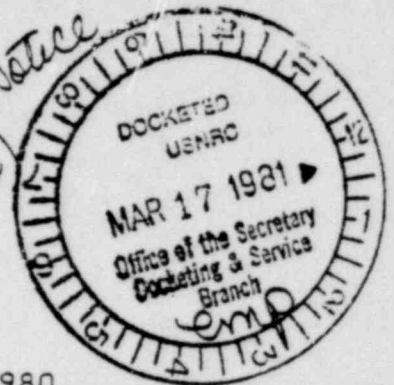




Commonwealth Edison
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DOCKET NUMBER
 DRAFT RULE
PR-Misc. Notice
(Reg Guide)



March 9, 1980

Secretary of the Commission
 U.S. Nuclear Regulatory Commission
 Washington, D.C. 20555

Attention: Docketing and Service Branch

Subject: Draft Regulatory Guide "Spent Fuel Heat Generation
 In An Independent Spent Fuel Storage Installation"
 Division 3 Task FPO 034-4

Dear Sir:

Commonwealth Edison has reviewed the subject Regulatory Guide and offer the attached comments. We appreciate having been given the opportunity to comment.

Sincerely,

J. S. Abel
 J. S. Abel
 Director Nuclear Licensing

ITP-11

810427 0 518

Commonwealth Edison
Comments on Draft Regulatory Guide
"Spent Fuel Heat Generation In An Independent
Spent Fuel Storage Installation"
Division 3 Task FP034-4

1. The draft Regulatory Guide is needed to simplify and standardize the long-term decay heat calculation. ANSI/ANS-5.1-1979 ("Decay Heat Power in Light Water Reactors") is the standard currently utilized in many of the licensing calculations in this area. It would be beneficial to replace the complicated and tedious calculation procedure of this standard with the simplified curves of the draft Regulatory Guide.
2. There would be no significant cost associated with the implementation of the subject Regulatory Guide.
3. Figure 1 of the draft Regulatory Guide provides the heat generation as a function of time after shutdown for fuel with burnups of 33,46, and 55 GWD/MTU. Other curves should be added for burnups of about 20 and 26 GWD/MTU, reasonable lower bounds for burnups presently being experienced in light water reactors.
4. The Figure 1 curves should be duplicated in tabular form to allow more accurate use of the information for licensing applications. Tabular data would also make it possible to interpolate between the burnup curves to the specific burnup values being utilized in the particular application.
5. The Regulatory Guide should contain additional information related to the use of Figure 1. For example, is it acceptable to use the curves on a discharge batch basis, or on an individual assembly basis? Is it acceptable to linearly interpolate between burnup values? Is it acceptable to linearly extrapolate the curves beyond the maximum time plotted in Figure 1 (10 years)? Are the curves applicable to all types of BWR and PWR fuel? What other methods, such as ANSI/ANS-5.1-1979, may be acceptable for a more detailed calculation of heat generation as a function of time after shutdown?