

INTERIM STAFF GUIDANCE
Compliance with Order EA-12-051
Reliable Spent Fuel Pool Instrumentation
NRR ISG XXX
[NRO ISG-XXX]

- Level adequate to provide substantial radiation shielding for a person standing on the spent fuel pool operating deck - The range of water level where any necessary operations in the vicinity of the spent fuel pool can be completed without significant dose consequences from direct gamma radiation from the stored spent fuel. The bottom of the level range may be selected at 10 feet (3 meters) above the top of fuel assemblies seated in the storage racks based on guidance in Regulatory Guide 1.13, "Spent Fuel Storage Facility Design Basis." Lower water levels may be specified for the bottom of the level range based on plant-specific analyses of necessary actions to confirm dose consequences to individuals would be within applicable limits at that water level.

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Industry Guidance for Compliance with NRC Order EA-12-051
NEI 12-02

2.3.2. Point 2 – level that is adequate to provide substantial radiation shielding for a person standing on the spent fuel pool operating deck.

Point 2 is based on either of the following:

- 10 feet (+/- 1 foot) above the highest point of any fuel rack seated in the spent fuel pools, or
- that level, which provides adequate radiation shielding to protect personnel performing local operations in the vicinity of the pool to restore makeup or cooling, based on either plant-specific or appropriate generic shielding calculations. The guidelines of EPA-400 (Reference 3) should be consulted for recommended personnel exposure limits. Additional guidance can be found in USNRC Regulatory Guide 1.13 (Reference 2) and ANSI/ANS-57.2-1983 (Reference 4).