From: Alan Blind
To: PalisadesRestartProject
Subject: [External_Sender] Palisades DD41 Recovery LAR — Comments Regarding Accident Dose and Personnel Protection
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Subject: Palisades DD41 Recovery LAR — Comments Regarding Accident Dose and Personnel Protection

NRC Palisades Restart Team,

I have reviewed the radiological consequence calculation, **HI-2261348, Revision 1, "Radiological Consequences of DD41 FHA at Palisades,"** included with Holtec's emergency license amendment request for recovery of fuel assembly DD41.

At this point, I am not aware of a regulatory pathway available to me to formally submit comments on the amendment while the NRC is completing its determination regarding whether the proposed amendment involves a significant hazards consideration. I also do not know whether the NRC intends to process or approve this request under the emergency provisions requested by Holtec, potentially before the normal public-comment process occurs. **Accordingly, I am submitting the following comments directly to the Palisades Restart Team so that they may be considered as part of the NRC's ongoing review.**

The calculation raises several questions that I believe warrant NRC consideration before approval of the proposed fuel-transfer evolution.

First, the **Control Room is clearly the limiting receptor relative to its applicable acceptance criterion**. Holtec calculates a Control Room dose of 3.0402 rem TEDE, consisting of 2.7462 rem from fuel damage and 0.294 rem from shine. **This represents approximately 61 percent of the 5-rem Control Room acceptance criterion**. By comparison, the calculated EAB and LPZ doses are only approximately 9 percent and 1 percent, respectively, of the 6.3-rem criteria used in the analysis. ML26273A469

This is particularly noteworthy at Palisades because of the physical relationship between the Control Room ventilation system and plant release points. The calculation itself shows a substantial difference between the atmospheric dispersion factors assumed for the Control Room normal and emergency ventilation intakes. The initial χ/Q for the normal intake is $\mathbf{6.1 \times 10^{-3}\ sec/m^3}$, compared with $\mathbf{8.32 \times 10^{-4}\ sec/m^3}$ for the emergency intake. ML26273A469

Given that the calculated Control Room dose already uses approximately 61 percent of the acceptance criterion, I believe NRC should specifically identify **what equipment, ventilation alignments, isolation actions, filtration, operator actions, response times, unfiltered in-leakage assumptions, and atmospheric-dispersion assumptions are credited to maintain the Control Room dose below 5 rem**.

I also do not see the LAR clearly explaining what additional operational or compensatory measures will be established during the DD41 recovery and transfer to manage this relatively significant Control Room consequence. Considering the proximity of the Control Room ventilation system to plant release points, I believe the assumptions regarding release location, atmospheric dispersion, Control Room isolation, and ventilation configuration deserve particular NRC scrutiny.

Second, I am concerned about an apparent omission from the radiological consequence analysis. HI-2261348 evaluates dose to three receptors: the **EAB, LPZ, and Control Room**. It does not appear to provide an accident-dose analysis for personnel performing or directly supporting the DD41 recovery and Fuel Transfer Canister movement. ML26273A469

These are the personnel who could be closest to the source if the postulated fuel-handling accident actually occurred. The LAR describes an unusual evolution involving the Fuel Movement Device, chain falls and rigging, placement of DD41 into the Fuel Transfer Canister, removal of the loaded canister from the water, movement through containment, transfer through the equipment hatch, re-rigging and upending of the canister, and subsequent movement into the spent-fuel-pool area. ML26273A469

Accordingly, I sugest it prudent that NRC determine:

1. What is the calculated accident dose to personnel operating and supporting the DD41 recovery and Fuel Transfer Canister movement?

2. Does that evaluation include direct radiation, airborne activity, shine, and dose received while personnel evacuate the immediate work area following a postulated fuel-handling accident?

3. What assumptions are made regarding worker location, evacuation time, dosimetry, radiation monitoring, respiratory protection, stay-time limitations, access controls, and other radiation-protection measures?

4. What specific measures will be in place to protect the Control Room, given that its calculated dose is already approximately 61 percent of its acceptance criterion?

5. Has NRC independently verified that the atmospheric-dispersion and Control Room ventilation assumptions used in HI-2261348 appropriately represent the actual release points and Control Room intake configuration applicable during this one-time fuel-transfer evolution?

I recognize that the LAR demonstrates that the calculated EAB, LPZ, and Control Room doses remain below the applicable design-basis accident acceptance criteria. My concern is different: **the Control Room is the most affected analyzed receptor relative to its acceptance criterion, yet the submittal does not clearly identify the measures that will manage that consequence, while the accident dose to personnel closest to the proposed fuel-transfer operation does not appear to be presented at all.**

This recovery and transfer evolution is a **first-of-a-kind, infrequently performed task** involving damaged fuel, specially designed equipment, multiple lifting and rigging evolutions, and movement of the fuel assembly outside its normal fuel-handling path. Nuclear management practice for activities of this nature is to approach them deliberately and with particular rigor, supported by **well-developed plans, procedures, training, contingency planning, and demonstrated personnel proficiency before the evolution begins**.

That rigor is especially important here because the personnel performing and supporting the fuel-transfer movement would be among those closest to the source should the postulated fuel-handling accident occur. Yet the radiological consequence analysis provided with the LAR does not appear to quantify their potential accident exposure.

Taking the time necessary to get the plans, procedures, training, radiation-protection measures, contingency actions, and personnel preparation right before beginning this first-of-a-kind evolution is imperative, particularly given the potentially significant radiological consequences to the workers directly involved. The urgency associated with the Palisades restart schedule should not displace that fundamental nuclear-safety principle.

Given Holtec's request for emergency processing, I respectfully ask that the NRC consider these matters **before making a final determination on the requested amendment and before authorizing the DD41 recovery and transfer evolution.**

Regards,

Alan Blind
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