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THE HARTORD LIECTING LIGHT COMPANY WESTERN MASSACHUSETTS ELECTRIC COMPANOL TONE WATER POWER COMPANY MORTHS AST NICOLEM ENGLISHED COMPANY MORTHS AST NICOLEM ENGLISHED COMPANY

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October 13, 1978

Docket No. 50-245

Director of Nuclear Reactor Regulation Attn: Mr. D. L. Ziemann, Chief Operating Reactors Branch #2 U. S. Nuclear Regulatory Commission Washington, D. C. 20555

Reference: (1) D. L. Ziemann letter to W. G. Counsil dated June 13, 1978.

Gentlemen:

Millstone Nuclear Power Station, Unit No. 1 High Density Spent Fuel Racks

In a phone conversation on September 22, 1978, Northeast Nuclear Energy Company (NNECO) informed Mr. J. Shea of your Staff that work had begun at Millstone Unit No. 1 to prepare for installation of the new high density spent fuel racks into the spent fuel pool. This preparatory effort includes removing the old racks, removing interferences on the floor, and installing seismic restraints. The actual installation of the new high density racks will commence in a few more weeks. It was stated that in order to have the racks installed and ready for the 1979 refueling outage, work in the pool had to begin by September, 1978. It was also indicated that, if necessary, the racks could be used in a less than optimum storage pattern (i.e., checkerboard), since such a pattern would not need to take credit for the boron poison, and the racks are still seismically approved. All the new racks installed and utilized in the "less than optimum" storage pattern would yield approximately the same number of storage spaces as in the old racks. Finally, it was stated that present spent fuel inventory was such that waiting until after the addition of spent fuel from the 1979 refueling would seriously impair the transition from the old racks to the new. Presently, all the spent fuel in the pool can be moved to one side so that just FI enough of the old racks can be removed to provide space for installation of two of the six modules of new high density racks. Addition of spent fuel from the upcoming refueling outage would preclude being able to remove enough old racks to accommodate the two new modules, necessitating that the installation procedure be revised to a more complex and costly scheme.

In Reference (1), the NRC Staff stated that their letter was to confirm the agreement not to install the new spent fuel racks at Millstone Unit No. 1 until the swelling in the high density fuel racks experienced at Connecticut Yankee Atomic Power Company's Haddam Neck Plant was understood and satisfactorily resolved for the Millstone Unit No. 1 design. In the telephone conversation with the NRC Staff on September 22, 1978, it was reiterated that, as stated in a previous telephone conversation, such a commitment had not been made by either

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a Staff member of NNECO or Northeast Utilities Service Company (NUSCO). However, it was suggested that the statement in Reference (1) may have been a misinter-pretation of the NNECO/NUSCO position that the new spent fuel racks would not be used to actually store spent fuel until such time as NRC Staff concurrence was obtained. It is the continued NNECO/NUSCO position that NRC Staff concurrence will be obtained before the new racks are used in either the originally licensed configuration or in a less than optimum pattern.

A review of this course of action with respect to ALARA considerations indicates there would be very little, if any, potential additional man-rem exposure when considering the possibility that the new racks could not be shown to be satisfactory and would have to be removed from the pool.

NNECO will endeavor to keep the NRC Staff informed of the status and progress of this issue. We will be happy to discuss this item further with you.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY

W. G. Counsil Vice President