM UNITS 2 AND 3

TER-C5506-585

*Prepared for*

Nuclear Regulatory Commission  
Washington, D.C. 20555

FRC Group Leader: R. C. Herrick  
NRC Lead Engineer: S. B. Kim

January 15, 1986

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Prepared by:

Reviewed by:

Approved by:

*R. C. Herrick*  
Principal Author

*V. Ngoc*

*D. P. Carfagno*  
Department Director

Date: Jan 15, 1986

Date: Jan 15/86

Date: 1-15-86

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**FRANKLIN RESEARCH CENTER**  
DIVISION OF ARVIN/CALSPAN  
20th & RACE STREETS, PHILADELPHIA, PA 19103



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D. C. 20555

ENVIRONMENTAL ASSESSMENT  
BY THE OFFICE OF NUCLEAR REACTOR REGULATION  
RELATING TO THE MODIFICATION OF THE  
SPENT FUEL STORAGE RACKS  
FACILITY OPERATING LICENSES NOS. DPR-44 AND DPR-56  
PHILADELPHIA ELECTRIC COMPANY  
PUBLIC SERVICE ELECTRIC AND GAS COMPANY  
DELMARVA POWER AND LIGHT COMPANY  
ATLANTIC CITY ELECTRIC COMPANY  
PEACH BOTTOM ATOMIC POWER STATION, UNITS 2 AND 3  
DOCKET NOS. 50-277 AND 50-278

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## 1.0 INTRODUCTION

The present storage capacity of the spent fuel pools at Peach Bottom Atomic Power Station, Units 2 and 3, is 2,608 fuel assemblies for each spent fuel pool for each unit. These limited storage capacities were in general in keeping with the expectation generally held in the industry that spent fuel would be kept onsite for a few years and then shipped offsite for reprocessing and recycling.

Commercial reprocessing of spent fuel has not developed as had been originally anticipated. In 1975 the Nuclear Regulatory Commission directed the staff to prepare a Generic Environmental Impact Statement (GEIS, the Statement) on spent fuel storage. The Commission directed the staff to analyze alternatives for the handling and storage of spent light water power reactor fuel with particular emphasis on developing long range policy. The Statement was to consider alternative methods of spent fuel storage as well as the possible restriction or termination of the generation of spent fuel through nuclear power plant shutdown.

A Final Generic Environmental Impact Statement on Handling and Storage of Spent Light Water Reactor Fuel (NUREG 0575), Volumes 1-3 (the FGEIS) was issued by the NRC in August 1979. In the FGEIS, consistent with long range policy, the storage of spent fuel is considered to be interim storage, to be used until the issue of permanent disposal is resolved and implemented.

One spent fuel storage alternative considered in detail in the FGEIS is the expansion of onsite storage by modification of the existing spent fuel pools. Since the issuance of the FGEIS, numerous applications have been received and approved. The finding in each case has been that the environmental impact of such increased storage capacity is negligible. However, since there are variations in storage designs and limitations caused by the spent fuel already stored in pools, the FGEIS recommended that licensing reviews be done on a case-by-case basis to resolve plant specific concerns.

In addition to the alternative of increasing the storage capacity of the existing spent fuel pools, the FGEIS discusses in detail other spent fuel storage alternatives. The finding of the FGEIS is that the environmental impact costs of interim storage are essentially negligible, regardless of where such spent fuel is stored. A comparison of the impact-costs of various alternatives reflects the advantage of continued generation of nuclear power versus its replacement by coal fired power generation. In the bounding case considered in the FGEIS, that of shutting down the reactor when the existing spent fuel storage capacity is filled, the cost of replacing nuclear stations before the end of their normal lifetime makes this alternative uneconomical.

This Environmental Assessment (EA) addresses only the specific environmental concerns related to the proposed expansion of the Peach Bottom Atomic Power Station, Units 2 and 3, spent fuel storage capacity. This EA consists of three major parts, plus a summary and conclusion. The three parts are: (1) descriptive material, (2) an appraisal of the environmental impact of the proposed action, and (3) an appraisal of the environmental impact of postulated accident. Additional discussion of the alternatives to increasing the storage capacity of existing spent fuel pool is contained in the FGEIS.

## 1.1 Description of the Proposed Action

By application dated June 13, 1985 and supplemented by letters dated August 1, 1985, October 9, 1985 and December 26, 1985, Philadelphia Electric Company (the licensee or PECO) requested approval to permit increases in the storage capacity of the Peach Bottom Atomic Power Station, Units 2 and 3, spent fuel pools (SFPs) from 2,608 to 3,819 storage cells. The increases are to be accomplished by use of new rack structures and removal of the SFPs cooling piping and diffusers.

The environmental impacts associated with the operations of Peach Bottom Atomic Power Station, Units 2 and 3, were considered in the Final Environmental Statement (FES) issued in April 1973(1). The purpose of this EA is to evaluate any additional environmental impacts which are attributable to the proposed increases in the SFPs storage capacity at both Peach Bottom units.

## 1.2 Need for Increased Storage Capacity

Each unit at Peach Bottom Atomic Power Station is a boiling water reactor (BWR). The licensee's projected SFP capacity requirements indicate that both units will lose their full-core discharge reserve storage capacity (764 assemblies) in the 1987-88 time frame; and, in the 1991-1992 time frame, they will no longer have the capacity to store any additional fuel discharges from the operating units. Therefore, to ensure that sufficient capacity continues to exist for Peach Bottom to store discharged fuel assemblies, PECO plans to replace the existing storage racks with new spent fuel storage racks whose design will allow for more dense storage of spent fuel, thus enabling the existing pools to store more fuel in the same place as occupied by the current racks.

## 1.3 Fuel Reprocessing History

Currently, spent fuel is not being reprocessed on a commercial basis in the United States. The Nuclear Fuel Services (NFS) plant at West Valley, New York, was shut down in 1972 for alterations and expansions; in September, 1976, NFS informed the Commission that it was withdrawing from the nuclear fuel reprocessing business. The Allied General Nuclear Services (AGNS) proposed plant in Barnwell, South Carolina, is not licensed to operate.

The General Electric Company's (GE) Morris Operation (MO) in Morris, Illinois is in a decommissioned condition. Although no plants are licensed for reprocessing fuel, the storage pool at Morris, Illinois and the storage pool at West Valley, New York are licensed to store spent fuel. The storage pool at West Valley is not full, but NFS is presently not accepting any additional spent fuel for storage, even from those power generating facilities that have contractual arrangements with NFS. On May 4, 1982, the license held by GE for spent fuel storage activities at its Morris operation was renewed for another 20 years, however, GE is also not accepting any additional spent fuel for storage at this facility.

## 2.0 FACILITY

The principal features of the spent fuel storage and handling at Peach Bottom, Units 2 and 3, as they relate to the proposed modifications are described here to aid understanding of the evaluations provided in subsequent sections of this EA.

## 2.1 Spent Fuel Pool (SFP)

Initially spent fuel assemblies are intensely radioactive due to their fresh fission product content when removed from the core; also, they have a high thermal output. The SFP is designed for storage of these assemblies to allow for radioactive and thermal decay prior to shipping them offsite. Space permitting, assemblies may be stored for longer periods, allowing continued fission product decay and thermal cooling. The SFPs structures are reinforced concrete lined with an eight gage thick stainless steel liner.

## 2.2 Spent Fuel Pool Cooling and Cleanup System

Each Peach Bottom unit has an independent spent fuel pool and spent fuel pool cooling and cleanup system. The spent fuel pool cooling and cleanup system is designed to remove the decay heat generated by the stored spent fuel assemblies and to maintain the water quality and clarity of the pool water. The Peach Bottom spent fuel cooling system is composed of three fuel pool cooling pumps, three heat exchangers, a filter-demineralizer, and two skimmer surge tanks. The filter-demineralizers, which collect radioactive corrosion products, are so arranged that one is designated for each reactor unit, and the third is a common spare for use by either unit when either of the other two units is taken out of service for pre-coating.

The pumps circulate the pool water in a closed loop, taking suction from the skimmer surge tanks through the heat exchangers, circulating the water through the filter-demineralizers, and discharging through diffusers at the bottom of the pool fuel. The cooled water traverses the pool picking up heat and debris before starting a new cycle by discharging over the skimmer weirs into the skimmer surge tanks. Makeup water for the system can be transferred from the condensate storage tank to the skimmer surge tanks. Pool water clarity and purity are maintained by a combination of filtration and ion exchange. Alarms, differential pressure indicators, and flow indicators monitor the condition of the filter-demineralizers.

## 2.3 Radioactive Waste Treatment System

Each unit contains waste treatment systems designed to collect and process the gaseous, liquid and solid waste that might contain radioactive material. The waste treatment systems are evaluated in the Final Environmental Statement (FES) for Unit Nos. 2 and 3, dated April 1973. The proposed modifications will not result in any significant additional radwaste that will need to be processed. Therefore, there will be no changes in the waste treatment systems described in Section 3.0 of the FES because of the proposed modifications.

## 3.0 NON-RADIOLOGICAL ENVIRONMENTAL IMPACTS OF PROPOSED ACTION

The non-radiological environmental impacts associated with the operations of Peach Bottom Atomic Power Station, Unit Nos. 2 and 3, as designed were considered in the FES. The proposed modifications of the SFPs will not cause any new non-radiological environmental impacts which were not previously considered based on the following:

- 1) The proposed modifications will alter only the spent fuel storage racks. They will not alter the external physical geometry of the SFP structures. In addition, construction of the new racks will be done offsite and transported

to the facility. No unusual terrestrial effects are anticipated or considered likely.

2) Additional storage will not result in a measurable increase in non-radiological chemical waste discharges to the receiving water. The licensee does not propose any changes in chemical usage or change to the NPDES permit.

3) Additional SFP heat output will not cause measurable thermal effects to the receiving water. The increase in the heat load due to this modification is less than five (5) percent for a 18-month reload and less than ten (10) percent for full-core discharge as compared with the present SFP design heat load. These calculated decay heat discharges to the plant water and to the Susquehanna River due to the proposed modifications do not significantly exceed the design values used by the NRC in its 1978 evaluation of the non-radiological environmental impact due to spent fuel increased storage at Peach Bottom. (2)

We conclude, based on the above evaluations, that the SFP modifications will not result in non-radiological environmental effects significantly greater or different from those already reviewed and analyzed in the FES for Peach Bottom, Units 2 and 3.

#### 4.0 RADIOLOGICAL ENVIRONMENTAL IMPACTS OF PROPOSED ACTION

##### 4.1 Introduction

The potential radiological environmental impacts associated with the expansion of the spent fuel storage capacity were evaluated and determined to be environmentally insignificant as addressed below.

During the storage of the spent fuel under water, both volatile and nonvolatile radioactive nuclides may be released to the water from the surface of the assemblies or from defects in the fuel cladding. Most of the material released from the surface of the assemblies consists of activated corrosion products such as Co-58, Co-60, Fe-59 and Mn-54 which are not volatile. The radionuclides that might be released to the water through defects in the cladding, such as Cs-134, Cs-137, Sr-89 and Sr-90 are also predominantly nonvolatile. The primary impact of such nonvolatile radioactive nuclides is their contribution to radiation levels to which workers in or near the SFPs would be exposed. The volatile fission product nuclides of most concern that might be released through defects in the fuel cladding are the noble gases (xenon and krypton), tritium and the iodine isotopes.

Experience indicates, however, that there is little radionuclides leakage from spent fuel stored in pools after the fuel has cooled for several months. The predominance of radionuclides in the SFP water appears to be radionuclides that were present in the reactor coolant system prior to refueling (which becomes mixed with water in the SFP during refueling operations) or crud dislodged from the surface of the spent fuel during transfer from the reactor core to the SFP.

During and after refueling, the SFP purification system reduces the radioactivity concentrations considerably. A few weeks after refueling, the spent fuel is cooled in the SFP and the fuel clad temperature becomes

relatively cool, approximately 180°F. This substantial temperature reduction should reduce the rate of release of fission products from the fuel pellets and decrease the gas pressure in the gap between pellets and clad, thereby tending to retain the fission products within the gap. In addition, most of the gaseous fission products have short half-lives and decay to insignificant levels within a few months. Based on the operational reports submitted by licensees and discussions with the operators, there has not been any significant leakage of fission products from spent light water reactor fuel stored in the MO (formerly Midwest Recovery Plant) at Morris, Illinois, or at the Nuclear Fuel Services (NFS) storage pool at West Valley, New York. Some spent fuel assemblies which have significant leakage while in operating reactors have been stored in these two pools. After storage in the onsite SFP, these fuel assemblies were later shipped to either MO or NFS for extended storage. Although the fuel exhibited significant leakage at reactor operating conditions, there was no significant leakage from these fuel assemblies in the offsite storage facility.

#### 4.2 Radioactive Material Released to the Atmosphere

With respect to releases of gaseous materials to the atmosphere, the only radioactive gas of significance which could be attributable to storing additional fuel assemblies for a longer period of time would be the noble gas radionuclide Krypton (Kr85). Experience has demonstrated that after spent fuel has decayed 4 to 6 months, there is no longer a significant release of fission products, including Kr-85, from stored fuel containing cladding defects.

The proposed Peach Bottom Unit Nos. 2 and 3 SFP modifications will increase the overall capability for each unit from 2608 to 3819 cells per unit. An average of 276 fuel assemblies are expected to be stored following each refueling. Since space must be reserved to accommodate a complete reactor core discharge (764 fuel assemblies), the useful pool capacity after the proposed modification will be 3055 fuel assemblies per unit. For the Peach Bottom site, at least one full core storage capability will be maintained for both units until 1993.

We assumed that all of the Kr-85 that is going to leak from defected fuel will do so in the interval between refuelings. The assumption is conservative and maximizes the amount of Kr-85 to be released. Our calculations summarized in Table 1 show that the maximum expected release of Kr-85 from one refueling cycle (276 assemblies) is approximately 144.3 curies. Spent fuel discharges from both units are expected to yield an annual release of 199 curies/year of Kr-85. This is not significant when compared to the estimated 300,000 curies/year of noble gas releases for the combined units from all other sources (1). Accordingly, the enlarged capacity of the pool has no significant effect on the greatest release rate of Kr-85 to the atmosphere. Thus, we conclude that the proposed modifications will have an insignificant effect on offsite exposures.

Iodine-131 release from spent fuel assemblies to the SFP water will not be significantly increased because of the expansion of the SFP storage capacity because the Iodine-131 inventory in the fuel will decay to negligible levels between refuelings for each unit.

A relatively small amount of tritium is contributed during reactor operation by fission of reactor fuel and subsequent diffusion of tritium through the fuel and Zircaloy cladding. Almost all of the tritium release from the fuel

occurs while the fuel is hot, that is, during operations and, to a limited extent, shortly after shutdown. Thus, expanding SFP capacity will not increase the tritium activity in the SFP.

Storing additional spent fuel assemblies is not expected to increase the bulk water temperature during normal refuelings above 150°F used in the design analysis. Therefore, it is not expected that there will be any significant change in the annual release of tritium or iodine as a result of the proposed modifications from that previously evaluated in the FES.

Assuming the loss of all SFP cooling, boiling could occur after 83 hours for the maximum "abnormal" heat load condition (full core discharge with all remaining storage spaces full with fuel from successive cyclic discharges). This is a substantial period for actions to be taken such as initiating pool makeup water for the SFP. The licensee has analyzed the effects of SFP boiling on the outside environment. The licensee utilized a model similar to that previously employed for a comparable analysis on the Limerick Generating Station to determine the offsite radiological consequences of SFP boiling. The results indicate that the potential offsite dose would be a very small fraction of 10 CFR Part 100 limits and was a negligible offsite contributor. We find this analysis and its conclusion to be acceptable.

#### 4.3. Solid Radioactive Waste

The concentration of radionuclides in the SFP water is controlled by the filters and the demineralizers, and by the decay of short-lived isotopes. The activity is highest during refueling operations when reactor coolant water is introduced into the SFP, and decreases as the SFP water is processed through the filters and demineralizers. The increase of radioactivity, if any, due to the proposed modifications, should be minor because of the capability of the cleanup system to continuously remove radioactivity in the SFP water to acceptable levels. The licensee states that the amount of solid waste presently being generated by the spent fuel pool cleanup system is approximately 100 cubic feet per unit every year. The licensee does not expect that these SFP modifications will result in any significant increase in this amount of solid waste generated from the spent fuel pool cleanup system. While we agree with the licensee, we note that should there be an increase in spent fuel pool resin waste generation, the total waste, however, would still be within those values estimated in the FES.

The present spent fuel pool racks will be removed from the pool. The disposal method has not been determined by the licensee. However, should the present racks be shipped to an ultimate burial site, the additional quantity of solid waste is not expected to be environmentally burdensome because the volume is small compared to the annual waste generation rate.

#### 4.4 Radioactivity Released to Receiving Waters

Since the SFP cooling and cleaning systems operate as a closed system, only water originating from cleanup of the SFP floors and resin sluice water need be considered as potential sources of radioactivity. It is expected that neither the quantity nor activity of the floor cleanup water will change as a result of the proposed SFP modifications. The SFP demineralizer resin removes soluble radioactive material from the SFP water. These resins are periodically sluiced with water to the SFP resin storage tank. The amount of radioactivity on the SFP demineralizer resin may increase slightly due to the additional spent fuel in the SFP, but the soluble radioactive material

would be retained on the resins. If any radioactive material is transferred from the spent resin to the sluice water it will be removed by processing through the liquid radwaste system. Therefore, because the liquid radwaste processing system captures radioactive material, it is not expected that any additional radioactivity will be released to the environment resulting from the proposed SFP modifications.

#### 4.5 Occupational Radiation Exposures

The staff has reviewed the licensee's plan for the modification of the Peach Bottom SFP racks with respect to occupational radiation exposure involving the removal and disposal of the current racks, and the installation of the proposed higher density racks. The licensee estimates that the exposure for this operation will be approximately 36 man-rem. This estimate is based upon the licensee's breakdown of occupational exposure for each phase of the modification. The licensee considered the number of individuals performing a specific job, their occupancy time while performing this job, and the average dose rate in the area where the job is being performed. This exposure is a small fraction (less than one percent) of the total annual person-rem from occupational exposure.

We have estimated the increment in onsite occupational dose during normal operations after the proposed SFP modifications have been completed with the proposed increase in stored fuel assemblies. Our estimate is based on information supplied by the licensee for occupation times and for dose rates in the SFP area from radionuclides concentrations in the SFP water. The spent fuel assemblies themselves contribute a negligible amount to dose rates in the pool area because of the depth of water shielding the fuel. Based on the present and projected operations in the SFP area, the staff estimates that the proposed modifications should add less than one percent to the total annual occupational radiation exposure at the plant. This small projected increase in radiation should not affect the licensee's ability to maintain individual occupational dose to ALARA levels and within the limits of 10 CFR Part 20. Thus, the staff concludes that the storing of additional fuel in the SFP will not result in any significant increase in dose received by workers.

### 5.0 ENVIRONMENTAL IMPACTS OF POSTULATED ACCIDENTS

#### 5.1 Rack Module Assembly Drop Accident

The overhead cranes in the auxiliary building at Peach Bottom will be used for removing the existing rack modules and lowering the new modules into the pool. The licensee has stated in Section 4.7.4.2, Procedure, of its August 1, 1985 submittal that all load handling operations for the new high density fuel storage racks in the SFP area will be conducted in accordance with the criteria of Section 5.1.1 of NUREG-0612, "Control of Heavy Loads at Nuclear Power Plants". In this same Section, the licensee has committed that at no time will a rack module be carried directly over another module installed in the SFP, and containing spent fuel. Therefore, the assessment of the radiological consequences of a replacement rack drop accident is not required.

## 5.2 Fuel Handling Accident

The staff has reviewed the licensee's proposed SFP storage capacity increase as it relates to changes in the radiological consequences of a postulated fuel handling accident as compared to those reported in the FES (1). A bounding calculation performed by the staff shows that the radiological consequences of a cask drop/tip accident are well within the NRC Standard Review Plan (SRP) dose guidelines (SRP 15.7.5). The staff, therefore, concludes that the proposed SFP modifications are acceptable.

## 5.3 Conclusion

Based upon the above evaluation, the staff concludes that the likelihood of a rack module assembly drop accident is sufficiently small because rack module assemblies will not be carried directly over other fuel-containing modules installed in the SFP and, therefore, the staff concludes that this accident need not be considered. Also, a fuel handling accident involving a dropped assembly or cask would not be expected to result in radionuclide releases leading to offsite radiological consequences exceeding those of the fuel handling accident evaluated in the staff's FES of April 1973; that is, the doses would be well within 10 CFR Part 100 values. We conclude, therefore, that the proposed modifications are acceptable and will not result in radiological environmental effects that differ significantly from those previously evaluated.

## 6.0 ALTERNATIVE USE OF RESOURCES

This action involves no use of resources not previously considered in the FES(1) for Peach Bottom Units 2 and 3. In addition, because we have not identified any significant environmental impacts which would result from this action, we have not considered alternatives to the proposed action or assessed the impacts of alternative beyond that considered in the FGEIS.

## 7.0 OTHER PERSONS CONSULTED

The NRC staff evaluated the licensee's proposal and consulted the FGEIS but did not consult other agencies or persons in preparing this environmental assessment.

## 8.0 SUMMARY

The Final Generic Environmental Impact Statement (FGEIS) on Handling and Storage of Spent Light Water Power Reactor Fuel concluded that the environmental impact of interim storage of spent fuel was negligible and the cost of various alternatives reflect the advantage of continued generation of nuclear power with the accompanying spent fuel storage. Because of the differences in SFP designs the FGEIS recommended licensing SFP expansion on a case-by-case basis. For Peach Bottom Atomic Power Station, Units 2 and 3, expansion of the storage capacity of the SFPs does not significantly change the radiological impact evaluated in the April 1973 FES (1). As discussed in Sections 2.0 and 4.0, the proposed reracking and added fuel are well within the capability of the SFP cleanup system and this system will keep

the concentrations of radioactivity in the SFP water well within acceptably low levels. Operation of the proposed SFP with additional spent fuel in the SFPs is not expected to increase the occupation radiation exposure by more than one percent of the total annual occupational exposure at Peach Bottom. We conclude that there are no significant radiological or nonradiological impacts associated with the proposed license amendments and that the amendments will not have a significant effect on the quality of the human environment.

Date: February 18, 1986

Principal Contributors:

H. Gilpin  
M. Lamastra  
J. Raval  
R. Fell  
G. Gears

#### 9.0 REFERENCES

1. Final Environmental Statement (FES) related to Peach Bottom Atomic Power Station, Units 2 and 3, April 1973
2. Letter from J.F. Stolz (NRC) to E.G. Bauer (Philadelphia Electric Company) dated November 30, 1978.

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TABLE I  
 SFP MODIFICATION  
 ESTIMATE RELEASE RATE OF KR-85

DATA

Peach Bottom, Units 2 and 3

Core = 764 fuel assemblies

Single Refueling = 276 core assemblies per unit per 18 months

Cladding = Zircaloy-4

Burnup = approx. 40,000 Mwd/MTu

Weight of UO<sub>2</sub> in Core = 164.3 MT of UO<sub>2</sub> or 144.7 MTu

Escape Rate Coeff. of Kr-85 =  $6.5 \times 10^{-8}/\text{sec}$

Fission Yield of Kr-85 = 0.0034

Failed Fuel Fraction (NUREG-0017) = .0012

Half-life (Kr-85) = 10.7 years

Amt Kr-85 in fuel < Production rate  
 >decay + >leakage

atoms/f      f/Mwsec

$$\text{Production Rate} = \frac{0.0034 \times 3.12 \times 10^{16} \times 3293 \text{ Mwt}}{144/8 \text{ MTu}}$$

$$= 2.4 \times 10^{15} \frac{\text{atoms}}{\text{MTu sec}}$$

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$$= \underline{2.4 \times 10^{15}} \text{ atoms/MTu sec}$$

(>decay =  $2.05 \times 10^{-9}$ /sec, >leak =  $6.5 \times 10^{-8}$ /sec)

Amt KR-85 in fuel  $\frac{<3.60 \times 10^{22} \text{ atoms/MTu}}{<2380 \text{ Curies/MTu}}$

The following model assumes that all Kr-85 that can leak out from the failed fuel assemblies will be released before the spent fuel is removed from the pool.

Simple case: All Kr-85 escape between refueling =

$$2880 \text{ curie/MTu} \times \frac{244.7 \text{ MTu}}{764 \text{ ass.}} \times \frac{276 \text{ ass.}}{\text{refuel}} \times .0012 = 149.3 \text{ curies/refueling}$$

For the two units, the average spent fuel input yields

$$144.3 \text{ curies/refuel} \times \frac{2 \text{ refuelings}}{18 \text{ months}} \times \frac{12 \text{ months}}{\text{year}} = 199.0 \text{ curies/year}$$