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April 17, 1981
FMY 81-62

United States Nuclear Regulatory Commission
Washington, D. C. 20555

Attention: Office of Nuclear Reactor Regulation
Division of Licensing
Mr. Robert A. Clark, Chief
Operating Reactors, Branch No. 3



Reference: (a) License No. DPR-36 (Docket No. 50-309)
(b) USNRC Letter to MYAPC dated March 17, 1981

Subject: Maine Yankee Fuel Storage Modification

Dear Sir:

Your letter, Reference (b), presented twenty-eight questions about the Maine Yankee spent fuel storage increment.

Your staff, at a meeting on March 3, 1981, indicated the scope and depth of information on this matter required by the assigned reviewers.

Much of the information your reviewers require can only be developed during the detailed design effort.

Under normal circumstances, we would prefer to hold development of a detailed design until licensing has progressed to the point at which some indication of ultimate success is available. This approach would, of course, be consistent with the general tenor of licensing in which it is judged better not to preclude any option by investing heavily in another. This approach can be implemented successfully if the NRC properly restricts its role to establishment of criteria and review of licensee commitments to meet those criteria and the licensee is properly required to commit to meeting NRC's criteria and explaining how satisfaction of NRC's criteria is determined. This process is reinforced by NRC's inspection and enforcement programs and the quality assurance programs of licensees. In fact, the densified spent fuel racks now in use at Maine Yankee were licensed in this way, before the investment necessary to develop detailed design was made.

In this case however, we have learned that the staff intends that essentially a complete design description be developed and submitted for review at the front end of the licensing process. The design description is expensive and takes some time to prepare because it requires that most if not all design work be completed.

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We have solicited two fuel rack vendor proposals. Each will contain a detailed design package suitable for submittal and for constituting the basis for responses to your questions.

The proposals are due at the end of April. Evaluation of the proposals, selection of a vendor and preparation of a submittal will take another two weeks.

Thus by mid May, you will have our design submittal and responses to your questions.

Very truly yours,

MAINE YANKEE ATOMIC POWER COMPANY

John Garrity

John H. Garrity, Director
Licensing and Engineering

JHG/plb

Maine Yankee Atomic Power Company

cc:

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