

Browns Ferry NRC Demonstration Position Paper

As required under 10CFR72 and submitted in the 72.212 report, each utility is required to demonstrate all aspects of operation of the system they propose to utilize for dry fuel storage. This includes the ability to remove fuel from a stored canister that has been placed in dry storage. TVA proposes to request being excused for certain aspects of dry cask storage mock-up demonstrations.

The following three areas should be considered for exemption from demonstration purposes at Browns Ferry Nuclear Plant.

- Helium Cool-down System Operation
- Canister Welding
- Weld Removal/Canister Cutting

The specific basis for each item requested to be exempted will be explained below. The main premise that is applicable to each of the items is explained first. Part 72 requires the licensee to demonstrate all aspects of the process they propose to use. TVAN is the licensee and as such has demonstrated these activities that are not specifically related to a site location, they are related to the system purchased. TVA has chosen Stone & Webster Construction Inc (SWCI) as the contractor to manage the actual field work associated with the Holtec System for dry fuel storage. The SWCI management team that performed the work for TVA at Sequoyah Nuclear Plant using the Holtec system will be the same performing this work at Browns Ferry. SWCI has a contract with Welding Services Inc (WSI) to provide the welding service for this work. WSI performed the welding for SWCI at Sequoyah on the Holtec system canisters.

Helium Cool-down System Operation

TVA purchased a Holtec helium cool-down system generic for use on BWR and PWR design fuel canisters manufactured by Holtec. This system was assembled at Sequoyah plant, demonstrated during the NRC dry run review and will be the same system used at Browns Ferry. TVA will prepare site specific procedures for use of this system at Browns Ferry but the procedure will be mechanically the same procedure used at Sequoyah. The process and procedure as well as the equipment have been demonstrated. Training people to perform this demonstration does not insure that these individuals would be the ones to actually perform the process because it is anticipated that this system will never be used; if it is used it would most likely be years from the time the canister was placed in service. TVA intends to continue the use of SWCI for dry fuel storage to insure that trained supervision is available should this system ever require use.

Canister Welding

SWCI intends to continue their alliance with WSI for welding of the canisters at Browns Ferry. WSI has agreed with SWCI to provide the same supervisor for the welding operations at Browns Ferry, WSI has further indicated that every attempt will be made to

use the same welders and QC that was used at Sequoyah. TVA's contract for the initial loading at Sequoyah included the Browns Ferry initial campaign as part of the contract award. As such this includes the same approach employed at Sequoyah will be that used at Browns Ferry. SWCI and WSI in addition to using the same management and supervision intend to use the same process, procedures, equipment, and NDE procedures along with a duplicate weld traveler for the Browns Ferry canisters. WSI has completed over 200 dry fuel storage canister closure welds with over 50 being Holtec design.

Weld Removal/Canister Cutting

TVA purchased a canister cutting and weld removal system from the E.H. Wachs Company. This equipment is specifically designed for removal of the vent/drain port covers and main closure weld cutting on Holtec canisters of both the MPC 32 and MPC 68 design. This equipment was demonstrated during the NRC dry run review at Sequoyah on an MPC 68 design canister mock-up (only mock-ups provided by Holtec). It was verified to fit the MPC 32 design for access to the vent/drain ports. TVA will develop Browns Ferry specific procedures for use of this equipment using the template from Sequoyah. The actual mechanics for operating the equipment will be identical to that used at Sequoyah. Training people to perform this work at Browns Ferry is identical to the logic for training people to operate the helium cool-down system as mentioned above. TVA and SWCI both have contracts with the E. H. Wachs Company and in the unlikely event a canister should require cutting we would most likely elect to have them perform this work under the supervision of SWCI and TVA jointly.