

5/13/92

Document Desk  
P1-37

The enclosed document came directly  
to me. It should be docketed.  
It pertains to the Point Beach Nuclear  
Plant. Docket Numbers

50-266

50-301

Thanks.

Bob Gamworthy  
5-1-1364

ADD

May 1, 1992  
1952 Palisades Dr.  
Appleton, WI  
54915

Dear Mr. Samworth, (Mr. Allan Hansen)

Thank you for your recent letter responding to my questions. However, I am still confused about some issues and hope you will have time to respond to these soon.

1. I have a Topical Safety Analysis Report for the VSC system Revision 3A, is this the last version? (I have seen references to a Rev 4). How can I get the most recent version? Would you send me one?

2. WEPCO has used the testing at INEL for "feasibility". The inference is that these tests give the "OK" to the VSC-24. I am enclosing 2 pages from WEPCO's Environmental Screening report given out to interested citizens. On p 33 it says "the VSC-24 system is a feasible technology which has been tested in a 17 assembly version at the Idaho Nuclear Engineering Laboratory." This, I assumed was also what they were referring to in Table 31 (under feasibility analysis) again where it states "proposed cask successfully tested by DOE". In a letter to me from Mr. Jeff Knub at WEPCO he states "The VSC designed by Sverin Nuclear Corp. has been selected for implementation at the First Beach Nuclear Plant. The cask was successfully tested in 1990 at the US DOE INEL outside Idaho Falls. The cask was loaded with spent fuel from the Turkey Pt and Surry reactors - etc". In the DOE Dry Cask Storage Study, Feb 1989 pages E-52 and E-53 refers to these tests and NRC and WEPCO are organizations referenced. Therefore, from all this, I was under the impression that the testing of the VSC-17 was a basis for use of the VSC-24. When I saw that the TSAK Rev 3A on p 4-1 refers to recent cask tests at INEL and p 4-7 refers to them again as a basis for "model/calculation", I assumed this was the test of the VSC-17 they meant. Was it?

So you can understand that when, in your letter, you say your Safety Evaluation report

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"does not reference a report on the VSC-17 testing and does not make use of the DOE work in that case. — this really confuses me. Please explain — is WEPco wrong in using this test for feasibility in its literature to the public?"

3. I also need an explanation of the Certification or "Rulemaking" or whatever is the final "OK" to use the cash. What is the procedure for all these reports? Does the vendor present a "Topical Report"; then the NRC present a "Safety Evaluation" and then the vendor revise the "Topical Report" to a "Topical Safety Analysis" or what? (all these initials are really confusing as to what is revising what — please explain the procedure. It really appalls me.)

4. What is the situation with the cash use at Palisades in Michigan? On the Table 3-1 of WEPco's Experimental Screening Report (enclosed) it says "currently being implemented at Palisades", and on p 33 (enclosed) it says it will be in place there before at P1. Beach.

In our local paper recently Mr. Rank from WEPco is quoted as saying, "It is a technology that has been in use in various places around the world including the US in Virginia and Michigan at the Palisades Plant."

My understanding is that Palisades is waiting for a "ruling", just as WEPco is, and should not be used as a reference for feasibility. Is WEPco correct in using this that way?

5. Has the vendor been given the permission to build casks for Palisades before all these necessary reports are finished? If so, why is this allowed? How could they be built before all the analysis is finished? Wouldn't

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even the assembly of the MSB at this point possibly be up for change when the final "ruling" is done?

6. I guess Jim is still wondering why WERCO was involved with testing the USC-17 when it was only tested with consolidated fuel. Since Palisade and WERCO are the ones interested in wanting the USC-24, why wasn't the cask tested using fuel of the type their plants use? Was there interest by these parties in consolidation at the time of the test? WERCO saying they don't plan to do this. It just seems to me that the array of the rods in spacing and the test for expansion of all the material in the cask, etc., would be so different with consolidated fuel. (Jim no expert for sure, yet I would feel much better if you people would be able to say - yes, the actual USC-24 was built, and tested, with fuel of the type it is to hold at Palisade and Sixt Black.) I wouldn't buy a car without trying it out even if the dealer told me the model was tested. Why are we getting a cask based on computer models? It just seems this is all so "rush, rush" because of the fuel rods being filled and Nevada not opening, that things are going so fast. What was the reason for testing the USC-17 in relation to WERCO?

7. The last concern I am thinking of right now is how these casks will be opened and the fuel transferred to a transport cask to be shipped out. In the Topical Safety Analysis Report p 8-5 there is one rather vague paragraph on unloading the cask. It sounds like just pushing this procedure for the future to figure out, as we have no integrated system with shipping casks or definite plan on whether the inner basket would have to be opened to test the

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integrity of the rods before shipping or what. If these casks stay on the pad longer than planned—whatever that really is—I find little written about procedures for opening them or removing them eventually. Considering a plant can, and probably will, ship fuel from the pool before opening the casks (to make more room without having to purchase more casks) it would seem the casks are more permanent than temporary the way things look now. Have you more detailed plans for removal of the fuel from the USC-24? The report referred to (reference 2.2) as well as Fig 2.2-1 is not in the reports that I have.

I really appreciate the Safety Evaluation Report and will try to get through that and look for the documents under the headings you referred to. Thank you very much.

Sincerely,

Fawn Skillinglaw

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P.S. I also have a letter from Palisades Public Affairs Dir. (Mark Savage) saying, "It should be noted that although the USC-24 system has not been placed into operation as of this time, a USC-17 cask, which is the same design as the USC-24 (only slightly smaller) has been built and is in operation for the DOE in Idaho."

— This, once again, was mentioned to me as feasibility for the use of the USC-24 from him, so you can see why I'm wondering about this constant reference to a test of consolidated fuel in a different cask—sounds like it really isn't so?.

Additional discussion regarding the design of physical provisions for ISFSI protection (guard houses, fences, intrusion detection, etc.) are provided in Section 1.E.

## H. DECOMMISSIONING

Decommissioning of the ISFSI will be performed in a manner similar to and in the same time frame as the decommissioning of Point Beach Nuclear Plant. This is predicated on the ability of the federal government to accept spent fuel as mandated by the Nuclear Waste Policy Act of 1982, as amended. It is anticipated that the MSBs will be transported in a compatible shipping cask to a federal repository when such a facility is operational. However, should the storage facility not accept the MSBs intact, the VSC-24 system allows the MSBs to be brought back into the pool and the fuel repositioned into the racks for loading into transport casks to be provided by the DOE.

The empty MSBs can be decontaminated of loose radioactive material by conventional water sprays and wipe downs. However, the small amount of neutron emissions from the stored fuel may slightly activate the MSB steel. Depending on this level of activation, the MSBs either will be processed, packaged, and shipped for shallow land burial or will be sold as salvageable scrap.

Decontamination of the empty concrete cask can be accomplished through the use of conventional high pressure water sprays to reduce contamination on the cask interior. The sources of contamination on the interior of the cask would be only crud from the outside of the MSB. The expected low levels of contamination from this source can be easily removed with a high pressure water spray and wipe-down. After decontamination, the VSC metal can be cut up for scrap or partially scrapped and any remaining contaminated portions shipped as radioactive waste to a disposal facility. Concrete cask material will be broken apart and shipped to a landfill.

Due to the leak tight design of the MSB, no residual contamination is expected to be left behind on the concrete base pad. The base pad, fence, and peripheral utility structures are de facto decommissioned when the last cask is removed and may be dismantled with the rest of the plant.

The spent fuel pool at Point Beach will remain functional until the ISFSI is decommissioned. This will allow the pool to be utilized to transfer fuel from the MSB to licensed shipping containers for shipment off-site.

## I. ESTIMATES OF INDUCED DEVELOPMENT

No significant induced development is expected to be associated with the proposed ISFSI.

## J. FEASIBILITY ANALYSIS

The VSC-24 system is a feasible technology which has been tested in a 17 assembly version at the Idaho Nuclear Engineering Laboratory. A Topical Safety Analysis Report has been submitted to the NRC and approved in the NRC's Safety Evaluation Report dated March 29, 1991. At least one commercial installation (at the Consumers Power Company Palisades Plant) will be in place and functional prior to the start-up of the Point Beach ISFSI.

TABLE 3-1  
(continued)

(Comparison of Dry Storage Systems)

	ACCIDENT IMPACTS	SAFEGUARDED FROM THEFT, DIVERSION OR SABOTAGE	DECOMMISSIONING	ESTIMATES OF INDUCED DEVELOPMENT	FEASIBILITY ANALYSIS
PROPOSED PROJECT (CONCRETE CASK)	See analysis of potential accident impacts, page	Spent fuel would be stored within the fenced plant boundary and security measures developed to safeguard the stored fuel.	Spent fuel in basket would be transferred to transport casks. Remainder of storage casks would be disposed as low-level waste. Pad and other structures would be handled as regular construction debris.	Little induced development in the Point Beach area. Most casks and ISFSI components are made in other states.	Feasible. NRC license already approved. Proposed cask successfully tested by DOE, currently being implemented at Palisades.
METAL CASKS	Same as for the proposed project.	Same as for the proposed project.	Spent fuel would have to be transferred to a transport cask. Otherwise, same as proposed project.	Same as for the proposed project.	Feasible. Some types of casks already licensed and in use.
MODULAR CONCRETE	Same as for the proposed project.	Security could be easier to provide since the spent fuel would be stored in fixed concrete structures.	Essentially the same as for the proposed project, except there would be more construction debris due to the larger amount of fixed structures.	More on-site construction would be required, but could be absorbed by local labor pool with little impact.	Feasible. NRC license already issued, in use at two sites now.
VAULT	Same as for the proposed project.	Security would be easier to provide since the spent fuel would be stored within a vault.	More difficult due to the fact that there would be a greater amount of both low-level waste and construction debris.	Essentially the same as for modular concrete. The larger facility to be built could result in some short term employment surge in the construction trades.	Feasible. Similar facility planned for Ft. St. Vrain reactor in Colorado. NRC approval granted.
STORAGE/ TRANSPORT CASKS.	Same as for the proposed project.	Same as for the proposed project.	Would be easier than the proposed project because the fuel could be shipped without repackaging. Casks would be disposed as low-level waste. ISFSI pad and other structures would be disposed as construction debris.	Same as for the proposed project.	Feasible. None in use, but are under consideration. No cask has dual certification (storage/transport) yet.