From: Diane Jackson NRR
To: George Hubbard NRR
Date: Thu, Mar 16, 2000 11:12 AM
Subject: Re: Fwd: UCS Comments on Spent Fuel Pool Risk

George -

My initial reactions to the USC letter....

1) an apology that we did not include his concern in the list in App 7 - we are concerned and want all stakeholder input. We explained how we addressed many comments and concerns from both industry and members of public in App 7, however we did not do a through job in capturing all concerns in this section. However, if you read the whole report, you could see how we addressed other concerns. The USC concern for the workers was not discarded - as seen in industry commitment to not need access to SFP floor to add water and in the PRA for what actions the workers could and would do (and would not do). We never assumed workers would perform duties when radiation was a concern. We should have explained this in Appendix 7, we are sorry.

2) Part of answer 1 above.
This report does not address all credible hazards from a decomm. plant - only SFP accident risk.

It is true at Dresden if a signicant the loss of shielding occurred it would have created on-site personnel hazards from high radiation fields. This is true at any plant - operating or decomm. that is also why regulations such as Part 20, ALARA, and OSHA remain unchanged to protect workers.

3) Regarding the last question of this item, " what will the NRC do to protect worker at operating and current decomm. plants that do not have the design and oeprational characteristics implemented?".

The staff believes that the current regulations provide adequate safety for the public and on-site workers. The implementation of the deisgn and operational characteristics are necessary given that there is a the change in regulation in other areas, such as EP and staffing.

Regarding the comment on the relavancy of the generic freq. w/out the D&O chacteristics, the freq. for risk was evaluated for operating plants in GSI-82. This current PRA can not apply to operating plants due to the differnces in staffing, systems, etc. Operating plant's heat removal systems are higher capacity that decomm plants due the higher heat loads. The staff is different due to the number of pertsonnel needed for an operating plant.

4) The staff agrees with your comment regarding the commitment by industry to have readouts and alarms in the CR is vague. That is why we also made the staff assumption (SDA #1) of walkdowns of the SFP area at least once per shift and that procedures provide guidance to assist plant personnel.

Q/152

2000

Dear Mr. Lochbaum,

Proposed Response to Lochbaum

Thank you for your letter dated March 15, 2000, regarding the draft final technical study on spent fuel pool risk at decommissioning nuclear power plants. Your comments on our study and on the Nuclear Regulatory Commission's (NRC) responsiveness to the public are appreciated. In the letter you stated that the we did not consider your comments in the draft final report that you provided during the Decommissioning workshop, particularly on worker safety. While we did not have an explicit section in the report to discuss worker safety, we did consider you comments in our continuing work after the workshop. As you know, we performed additional risk assessment work on human reliability. In the reassessment, we considered that plant personnel would perform actions that would be reasonable and consistent with regulations that limit worker dose. Industry commitments also addressed worker safety. Several commitments specify that procedures and plans be in place that would assist in the early identification and remediation of a decrease in spent fuel pool level. Additionally, industry commitment Number 8 explicitly calls for remote alignment capability for spent fuel pool make-up without requiring worker entry to the pool floor. These plans and procedures and the design characteristic protect workers in the event of a large loss of inventory.

Further, regulations that govern radiological safety for workers during operation, such as 10 CFR Part 20 and ALARA (which requires worker radiation dose to be As Low As Reasonably Achievable), remain unchanged during decommissioning. These regulations continue to protect workers at permanently shutdown power plants.

It was an oversight that this was not discussed with the other stakeholder concerns in the draft final report. It will be corrected in the final report.

You also asked what would be done for operating plants and current decommissioning plants that do not have the design and operational characteristics discussed in the report. Our assessment examined important characteristics related to an exemption request to certain regulations and was based on staffing and systems found in a decommissioning plant. For an operating or decommissioning plant not requesting particular exemptions, the characteristics identified in the report are not necessary. Current decommissioning plants that have been granted exemptions to regulations do not rely on the design and operational characteristics identified in our assessment. If a licensee chose to demonstrate that their plant is within the framework of our study when requesting an exemption, then the design and operational characteristics would have to be adopted.

We believe that your involvement helps to improve our products so that we can maintain nuclear safety and enhance public confidence. We welcome and appreciate your comments. We plan to include your comments in the final report.