

# Minnesota Pollution Control Agency

November 9, 1978

Mr. Olan D. Parr, Chief  
Branch #3, Division of Project Management  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Dear Mr. Parr:

It is my understanding that the safety evaluation of the General Electric High Density Fuel Storage System is being conducted within your jurisdiction. Because the Monticello nuclear power plant is using that system, we have an interest in the Nuclear Regulatory Commission (NRC) safety evaluation.

It is our view that the placement of pressure relief holes in tops of the fuel rack walls may not necessarily provide assurance against fuel rack swelling in the long term. Thus, the safety evaluation should include the possibility that rack swelling might wedge or lock a fuel assembly into place. In this circumstance the additional force to extract the fuel assembly at some future time might cause unforeseen damage to the fuel pin cladding and result in spillage of oxide fuel and fission products. I realize this long term scenario involves a complex interplay of difficult-to-portray variables; however, I believe the question of safe extraction of spent fuel from the storage racks is significant and germane to the NRC safety evaluation.

I wish to be kept posted on developments and would like an opportunity to review significant documents, particularly NEDO-24076 GE Design Report and Safety Evaluation and the NRC safety evaluation.

Sincerely,

  
Sandra S. Gardebring  
Executive Director

SSG:jb

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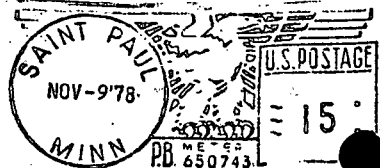
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