

ATTACHMENT I

PROPOSED TECHNICAL SPECIFICATION CHANGES

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Power Authority of the
State of New York
May, 1978

- B. If any of the specified limiting conditions for refueling are not met, refueling shall cease until the specified limits are met, and no operations which may increase the reactivity of the core shall be made.
- C. During fuel handling and storage operations, the following conditions shall be met.
1. Radiation levels in the spent fuel storage area shall be monitored continuously whenever there is irradiated fuel stored therein. If the monitor is inoperable, a portable monitor may be used.
 2. The spent fuel cask shall not be moved over any region of the spent fuel pit which contains irradiated fuel. Additionally, if the spent fuel pit contains irradiated fuel, no loads in excess of 2,000 pounds shall be moved over any region of the spent fuel pit, except when the capsule T specimen is being moved in and out of the pool, in which case a 20,000 pound limit will be allowed for the sole purpose of lifting the cask and specimens.
 3. During periods of spent fuel cask or fuel storage building cask crane movement over the spent fuel pit, or during periods of spent fuel movement in the spent fuel pit, when the pit contains irradiated fuel, the pit shall be filled with borated water at a concentration of ≥ 1000 ppm.
 4. Whenever movement of irradiated fuel in the spent fuel pit is being made, the minimum water level in the area of movement shall be maintained 23 feet over the top of irradiated fuel assemblies seated in the storage rack.
 5. Hoists or cranes utilized in handling irradiated fuel shall be dead-load tested before fuel movement begins. The load assumed by the hoists or cranes for this test must be equal to or greater than the maximum load to be assumed by the hoists or cranes during the fuel handling operation. A thorough visual inspection of the hoists or cranes shall be made after the dead-load test and prior to fuel handling.

ATTACHMENT II

SAFETY EVALUATION

Power Authority of the
State of New York
May, 1978

Safety Evaluation

Limits Over the IP3 Spent Fuel Pit

Section I - Description of the Proposed Modification

The Power Authority plans to move the capsule T specimen cask in and out of the Spent Fuel Pit

Technical Specification 3.8; Refueling, Fuel Handling and Storage; Section C.2 states "...if the Spent Fuel Pit contains irradiated fuel, no loads in excess of 2,000 pounds shall be moved over any region of the Spent Fuel Pit."

Since the specimen cask weighs approximately eight tons (16,000 pounds) it will be necessary to change the requirements of TS3.8.C.2.

Section II - Purpose of the Modification

The modification is proposed to allow for removal of specimens which must be tested in accordance with 10CFR50, Appendix G, Fracture Toughness Requirements.

Section III - Impact of Change on FSAR

A review of the FSAR and SER accident analyses indicates that there are no changes to the parameters and assumptions used, and that the conclusions reached are unchanged, as a result of this modification. The proposed change involves a load handling operation similar to one analyzed in the FSAR.

As indicated in the Safety Evaluation Report, Section 9.1.4, pg. 9-7, dated September 21, 1973, mechanical stops in the overhead bridge crane, which can only be removed by administrative control, assure that movement of a cask by the fuel storage building crane is confined to certain areas, thereby avoiding travel over the spent fuel storage area.

The only possible occurrence of a different type than any previously evaluated in connection with the Spent Fuel Handling System involves the likelihood of a heavy load impacting fuel in the pool. This item is under generic review by NRC as reported in the safety evaluation corresponding to Amendment No. 13 to FOL DPR-64. However, for the first refueling at IP3 the Power Authority proposed to utilize the fuel racks opposite the cask loading area. This commitment would effectively eliminate the possibility of a heavy load handling accident causing damage to the stored fuel (in view of the existing administrative controls). The Technical Specification prohibiting the movement of loads in excess of 2,000 pounds over any area of the pool may be waived for this particular instance without creating an unreviewed safety question until NRC completes its generic review.

Section IV - Implementation of Modification

The modification as proposed will not impact the ALARA and Fire Protection Programs. Failure to incorporate this modification will result in an increase to personnel exposure since the radioactive specimens would have to be raised above the Spent Fuel Pit for placement inside the cask.

Section V - Conclusions

(a) The probability of occurrence or the consequences of an accident of malfunction of equipment important to safety previously evaluated in the safety analysis report has not been increased; (b) a possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis reports has not been created; and (c) the margin of safety as defined in the basis for any technical specifications is not reduced.

Section VI - References

- (a) IP3 FSAR
- (b) IP3 Safety Evaluation Reports.