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 70-2917 Tennessee Valley Authority, Chattanooga, TN, 07002917  
 70-2941 Tennessee Valley Authority, Chattanooga, TN, 07002941

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SUBJECT: Requests exemption from 10CFR70.51(d) re conduct of physical inventories at intervals not to exceed 12 months of SNM.

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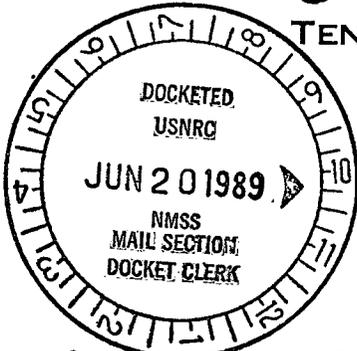
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TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401  
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JUN 13 1989



U.S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
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Gentlemen:

In the matter of the  
Tennessee Valley Authority

) Docket Nos. 70-2917  
) 70-2941

BELLEFONTE NUCLEAR PLANT (BLN) - REQUEST FOR AN EXEMPTION FROM 10 CFR 70.51(d)

BLN is required by 10 CFR 70.51(d) to conduct physical inventories at intervals not to exceed 12 months of all special nuclear material (SNM) in its possession under NRC licenses SNM-1865 (BLN1) and SNM-1883 (BLN2). TVA hereby requests an exemption, in accordance with 10 CFR 70.14, to allow the use of tamper-indicating Type E seals to secure the nuclear fuel assembly storage areas at BLN instead of conducting annual physical inventories.

TVA notified NRC by letter dated July 29, 1988, that BLN was in a construction deferred status and as a result, fuel is expected to remain in storage for the immediate future. The 410 nuclear fuel assemblies stored at BLN were received between February 1980 and October 1981, and they are stored in fuel storage racks in the new fuel storage vault (NFSV) and the unit 2 spent fuel storage pool (SFSP). The assemblies have not been moved since receipt. The assemblies are stored dry and individually encased in translucent plastic bags to maintain cleanliness. Within each storage area, the fuel storage racks themselves are covered by plastic. A physical inventory involves movement of individuals on top of the fuel storage racks to remove the plastic so that assembly identification numbers can be read. Approval of this exemption request will eliminate the risk of personnel injury, particularly during SFSP inventories.

The NFSV is located on the fuel handling floor and is covered by three metal covers. A metal bar is laid perpendicularly across the middle of all three covers. This bar is locked in place at each end by a hasp and padlock. Seals will be added to these two hasps to secure the NFSV. Both seals will be accessible from the fuel handling floor.

The unit 2 SFSP area can be entered from the fuel handling floor via two personnel doors or a steel garage-style rollup door or, from the unit 2 reactor containment area, by two fuel transfer tubes which lead into the unit 2 reactor containment area. The garage-style rollup door already has a hasp and padlock in place on the inside of the SFSP area. A hasp and padlock will be added to the outside of the SFSP area to the main personnel entry door into the SFSP area. Another hasp and padlock will be added to the other personnel door but this time on the inside of the SFSP area. The two fuel

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transfer tubes are closed by gates inside the SFSP area lowered into place by shafts turned by valve wheels. These valve wheels, along with the top half of the shafts, are removable and are stored in a room within the SFSP area. This room can only be entered from the inside of the SFSP area, and a hasp and padlock will be added to the door to this storage room. Seals will be added to these four hasps (one on each personnel door, the garage-style rollup door, and the one on the door to the storage room) to secure the SFSP area. However, with this arrangement, only one seal will be accessible from the fuel handling floor.

These three seals (one on each hasp at the ends of the metal locking bar over the NFSV and the one on the hasp on the outside of the main personnel entry door into the SFSP area) will be the only seals accessible from the fuel handling floor. They will be verified at intervals not to exceed 12 months; however, the nuclear fuel assemblies will not be physically inventoried again until some or all of them are moved. Movement of assemblies in either the NFSV or the unit 2 SFSP area, but not both, will require a physical inventory of only the affected area.

On occasions, entry into the NFSV or the unit 2 SFSP area is required. Instructions will be written to allow, on these occasions, the intentional breaking of the seal(s) required for this entry. These instructions will require that the reason for each entry be documented, and that plant management approve each entry as noted by their signature on the documentation. Two individuals will observe the breaking of the seal(s) and will document their observances. As soon as the reason for the entry is completed, a new seal will be installed. This installation will also be observed by two individuals and documented.

Provisions of the Tennessee Valley Authority, Bellefonte Nuclear Plant, "Fuel Storage Physical Security Plan," submitted by TVA letters dated January 6 and 23, 1981, and approved by NRC letters dated March 27 and June 12, 1981, will remain in effect.

TVA will, upon the approval of this exemption request, install the seals as described above and take credit for the last physical inventory which was conducted August 23, 1988.

This issue and TVA's need for such an exemption was discussed with NRC inspector G. A. Todd, during NRC Region II Inspection Nos. 70-2917/89-01 and 70-2941/89-01 conducted at BLN January 11, 1989.

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Enclosed is a list of all the commitments contained in this submittal.

If you have any questions, please telephone Percy J. Hammons at (615) 751-2736. Unless this exemption request is granted, the next physical inventory of the nuclear fuel assemblies at BLN must occur not later than August 23, 1989. Therefore, your timely attention to this request would be appreciated.

Very truly yours,

TENNESSEE VALLEY AUTHORITY

  
Manager, Nuclear Licensing  
and Regulatory Affairs

Enclosure

cc (Enclosure):

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ENCLOSURE

BELLEFONTE NUCLEAR PLANT (BLN) -  
REQUEST FOR AN EXEMPTION FROM 10 CFR 70.51(d)

The following is a list of all commitments contained in this submittal.

1. Add tamper-indicating type E seals (seal) to each end of the metal locking bar over the NFSV.
2. Add a hasp, padlock, and seal to the outside of the SFSP area to the main personnel entry door into the SFSP area.
3. Add a hasp, padlock, and seal to the other personnel door on the inside of the SFSP area.
4. Add a seal to the hasp to the steel garage-style rollup door on the inside of the SFSP area.
5. Add hasp, padlock, and seal to the storage room inside of the SFSP area.
6. Inspect the three seals accessible from the fuel handling floor at intervals not to exceed 12 months.
7. Write instructions for entry into the NFSV or the unit 2 SFSP area. Instructions will cover reason for entry, approval, breaking of seals, and new seal installation.

DOCKET NO. 70-2917 & 2941

CONTROL NO. 25637

DATE OF DOC. June 13, 1989

DATE RCVD. June 20, 1989

FCUF  PDR

FCAF \_\_\_\_\_ LPDR \_\_\_\_\_

I & E REF.

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