

August 1, 2001

U.S. Nuclear Regulatory Commission
11555 Rockville Pike
Rockville, MD 20852-2738

Attn: Document Control Desk

Subject: Submittal of a Supplement to the Safety Analysis Report (SAR) Changed Pages for the UMS[®] Universal Storage System Amendment #2 for Maine Yankee Atomic Power Company Site Specific Spent Fuel (TAC No. L23217)

Docket No. 72-1015

- References:**
1. Request for Amendment of the Certificate of Compliance (CoC) for the NAC-UMS[®] Universal Storage System to Incorporate Nonfuel Components and Unregistered Damaged Fuel Rods as Approved Contents, Revision UMSS-00L, NAC International, October 17, 2000
 2. NRC/NAC conference call to discuss clarifications of the UMS[®] CoC Amendment #2 Technical Specifications, August 1, 2001

In accordance with the conference call discussion (Reference 2), NAC International (NAC) herewith submits ten copies of the Safety Analysis Report (SAR) changed pages to supplement the request for Amendment #2 of the UMS[®] Universal Storage System Certificate of Compliance (Reference 1).

This submittal includes the SAR changed pages, which are designated as Revision UMSS-01G, for the UMS[®] SAR. The changed pages have been prepared in accordance with the following conventions:

- Revision indicators (revision bars) are used to highlight changes. Revision bars are not used to indicate text flow, but the revised "text flow" pages are provided for completeness.
- The changed pages for this submittal are designated as Revision UMSS-01G to provide a unique identification of the pages and changes.
- All of the pages in the List of Effective Pages are designated Revision UMSS-01G, but no revision bars are used on those pages.

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Page 2

The enclosed changes are minor editorial corrections to make the current Chapter 12 "SAR" version consistent with the "clean" technical specifications previously sent to the NRC.

If you have any comments or questions, please contact me on my direct line at (678) 328-1321.

Sincerely,



Thomas C. Thompson
Director, Licensing
Engineering & Design Services

Enclosures

cc: T. Williamson (MY)
P. Plante (MY)

EA790-SAR-002

DOCKET No. 72-1015

UMS[®]

UNIVERSAL MPC SYSTEM[®]

SAFETY ANALYSIS REPORT

for the

UMS[®] Universal Storage System

AUGUST 2001 REVISION UMSS-01G



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Definitions
A 1.1

HIGH BURNUP FUEL

A fuel assembly having a burnup between 45,000 and 50,000 MWD/MTU, which must be preferentially loaded in periphery positions of the basket.

An intact HIGH BURNUP FUEL assembly in which no more than 1% of the fuel rods in the assembly have a peak cladding oxide thickness greater than 80 microns, and in which no more than 3% of the fuel rods in the assembly have a peak oxide layer thickness greater than 70 microns, as determined by measurement and statistical analysis, may be stored as INTACT FUEL.

HIGH BURNUP FUEL assemblies not meeting the cladding oxide thickness criteria for INTACT FUEL or that have an oxide layer that has become detached or spalled from the cladding are stored as DAMAGED FUEL in a MAINE YANKEE FUEL CAN.

FUEL DEBRIS

An intact or a partial fuel rod or an individual intact or partial fuel pellet not contained in a fuel rod. Fuel debris is inserted into a 9 x 9 array of tubes in a lattice that has approximately the same dimensions as a standard fuel assembly. FUEL DEBRIS is stored in a MAINE YANKEE FUEL CAN.

CONSOLIDATED FUEL

A nonstandard fuel configuration in which the individual fuel rods from one or more fuel assemblies are placed in a single container or a lattice structure that is similar to a fuel assembly. CONSOLIDATED FUEL is stored in a MAINE YANKEE FUEL CAN.

(continued)

SITE SPECIFIC FUEL

Spent fuel configurations that are unique to a site or reactor due to the addition of other components or reconfiguration of the fuel assembly at the site. It includes fuel assemblies, which hold nonfuel-bearing components, such as control components or instrument and plug thimbles, or which are modified as required by expediency in reactor operations, research and development or testing. Modification may consist of individual fuel rod removal, fuel rod replacement of similar or dissimilar material or enrichment, the installation, removal or replacement of burnable poison rods, or containerizing damaged fuel.

Site specific fuel includes irradiated fuel assemblies designed with variable enrichments and/or axial blankets, fuel that is consolidated and fuel that exceeds design basis fuel parameters.

MAINE YANKEE FUEL CAN

A specially designed stainless steel screened can sized to hold INTACT FUEL, CONSOLIDATED FUEL, DAMAGED FUEL or FUEL DEBRIS. The screens preclude the release of gross particulate from the can into the canister cavity. The MAINE YANKEE FUEL CAN may only be loaded in a Class 1 canister.

CANISTER Surface Contamination
A 3.2.1

SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
SR 3.2.1.1 Verify that the removable contamination on the accessible exterior surfaces of the CANISTER is within limits	Once, prior to TRANSPORT OPERATIONS
SR 3.2.1.2 Verify that the removable contamination on the accessible interior surfaces of the TRANSFER CASK does not exceed limits	Once, prior to TRANSPORT OPERATIONS

CONCRETE CASK Average Surface Dose Rate
 A 3.2.2

- A 3.2 NAC-UMS[®] SYSTEM Radiation Protection
- A 3.2.2 CONCRETE CASK Average Surface Dose Rates

LCO 3.2.2 The average surface dose rates of each CONCRETE CASK shall not exceed the following limits unless required ACTIONS A.1 and A.2 are met.

- a. 50 mrem/hour (neutron + gamma) on the side (on the concrete surfaces);
- b. 50 mrem/hour (neutron + gamma) on the top;
- c. 100 mrem/hour (neutron + gamma) at air inlets and outlets.

APPLICABILITY: During LOADING OPERATIONS

ACTIONS

-----NOTE-----

Separate Condition entry is allowed for each NAC-UMS[®] SYSTEM.

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. CONCRETE CASK average surface dose rate limits not met	A.1 Administratively verify correct fuel loading <u>AND</u>	24 hours

(continued)

Administrative Controls and Programs
A 5.0

A 5.5 Radioactive Effluent Control Program

The program implements the requirements of 10 CFR 72.44(d).

- a. The NAC-UMS[®] SYSTEM does not create any radioactive materials or have any radioactive waste treatment systems. Therefore, specific operating procedures for the control of radioactive effluents are not required. LCO 3.1.5, CANISTER Helium Leak Rate, provides assurance that there are no radioactive effluents from the NAC-UMS[®] SYSTEM.
- b. This program includes an environmental monitoring program. Each general license user may incorporate NAC-UMS[®] SYSTEM operations into their environmental monitoring program for 10 CFR Part 50 operations.
- c. An annual report shall be submitted pursuant to 10 CFR 72.44(d)(3).

A 5.6 NAC-UMS[®] SYSTEM Transport Evaluation Program

This program provides a means for evaluating various transport configurations and transport route conditions to ensure that the design basis drop limits are met. For lifting of the loaded TRANSFER CASK or CONCRETE CASK using devices that are integral to a structure governed by 10 CFR Part 50 regulations, 10 CFR 50 requirements apply. This program is not applicable when the TRANSFER CASK or CONCRETE CASK is in the fuel building or is being handled by a device providing support from underneath (i.e., on a rail car, heavy haul trailer, air pads, etc.).

Pursuant to 10 CFR 72.212, this program shall evaluate the site specific transport route conditions.

- a. The lift height above the transport surface prescribed in Section B3.4.6 of Appendix B to Certificate of Compliance (CoC) No. 1015 shall not exceed the limits in Table 12A5-1. Also, the program shall ensure that the transport route conditions (i.e., surface hardness and pad thickness) are equivalent to or less limiting than those prescribed for the reference pad surface which forms the basis for the values cited in Section B3.4.6 of Appendix B to CoC No. 1015.

(continued)

Administrative Controls and Programs
A 5.0

A 5.6 NAC-UMS[®] SYSTEM Transport Evaluation Program (continued)

- b. For site specific transport conditions which are not bounded by the surface characteristics in Section B3.4.6 of Appendix B to CoC No. 1015, the program may evaluate the site specific conditions to ensure that the impact loading due to design basis drop events does not exceed 60g. This alternative analysis shall be commensurate with the drop analyses described in the Safety Analysis Report for the NAC-UMS[®] SYSTEM. The program shall ensure that these alternative analyses are documented and controlled.
- c. The TRANSFER CASK and CONCRETE CASK may be lifted to those heights necessary to perform cask handling operations, including CANISTER transfer, provided the lifts are made with structures and components designed in accordance with the criteria specified in Section B3.5 of Appendix B to CoC No. 1015, as applicable.

A 5.7 Verification of Oxide Layer Thickness on High Burnup Fuel

A verification program is required to determine the oxide layer thickness on high burnup fuel by measurement or by statistical analysis. A fuel assembly having a burnup between 45,000 MWD/MTU and 50,000 MWD/MTU is classified as high burnup. The verification program shall be capable of classifying high burnup fuel as INTACT FUEL or DAMAGED FUEL based on the following criteria:

1. A HIGH BURNUP FUEL assembly may be stored as INTACT FUEL provided that no more than 1% of the fuel rods in the assembly have a peak cladding oxide thickness greater than 80 microns, and that no more than 3% of the fuel rods in the assembly have a peak oxide layer thickness greater than 70 microns, and that the fuel assembly is otherwise INTACT FUEL.
2. A HIGH BURNUP FUEL assembly not meeting the cladding oxide thickness criteria for INTACT FUEL or that has an oxide layer that is detached or spalled from the cladding is classified as DAMAGED FUEL.

A fuel assembly, having a burnup between 45,000 and 50,000 MWD/MTU, must be preferentially loaded in periphery positions of the basket.

B 2.0 APPROVED CONTENTS

B 2.1 Fuel Specifications and Loading Conditions

The NAC-UMS[®] System is designed to provide passive dry storage of canistered PWR and BWR spent fuel. The system requires few operating controls. The principal controls and limits for the NAC-UMS[®] System are satisfied by the selection of fuel for storage that meets the Approved Contents presented in this section and in Tables 12B2-1 through 12B2-5 for the standard NAC-UMS[®] System design basis spent fuels.

This section also permits the loading of fuel assemblies that are unique to specific reactor sites. SITE SPECIFIC FUEL assembly configurations are either shown to be bounded by the analysis of the standard NAC-UMS[®] System design basis fuel assembly configuration of the same type (PWR or BWR), or are shown to be acceptable contents by specific evaluation of the configuration.

The separate specific evaluation may establish different limits, which are maintained by administrative controls for preferential loading. The preferential loading controls allow the loading of fuel configurations that may have higher burnup, additional hardware material or unique configurations as compared to the standard NAC-UMS[®] System design basis spent fuels.

Unless specifically excepted, SITE SPECIFIC FUEL must meet all of the controls and limits specified for the NAC-UMS[®] System, as presented in Table 12-1.

If any Fuel Specification or Loading Conditions of this section are violated, the following actions shall be completed:

- The affected fuel assemblies shall be placed in a safe condition.
- Within 24 hours, notify the NRC Operations Center.
- Within 30 days, submit a special report that describes the cause of the violation and actions taken to restore or demonstrate compliance and prevent recurrence.

(continued)

B 2.1.1 Fuel to be Stored in the NAC-UMS[®] SYSTEM

INTACT FUEL ASSEMBLIES meeting the limits specified in Tables 12B2-1 through 12B2-5 may be stored in the NAC-UMS[®] SYSTEM.

B 2.1.2 Preferential Fuel Loading

The normal temperature distribution in the loaded TRANSPORTABLE STORAGE CANISTER results in the basket having the highest temperature at its center and lowest temperature at the outer edge. Considering this temperature distribution, spent fuel with the shortest cooling time (and, therefore, having a higher allowable cladding temperature) is placed in the center of the basket. Fuel with the longest cooling time (and, therefore, having a lower allowable cladding temperature) is placed in the periphery of the basket.

Using a similar argument, fuel assemblies with cooling times between the highest and lowest cooling times of the designated fuel, are placed in intermediate fuel positions.

Loading of the fuel assemblies designated for a given TRANSPORTABLE STORAGE CANISTER must be administratively controlled to ensure that the dry storage fuel cladding temperature limits are not exceeded for any fuel assembly, unless all of the designated fuel assemblies have a cooling time of 7 years or more.

CANISTERS containing fuel assemblies, all of which have a cooling time of 7 years or more, do not require preferential loading, because analyses have shown that the fuel cladding temperature limits will always be met for those CANISTERS.

CANISTERS containing fuel assemblies with cooling times from 5 to 7 years must be preferentially loaded based on cooling time. By controlling the placement of the fuel assemblies with the shortest cooling time (thermally hottest), preferential loading ensures that the allowable fuel cladding temperature for a given fuel assembly is not exceeded. The preferential loading of fuel into the CANISTER based on cooling time is described as follows.

(continued)

B 3.4.2 Maine Yankee Site Specific Parameters and Analyses

The design basis site-specific parameters and analyses that require verification by Maine Yankee are:

1. The temperature of 76°F is the maximum average yearly temperature. The 3-day average ambient temperature shall be 106°F or less.
2. The allowed temperature extremes, averaged over a 3-day period, shall be greater than -40°F and less than 133°F.
3. The design basis earthquake horizontal and vertical seismic acceleration levels at the top surface of the ISFSI pad are bounded by the values shown:

Horizontal g-level in each of Two Orthogonal Directions	Corresponding Vertical g-level (upward)
0.38g	$0.38 \times 0.667 = 0.253g$

4. The analyzed flood condition of 15 fps water velocity and a height of 50 feet of water (full submergence of the loaded cask) are not exceeded.
5. The potential for fire and explosion shall be addressed, based on site-specific considerations. This includes the condition that the fuel tank of the cask handling equipment used to move the loaded CONCRETE CASK onto or from the ISFSI site contains no more than 50 gallons of fuel.
6. Physical testing shall be conducted to demonstrate that the coefficient of friction between the CONCRETE CASK and ISFSI pad surface is at least 0.5.

(continued)

B 3.4.2 Maine Yankee Site Specific Parameters and Analyses (continued)

7. In addition to the requirements of 10 CFR 72.212(b)(2)(ii), the ISFSI pad(s) and foundation shall meet the design basis earthquake horizontal and vertical seismic acceleration levels at the top surface of the ISFSI pad as specified in B 3.4.2 (3).

The surface of the ISFSI pad shall have a broom finish or brushed surface as defined in ACI 116R-90 and described in Sections 7.12 and 7.13.4 of ACI 302.1R.

8. In cases where engineered features (i.e., berms, shield walls) are used to ensure that requirements of 10 CFR 72.104(a) are met, such features are to be considered important to safety and must be evaluated to determine the applicable Quality Assurance Category on a site specific basis.
9. TRANSFER CASK OPERATIONS shall only be conducted with surrounding air temperatures $\geq 0^{\circ}\text{F}$.