

NOV 28 1990

To: Scott Pennington
From: Bob Wilson
Subject: Letter from WEC-CNFD dated November 15, 1990
Date: November 20, 1990

You requested I review the subject letter from Westinghouse Electric. The letter contains additional information about the CNFD amendment request to change the safety margin limit for one operation from the limit in the facility license. We had sent them a copy of an internal NRC letter detailing the status of our review of the request package and the Westinghouse letter had additional information about issues raised in our letter.

1. "Effect of the concrete walls of the wash pits on the safety margin"
We noted that this was not addressed in the application. The new letter stresses that the pits have a steel liner and they should negate the nonconservative effect of the concrete. We need the details of the liner's material and thickness to assess the safety significance of the liners but anticipate that the liners will have an important effect.
2. "Moderators more effective than water contaminating the wash pits"
The water pit area is evidently administrated as a moderator control zone. It would be important to know how this is practically accomplished. It would seem to be a contradiction in terms but perhaps they have developed a program to do this. They have evaluated the liquids known to be required in the area and determined them to be less effective moderators than water and to be normally present in small quantities.
3. "Fuel element reactivity increase due to mechanical damage"
The issue is to assure that no credible accident could occur at the water pits that could increase the spacing of the rods in a fuel element. The first accident is dropping the fuel element. The Westinghouse letter refers to an analytic study and a test. The study was dropping one element 15 feet onto another. The test was dropping a shipping cask containing an element a distance of 30 feet. The question not answered is: do these envelope dropping a fuel element in the water pit? Does the cask cushion the fall or is it equivalent to landing on concrete. Does another element provide the same crash base as concrete?
The second accident is dropping something on the fuel element in the pit. How has this been precluded?
4. "Double batching in the wash pit"
The discussion in the letter about the risk of removing one element in the water pit and adding another emphasized the need to rest an element on the bottom of a pit to disengage it. As the pit was quite deep the sequence was not considered credible. A basic assumption is a control to eliminate any object in the pit to rest the element on. Does this control exist?

At our meeting yesterday with George Bidinger, he pointed out that the NRC has not reviewed the Westinghouse validation process and would need to see the general procedure and its specific application to this fuel.

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