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Comment #B

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USNRC



December 5, 1995

Chief
Rules Review and Directives Branch
U. S. Nuclear Regulatory Commission
Mail Stop T-6D-69
Washington, D. C. 20555-0001

Subject: Commonwealth Edison Company
Comments on Proposed Generic Letter 95-XX: Boraflex Degradation in
Spent Fuel Pool Storage Racks (M91447)

Reference: 60 FR 56359 dated November 8, 1995

Commonwealth Edison Company (ComEd) is submitting the following comments to the proposed Generic Letter 95-XX: Boraflex Degradation in Spent Fuel Pool Storage Racks (M91447).

Additional guidance should be provided in the "Discussion" segment of the Generic letter to better illustrate those "corrective actions" that the NRC might consider as appropriate measures to maintain the 5 percent subcritical margin. ComEd is currently considering a large spectrum of actions which include;

- utilization of the reactivity margins associated with burn-up credit
- utilization of reactivity credit for soluble boron
- placement of irradiated fuel assemblies in a designated region to provide for radioactive decay prior to permanent storage
- checkerboarding of storage locations
- use of specially designed neutron absorbing inserts
- altered spent fuel pool management techniques to minimize the radiation dose delivered to any given storage location.

ComEd appreciates the opportunity to comment on this matter, and would welcome any further interaction deemed necessary by the staff.

Gary G. Benes
Gary G. Benes
Nuclear Licensing Administrator

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PDR I&E
MISC PDR