



UNITED STATES  
ATOMIC ENERGY COMMISSION  
WASHINGTON, D.C. 20545

F. Kruesi

July 17, 1972

Morris Rosen, Technical Assistant to Deputy Director for Reactor Projects, Directorate of Licensing

GENERAL COMMENTS ON THE GINNA FUEL PROBLEM

Reference: Your note dated July 12, 1972, on above subject.

I have reviewed your comments and although I plan to explore them in more detail with others in REG I feel it necessary to give you my general reaction at this time.

As you indicated we (REG) have discussed the Ginna fuel problem and have agreed (no dissensions in the staff) that (a) the operation of Ginna, Robinson and Point Beach is justifiable on a health and safety basis and (b) there is a need to investigate the potential generic problems on an expeditious and deliberate basis.

In your note you went further and identified some specific conditions and opinions which I'll refer to below.

1. You conclude that the fuel model for predicting steady state, transient and accident performance is "significantly different from reality" with specific areas considered "rather naive". I agree on the need to reexamine to what extent the new information we have affects the ability to predict fuel performance. However, I believe it is premature to reach conclusions such as yours concerning "reality" and "naivety" without having made the detailed reevaluations.
2. You state that previously observed in-core neutrons flux spikes have been ignored.

I must question the basis of your statement. It is my understanding that the significance of the occurrence of "spikes" was considered. Whether or not there was an adequate evaluation and whether there was enough knowledge to determine their significance are logical questions and should be pursued.

3. You highlight the "great need for obtaining and adequately evaluating operating experience as well as the advisability of factoring it into safety considerations" and you refer to "limited attention to operating experience to date".

Unfortunately your comments imply that this need has not been recognized. As you know this need has been clearly recognized in recent appraisals of Regulatory matters. This was reflected in the recent reorganization

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which established a unit (Office of Operations Evaluation) to meet this need with emphasis on the priority of the function.

4. You suggest that the Ginna experience should lead us to examine our understandings in other areas associated with the effects of high irradiation such as radiation embrittlement of vessels. I may not agree with your example but I do agree on the need to evaluate any new information we obtain from operating experience to determine if it has any bearing on other areas.

Original Signed by

D. J. Skovholt

*Acting*

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