

YANKEE ATOMIC ELECTRIC COMPANY

Telephone (413) 424-5261



49 Yankee Road, Rowe, Massachusetts 01367

June 6, 2001
BYR 2001-050

USNRC
Attn: Document Control Desk
Washington, D.C. 20555

- References: (a) Letter, YAEC to USNRC, dated April 3, 2001, "Request for Exemption," BYR 2001-030.
- (b) Letter, USNRC to NAC, dated March 17, 2000, "Certificate of Compliance for the NAC International, Inc., Multi-Purpose Canister (MPC) System (CoC No. 1025).
- (c) NRC/YAEC/NAC Meeting on the Yankee Atomic Exemption Request for Yankee Rowe, May 18, 2001.

Subject: Additional Information – Request for Exemption

Dear Sir:

As described in Reference (a), Yankee Atomic Electric Company (YAEC) is preparing to transfer spent fuel from the Yankee Nuclear Power Station (YNPS) Spent Fuel Pool to a dry cask storage facility beginning in the summer of 2001. Reference (a) also requested NRC's approval of an exemption to certain requirements of Reference (b) in accordance with 10CFR72.7, "Specific Exemptions," by June 15, 2001, based on the schedule for start of fuel transfer at that time. In accordance with Reference (c), this letter revises the need date for the exemption to July 15, 2001, based on the current schedule of late August 2001 for commencing fuel transfer. The need is based on revising applicable cask operations procedures and completing training before internal dry run operations commence in early August 2001.

Also, as requested in Reference (c), this letter presents an attachment that provides additional information regarding the estimated dose savings associated with the exemption. The attached table presents the expected doses associated with the activities when entering the LCO required actions. We estimate an additional dose to operations personnel of about 0.2 person-rem/canister resulting from the needs to perform the required actions for each entry into LCO 3.1.5 or 3.1.6 of the NAC-MPC technical specifications. Projected over fifteen fuel canisters, the accumulated dose savings could be 3-6 person-rem depending on whether one or two LCO's are entered.

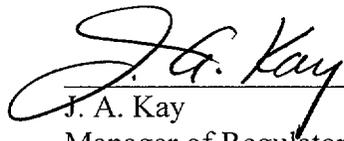
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If you have any questions, please contact Mr. James A. Kay, Manager of Regulatory Affairs, at 978 568-2302.

Sincerely,

YANKEE ATOMIC ELECTRIC COMPANY



J. A. Kay
Manager of Regulatory Affairs

cc: H. Miller, Regional Administrator, NRC Region I
J. Hickman, Project Manager, NRC NRR

Attachment

**Dose Estimate for LCO Required
Actions for MPC-YR**

Activity/Operations ⁽¹⁾⁽²⁾	Duration (hr)	No. of Personnel	Est. Dose Rate (Mrem/hr)	Est. Dose (Man-mrem)
1. Cease current operations	.25	1	10	2.5
2. Align Auxiliary Systems to backfill cavity with helium	.25	2	10	5
3. Backfill cavity w/helium (Evacuate cavity w/vacuum pump, as required)	.25	2	50	25
4. Connect Auxiliary Air Cooling System to the 8 TFR hose connections (2 persons)	.5	1	10	5
	.5 (Parallel Ops)	1	80	40
5. Move Air Compressor and attach to Air Chiller unit	.5	2	0	-
6. Start Auxiliary Air Cooling System	.25	1	0	-
7. Monitor Auxiliary Cooling System operation (min. 24 hrs.)	24	1	1	24
8. Stop Auxiliary Cooling System	.25	1	5	1.25
9. Disconnect Auxiliary Air Cooling System from the 8 TFR hose connections (1 person)	.5	1	80	40
10. Continue planned operations, per procedure including evacuation of helium as required	.5	1	50	25
Totals	27.75 hours			167.75 Man-mrem

Notes: (1) Operations from end of allowed time for LCO Activity
(2) The operational sequences are essentially identical for both LCO 3.1.5 and 3.1.6