

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-137, 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 four inches in depth 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. The Spent Fuel Pool wall has a single construction joint, at 75 feet. The Spent Fuel Pool wall in the area of the cracks is four feet thick. 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.

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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) Noticeable 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

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

_____	_____
signature	date
_____	_____
signature	date