

MAR 2 1994

Ms. K. S. Knapp, Manager
Safety and Licensing
B&W Fuel Company
Commercial Nuclear Fuel Plant
P.O. Box 11646
Lynchburg, VA 24506-1646

Dear Ms. Knapp:

SUBJECT: EMERGENCY RESPONSE PLAN EXEMPTION (TAC NO. L30637)

This refers to your application dated November 9, 1993, and supplemental information dated December 1, 1993, requesting an exemption from the emergency plan requirements in 10 CFR 70.22.

We have completed our review of your accident evaluation as required by 10 CFR Section 70.22 and concluded that additional information is needed before final action can be taken. The additional information, specified in the enclosure, should be provided within 60 days of the date of this letter. Please reference the above TAC No. in future correspondence related to this request.

If you have any questions, please contact me at (301) 504-3416.

Sincerely,

Original Signed By:

Michael A. Lamastra
Licensing Section 2
Licensing Branch
Division of Fuel Cycle Safety
and Safeguards, NMSS

Enclosure:
Comments on Accident Evaluation

Distribution: (Control No. 790S)

Docket No. 70-1201	NRC File Center	PDR
Region II	NMSS r/f	FCSS r/f
GTroup, RII	FCLB r/f	FCLS2 r/f
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Request for Additional Information
Application Dated November 9, 1993
B&W Fuel Company
Docket 70-1201

<u>Page</u>	<u>Comment</u>
A-1	Reference 5, the B&W Environmental Report, was prepared in 1974, but in evaluating the meteorology and atmospheric dispersion, more recent data is available, including data from the meteorology facility at the Lynchburg Technology Center and the Mt. Athos site. Why was the more recent data not used?
A-5	The site is situated in a depression with the top of the stack below the surrounding terrain to the south and the east of the plant. How has this been considered in assessing the dispersion?
A-6	The locations of the "nearest resident" (at 800 meters) and the "nearest receptor" (at 1000 meters) are provided in the 1974 report. During the past 20 years, these locations may have changed (moved closer). Have the locations of the nearest receptor and nearest resident been reassessed?
A-7	The stack height is 21 meters but the building height, though not specified, is estimated to be at least 10 meters. These are close enough that building wake effects should have been evaluated, but the dose calculations do not reflect the wake. Please re-do the calculations accordingly.
A-9	It appears that the iodine concentrations were not properly evaluated. While the second footnote under Table IV states that "an iodine reduction factor (25%)" was used, Section C.2.a of Reg. Guide 3.35 indicates that in calculating a source term, 25% of the iodine should be assumed to be released directly to the room. Section 3.2.d of Reg. Guide 3.35 also indicates that there is no iodine depletion allowance. Please clarify how the iodine concentrations were evaluated and confirm that they were determined in accordance with the procedure outlines in Reg. Guide 3.35.
A-15	Step 2 - is the PLR <u>area</u> or <u>volume</u> intended?