

From: "Albon Harrison" <awharrison@stpegs.com>
To: <JLM3@nrc.gov>
Date: 8/27/02 10:12AM
Subject: STP Relocation of Crane Travel Technical Specification

John,

I understand the reviewer for this proposed TS change believes the TS meets 10CFR50.36(c)(2)(ii)(B) Criterion 2 and consequently should not be a candidate for relocation.

B) Criterion 2. A process variable, design feature, or operating restriction that is an initial condition of a design basis accident or transient analysis that either assumes the failure of or presents a challenge to the integrity of a fission product barrier

The subject TS is not a process variable. It is not a design feature or operating restriction that is an initial condition for a DBA or transient analysis that assumes the failure of or presents a challenge to the integrity of irradiated fuel in the spent fuel pool (the only potential fission product barrier). The purpose of the specification is to prevent the drop of a heavy load on spent fuel that would exceed the design assumptions of the fuel handling accident (DBA); however, the drop of a heavy load is not a design basis accident. For instance, there is no analogous TS prohibition for crane travel over the reactor vessel in the RCB because heavy loads are administratively controlled to preclude the need to consider a heavy load drop DBA. Thus, we don't think the TS meets Criterion 2.

We believe the STP application and technical justification is consistent with the precedent set by other applicants who relocated this TS.

Wayne Harrison
STPNOC Licensing
361-972-7298
pager 0594
awharrison@stpegs.com

CC: <donaldh@excelservices.com>, <MCT@nrc.gov>, "Duane Gore"
<degore.GWPO_NENG.GWDOM_STP@stpegs.com>, "Robyn Piggott"
<rdpiggott.GWPO_NASSUR.GWDOM_STP@stpegs.com>, "Scott Head"
<smhead.GWPO_NASSUR.GWDOM_STP@stpegs.com>

Received from igate.nrc.gov
by nrcgwia.nrc.gov; Tue, 27 Aug 2002 10:12:16 -0400
Received from nrc.gov
by smtp-gateway SMTPæ id KAA11379,
Tue, 27 Aug 2002 10:09:44 -0400 (EDT)
Received from GWDOM_STP-Message_Server by stpegs.com
with Novell_GroupWise; Tue, 27 Aug 2002 09:12:22 -0500
Message-Id: <sd6b4276.090@stpegs.com>
X-Mailer: Novell_GroupWise 5.5.5
Date: Tue, 27 Aug 2002 09:12:16 -0500
From: "Albon Harrison" <awharrison@stpegs.com>
To: <JLM3@nrc.gov>
Cc: <donalddh@excelservices.com>, <MCT@nrc.gov>,
"Duane Gore" <degore.GWPO_NENG.GWDOM_STP@stpegs.com>,
"Robyn Piggott" <rdpiggott.GWPO_NASSUR.GWDOM_STP@stpegs.com>,
"Scott Head" <smhead.GWPO_NASSUR.GWDOM_STP@stpegs.com>
Subject: STP Relocation of Crane Travel Technical Specification
Mime-Version: 1.0
Content-Type: text/plain, charset=US-ASCII
Content-Transfer-Encoding: quoted-printable
Content-Disposition: inline

John,

I understand the reviewer for this proposed TS change believes the TS meets 10CFR50.36(c)(2)(iii)(B) Criterion 2 and consequently should not be a candidate for relocation.

B) Criterion 2. A process variable, design feature, or operating restriction that is an initial condition of a design basis accident or transient analysis that either assumes the failure of or presents a challenge to the integrity of a fission product barrier

The subject TS is not a process variable. It is not a design feature or operating restriction that is an initial condition for a DBA or transient analysis that assumes the failure of or presents a challenge to the integrity of irradiated fuel in the spent fuel pool (the only potential fission product barrier). The purpose of the specification is to prevent the drop of a heavy load on spent fuel that would exceed the design assumptions of the fuel handling accident (DBA); however, the drop of a heavy load is not a design basis accident. For instance, there is no analogous TS prohibition for crane travel over the reactor vessel in the RCB because heavy loads are administratively controlled to preclude the need to consider a heavy load drop DBA. Thus, we don't think the TS meets Criterion 2.

We believe the STP application and technical justification is consistent with the precedent set by other applicants who relocated this TS.

Wayne Harrison
STPNOC Licensing
361-972-7298
pager 0594
awharrison@stpegs.com