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 AUTH. NAME AUTHOR AFFILIATION
 THOMPSON, G. Affiliation Not Assigned
 RECIP. NAME RECIPIENT AFFILIATION
 DUDLEY, R. F.

See Rpts

SUBJECT: Submits comment on encl 2 to 990617 memorandum, including encl 2 titled, "Draft Technical Study of Spent Fuel Pool Accidents for Decommissioning Plants." Rept providing info on implications & significance of partial drainage, encl.

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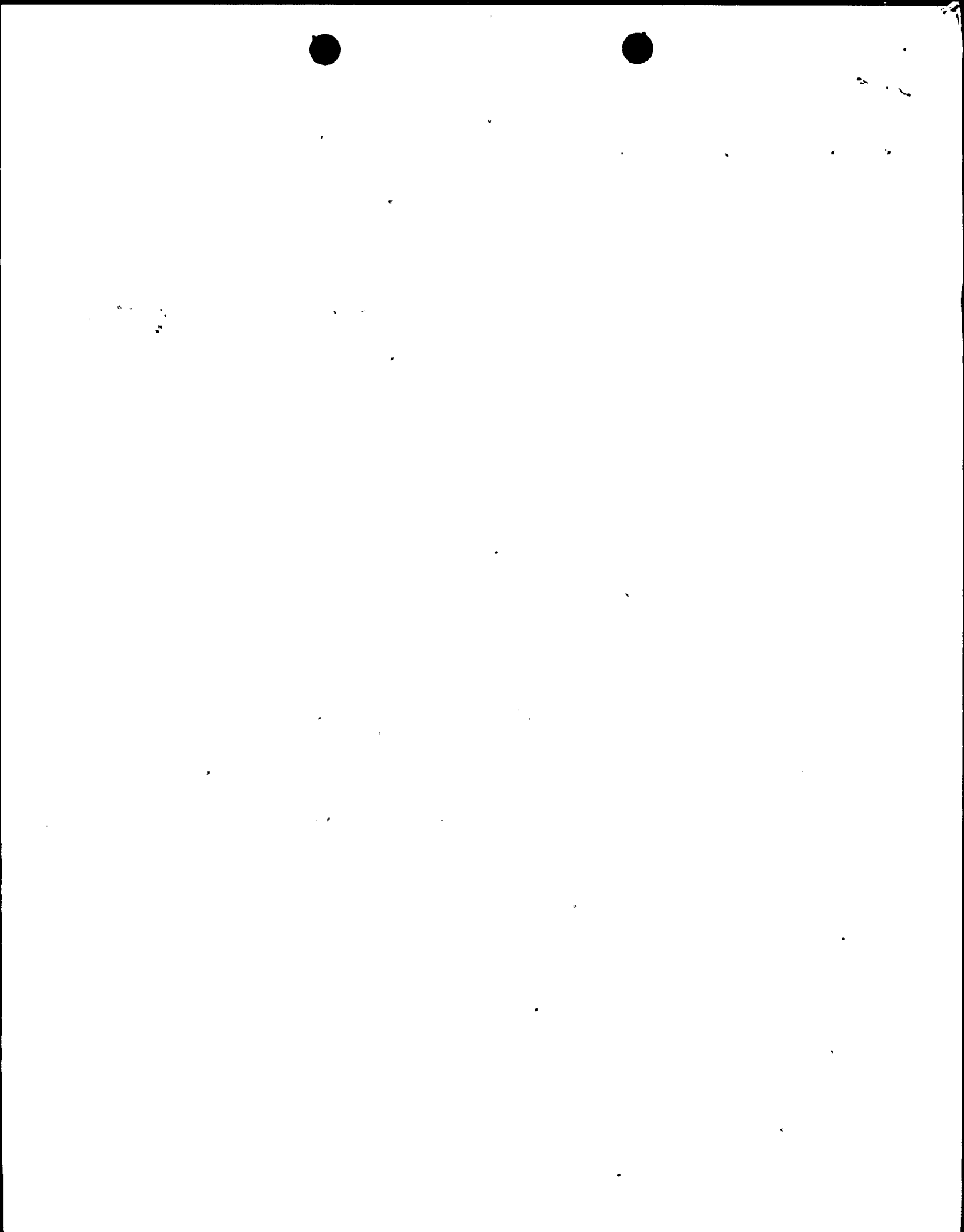
NOTES: Application for permit renewal filed. 05000400

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30 September 1999

Richard F Dudley
Senior Project Manager, Decommissioning Section
Project Directorate IV and Decommissioning
Division of Licensing Project Management
Office of Nuclear Reactor Regulation
US Nuclear Regulatory Commission
Washington, DC 20555-0001

Dear Mr Dudley:

Re: Spent Fuel Pool Accidents

I write to comment upon Enclosure #2 to your 17 June 1999 memorandum titled "Summary of Meeting with the Nuclear Energy Institute". Enclosure #2 was titled "Draft Technical Study of Spent Fuel Pool Accidents for Decommissioning Plants".

This Draft Technical Study is deficient in at least two respects. First, it does not address the implications of partial drainage of a spent fuel pool. Second, it does not address the potential for an exothermic reaction between steam and zirconium. Both deficiencies are significant, and must be corrected if this Study is to provide useful guidance for regulatory action.

Please find enclosed a report which provides information on the implications and significance of partial drainage and the steam-zirconium reaction in connection with spent fuel pool accidents (see especially Appendices C, D and E). This report addresses an operating nuclear power plant (the Harris plant), but many of its findings are relevant to spent fuel pools at nuclear power plants which have been shut down.

If you and your colleagues wish to discuss the implications and significance of partial drainage and the steam-zirconium reaction, I would be pleased to do so.

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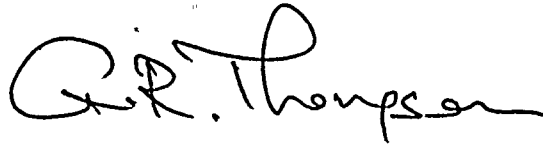
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IRSS letter to Richard Dudley
30 September 1999
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I would like to be informed about future meetings that relate to the safety of spent fuel pools.

Thank you for your attention.

Sincerely,

A handwritten signature in cursive script that reads "G. R. Thompson". The signature is written in black ink and is centered on the page.

Gordon Thompson
Executive Director

Enclosure: "Risks and alternative options associated with spent fuel storage at the Shearon Harris nuclear power plant", a report prepared by Gordon Thompson for Orange County, NC, February 1999

