

May 16, 1994

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Dr. John T. Larkins, Executive Director
United States Nuclear Regulatory Commission
Advisory Committee on Reactor Safeguards
Washington, DC 20555

**SUBJECT: SUSQUEHANNA STEAM ELECTRIC STATION UNITS 1 AND 2
LOSS OF SPENT FUEL POOL COOLING LICENSING BASIS**

Dear Dr. Larkins:

On May 6, 1994, the NRC staff made a presentation to the Advisory Committee on Reactor Safeguards (ACRS) on the substantial safety hazard the undersigned identified in the design of the Susquehanna Steam Electric Station (SSES) and submitted to the NRC in a 10CFR21 report dated November 27, 1992. The NRC presentation relied extensively on two positions with which we strongly disagree - first, that the loss of spent fuel pool cooling following a Design Bases Loss-of-Coolant Accident (DBA LOCA) is outside the SSES current licensing basis, and second, that the probability is so low as to permit the concerns to be dismissed as having negligible safety significance.

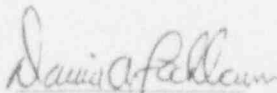
In a letter dated March 21, 1994 (attached), we identified numerous links between the loss of spent fuel pool cooling and the DBA LOCA event. A loss of spent fuel pool cooling at the SSES is a direct and immediate consequence of a LOCA event. Since it was clearly apparent from their presentation to the ACRS that the NRC staff had not properly considered these links, we requested in a letter dated May 10, 1994 (attached) that the NRC staff formally address each one of the links. In this letter, we also brought to the NRC Project Manager's attention the determination in NRC Bulletin 94-01 dated April 14, 1994 that a related event at the Dresden Unit 1 facility resulted in 'compliance backfits' for eight licensees.

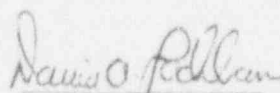
The NRC staff's probability arguments are weak, and we were encouraged by the ACRS' challenges of these NRC staff arguments. These probability arguments also conflict with the position taken by the NRC staff in NRC Generic Letter 91-18. This NRC position explicitly forbid use of probabilities when making operability determinations. In essence, that is precisely what the NRC staff is attempting to do when they examine spent fuel pool cooling following a DBA LOCA event at SSES.

The ACRS should also be aware that Mr. William Russell of the NRC's Office of Nuclear Reactor Regulation recently denied a 2,206 petition filed by Mr. Paul M. Blanch on the spent fuel pool cooling concerns solely on the basis of a probability argument. For some reason, the distribution for this denial included several hundred individuals.

Please do not hesitate to contact us if we can provide any assistance to the ACRS on this matter.

Sincerely,


David A. Lochbaum


for Donald C. Prevatte

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- Attachments:
- 1) Letter dated March 21, 1994 from David A. Lochbaum and Donald C. Prevatte to Joseph W. Shea, "*Comments on SSES Loss of Spent Fuel Pool Cooling Licensing Basis*"
 - 2) Letter dated May 10, 1994 from David A. Lochbaum and Donald C. Prevatte to Joseph W. Shea, "*SSES Loss of Spent Fuel Pool Cooling Licensing Basis*"
 - 3) Letter dated March 16, 1994 from Joseph W. Shea to David A. Lochbaum and Donald C. Prevatte, "*Spent Fuel Pool Cooling Issue*"

Distribution: (without attachments)

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