

Maine Yankee

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December 19, 2002
MN-02-064 RA-02-163

U. S. NUCLEAR REGULATORY COMMISSION
Attention: Document Control Desk
Washington, D.C. 20555

- References:
- (a) License No. DPR-36 (Docket No. 72-30).
 - (b) NAC Certificate of Compliance for Spent Fuel Storage Casks Issued to NAC International Inc. Certificate No. 1015, Amendment 2, dated 12/31/2001.
 - (c) Certificate of Compliance, Appendix A, Technical Specifications for the NAC-UMS[®] System
 - (d) NAC International Inc., Final Safety Analysis Report (FSAR) for the UMS[®] Universal Storage System Docket No. 72-1015
 - (e) Letter: T. Williamson, MYAPC to USNRC; "Request for Exemption from Certain Requirements of NRC Regulations 10 CFR72.212(a), 72.212(b)(2)(i), 72.212(b)(7), and 72.214"; MN-02-055; November 7, 2002.

Subject: Request for Exemption from Certain Requirements of NRC Regulations 10 CFR72.212(a), 72.212(b)(2)(i), 72.212(b)(7), and 72.214

Ladies and Gentlemen:

This letter supplements information submitted in reference (e) which requests USNRC approval of an exemption to certain requirements in 10 CFR72.212(a), 72.212(b)(2)(i), 72.212(b)(7) and 72.214.

Maine Yankee was requested by the staff in a conference call on December 10, 2002 to provide additional information regarding occupational exposure estimates for the vacuum drying evolutions and the relationship to the overall station decommissioning exposure estimates. Maine Yankee also indicated that the information regarding Occupational Exposure presented in reference (e) only included gamma exposure and did not include the contribution from neutron exposure. The following table contains the amended exposure totals including neutron contribution.

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Canister Sequence	Approximate Heat Load (kW)	Processing Hours	Occupational Exposure-neutron and gamma
1.	4.36	250	272mrem
2.	4.41	175	223mrem
3.	4.41	150	241mrem
4.	4.31	160	254mrem
5.	9.15	220	422mrem
6.	9.13	210	358mrem
7.	9.37	330	365mrem
8.	9.37	312	512mrem
9.	9.31	396	529mrem

Our experience to date indicates the repeated entry into the limiting condition of the technical specification requirement for air cooling adds a minimum of 60 hours to the overall evolution for each canister. Maine Yankee believes the granting of the exemption requested and the resulting increased drying times will result in the reduction of the occupational exposure for the processing of the remaining dry storage canisters of approximately 5 person-rem. This reduction is a significant percentage of the overall station dose for the entire decommissioning project. For the entire year 2002, the total station dose for all activities will be approximately 65 person-rem. The expected savings of 5 person-rem represents nearly 8% of the 2002 station dose and will likely represent an even greater percentage of the 2003 station dose. We expect the fuel loading campaign to be completed in 2003 with the loading of 50 remaining canisters. Maine Yankee views an 8-10% reduction in overall dose to be a substantial benefit to health and safety of the personnel involved with these evolutions.

Maine Yankee has also confirmed that the additional exposure incurred by security force personnel is not tabulated on our canister exposure data base but would add to the totals presented above (except for overall annual station dose data). Security personnel are required to be present whenever spent fuel is being loaded into dry casks storage and until the fuel is transferred to the ISFSI.

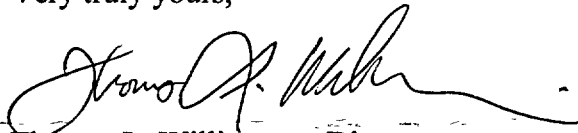
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Please contact me at (207-882-4530) should you have any questions or desire additional information.

Very truly yours,



Thomas L. Williamson, Director
Nuclear Safety and Regulatory Affairs

c: Mr. H. J. Miller , USNRC, Region 1
Mr. M. K. Webb, USNRC
Mr. S. C. O'Connor, USNRC
Ms. P. Craighead, Esq., State of Maine
Mr. P. J. Dostie, State of Maine
Mr. T. Thompson, NAC International, Inc.