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Jim Shapaker

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# Duquesne Light Company

Beaver Valley Power Station  
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December 7, 1995

GEORGE S. THOMAS  
Division Vice President  
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Nuclear Power Division

U. S. Nuclear Regulatory Commission  
Chief, Rules Review and Directives Branch  
Mail Stop T-6D-69  
Washington, DC 20555-0001

**Subject: Proposed Generic Communication; Boraflex Degradation in Spent Fuel Pool Storage Racks**

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Duquesne Light Company (DLC) is responsible for the operation of Beaver Valley Power Station Units 1 and 2. DLC has reviewed the proposed generic letter and would like to submit the below comment.

The purpose of the proposed generic letter is to request that licensees who use Boraflex as a neutron absorber in their spent fuel storage racks (1) assess the capability of the Boraflex to maintain a 5 percent subcriticality margin and (2) submit a plan of action if this subcriticality margin cannot be maintained by the Boraflex material because of current or projected degradation. The Nuclear Regulatory Commission requests a "description of the physical condition of the Boraflex, including any deterioration, on the basis of current as well as future projected accumulated gamma exposure."

The physical condition of the Boraflex in a spent fuel rack resulting from "future projected accumulated gamma exposure" cannot be determined. Design of the rack is an integral part of the degradation process (i.e., some rack designs retard the degradation process more than others). Therefore, unless specific testing based on rack design is performed, current technologies are inadequate to determine the future physical condition of the Boraflex. It is more practical to periodically monitor the condition of the Boraflex material using existing neutron absorber surveillance programs. Therefore, DLC suggests that the words "as well as future projected" be deleted from the above sentence.

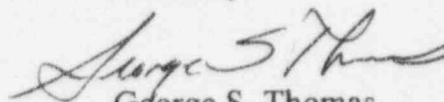
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Thank you for the opportunity to comment on this issue. If you have any questions on this submittal, please contact Mr. R. A. Hruby, Director, Materials and Standards Section, (412) 393-5705.

Sincerely,



George S. Thomas