CO-OPERATIVE CITIZEN'S MONITORING NETWORK, INC. F.O. Box 1491 New Haven, CT. 06506 (800) 475-2266 (203) 387-6937

December 5, 1992

Johr Hull, Esq. Ann P. Hodgdon, Esq. Office of General Counsel U.S. Nuclear Regulatory Commission

Request for Information Pertaining to the Criticality Analyses of Milistone II Spent Fuel Pool, Regions A, B, C:

Docket no. 50-336, 70L No. DPR-65, (ASLBP No. 92-665-07 TLA) (Spent Fuel Pool Re-design)

- I. To insure enough time for review, we need the criticality calculations (to include all input and output, data and programs, and all source materials and other references*) that were done by NRC staff in its review of the Millstone II Spent Fuel Pool redesign criticality analyses by NU, CE, ABB-CE, Holtro, Dr. Vernetsor or the NRC staff itself by January 5, 1992.
- Z. All the experiments and measurements love on Boroflex, under laboratory conditions, at all stages of use in spent fuel pools under conditions similar to Millstone II, and on materials in and from the SFP at Millstone II. This should include all assumptions, parameters of experiments, experimental data, summary of experiments, models and computer programs with all assumptions specified, input with all sources of data referenced, computer runs (output), and conclusions.*
- 3. In the 1986 rerack of Milistone II the fuel assembli's were placed for the first time in such close proximity as to have a Keff > 1. We need to revisit those calculations with special attention to the data on reactivity of consolidated assemblies, and the information available at that time on Boroflex and other materials in use in the pool to reduce Keff. We understand from a MU letter that DDE was directly involved in that rerack design for incorporation of consolidated fuel assemblies. We request that you obtain from DOE these materials for our review. This is relevant to the current criticality analysis since it is our understanding that the current license permits consolidation.
- * All references should be provided, especially inhouse documentation or that of private or governmental entities whose work is not readily accessible in a typical Science & Engineering library.
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 4. The prevention of criticality in the pool relies in part on circulation of dissolved boron. We request information on post 1986 rerack concentrations of boron in the pool and concentration and circulation problems that have occurred.
- 5. Since studies done on bornilex and on assemblies and consolidated cans may include the amount and type of radiation exposure, where this informs 'n is used we need to be informed if it is estimated or measure on by what methods and means.
- 6. Because much attention—eing given to region B, or the storage area for new fuel b, ARC staff, we request that the information they receive be shared with us.
- 7. The current storage in region A is such as to be at almost maximum capacity, not considering the use of consolidation. Therefore we request all information necessary for doing a complete criticality analysis of this region.

This information should include but not be limited to:

All available data on the current condition and position (both experimental and actua!) of the assemblies, racks, boroflex panels and metal panel holders, sample coupons, waste and damaged fuel, consolidated cans and other pertinent structures.

A complete report on erosion and blackness testing (for both A and B regions) describing the method utilized any limitations of the procedure.

9212210189 921205 PDR ADOCK 05000336 PDR All information used in any modeling and all computer programs and the output, conclusions, and assumed accuracy of this process.

The actual radioactive isotopes generated as a measure of burnup prior to 85% burnup and the level of neutron activity as it relates to burnup and initial enrichment.

The flow rate and chemical composition of coolant liquid in pool as it is, has been, and should be.

Sincerely, MARY ELLEN MARUCCI Co-ordinator, CCMN, Inc.

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RELATED CORRESPONDENCE

PROD 8 UTIL FAC 50 - 336 - OLA

TOUKLILD USNRC

LINDA M. BLAIR P.O. BOX 461 NEW HAVEN, CT. 06502 (203) 777-1921

'92 DEC -9 All :30

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IMPORTANT!!!

Faxes may be sent to the above phone number on Tuesdays and Thursdays between 8:00 and 11:00 P.M. or by calling the number and setting an appointment for the purpose of sending the fax.

Thank you.

THIS FAX IS FOR:

Mr. EMIL JULIAN