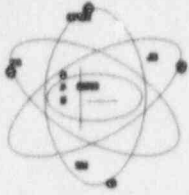


SAXTON NUCLEAR EXPERIMENTAL CORPORATION GENERAL PUBLIC UTILITIES SYSTEM



Jersey Central Power & Light
General Public Utilities Nuclear Corporation
Metropolitan Edison Company
Pennsylvania Electric Company

MAILING ADDRESS:
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Parsippany, NJ 07054

April 24, 1996

C301-96-2022

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D.C. 20555

Gentlemen,

Subject: Saxton Nuclear Experimental Corporation
Operating License No. DPR-4
Docket No. 50-146
Response to the Request for Additional Information Regarding Technical
Specification Change Request No. 57 dated March 25, 1996.

The purpose of this letter is to submit the response to the Request for Additional Information regarding Technical Specification Change Request No. 57, which addresses the proposed expansion of permissible work scope at the SNEC facility.

Sincerely,

G. A. Kuehn Jr.

Vice President SNEC

WGH

Attachment

- 1) Response to the Request for Additional Information
- 2) Procedure 6575-ADM-4500.40, "Control of Hotwork"
- 3) Environmental Report for the Construction of the Decommissioning Support Facilities
- 4) Revised Proposed Technical Specification page 1a

cc: Administrator, NRC Region I
NRC Project Manager NRR
NRC Project Scientist, Region I

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Question 1: In the analysis of proposed changes to the Technical Specifications (TSs), you state that the requested changes have no effect on flooding and radioactive hazard. Please provide your bases for this statement.

Response: The construction of the SNEC facility decommissioning support systems and structures will have no impact on the hazard posed by flooding or radioactive hazard for the following reasons:

With regard to flooding, records kept by the U. S. Geologic Survey from 1889 to the present identify the maximum observed flood level at the facility site was 809.5 feet above mean sea level (MSL) recorded in March 1936. In 1969, the Army Corps of Engineers performed a study that concluded a flood level of 812 feet above MSL has a recurrence period of 225 years. Both the Federal Emergency Management Agency and Army Corps of Engineers were contacted in March of 1996 to verify the validity of the projections. Both agencies indicated that no additional studies have been performed which would update this data nor was there any data to contradict these projections. The flood of record and the 225 year flood recurrence projection are referenced in the 1972 Saxton Decommissioning Plan and Safety Analysis Report.

The predominant grade elevation for the decommissioning support structures is approximately 812.5 feet above MSL. The finished slab elevation of the Decommissioning Support Building (DSB) will be approximately 813.5 feet above MSL. This places the main structure and that portion subject to the effects of flooding above the 225 year flood recurrence elevation. Installation of support services for the Containment Vessel will use existing penetrations; all of which are above the referenced flood levels. Additionally, these installations will be made so as to ensure a seal can be made to prevent water intrusion into the Containment Vessel. Therefore, the new structures and activities will not affect the ability to cope with the largest recorded flood.

With regard to radioactive hazard, the DSB will be constructed adjacent to the Containment Vessel but will not be internally connected to the Containment Vessel until the Decommissioning Plan is approved. Therefore, the construction activities permitted by these changes will not affect the radioactive hazard at the site. In addition, decommissioning activities will not be permitted within the DSB until approval of the Decommissioning Plan. SNEC will only use the completed structure

during performance of activities associated with the expanded work scope addressed by this change. These activities will be limited to those of a nature which have been routinely performed at the site since 1972. These activities include the packaging of low level radioactive waste, the preparation of containers for shipment and the temporary storage of radwaste packages awaiting shipment. All of these activities have been and will continue to be conducted in accordance with NRC regulations. To date, these activities have largely been performed outdoors or in temporary enclosures. The use of more substantial facilities will provide a greater level of protection against offsite release and reduce the overall hazard associated with the activities.

Question 2: Your proposed changes to TS A.3. state in part:

Any action which results in alteration of the Containment Vessel, removal of major radioactive components or results in dismantling of components for shipment that contain greater than class C waste is prohibited.

There is a possibility that the phrase "for shipment that contain greater than class C waste" may be interpreted to allow dismantling of components other than asbestos and defunct electrical services as long as they are not prepared for shipment. This would be against section 2.C.(2) of the SNEF license. Please consider removing the phrase "for shipment that contain greater than class C waste" from the proposed TS or justify the inclusion of this phrase considering the discussion above.

Response: The phrase "for shipment that contain greater than class C waste" has been removed from the proposed Technical Specification wording to eliminate the possible misinterpretation of the intent of the section. See the revised Technical Specification page, Attachment 4.

Question 3: Your proposed TS has an example list of decommissioning support systems you want to install in the CV. Will any additional systems be installed beyond those on the list? If so, please list all the systems that are planned for installation in the TS.

Response: The list provided is the complete listing of decommissioning support systems that will be installed in the Containment Vessel once such work is permitted by the approval of the proposed revised Technical Specifications. To eliminate the ambiguity, the phrase "for example" has been removed from the proposed revised wording. See the revised Technical Specification page, Attachment 4.

Attachment 2
Procedure 6575-ADM-4500.40, "Control of Hotwork"
9 Pages

Question 4: Are the fire protection provisions and procedures discussed in your application the same as those used for characterization activities? Your application discusses the use of fire watches when appropriate. Please elaborate under what conditions fire watches would be used. Please discuss the equipment referred to in your application that the local fire departments will receive. Will the equipment be given to the fire departments before the activities requested in this application start?

Response: The fire protection provisions and procedures discussed in the application are the same as those used for characterization. Fire watches will be used whenever welding, grinding or other hot work is being performed. These activities are controlled by procedure 6575-ADM-4500.40, "Control of Hotwork" which identifies when and how a fire watch is assigned to a task and the responsibilities of the assignee. The procedure is included as Attachment 2 for your information.

As a result of a verbal agreement between the Lead Fire Protection Engineer and local fire company officials, the fire protection equipment referred to in the application will be kept at the site and made available to the local fire personnel responding to a fire at the facility; it will not be turned over to them. Transportation of specialized equipment (portable lighting and an ambulance kit which contains materials to support transport of contaminated, injured personnel), which is inappropriate for applications other than the SNEC facility, was considered to be undesirable. The equipment will be available on site prior to the start of the activities requested by the Technical Specification Change Request.

Question 5: Please provide an environmental report that discusses the environmental impact of the construction of the decommissioning support facilities. The environmental impact of the use of the decommissioning support facilities for decommissioning activities need not be discussed now but should be covered in the environmental report for the decommissioning plan.

Response: An environmental report discussing the environmental impact of the construction of the decommissioning support facilities is provided as Attachment 3.

Question 6: How will the area that comprises the exclusion area at any particular point in time be clearly indicated?

Response: The Exclusion Area will be identified by signs posted along the perimeter.