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FACIL:50-397 WPPSS Nuclear Project, Unit 2, Washington Public Powe 05000397
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SORENSON,G.C. Washington Public Power Supply System
RECIP.NAME RECIPIENT AFFILIATION
SCHWENCER,A. Licensing Branch 2

SUBJECT: Requests that spent fuel storage pool monitors not be made requirement in Tech Specs based on recent exemption granted for License SNM-1890. Storage in spent fuel storage area exempt, predicated on design of storage facility.

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October 3, 1983
G02-83-881

Docket No. 50-397

Director of Nuclear Reactor Regulation
Attention: Mr. A. Schwencer, Chief
Licensing Branch No. 2
Division of Licensing
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Mr. Schwencer:

Subject: NUCLEAR PROJECT NO. 2
CRITICALITY DETECTORS IN SPENT FUEL STORAGE AREA

References: 10CFR70.24 and WNP-2 Technical Specification LCO 3.3.7.1

The Supply System requests an exception to the interpretation that the requirements of 10CFR70.24 for nuclear fuel stored in the spent fuel storage area requires a spent fuel pit criticality monitor.

The spent fuel storage area has 22 feet of water shielding normally covering the spent fuel. A point kernel shielding calculation conservatively estimates that a setpoint of 5×10^{-3} Mr/hr would be required at the pool surface to detect a criticality with the sensitivity requirements of 10CFR70.24(a)(1). 70.24 also states that the section is not intended to require underwater monitoring when special nuclear material is handled or stored beneath water shielding.

The spent fuel storage area is a high density rack design with fixed poison surrounding each fuel location. A spent fuel rack fully loaded with fresh fuel at a 3.25 weight percent maintains Keff $<.95$ at the conservative moderator temperature of 68^{0}F, giving assurance that an inadvertent criticality in the spent fuel storage area would not occur.

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A request for an exemption to 10CFR70.24 was granted for the Supply System's Special Nuclear Materials License, (SNM-1890). Storage in the spent fuel storage area was exempt, predicated on the design of the spent fuel storage facility.

The Supply System is therefore requesting that spent fuel storage pool monitors not be made a requirement of Limiting Condition for Operation 3.3.7.1 in the WNP-2 technical specifications.

Very truly yours,

GC Sorensen

G. C. Sorensen, Acting Manager,
Nuclear Safety and Regulatory Programs

RJT/tmh

cc: R Auluck - NRC
WS Chin - BPA
A Toth - NRC Site
D Hoffman - NRC