

Attachment A

Make the following changes in the Technical Specifications.

Remove

page 3.11-2

Insert

page 3.11-2

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- e. Charcoal adsorbers shall be installed in the ventilation system exhaust from the spent fuel storage pit area and shall be operable.
- 3.11.2 Radiation levels in the spent fuel storage area shall be monitored continuously.
- 3.11.3 A load in excess of one fuel assembly and its handling tool shall never be stationed or permitted to pass over storage racks containing spent fuel.
- 3.11.4 Fuel assemblies with less than 60 days since irradiation shall not be placed in storage positions with less spacing between them than that indicated in Figure 3.11-1 by the designation RDF.
- 3.11.5 The spent fuel pool temperature shall be limited to 150°F.
- 3.11.6 The spent fuel shipping cask shall not be carried by the auxiliary building crane, pending the evaluation of the spent fuel cask drop accident and the crane design by RG&E and NRC review and approval.

Basis:

Charcoal adsorbers will reduce significantly the consequences of a refueling accident which considers the clad failure of a single irradiated fuel assembly. Therefore, charcoal adsorbers should be employed whenever irradiated fuel is being handled. This requires that the ventilation system should be operating and drawing air through the adsorbers.

The desired air flow path, when handling irradiated fuel, is from the outside of the building into the operating floor area, toward the spent fuel storage pit, into the area exhaust ducts, through the

Attachment B

The current Technical Specification 3.11.3 states that the trolley of the auxiliary building crane shall never be stationed or permitted to pass over storage racks containing spent fuel. Based on conversations with the NRC staff, the proposed specification is submitted to clarify safety concerns in two areas:

- 1) The issue to be addressed by this crane travel restriction is the control of heavy loads over the spent fuel pool as discussed in NUREG-0612.¹ The failure of the trolley and/or bridge such that it would drop into the pool is not considered credible.
- 2) The restriction on loads being transported over the pool has generically been applied only to those heavy loads defined as being in excess of a fuel assembly and its handling tool (NUREG-0612).

The proposed specification will remove the Technical Specification restrictions on crane travel when a non-heavy load is being transported. This is consistent with Westinghouse Standard Technical Specifications and NRC Staff guidance.

The movement of non-heavy loads over the spent fuel pool will still require review by plant supervision. Current crane interlocks prevent the crane from travelling over the pool and to defeat these interlocks requires approval of the Shift Supervisor. These restrictions will remain. Furthermore, routine operation of the crane does not require travel over the pool so that defeat of the interlocks would be required infrequently. For those instances where non-heavy loads are required to be moved over racks containing spent fuel, restrictions will be placed in procedures that 1) the rack will not contain spent fuel that has decayed less than 60 days since irradiation, or 2) the maximum height the load is carried over the rack will not exceed that height which would result in potential energy in excess of a fuel assembly and its handling tool transported at a normal height over the rack (17,000 ft. lbs.). The decay time limit of 60 days will insure that the consequences of a load drop would not exceed those previously evaluated. Alternatively, the height limit would insure that the resulting cladding stress to a stored fuel assembly would be less than previously evaluated.²



[The text in this section is extremely faint and illegible due to low contrast and noise. It appears to be a large block of text, possibly a list or a series of paragraphs, but the individual characters and words cannot be discerned.]

Attachment C

In accordance with 10CFR 50.91 this change to the Technical Specifications has been evaluated against three criteria to determine if the operation of the facility in accordance with the proposed amendment would:

1. involve a significant increase in the probability or consequences of an accident previously evaluated; or
2. create the possibility of a new or different kind of accident from any accident previously evaluated; or
3. involve a significant reduction in a margin of safety.

As outlined below, Rochester Gas & Electric submits that the issues associated with this amendment request are outside the criteria of 10CFR 50.91, and therefore, a no significant hazards finding is warranted.

NUREG-0612 provides the requirements for the control of movement of heavy loads. A "heavy" load is defined as a load in excess of one fuel assembly and its handling tool. As stated in Attachment B, the proposed change to the Technical Specification complies with the requirements of NUREG-0612 by retaining the restriction on movement of heavy loads over racks containing spent fuel. The failure of the trolley such that it would drop into the spent fuel pool is not considered to be credible.

Therefore, a no significant hazards finding is warranted because:

- 1) By retaining the restriction on movement of heavy loads, and the procedural requirements as discussed in Attachment B, there is no increase in the probability or consequences of an accident previously evaluated.
- 2) There is no possibility of a different kind of accident created.
- 3) The margin of safety remain as previously evaluated and is not reduced.

References

1. NUREG-0612, Control of Heavy Loads at Nuclear Power Plants, July 1980.
2. Letter, R.W. Kober, RG&E, to D.M. Crutchfield, NRC, June 12, 1984.