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REC: STOLZ J F
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TOLEDO EDISON

DOCDATE: 06/29/78
DATE RCVD: 06/29/78

DOCTYPE: LETTER NOTARIZED: NO
SUBJECT:
FURNISHING INFO TO QUESTIONS 1 & 4 OF NRC REQUEST FOR ADDL INFO CONCERNING CONTAMINATION OF EXISTING SPENT FUEL RACKS, IN SUPPORT OF APPLICANT"S SPENT FUEL STORAGE APPL.

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NOTES:
1. SEND ALL AMENDMENTS TO J. ROE

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TOLEDO EDISON

LOWELL E. ROE
Vice President
Facilities Development
(419) 259-5242

June 22, 1978

Docket No. 50-346

License No. NPF-3

Serial No. 451

Director of Nuclear Reactor Regulation
Attention: Mr. John F. Stolz, Chief
Light Water Reactors Branch #1
Division of Project Management
United States Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Mr. Stolz:

In our submittal Serial No. 425 dated April 4, 1978, we responded to your Request for Additional Information (RAI) pertaining to the proposed Davis-Besse Nuclear Power Station Unit 1 spent fuel storage capacity modification. Questions 1 and 4 of the R/I dealt with contamination of the existing spent fuel racks to which Toledo Edison had responded that the existing fuel racks had not been contaminated. Subsequent to our responses, Davis-Besse Unit 1 became involved with the burnable poison rod assembly (BPRA)/orifice rod assembly (ORA) problem addressed in our letters, Serial No. 435 dated May 18, 1978 and Serial No. 439 dated May 26, 1978. Activities associated with this problem were envisioned to cause a then undefined contamination of the existing spent fuel racks. We were thus informed that your staff would stop further review on the spent fuel storage application until the responses to RAI Questions 1 and 4 were revised.

In an effort to have the review of the spent fuel storage application proceed without undue delay, we wish to provide the following information.

The BPRA/ORA events included the activity of passing the removed BPRA's and ORA's through the spent fuel pool and into the adjacent cask pit where they will be stored under an adequate shield of water until their ultimate disposal. This transfer operation has been completed. During the transfer, the brief period of mixing of contaminated, borated refueling water present in the transfer pit, with the demineralized water contained (for shielding purposes only) in the spent fuel pool, and any deposits "washed" off the assemblies in the transfer process, have caused only a very small amount of contamination of the spent fuel pool water. Activity levels in the spent fuel pool water are currently on the order of 1.5×10^{-5}, uCi/cc with the primary constituent being Cobalt-58. The existing racks were not subjected to any irradiation by spent fuel assemblies.

Draining of the spent fuel pool will be done at a convenient time following the May-June outage when proper processing of the slightly borated water can be performed. With proper wash down during the draining of the spent fuel pool, contamination of the existing racks and pool walls will be minimal. Subsequent to draining of the spent fuel pool, the existing racks and area will be properly surveyed for contamination and further decontaminated as necessary, consistent with health physics requirements, to allow as much as practicable uncontrolled handling and disposal of the existing racks. There is the possibility that small areas of the racks will not be able to be reasonably decontaminated below controlled levels. In such cases it may become desirable to remove sections of the racks for disposal as low level waste. This is not envisioned to be a significant amount of material.

We trust that the above information will suffice to allow continuance of your review and timely approval of our application for the spent fuel storage capacity modification.

Yours very truly,

Lowell E. Roe

bj d/5-6