

YANKEE ATOMIC ELECTRIC COMPANY

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January 23, 1997
BYR 97/003

Ms. Marissa Bailey, Project Manager
Spent Fuel Projects Office
U.S. Nuclear Regulatory Commission
11555 Rockville Pike
Rockville, MD 20555-0001

References: (a) License No. DPR-3 (Docket No. 50-29)

(b) Letter, NAC International to USNRC, "Request for an Amendment to the COC for the NAC-STC to Include a Canisterized Configuration and Including Revision No. 9 of the NAC-STC SAR", dated December 30, 1996

Subject: YNPS SNF Transport and Storage Project

Dear Ms. Bailey,

NAC International (NAC) recently submitted to NRC an amendment request [Reference (b)] regarding the NAC-STC transportation system, and is presently completing the corresponding storage application for submittal to the NRC in the near future. The purpose of this letter is to provide NRC with additional information regarding the importance of this submittal as it pertains to Yankee Atomic Electric Company, in support of NAC's desired review and approval schedule.

As discussed in a meeting with your staff on September 17, 1996, Yankee Atomic Electric Company has entered into an agreement with NAC to design, license, and potentially build a dry spent nuclear fuel and/or Greater-Than-Class-C (GTCC) waste transport and storage system for the Yankee Nuclear Power Station in Rowe, Massachusetts. Yankee is in the process of decommissioning this facility. A key part of the Yankee Decommissioning Plan is to prepare spent nuclear fuel and GTCC waste for transport to an offsite, interim storage facility (public or private) as soon as one is available. Also built into this plan is a contingency to provide dry storage of spent nuclear fuel and/or GTCC waste, should there be further delay in the availability of an offsite, interim storage facility. The canister storage system design is based upon the design requirements for transport, and provides significant flexibility due to full compatibility with the NAC-STC transport system. This ensures that the transport option can be exercised as soon as an offsite, interim site is made available. Whether interim storage is provided by DOE or by a private entity, Yankee needs to be ready to transport as soon as such a facility becomes available. Prompt decommissioning of the Yankee facility and transport of spent fuel and GTCC waste at the earliest possible time is in the best interest of the ratepayers.

Since the NAC-STC transport system, as amended by Reference (b), provides the basis for the transport and storage system to be utilized at Yankee Nuclear Power Station, NAC has requested that NRC target the mid-1997 time for completion of review and approval activities. This will

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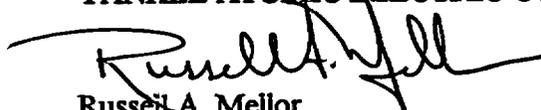
position Yankee to have a system in place in the 1998 time frame, suitable for transport of spent nuclear fuel and/or GTCC waste to an interim site should one become available, or suitable for on-site storage to facilitate decommissioning of the remaining portions of the facility. A delay in approval will result in a potential delay in facility decommissioning activities and a consequent delay in off-site shipment of Low Level Waste (LLW) resulting from spent fuel pool and related equipment decommissioning to the disposal site in Barnwell, South Carolina. Should the Barnwell facility close prior to completion of these shipments, Yankee's ability to complete its mission to decommission its facility in a timely fashion will be inhibited. Further delay in decommissioning will impose additional financial burdens on Yankee, a small, single asset utility, and ultimately place a heavier burden on ratepayers.

Since the NAC-MPC system is already licensed by the NRC, and since the changes to the system as proposed in NAC's amendment request are based upon previously approved technology, an expedited NRC review and approval schedule should be possible. Completion of review and approval of this amendment request in the mid-1997 time frame will directly support Yankee Atomic's goal of a fully decommissioned facility. We urge NRC to take action as appropriate to expedite the review and approval of NAC's amendment request. Both NAC and Yankee are committed to provide any assistance deemed necessary by NRC in support of this important submittal.

Should you have any questions or comments, please feel free to contact me directly at (508)568-2203. Thank you for your prompt consideration of this amendment application.

Very Truly Yours,

YANKEE ATOMIC ELECTRIC COMPANY



Russell A. Mellor
Manager of Operations/
Decommissioning Manager

cc: Mr. Morton B. Fairtile, USNRC
Mr. Thomas C. Thompson, NAC
Mr. John White, USNRC Region I

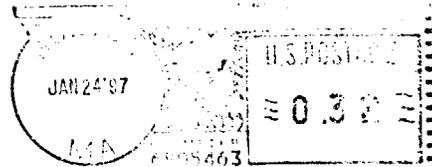
U.S. Nuclear Regulatory Commission
Page 3

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