

Cox, Mark
From: Schwartz, Geoffrey
Sent: Monday, September 12, 2005 6:41 PM
To: Dacimo, Fred; Rubin, Paul; Ventosa, John; Comiotes, Jim; McMullin, Kathy; Blizzard, Andrea
Cc: Verrochi, Steven; Skonieczny, John; Hinrichs, Gary; Axelson, William L; Mayer, Don; Lavera, Ron; Cox, Mark; Hipschman, Thomas; Sandike, Steven; Vitale, Anthony; Small, Al; Conroy, Pat; Jones, T. R.; Kobbs, Mary; Lee, Liz; Schwartz, Geoffrey
Subject: U2 Pool call crack update and draft ODMI
Attachments: U2SFPWallODMI.doc; U2SPFSouthWallIndicationR2091205.doc

See attached updated White Paper/Action Plan and draft ODMI. The ODMI should be issued tomorrow morning:

Kathy McMullin/Andrea Blizzard: Please note the High-level summary status immediately below.

Summary of the issue and status, and today's today's actions and observations:

(1) High-level summary: Hairline cracks have been found in the south wall of Unit 2 Spent Fuel Pool, with slight moisture in and around the cracking on the west side of the wall (northwest area of Fuel Storage Building loading bay). The cracking was uncovered during removal of soil for the dry cask storage project and is typical of shrinkage cracks that form during concrete curing. The moisture is very slight and radioactivity levels and contamination in and around the cracking is very low. The condition has been evaluated by Structural Engineering and the Spent Fuel Pool is structurally sound. The source of the moisture is under investigation by a cross-discipline team, using various data gathering and analysis techniques and operating experience.

(2) Today's actions/observations:

(i) Team meeting and conference calls with ConEd personnel (L. Villani and A. Homyk). L. Villani was Civil/Structural Design Supervisor at the time of the 1990-1992 Unit 2 Spent Fuel Pool liner leak (east side of pool, 89 foot elevation) investigation and repair. The calculation to demonstrate that the rebar was not degraded due to this leak has been retrieved. These personnel also stated that the indications external to the pool wall at the time included boron "stalagmites" and significantly higher than background on-contact radiation levels. This information is provided here simply as an informal (not meant to draw conclusions) comparison to the current situation, in which boron visible (balls or other formations) deposits have not been detected and radiation levels are low.

(ii) Some soil and rock was removed beneath the area of the moist crack for sampling purposes and another moist crack was observed below the first one. The upper (first) crack is at approximately 64.5 foot elevation and the second crack is approximately three feet below the first. The moisture observed is similar, a small amount in and around the crack. The characteristics (length, horizontal orientation, very narrow) are also very similar.

Information in this record was deleted
in accordance with the Freedom of Information
Act, exemptions 4 & 6
FOIA-2005-0369

D-3

(iii) Visual inspection of the (upper) crack at 64.5 foot elevation indicates the amount of moisture, compared to last week, is declining. A plastic covering was placed over the crack Friday, and this morning very little liquid was found in the plastic (not enough for meaningful radiochemistry analysis).

(iv) A Challenge Meeting was held this afternoon and observed by a member of the Resident's Office. The panel members were the General Manager of Plant Operations, Site Operations Manager, and Planning/Scheduling/Outage Manager. Representing the project team were the Manager of Dry Cask Storage and Supervisor of radiological Engineering. Also present were the Director of Special Projects, and the Licensing Supervisor. Additional actions that will be taken based on this meeting include contacting JAF for OE on pool liner leakage, preparation of an ODMI, request for a fleet engineering call on 9/13, daily updates at the 8:30 morning meeting, and designation of a lead for this issue other than the Manager of Dry Cask Storage so that he can better focus on the overall project.



U2SFPWallODMI.doc (91 KB)



U2SFPSouthWallIndicationR20912...

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Page [] Cell []

Ex. 6

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EN-OP-111 – OPERATIONAL DECISION-MAKING ISSUE (ODMI) PROCESS

Attachment 9.2 – ODMI Implementation Action Plan (fill-in form)

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***Title:** Moist hairline cracks in Unit 2 Spent Fuel Pool south wall.

***Subject / Issue:** Moist hairline cracks were found at and approximately 64.5 feet and 61.5 feet on the loading bay side of the Unit 2 south Spent Fuel Pool wall, in the northwest corner of the loading bay.

Revision No. 0

Revision Date 9/12/05

***CR #** IP2-2005-0557 ***Date CR Assigned as ODMI** 9/8/05


***Responsible Manager (RM):** John Ventosa

***Responsible Individual (RI):** John Skonieczny

***Assigned Team Members:** Geoff Schwartz (Manager of Dry Cask Storage), Don Mayer (Director of Special Projects (and Health Physics)), Bill Axelson (Supervisor of Radiological Engineering), John Skonieczny (Civil/structural Engineer), Ron Lavera Radiological Engineer), Steve Sandike (Chemist).

***Scope / Purpose of Plan:** (attach additional sheets as needed) Monitor moisture and radiochemistry to determine if there could be an active Spent Fuel Pool liner leak and if it is degrading.

***Identification of Consequences / Details on Solution Evaluation:** (include action checklist and attach additional sheets if needed) The moisture in and near the upper crack, the concrete in the crack, and soil adjacent to the crack have been sampled and analyzed for radiochemistry. Low levels of Cs-134, Cs-37, Co-60, and Boron have been detected. The ratio of Cs-134 activity to Cs-137 indicates the activity is approximately 11 years old. Soil samples have been sent to an off-site laboratory to test for Tritium (H-3), and results are expected 9/14/05. The moisture is so slight that not enough has been collectible to perform radiochemistry analysis for H-3. Visual inspections are being conducted daily and no degradation in the moisture (i.e., increasing amount) has been detected. Two openings [] were made in the area of the crack (just to the rebar) and the rebar was in good condition. Structural Engineering has inspected the cracks and deemed them to be typical shrinkage cracks that form during concrete curing. Ex. 4

[] Due to the thickness of the wall, amount of heavy rebar, and lack of degradation in moisture, the Spent Fuel Pool wall is  considered structurally sound.

***Specific Actions / Procedures used / Owners / Due Dates:** (attach additional sheets as needed) (1) Daily visual inspections by Responsible Engineer J. Skonieczny. (2) Surveying and radiochemistry analysis of crack area at least weekly by Health Physics (R. Lavera). (3) Obtain H-3 sample radiochemistry results from off-site laboratory (B. Axelson). (4) Operations continue normal pool makeup and observe for any noticeable change in frequency or amount.

***Compensatory Measures required:** (attach additional sheets as needed) No compensatory measures are necessary at this time. There is no impact on any system that supports safe reactor plant power operation. Continue standard radiological controls in affected area.

EN-OP-111 – OPERATIONAL DECISION-MAKING ISSUE (ODMI) PROCESS

Attachment 9.2 – ODMI Implementation Action Plan (fill-in form)

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***Contingencies based on Consideration of Potential Events / Failures:** (attach additional sheets as needed) None at this time.

***Trigger Point(s):** (attach additional sheets as needed) (1) Degradation in moisture amount in and around cracks; (2) Cs-134 to Cs-137 ratio decreases approaching 2.0; H-3 radiochemistry analysis results indicative of H-3 concentration in pool (i.e. indicative of active liner leak); (4) Noticable change in pool makeup amount or frequency.

***Abort and Hold Criteria:** (attach additional sheets as needed) None.

***Actions if Trigger Point(s) exceeded:** (attach additional sheets as needed) Inform Shift Manager, and Manager of Dry Cask Storage G. Schwartz (contact numbers in Outlook). Manager of Dry Cask Storage inform Director of Engineering and Licensing Manager. Shift Manager inform Unit 2 operational management chain of command up to and including Site Vice President.

***Any New / Revised Procedures Needed:** (be specific as to those procedures / rev #'s impacted) None.

***Ops / Staff Preparation Required (Simulator training fidelity, use of mockups, etc.):** None.

***Current Status of Plan:** (add this as needed as activities updated for report out to CRG) See attached.

***References consulted:** (attach as necessary) Reports and records from (1) Surry NPP Unit 1 Spent Fuel Pool liner leak; (2) IP2 1990-92 Spent Fuel Pool liner leak; (3) Test Report from 1979-1987 FP&L experiment to determine corrosion rates for concrete reinforcement subjected to boron environment.

***Communications Plan:** (attach additional sheets as needed) Daily written status reports will be submitted to the management chain of command, NRC Resident's Office, and a summary to the Site Manager of Communications.

***Monitoring Activities:** (attach additional sheets as needed) See above.

***Conclusion / Summary:** (attach additional sheets as needed) Source of moisture is not conclusively known at this time. Results of H-3 testing will be reviewed and further testing methodology including intrusive tests, if required, will be determined following that review.

***SUBMITTED:**

Responsible Individual: J. Skonieczny /
signature date

Responsible Manager: J. Ventosa /
signature date

EN-OP-111 – OPERATIONAL DECISION-MAKING ISSUE (ODMI) PROCESS
Attachment 9.2 – ODMI Implementation Action Plan (fill-in form)

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***APPROVALS:** (Operations Mgt is mandatory to approve all ODMI plans):

_____	_____
signature	date
_____	_____
signature	date

Hairline Crack in IPEG Unit 2 Spent Fuel Pool South Wall
Revision 2, 9/12/05

Ex.
4

Background

IPEC is in the process of implementing dry cask storage capability for Unit 2.
This requires that the Fuel Storage Building (FSB) loading bay floor be removed

and replaced with a significantly more substantial structure. The original floor has been removed, and excavation of soil and rock in the loading bay is in progress. During removal of loose soil and rocks in the north area of the loading bay (along the SFP south wall), approximately horizontal cracks were exposed at an elevation of approximately 65 feet, and an approximately vertical crack above. The cracks are very narrow (less than 1/64-inch wide). One of the cracks, on the west side of the south SFP wall, has moisture in and near it.

SFP wall structure

In the area of the crack,

The cracks have been visually inspected by an IPEC civil/structural engineer, and the IPEC Supervisor of Civil/Mechanical Engineering. The condition is typical of cracking due to shrinkage during post-construction concrete curing. The moisture in and around one of the cracks is very slight, essentially a film which is not dripping or beading. The moisture has been analyzed and found to contain trace amounts of Cesium 134 and 137, Cobalt-60, and Boron. The Boron concentration is about 6 to 15 times less than the concentration in the SFP, and the ratio of Cesium-134 to 137 indicate the activity is about 6 to 10 years old. The crack has calcium stains emanating from it, as is expected when moisture leaches through concrete, and no visual evidence of steel corrosion products (rust). Due to the thickness of the SFP wall, amount of steel reinforcement, and lack of evidence that the small amounts of moisture and boron have caused corrosion of the reinforcing rods, there is reasonable assurance that the SFP wall is structurally sound and capable of performing it's intended function.

Ex. 4



Potential sources of moisture

The moisture in and around the crack could be from one or a combination of several sources.

1. A leak, either active or in the past, through the SFP stainless steel liner,

and leach through the wall into the crack.

Ex. 4

- a. The Unit 2 SFP does not have a leak detection system. Usually such a system consists of a drain path

(Unit 3 has such a leak detection system). The Unit 2

Ex. 4

An active leak, depending on it's age and volume, could be determined when it develops by a change in frequency of pool water make-up and/or a change in pool boron concentration. A discussion with Unit 2 licensed operators

indicated the frequency of make-up has not changed, other than that expected due to seasonal changes in pool water evaporation rate, and as a separate attachment to this paper, a trend graph of boron concentration in Unit 2 SFP is attached indicating no unexpected/unexplained loss of boron. However, due to the lack of a leak detection system, and the large volume of pool water normally lost due to evaporation, a small liner leak could go undetected.

- b. Based on isotopic ratios and radionuclide type, the existence of radionuclides such as Cesium and Tritium in the moisture could provide an indicator of whether there is an active leak, or whether the moisture source could have been from a since-repaired liner leak. Soil and moisture samples are being collected and will be sent to a laboratory for analysis which can detect the presence of Tritium.
2. Contamination of the soil in the FSB loading bay, above and adjacent to the moist crack, and subsequent entry of contaminated liquid into the crack due to hydraulic pressure from the loading bay side.

Historical information

1. In the northeast area of the SFP stainless steel liner at about the 89 foot level, a small hole occurred during a 1990 pool re-racking project. The damage was discovered in 1992 when boron powder was found on the SFP east exterior wall. During subsequent radiological recovery and repair of the hole, outside soil adjacent to the SFP east wall was found to contain Antimony-124 and 125, and Cesium-137. Approximately 100 55-gallon barrels of soil, down to a depth of eight feet below grade (72 foot level) required remediation. The leakage through the hole in the pool liner was estimated to have been 20-30 gallons per day, which was unnoticed due to the much large volume of normal evaporative loss from the pool.
2. The original loading bay floor had a drain system (see attached elevation sketch), above and adjacent to the area of the moist crack, which was piped through the wall separating the FSB loading bay and SFP heat exchanger room to a sump in the heat exchanger room. When the floor was removed in 2004 for the dry cask storage modifications, the drain pipe was found to be cracked, and the wall penetration through which the drain pipe was installed was found to be unsealed. Discussions with personnel who were working at Unit 2 at the time indicated that in years past, the level in the sump rose above the drain pipe penetration. This, along with the cracked pipe, resulted in contamination of the soil beneath the floor. Contamination of this soil, primarily in the northwest area of the loading

bay, was found and remediated during excavation in 2004 and 2005 for the dry cask storage project.

3. From 2003 through 2005, various activities associated with the dry cask storage project in the area above and adjacent to the crack required the use of water as a dust-inhibiting and cooling measure, which was allowed to drain into the FSB loading bay soil. These activities included core-boring, saw cutting of the original loading bay floor, and excavation. Six core-bore samples, to a depth of greater than 20 feet, were taken in the FSB loading bay (four cores), and FSB access roadway (2 cores) in 2003 during the dry cask storage engineering study activities.

Industry operating experience

In September 2002 the Salem nuclear plant found evidence of contaminated water leaking through a wall and onto the floor of the auxiliary building. This leak was found as a follow-up to unexpected shoe contaminations. There were other leaks through walls and penetrations that appeared to be originating from the Unit 1 SFP. It was determined that the tell-tale drains for the SFP were plugged with debris, so there was a build up of hydrostatic pressure between the liner and concrete wall. This caused the leakage to find alternative through-wall paths. When these drains were cleaned, the leakage flowed to a collection system, essentially terminating the through wall leakage. The pool leakage was then identified via the drain system. This pool leakage occurred for an indeterminate time.

Salem conducted sampling and analysis of the environment surrounding Unit 1 FSB, in a phased approach, to identify potential release of the water outside the building confines. On February 6, 2003, Salem found tritium (H-3) contamination in close proximity to the Unit 1 FSB. By now the tell-tale drains were functioning, so the through wall leakage had stopped. Salem reviewed other spills that could have contributed to the tritium contamination.

Salem performed test core borings in various site locations and initially identified five areas with varying tritium contamination levels. 37 well locations were installed around the site to better characterize the extent of contamination, and 30 of the areas found some tritium contamination. There were no locations that found tritium in unrestricted-access areas

Action Plan

The following actions are being implemented to aid in determining the source of moisture, potential amount and extent of related soil contamination, conclusions, and remediation/repair plan and schedule.

1. The IPEC Manager of Dry Cask Storage (G. Schwartz, x6684) has overall responsibility for executing this plan, updating it, and keeping senior management, NRC, and Unit 2 Shift Manager informed daily. The IPEC Director of Special Projects (D. Mayer, x5521) who has responsibility for Health Physics Department) will assist.
2. (Manager of Dry Cask Storage) Issue Condition Report and submit Operability Evaluation information to Shift Manager. **Complete. CR-IP2-2005-03557.**
3. (Manager of Dry Cask Storage) Prepare Operational Decision Making Issue (ODMI). **Target to issue ODMI 9/13/05.**
4. (Radiological Waste Department) Take radiological samples at damp crack, and take dirt samples from where excavation material was placed. **Results (ND = None Detected):**

Sample Date-time	Location	Type	Co-60 uCi	Cs-134 uCi	Cs-137 uCi
9/1/05 10:00 AM	N. Wall at leak	Large Area Smear	ND	3.03E-07	1.92E-03
9/1/05 10:12 AM	N. Wall at leak	Large Area Smear	ND	6.24E-04	4.64E-03
9/1/05 12:00 PM	N. Wall at leak	Large Area Smear	ND	ND	1.68E-03
9/1/05 2:00 PM	N. Wall at leak	Scraping of wall	2.22E-03	5.06E-03	8.07E-02
9/2/05 1:30 PM	N. Wall at leak	Large Area Smear	ND	ND	1.17E-03
9/2/05 1:30 PM	N. Wall at leak	Large Area Smear	ND	ND	1.17E-03
9/7/05 1:00 PM1	Outside MOB Dirt on Hill area	Dirt	ND	ND	8.75E-08
9/7/05 1:00 PM2	Outside MOB Dirt on Hill area	Dirt	ND	ND	ND
9/7/05 1:00 PM3	Outside MOB Dirt on Hill area	Dirt	ND	ND	1.03E-07
9/7/05 1:00 PM4	Outside MOB Dirt on Hill area	Dirt	ND	ND	5.61E-07
9/8/05 10:00 AM4	Outside MOB Dirt on Hill area Re-sample	Dirt	ND	ND	2.18E-07

5. (Civil-structural Engineering) Determine rebar location in relation to cracks, using a rebar detection device. **Completed 9-7-05. Rebar is [] to cracks.**
- Ex. 4 6. (Radiological Waste Department/Civil-structural Engineering) Hand-drill (small diameter bit) several inches into the SFP wall in the area of the moist crack and analyze drill-bit finds for contamination. **Completed 9-7-05. Finds appeared to be damp in first several inches of depth, then appeared to be dry. Results:**

<u>Sample of Hole Drilled In North FSB Wall</u>	<u>pH</u>	<u>Co-60 uCi/gm</u>	<u>Cs- 134uCi/gm</u>	<u>Cs-137 uCi/gm</u>	<u>Iron ppm</u>	<u>Boron ppm</u>
Base line	11.74	ND	ND	ND	96	159
First 2" (0-2") of crack	10.7	8.31E-05	2.65E-05	1.65E-03	628	72

Second 2" (2-4") of crack	11.46	4.04E-05	1.39E-05	8.46E-04	640	56
Third 2" (4-6") of crack	11.75	1.02E-05	ND	1.27E-04	3285	28
Fourth 2" (6-8") of crack	11.79	ND	ND	1.75E-05	60	226

7. (Radiological Waste Department) Place a plastic covering over the moist crack to attempt to capture of a larger volume of liquid for radiochemistry analysis. Plastic installed 9-7-05 and left in place 24 hours. Collected approximately 2 mL of liquid, which was insufficient for Tritium detection. Plastic reinstalled and left over weekend of 9/10 to 9/11/05, with moisture collected still insufficient.
8. (Chemistry Department) Sample the soil beneath the area of the crack for H-3. Sample collected, sent off-site to laboratory for Tritium analysis 9/9/05 - results expected by 9/14/05 or earlier. Other analysis results:

Sample Date	Location		Co-60 uCi/gm	Cs-134 uCi/gm	Cs-137 uCi/gm
9/6/2005	Against North Wall below Leak	Dirt	1.05E-05	3.98E-06	2.92E-04
9/6/2005	1 ft from N. Wall Below Leak	Dirt	1.15E-06	ND	1.61E-05
9/6/2005	2 ft from N. Wall Below Leak	Dirt	2.42E-07	ND	5.07E-07
9/6/2005	3 ft from N. Wall Below Leak	Dirt	ND	ND	1.19E-07
9/8/2005	Against North Wall below Leak 1 ft depth	Dirt	5.90E-06	3.54E-06	1.63E-04
9/8/2005	1 ft from N. Wall Below Leak 1 ft depth	Dirt	1.19E-06	1.82E-07	1.09E-05
9/8/2005	2 ft from N. Wall Below Leak 1 ft depth	Dirt	ND	ND	9.44E-08
9/8/2005	Against North Wall below Leak 2 ft depth	Dirt	1.38E-05	1.43E-05	6.00E-04
9/8/2005	2 ft from N. Wall Below Leak 2 ft depth	Dirt	ND	ND	ND

9. (Chemistry Department) Scrape material from an unaffected area of the SFP wall and test for boron content. Used dry finds from drilling (see above table).
10. (Civil/structural Engineering) Determine the typical level of boron in clean concrete. Attempted, no information available.
11. (Civil/structural Engineering) Determine expected corrosion rates for steel reinforcing rods subjected to an environment containing boron. Calculation being performed using pH of SFP wall concrete based on samples taken, and using baseline results published in Florida Power & Light Test report P522-1471 of 1987 (Long-term Concrete Rebar

Test) regarding corrosion rates for rebar in a liquid-boron environment. Calculation targeted for completion 9-13-05. Similar calculation completed for SFP liner leak of 1990-92, determining no significant rebar degradation, has been recovered and is being reviewed.

- Ex. 4
12. (Licensing Department) Gather historical written records on SFP stainless steel liner damage and SFP sump overflows. Some Liner damage information recovered, search ongoing. L. Villani, Civil/Structural Engineering Supervisor (ConEd employee) at the time was consulted 9/12/05. Stated that boron formation on east exterior pool wall was significant ("stalagmites") and radiation on contact was significantly above background.
 13. (Civil/structural Engineering) Arrange a ground-penetrating radar (GPR) inspection (or other methodology) of the crack to determine (if possible) crack depth. GPR determined not feasible. Two 4-inch diameter cores, [] were taken 9-8-05 in the area of the moist crack. One appeared to be dry on 9-8-05 and it is presumed this was affected by boring bit heating. 24 hours later on 9-9-05 it was damp. The rebar exhibits normal surface oxidation. Visual inspection on 9/12/05 appears to indicate moisture is lessening.
 14. (Chemistry Department) Determine if a Unit 2 Spent Fuel Pool Integrity Evaluation from Tritium Measurement, was performed, similar to that performed for Unit 3. Not performed for Unit 2. TBD whether to perform this, as it requires a lengthy period of data collection.
 15. (Radiological Waste Department) Gather radiological results of test core borings accomplished for dry cask storage inside FSB loading bay (4) and in FSB loading bay access road in 2003. Completed. Low-level surface contamination was found consisting of Cs-134, Cs-137, Co-58 and Co-60.
 16. (Manager of Dry Cask Storage) Bring in expert structural engineer from ABS Consulting with past experience in SFP leakage. Arrived 9/12/05. Drafting calculation referred to above.
 17. (Manager of Dry Cask Storage) Issue final version of this paper with conclusions and physical actions (as deemed necessary, such as repairs, test wells, etc.) and schedule. Target 9-23-05.

Summary as of 9/12/05

Due to the thickness of the SFP wall, amount of steel reinforcement, and lack of evidence that the small amounts of moisture and boron have caused corrosion of the reinforcing rods, there is reasonable assurance that the SFP wall is structurally sound and capable of performing it's intended function.

The data collected so far is inconclusive. The next key event is results of Tritium testing.

Some soil and rock was removed 9/12/05 beneath the area of the moist crack for sampling purposes and another moist crack was observed below the first one. The upper (first) crack is at approximately 64.5 foot elevation and the second crack is approximately three feet below the first. The lower crack characteristics (hairline, roughly horizontal, length, moisture) observed is very similar to the upper crack. Visual inspection of the (upper) crack at 64.5 foot elevation indicates the amount of moisture, compared to last week, is declining. A plastic covering was placed over the crack on 9/9/05, and on 9/12/05 very little liquid was found in the plastic (not enough for meaningful radiochemistry analysis). A Challenge Meeting was held 9/12/05 and observed by a member of the

Resident's Office. The panel members were the General Manager of Plant Operations, Site Operations Manager, and Planning/Scheduling/Outage Manager. Representing the project team were the Manager of Dry Cask Storage and Supervisor of Radiological Engineering. Also present were the Director of Special Projects, and the Licensing Supervisor. Additional actions that will be taken based on this meeting include contacting JAF for OE on pool liner leakage, preparation of an ODML, request for a fleet engineering call on 9/13, daily updates at the 8:30 morning meeting, and designation of a lead for this issue other than the Manager of Dry Cask Storage so that he can better focus on the overall project.

Attachments (See Rev.1 issue of this paper dated 9-9-05)

Elevation sketches (2)
Moist crack photograph
Unit 2 SFP Boron graph
Core bores photograph