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March 16, 1983

ØCANØ38316

Director of Nuclear Reactor Regulation
ATTN: Mr. J. F. Stolz, Chief
Operating Reactors Branch #4
Division of Licensing
U. S. Nuclear Regulatory Commission
Washington, DC 20555

Director of Nuclear Reactor Regulation
ATTN: Mr. Robert A. Clark, Chief
Operating Reactors Branch #3
Division of Licensing
U. S. Nuclear Regulatory Commission
Washington, DC 20555

SUBJECT: Arkansas Nuclear One - Units 1 & 2
Docket Nos. 50-313 and 50-368
License Nos. DPR-51 and NPF-6
Schedule for Spent Fuel Storage Expansion

Gentlemen:

Our letter dated November 5, 1982 (ØCAN118205) submitted the request for spent fuel pool storage expansion at Arkansas Nuclear One (ANO) and requested your approval by March 1, 1983. This date was requested based on the necessity to complete the expansion project prior to increasing the number of fuel assemblies in the respective pools.

Attachment 1 outlines the planned schedule for the project. Phase 1 includes (1) removal of existing racks and installation of new racks in the ANO-2 pool, and (2) beginning removal of existing racks from the ANO-1 pool. This phase will end prior to completion of removal of existing racks in ANO-1 due to the receipt of new fuel for ANO-2, currently scheduled for November 15, 1983. Thirty-two (32) weeks are planned for Phase 1.

Phase 2 is scheduled to begin after completion of the ANO-2 refueling (2R4), when the pools are again available for rerack work. This phase (completion of reracking of ANO-1) must be completed prior to fuel receipt for the ANO-1 refueling (1R6), currently scheduled for September 15, 1984. Fourteen (14) weeks are planned for Phase 2.

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Subsequent to our November submittal, we discussed the review schedule with Mr. Guy Vissing. Mr. Vissing indicated that the March 1, 1983, approval request probably could not be met and that late March was more of a reality. From a recent conversation with Mr. Vissing, we now understand the NRC scheduled review completion is June 21, 1983. This schedule creates a significant impact on the rerack project and most probably will preclude the capability of any rerack of ANO-1.

The new racks were delivered onsite on March 11, 1983. Personnel were scheduled available on March 14, 1983, to begin installation. This effort has now been postponed.

As outlined above, the time windows when the spent fuel pools are available for reracking are specific and relatively short. The ANO-1 reracking schedule is critical as it will likely not be possible to rerack the pool if additional spent fuel is added.

We have reevaluated our schedules to identify the impact of a later than expected NRC approval date.

If approval is received prior to April 15, 1983, it appears the original schedule and work plan can be met with some readjustments and overtime.

Approval between April 15 and May 15 would result in a major disruption of the work plan. Baring any unforeseen difficulties, the work plan could remain intact by use of substantial (~$100,000) amounts of overtime. This would be, however, a very precarious schedule and the probability of success would not be nearly as high as desired and could lead to substantial additional costs.

NRC approval after May 15, 1983, would require development of a new work plan. The ANO-2 rerack would have to be postponed until after ANO-2's next refueling outage with the ANO-1 rerack beginning initially on May 15, 1983. Postponing the ANO-2 rerack would require significant reanalysis and ALARA rereview as the workers would likely receive larger radiation doses due to the increased amount of spent fuel in the pool. This delay would, as well, result in increased project costs of approximately $200,000, not including man rem considerations.

Approval after June 15, 1983, would require postponement of both ANO-1 and ANO-2 reracks until after their next refueling outages. Our evaluation of this situation has indicated that this would likely preclude the possibility of an ANO-1 rerack without extraordinary measures. After ANO-1's next refueling, the increased spent fuel in the pool will most likely result in unacceptable radiation doses to the workers. Therefore, to conduct a rerack at that time would require removal of ANO-1 spent fuel to the ANO-2 pool. The possibility of such a shuffle has not been determined. The cost of the shuffle and the analysis required to support it has not been determined. It is preliminarily estimated as "considerably in excess of $200,000."

The current NRC review schedule of June 21, 1983, seriously jeopardizes this project. We request your assistance in expediting that schedule as we believe the rerack project is vital to the continued operation of our facilities.

We have several personnel dedicated to this project and will make them available to you to the extent you deem necessary to support and expedite your review. Please contact us by March 25, 1983, with regard to your latest schedule to allow us to adjust our planning and work plans appropriately. Thank you for your consideration.

Very truly yours,

John R. Marshall
Manager, Licensing

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Attachment

ATTACHMENT 1

ANO SPENT FUEL RERACK SCHEDULE

2/1/83