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Vice President, Nuclear
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60 FR 56359
11/08/95
11472
#6

Georgia Power
the southern electric system

December 8, 1995

Docket Nos. 50-424
50-425

LCV-0713

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

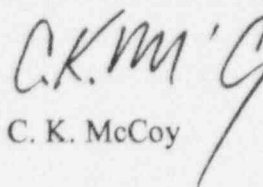
Comments on
"Proposed Generic Communication; Boraflex Degradation in
Spent Fuel Pool Storage Racks (MD91447)"
(60 Federal Register 56359 dated November 8, 1995)

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NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C.

Dear Sir:

Georgia Power Company (GPC) has reviewed the proposed generic letter, "Boraflex Degradation in Spent Fuel Pool Storage Racks," published in the Federal Register on November 8, 1995. In accordance with the request for comments, GPC submits the following. The safety assessment in the proposed generic letter recognizes that the presence of borated water in pressurized water reactor (PWR) spent fuel pools contributes to margin for maintaining subcriticality in spent fuel racks. However, as part of the requested information, licensees are being required to demonstrate subcriticality margin in unborated water. This request appears to be inconsistent with the stated benefit of borated water, particularly for PWRs. As you are aware, the Westinghouse Owners Group (WOG) has initiated an effort to change the k_{eff} criterion, with only limited credit for boron in solution for spent fuel pool criticality control in PWRs, and has pursued discussions with the Nuclear Regulatory Commission including submittal of a topical report with lead plant reference. Due to the potential benefits of the WOG effort, it is recommended that this initiative be considered along with expanded credit for soluble boron.

Respectfully submitted,


C. K. McCoy

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U. S. Nuclear Regulatory Commission

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CKM/TMM

cc: Georgia Power Company
J. B. Beasley, General Manager - Vogtle Electric Generating Plant

U. S. Nuclear Regulatory Commission, Washington, DC
L. L. Wheeler, Licensing Project Manager, Vogtle

U. S. Nuclear Regulatory Commission, Region II
S. D. Ebnetter, Regional Administrator
C. R. Ogle, Senior Resident Inspector - Vogtle