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 AUTH. NAME AUTHOR AFFILIATION
 BOHLKE, W.H. Florida Power & Light Co.
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SUBJECT: Comment opposing proposed generic communication, "Boraflex Degradation in SFP Storage Racks."

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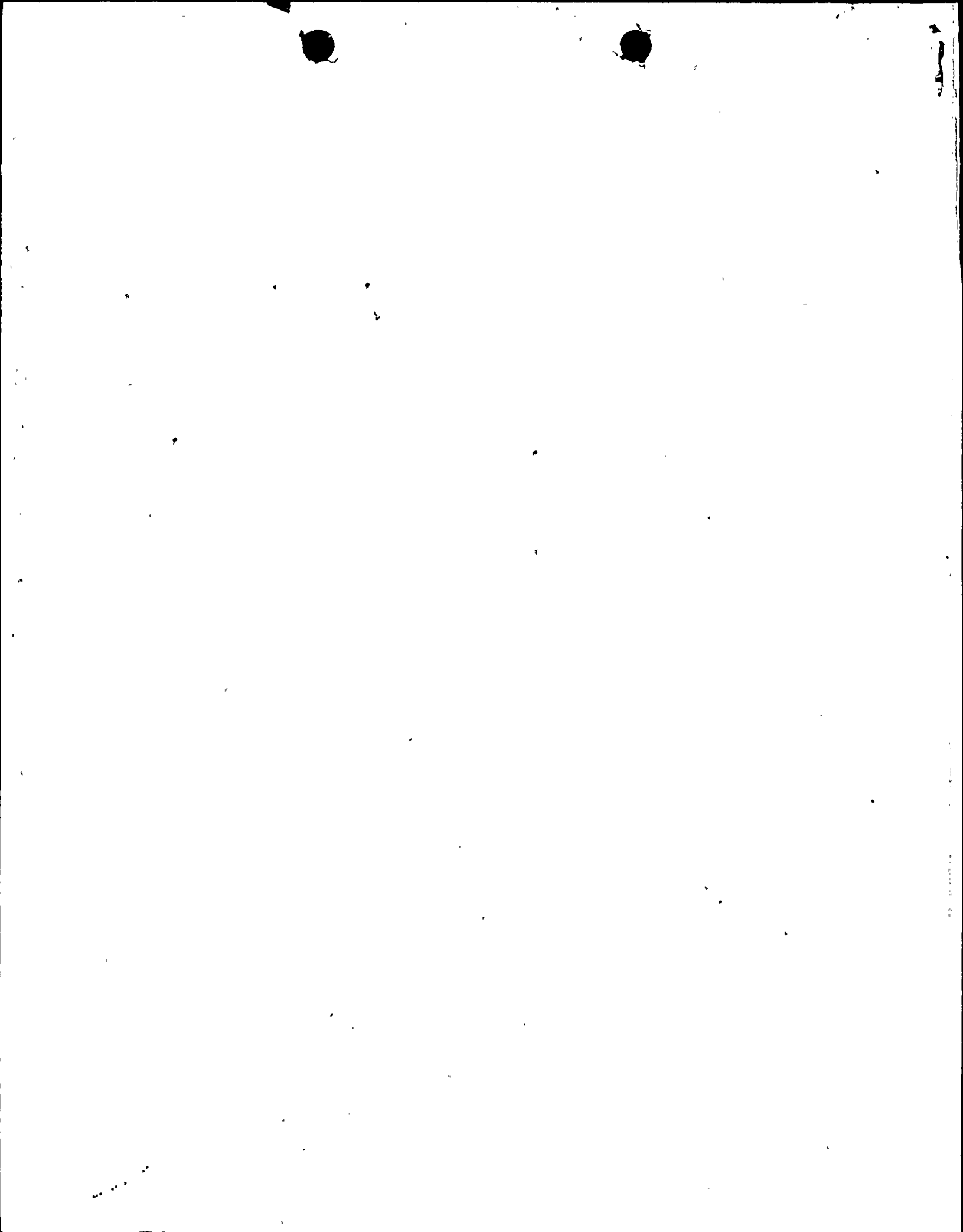
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Jim Shapeker

60 FR 56389
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Florida Power & Light Company, P.O. Box 14000, Juno Beach, FL 33408-0420

Comment #2
DEC 4 1995

L-95-325



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

Subject: *Proposed Generic Communication; Boraflex
Degradation in Spent Fuel Pool Storage Racks
60 FR 56359
Request for Comments*

1995 DEC 11 PM 1:53
RULES AND REGULATIONS
USNRC

On November 8, 1995, the Nuclear Regulatory Commission (NRC) published for public comment, "Proposed Generic Communication; Boraflex Degradation in Spent Fuel Pool Storage Racks." These comments are submitted on behalf of Florida Power & Light (FPL), a licensed operator of two nuclear power plant units in Dade County, Florida and two units in St. Lucie County, Florida.

FPL notes that the EPRI studies reported in the draft generic letter were documented in 1993, and further investigations are ongoing. Specifically, EPRI report TR-103300 that states that the access of water to and around Boraflex panels is perhaps the most significant factor influencing the rate of Silica dissolution from Boraflex. In the "Requested Information" section of the draft, the NRC requests licensees to provide a description of the physical condition of the Boraflex, including any deterioration, on the basis of current, as well as, future projected accumulated gamma exposure and possible water ingress to the Boraflex. FPL contends that Blackness Tests and trending of Silica levels in the spent fuel pool (SFP) coolant is sufficient to monitor the performance of Boraflex in the SFPs. It is not necessary, nor is the information available, to project future degradation based on the access of water to and around the Boraflex.

The NRC staff recognizes in the draft generic letter that the presence of borated water in pressurized water reactor (PWR) SFPs contribute to the margin on subcriticality. However, the staff indicates that licensees will be requested to provide information on maintaining margin in unborated water. We believe that such a request is inconsistent with the stated benefit of borated water, particularly for PWRs. We note that the Westinghouse Owners Group (WOG) has submitted a topical report to the staff in an effort to credit boron in solution for criticality control in PWRs. In light of the WOG effort, we urge the staff to reconsider this information request to account for actual plant conditions.

We appreciate the opportunity to comment on this proposed generic letter.

Very truly yours,

W. H. Bohlke
Vice President
Nuclear Engineering and Licensing

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