

August 26, 1985

VPNPD-85-274 NRC-85-91

Mr. H. R. Denton, Director Office of Nuclear Reactor Regulation U. S. NUCLEAR REGULATORY COMMISSION Washington, D. C. 20555

Attention: Mr. Edward Butcher, Acting Chief Operator Reactor Branch No. 3

Gentlemen:

DOCKET NOS. 50-266 AND 50-301 SPENT FUEL RACK NEUTRON ABSORBING MATERIAL SURVEILLANCE PROGRAM POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2

On September 6, 1983 we sent a letter to the Nuclear Regulatory Commission which transmitted our safety evaluation for use of Optimized Fuel Assemblies (OFA) at our Point Beach Nuclear Plant. In Attachment C to that letter we advised that the spent fuel pool storage rack neutron absorbing material (boraflex) surveillance program would be modified to cover increased boraflex test sample exposures of at least 2.5 x 10¹¹ rads gamma. This integrated gamma dose was conservatively calculated assuming that the boraflex test samples were exposed to freshly discharged optimized fuel assemblies for 80 6-month cycles or 40 years.

At Point Beach boraflex test sample exposure did not commence until 1981. OFA spent fuel assemblies will not be routinely discharged to the spent fuel pool until 1987; hence, exposure of these samples to OFA for 80 6-month cycles is unachievable. Based on accumulated exposure to date and projections of exposure to freshly discharged OFA fuel every six months beginning in 1987, it is calculated that the boraflex test samples installed at Point Beach will receive approximately 0.9 x 10¹¹ rads gamma by the year 2010. Test sample exposure of 2.5 x 10¹¹ rads nevertheless exceeds by a significant margin the projected dose of 0.2 x 10¹¹ rads which a typical, non-test sample, boraflex sheet would be exposed to due to storage of OFA spent fuel assemblies in the spent fuel racks over a 40-year storage life.

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In summary, 0.9×10^{11} R is the appropriate overall exposure for the boraflex test sample surveillance program. If you have any questions regarding this correction to our previous boraflex program discussions, please let us know.

Very truly yours,

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Vice President-Nuclear Power

C. W. Fay

Copy to NRC Resident Inspector