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GE Nuclear Energy

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March 25, 2004

Mr. C. M. Regan  
Spent Fuel Projects Office  
U.S. Nuclear Regulatory Commission  
M/S 013D13  
One White Flint North  
11555 Rockville Pike  
Rockville, Maryland 20852-2738

REFERENCE : SNM-2500 Docket 72-1 TAC No. L23091

SUBJECT: March 17, 2004 conference call

Dear Mr. Regan,

This letter confirms the conference conducted on March 17, 2004 between SFPO and GE Morris Operation. The conference call was held to discuss the GE-MO plan for submission of SNM-2500 Amendment 12 and supporting revision of the GE-MO Consolidated Safety Analysis Report.

In regard to SNM-2500 Amendment 12, the following items were discussed:

1. Incorporation of those items from previously submitted SNM-2500 Amendments 10 and 11, which were withdrawn by GE-MO letter date March 1, 2004.
2. Modify license to authorized storage of only the spent fuel currently in inventory. There are no plans to receive additional spent fuel or to replace any currently in inventory at Morris Operation.
3. Delete 2.3.1 Ventilation Exhaust Vacuum specification for low activity waste evaporator. The requirement was for the evaporator that supported the LAW Vault. The current evaporator runs approximately 5 to 10 days per year under manual control.
4. Change the following Section 4.0 Surveillance Requirements to:
  - 4.1 Effluent Air – Delete this requirement. Air sampling history since last fuel received shows that at no time has the prefilter air neared 10CFR limits for exhaust air activity. Air will continue to be sampled under a specific SOP and used as the basis for required annual emissions reporting.

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- 4.2 Holding Basins and Evaporation Pond – Delete both requirements. The evaporation pond was drained and closed in 1996 under IEPA Permit. Due to process changes at GE-MO, the potential to contaminate the Holding Basins no longer exists. The Holding Basins will continue to be monitored for activity under the current SOP.
  - 4.3 Sealed Sources – Leave as is but renumber.
  - 4.4 Instrumentation – Delete all except for Area Radiation Monitors and Criticality Monitors. Vaults are empty and do not require monitoring. Calibration for the basin leak detection system will continue to be performed and documented in a specific Operability Test.
  - 4.5 Coolers – Delete this requirement. Outdoor basin water coolers were removed in 2000 and replaced with heat pumps. Basin water no longer goes outside of the basin building.
  - 4.6 Process Steam Bypass – Delete this requirement. Process steam was not used since the reprocessing facility was deactivated under license SNM-1265. All steam use was eliminated in 1997.
  - 4.7 Cask Coolants – Delete this requirement. No casks would be received with fuel so the casks would be dry.
  - 4.8 Basin Water Chemical Characteristics – Delete requirement for  $\text{NaNO}_3$  and Cl. There are no sources for these chemicals in the fuel basins and sampling history shows them to be routinely less than MDL. Replace pH with conductivity measurement. Conductivity measurement would not only show changes in pH, but also any changes in other chemical materials.
  - 4.9 Basin Water Radioactive Contaminants – Leave as is but renumber.
5. Delete 6.2.2 Staff Qualifications – Section 9.0 of the CSAR describes staff. Qualifications are defined in specific GE HR position descriptions. Management/supervisory personnel changes are reviewed/approved by Region III.
6. Delete 6.4 Plant Safety Committee – Members are shown in CSAR organization chart and specific GE-MO procedure.

The CSAR will be revised accordingly to support the above items:

1. General revision to information in the CSAR will be updated using answers to questions developed through the RAI process, such as:
  - CSAR will include shipping, handling and storage of fuel.



- Systems determined to be out of scope for licensing will remain in CSAR as operating support systems.
- 2. Section 4 will be revised to reflect current spent fuel inventory.
- 3. Section 7, radiation protection details will be updated for current inventory and all reference to receipt of fuel will be removed.
- 3. Accident Safety Analysis described in Section 8.0 will remain with little or no change. The described analysis are conservative for the fuel on hand and show that no mechanism exists in the fuel storage environment to cause an airborne release near the 10CFR72.104 limits.

A discussion was also conducted regarding anticipated evaluation of SSCs in and out of scope for the updated license basis. Basic agreement was reached on the following:

**IN SCOPE -**

1. Fuel storage system, including basins, liner, baskets, grid
2. Unloading pit doorway guard
3. Basin expansion gate
4. Fuel/cask handling cranes
5. Fuel and basket grapples
6. Area Radiation Monitors
7. Criticality monitors
8. Chemistry control
9. Cask set-off shelf energy absorbing pad
10. Effluent air monitoring system instrumentation
11. Water Tower
12. Basin Building Structure covering fuel.

**OUT OF SCOPE -**

1. LAW Vault Intrusion
2. Cladding Vault Intrusion
3. Chillers
4. Process Steam
5. Cask Coolant
6. Basin Filter System
7. Demineralized Water System
8. Ventilation Exhaust System

Sincerely,

Edward W. Secko  
GE-Morris Operation

cc: J. E. Ellis  
C. J. Monetta