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60 FR 56359  
11/08/95  
11472  
#8



Southern Nuclear Operating Company  
the southern electric system

Dave Morey  
Vice President  
Farley Project

December 8, 1995

Docket Nos. 50-348  
50-364

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

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

Dear Sir:

Southern Nuclear Operating Company (SNC) 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, SNC 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,

Dave Morey

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DNM/TMM

cc: Southern Nuclear Operating Company  
R. D. Hill, Plant Manager

U. S. Nuclear Regulatory Commission, Washington, DC  
B. L. Siegel, Licensing Project Manager, NRR

U. S. Nuclear Regulatory Commission, Region II  
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