From: "Sokolsky, David" <DDS2@pge.com>
To: "John Hickman" <JBH@nrc.gov>
Date: 12/21/2007 6:04:16 PM
Subject: FW: 2 More Questions

John,

I previously sent you information related to decommissioning costs. Below are answers to your questions related to the spent fuel pool.

Your e-mail stated: "you propose to delete TS 5.6.3, "Fuel Storage Pool Water Chemistry Program," entirely. However, the TS specifies controls for monitoring fuel storage pool water chemistry to minimize the potential effects of corrosion which could affect the safe storage of irradiated fuel, and to minimize the potential dose to the public due to release of fuel storage pool water to groundwater. What is your history of pool leakage? When do you plan on draining the pool and/or will the contaminated (tritiated?) pool water be replaced with uncontaminated water? Does the liner mitigate releases sufficiently that this requirement is redundant?"

Q: What is your history of pool leakage?

A: There was evidence in the early 1960's of leakage from the pool, when Zn-65 was detected in the groundwater monitoring wells around the spent fuel pool. In the mid-1960's HBPP installed the current liner. Control of the liner level (below both the spent fuel pool level and the groundwater level) was incorporated into the tech specs in the 1980's, and the monitoring wells have not detected any leakage from the pool. This liner level water is sampled and trended to provide an early indication of liner failure in the SFP.

PG&E Letter HBL-01-011, dated October 31, 2001, requested revising and reformatting the then-current tech specs into standardized Permanently Defueled Technical Specifications. Enclosure G of letter HBL-01-011, provides an explanation of the purpose of the spent fuel pool water chemistry program. Enclosure G states that "if there is a failure of the liner, the potential releases (from the spent fuel pool) will be minimized." Thus, we added the tech spec statement "and to minimize the potential dose to the public due to release of fuel storage pool water to groundwater" in case of a liner failure.

Q: When do you plan on draining the pool and/or will the contaminated (tritiated?) pool water be replaced with uncontaminated water?

A: We plan to keep water in the pool until the reactor vessel is inspected, approximately 3 years after spent fuel is transferred into the ISFSI. However, we will replace the existing tritiated pool water with uncontaminated water shortly after spent fuel is transferred into the ISFSI to minimize the consequences if SFP leakage to groundwater occurs. The current plans are to perform a feed and bleed operation with the SFP water to reduce the tritium concentration in the SFP. The water released from the SFP will be processed through liquid radwaste and the release of this tritium will be accounted for by the methodology in our current ODCM.

Q: Does the liner mitigate releases sufficiently that this requirement is redundant?

A: The liner, and maintaining the liner gap level less than pool and groundwater levels, reduces the potential for groundwater releases from the spent fuel pool. In addition, one of the purposes of the water chemistry control program is to prevent corrosion of the spent fuel, and because the spent fuel will be removed, the water chemistry control program will no longer be needed.

I hope this resolves the NRC concerns. Let me know if you need additional clarification.

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-----Original Message-----
From: John Hickman [mailto:JBH@nrc.gov]
Sent: Wednesday, December 19, 2007 8:30 AM
To: Sokolsky, David
Subject: 2 More Questions

Dave,

Related to your issue with the decommissioning funding data on the NRC web site. Could you forward to me a link to the specific site with the bad data? Also, I assume that the current best source of data is the last decommissioining funding report you sent in. If not, let me know where to get the data.

Also, related to the delete ops and admin request; you propose to delete TS 5.6.3, "Fuel Storage Pool Water Chemistry Program," entirely. However, the TS specifies controls for monitoring fuel storage pool water chemistry to minimize the potential effects of corrosion which could affect the safe storage of irradiated fuel, and to minimize the potential dose to the public due to release of fuel storage pool water to groundwater. What is your history of pool leakage? When do you plan on draining the pool and/or will the contaminated (tritiated?) pool water be replaced with uncontaminated water? Does the liner mitigate releases sufficiently that this requirement is redundant?

Thanks
John

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Subject: FW: 2 More Questions
Creation Date 12/21/2007 6:03:28 PM
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OWGWPO04.HQGWDO01
JBH (John Hickman)

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Expiration Date:	None
Priority:	Standard
ReplyRequested:	No
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Concealed Subject:	No
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Message is eligible for Junk Mail handling
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