

From: Mark Rubin *MR*
To: Glenn Kelly, Joseph Staudenmeier, Richard Barret... *NR*
Date: Mon, Apr 3, 2000 7:03 PM
Subject: Re: Harris filings re: relevance of Decommissioning study

Susan:

Glenn has been tied up on other high priority assignments. I took a quick look at the filings. I have no comment or objection to the NRC or licensee filings.

The Orange County filing identified a number of "inadequacies" with respect to the draft SFP analysis. These are primarily in the area of heat transfer and scenario development. Quality reviews to date have not identified these issues, though the comment period is not yet closed.

*Ex 5
A/C*

I will discuss with management whether we should consider these issues
 To be public comments on the draft report, that should be addressed prior to the final report issuance.

However, the issues raised relate to the adequacy of the analysis with respect to decommissioning plants. The conclusions of low likelihood for pool uncover (addressed in your filing as a low probability of a SFP accident) should, however, remain basically valid for an operating plant as well, since the partial drain down scenarios raised would appear to (at most) impact the maximum time (since unloading) that the fuel would be suspect able to rapid oxidation. The draft report's calculation on likelihood of fuel uncover was based on lowered water level to the top of the fuel, so it is slightly conservative with respect to the time available for operator recovery, as the partial drain down proceeds.

In addition, I take issue with the Orange County assertion that full uncover is always preceded by partial drain down. In discussing partial drain down, Orange County filing seems to be referring to a slow level drop caused by boil off of the pool inventory, with some impact on fuel assembly natural convection air cooling flow due to water blockage of the lower assembly structure.

The staff draft assessment showed that SFP risk (at decommissioning facilities) is driven by large seismic events that cause major structural failures of the pool, resulting in very rapid loss of pool inventory. For such scenarios, there would not be the slow level decrease postulated by the Orange County filing. Therefore, even if a credible partial drain down scenario exists (for decommissioning plants), it could possibly extend the period of rapid oxidation vulnerability, rather than impact the low annualized frequency. The potential or credibility of partial drain down events at an operating plant has not been assessed. Therefore, the draft report does not provide any directly relevant information in this area other, than as stated above, it is perceived to be of low likelihood since the calculated frequency of uncover to top of fuel is low.

>>> Susan Uttal 04/03 2:13 PM >>>

I have not heard anything from anyone regarding Orange County's latest filing or CP&L's filing. Please review the pleadings and please get back to me by COB today.

Thank you.

CC: George Hubbard, Richard Barrett, Richard Correia...

7/4