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SUBJECT: Discusses inconsistencies in SER forwarded on 861216 re application to store consolidated spent fuel & to expand spent fuel pool. Inconsistencies re use of fuel w/burnable poisons & auxiliary bldg crane should be clarified.

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December 2, 1986

Director of Nuclear Reactor Regulation
Attention: Mr. George E. Lear, Chief
PWR Project Directorate No. 1
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Subject: Safety Evaluation - Storage of Consolidated Fuel
R. E. Ginna Nuclear Power Plant
Docket No. 50-244

Dear Mr. Lear:

By letter dated December 16, 1985, the NRC Staff provided a Safety Analysis Report on an application by Rochester Gas & Electric dated February 27, 1985. This application requested an amendment to the Ginna Technical Specifications allowing the storage of consolidated spent fuel and increasing the storage capacity of the spent fuel pool. The SER concluded that storage of consolidated fuel was acceptable, but maintained the limit on storage capacity at 1016 fuel assemblies.

In our review of the SER, two statements were noted in the Staff's analysis that were not consistent with the amendment application or our responses to Staff requests for additional information. These statements concern the use of fuel with burnable poisons and the auxiliary building crane.

Your review and clarification of this SER is requested. The inconsistencies noted below present the potential for unnecessary confusion and the perception that plant operation may exceed the bounds of the licensing basis. Although these issues were discussed with the NRC Staff after Amendment 12 was issued, no further action has been taken.

In Section 2.1 of the December 1985 SER it is stated that "Rochester Gas & Electric does not have nor do they contemplate to use fuel assemblies with burnable poisons,...". The reference given was our response to Staff questions dated July 11, 1985. In the response to question 4 of that letter, RG&E included a provision that the applicability of the burnup-enrichment curves of Figure 5.4-2 of the Technical Specifications would be verified if burnable poisons were used. The verification would assure that the criteria for the pool Keff of less than or equal to .95 would be met. The provisions

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for this evaluation were incorporated into proposed changes to the basis of the specification which were included in our response. This same proposed change to the basis included a statement requested by the NRC Staff concerning the effect of storing less than 179 fuel rods per half canister. Neither of these changes to the basis were incorporated into the specification approved by the SER.

In Section 2.3.2 of the SER, the Staff analysis of canister handling appears to conclude that because the auxiliary building crane meets the single failure proof criteria of NUREG-0612 and handling of the canister uses the 5 ton hook of the Auxiliary Building crane, the handling of the canister will satisfy the single failure proof guidelines and is therefore acceptable. The Staff references the SER on the modification to the Auxiliary Building crane dated October 1, 1984. This SER, and the RG&E submittals on which this SER was based, never addressed any modification to the crane that would result in a load being transported by the 5 ton hook in a single-failure proof mode. Rather the radiological effects of a canister drop were evaluated and found to be acceptable. RG&E has modified the 40 ton hook on the auxiliary building crane to be single failure proof to meet other heavy load handling concerns that are separate from use of the 5 ton hook for canister movements.

Your review of these issues and clarification of the SER will be appreciated. In addition, the amendment approval noted that the request to increase the storage capacity of the pool would be handled by a separate licensing action. RG&E is still interested in the completion of that activity. RG&E will contact the NRC Staff to develop a schedule to address these issues.

Thank you for your assistance.

Very truly yours,

Roger W. Kober

Roger W. Kober