

APPENDIX D

Response to NRC Request for Additional Information

In a telephone conversation on January 24, 1983, the NRC requested additional details regarding the administrative controls for storing fuel in every other row and every other column of the spent fuel pool as committed to in Appendix C of this application. The following steps summarize the administrative controls which will be implemented in an approved plant procedure.

- 1) A map of the spent fuel pool will be developed showing the storage location of each fuel assembly by serial number in every other row and every other column of the pool. The Waterford 3 Nuclear Engineering Engineer-Nuclear will approve this map.
- 2) An SNM Transfer Report will be developed for each fuel shipment specifying the storage location of each fuel assembly when it is removed from its shipping container. The SNM Transfer Report will be in conformance with the map in Step 1.
- 3) The Waterford 3 Nuclear Engineering Engineer-Nuclear will appoint an SNM Handling Supervisor for each shift that handles new fuel receipt.
- 4) The SNM Handling Supervisor and another person on the shift performing fuel handling activities will independently verify the fuel assembly storage location and initial or sign the SNM Transfer Report at the completion of each movement of a fuel assembly to the spent fuel pool.

These controls will be in effect until 100% neutron attenuation testing of the spent fuel storage racks has been completed.

In Appendix A to this application, the Radiation Monitoring System in the Fuel Handling Building was described as consisting of seven area radiation monitors and two process monitors. Of these, only the four safety channels of the area radiation monitors are intended to be functional under the SNM License. These safety channels will provide an alarm locally and in the control room. The logic for these independent, redundant safety channels is one-out-of-four. Hence, allowing for maintenance and testing purposes, adequate protection may be provided by a few as two safety channels.