

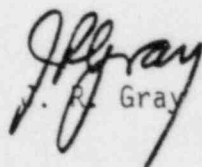
May 3, 1984

Note to: R. Birkel  
D. McDonald

From: J. Gray

SUBJECT: PROPOSED INITIAL NOTICES AND NSHC FINDINGS FOR SFP RERACKS

OELD has been asked to concur in proposed initial notices and NSHC findings on license amendments which would authorize reracks for the SFPs at McGuire and Turkey Point. While the notices appear adequate and the proposed NSHC findings sufficient, OELD has recently become aware of a "Generic Safety Issue" which may possibly have a bearing on NSHC. Specifically, in the Trojan SFP amendment proceeding, intervenors have raised a contention concerning "Generic Issue 82-Beyond Design Basis Accidents in Spent Fuel Pools." Generic Issue 82 involves, among other things, a study which purports to show that, if all SFP water is lost, closely spaced stored zirc fuel assemblies could self-ignite and burn if decay heat generation reaches certain levels. The existence of Generic Issue 82 raises a question as to whether individual applications for SFP amendments which would result in reducing the spacing between stored fuel assemblies may warrant consideration of a fuel assembly fire in determining whether or not the amendments in question involve SHC. We would be pleased to meet with you and Gus Lainas to discuss this matter and attempt to reach a decision on whether the existence of Generic Issue 82 warrants consideration in the NSHC findings in the notices for the McGuire and Turkey Point SFP amendments, as well as similar cases in the future. Until a decision is reached on this matter, we would be inclined to withhold concurrence on the McGuire and Turkey Point packages.

  
J. R. Gray

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