UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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| In the Matter of | ) | |
| | ) | |
| COMMONWEALTH EDISON COMPANY | ) | Docket Nos. 50-295 |
| | ) | 50-304 |
| (Zion Station, Units 1 and 2) | ) | |

# NRC STAFF TESTIMONY ON BOARD QUESTION (4)(e)

by

Joel E. Kohler

The Licensing Board has requested the parties' response to certain questions in their Order Following Prehearing Conference, dated January 19, 1979. Board Question (4)(e) is as follows:

> What provisons have been made or procedures developed to protect the workmen and/or plant personnel from the consequences of such postulated accidents during the period when the proposed spent fuel pool modifications are being performed?

## Answer

The Applicant has determined that emergency operating procedure-6 (EOP-6) titled "Fuel Handling Emergency" which the licensee employs during all fuel handling is applicable during fuel pool modifications. This procedure describes the designed automatic events which take place during a fuel handling emergency. In addition, it provides guidance to personnel for emergency evacuation of affected area and directs control room operators to verify that requirements of EOP-6 are implemented. As such, the Applicant has determined there is no need for additional specific procedures to be developed to protect workmen from postulated accidents during the period of time when fuel pool modifications are being performed.

With regard to the capability of the equipment being used, the applicant intends to provide a 125 ton hook. The nominal weight of one rack is 15-20 tons. The hook will be load tested to 110% of design and a magnetic particle inspection will be performed. There are two main cables which will be used in conjunction with the building crane. The cables will be subjected to the same 110% load test as the hook. The motors that will be used have emergency braking features which activate on loss of power. The rate of speed that controls the crane's upward and downward movement is governed by a motor controller and various passive gear ratios which limit travel speed. There will be no fuel movement during rack movement and the new fuel rack to be installed will not pass over any areas of the pool presently containing spent fuel.

The Region III inspection effort regarding the Spent Fuel Pool modification will verify that the equipment employed will be as described and the emergency operating procedures regarding fuel handling are implemented.

It is RIII's position that adherence to the EOP-6 and acceptable surveillance testing of the crane lifting equipment should provide assurance that the fuel rack modification to the Zion Spent Fuel Pool can be installed without additional procedures being developed.