

From: N. Kaly Kalyanam
To: Thomas Hiltz
Date: 09/20/2007 9:26:41 AM
Subject: SONGS 2 and LAR - Request to revise Fuel Storage Pool Boron Concentration - TAC Nos. MD1405/MD1406

Tom,

Three technical branches (SRXB, EMCB, and SBPB) had provided the SE input for the subject license Amendment request from SONGS.

The SBPB SE dated March 1, 2007 (ADAMS Accession No. ML070570428) has the following paragraph:

"The NRC staff, in a safety evaluation dated October 25, 1996, accepted Westinghouse Owners Group Topical Report WCAP-14416-P in licensing applications to credit soluble boron in SFP criticality analyses. The review and acceptance of WCAP-14416-P focused on the methodology whereby credit could be taken for soluble boron in the SFP to meet NRC recommended criterion stated previously. All licensee's proposing to use this method for soluble boron credit were advised to identify potential events which could dilute the SFP soluble boron to the concentration required to maintain the 0.95 k-effective limit. They were also advised to quantify the time span of these dilution events to show that sufficient time is available to enable detection and mitigation of any dilution event. Southern California Edison (SCE) used the approved methodology of Topical Report WCAP-14416-P by quantifying time available to identify and mitigate potential boron dilution events at SONGS Units 2 and 3. This was reported to the NRC by SCE in its application letter for this license amendment request dated April 28, 2006, and is the subject of this safety evaluation."

When SRXB reviewed the "complete" SE, the reviewer, Mr. Summer Sun, pointed out the following statement in NRC letter to Westinghouse dated July 27, 2001 (ADAMS No. ML012080337):

"Westinghouse's approach to resolving this issue was to seek to identify conservative reactivity margins to compensate for the nonconservatism in calculated burnup bias and to re-analyze (calculate) the axial burnup biases on a plant-specific basis. Although this approach may lead to sufficient margin to account for the identified non-conservatism(s) on a plant-specific basis, it departs from the Westinghouse methodology approved in WCAP-14416-NP-A. Therefore, the staff concludes that the methodology of WCAP-14416 can no longer be relied upon as "approved methodology" by the NRC staff or the licensees. For future licensing actions, licensees will need to submit plant-specific criticality calculations for spent fuel pool configurations that include technically supported margins."

Since the licensee for SONGS had submitted " plant-specific criticality calculations for spent fuel pool configurations that include technically supported margins," Summer suggested removal of the above paragraph from the SBPB SE.

I discussed this change with Mr. D. Harrison, Branch Chief for SBPB and he

agreed with Summer's suggestion and removal of the specific paragraph from SBPB's input to the SE. He also stated there will be no need for concurrence by him. I told Donnie I will docket this email for posterity.

Thanks

N. (Kaly) Kalyanam
PM, SONGS 2 and 3

CC: Donald Harrison; Gregory Cranston; Summer Sun

Mail Envelope Properties (46F27511.652 : 14 : 35268)

Subject: SONGS 2 and LAR - Request to revise Fuel Storage Pool Boron Concentration - TAC Nos. MD1405/MD1406
Creation Date 09/20/2007 9:26:41 AM
From: N. Kaly Kalyanam
Created By: NXK@nrc.gov

Recipients

nrc.gov
OWGWPO03.HQGWDO01
GVC CC (Gregory Cranston)

nrc.gov
OWGWPO04.HQGWDO01
DGH CC (Donald Harrison)
TGH (Thomas Hiltz)

nrc.gov
TWGWPO02.HQGWDO01
SBS CC (Summer Sun)

Post Office

OWGWPO03.HQGWDO01
OWGWPO04.HQGWDO01
TWGWPO02.HQGWDO01

Route

nrc.gov
nrc.gov
nrc.gov

Files	Size	Date & Time
MESSAGE	3721	09/20/2007 9:26:41 AM

Options

Expiration Date: None

Priority: Standard
ReplyRequested: No
Return Notification: None

Concealed Subject: No
Security: Standard