

February 21, 1986

bounded by the analysis in reference (b). The NRC criticality analysis is attached.

The mechanical probes and water jets on the vacuum nozzle will use a submersible circulating pump with a capacity of 25 gpm as the driving force for debris bed agitation. Since the pump and circulating systems will use RCS water and will be completely contained in the internals indexing fixture, it creates no deboration or RCS leakage pathways that have not been previously analyzed.

Use of a larger vacuum tool will permit vacuuming of debris from the lower head. The only potential safety concern is impacting of incore instrument tubes with the vacuum nozzle. The low impact loads imparted by the vacuum nozzle on the incore instrument tubes are unlikely to cause damage. In the unlikely event of damage, the potential consequences of incore instrument tube failure has been analyzed in the staff's safety evaluation in support of Technical Specification Change 46.

Operation of the vacuum system without a filter on the knockout canister discharge is likely to cause a high turbidity and increased radionuclide concentration in the RCS water. Increased turbidity will require periodic shutdown of defueling operations until visibility improves but will present no adverse safety impact provided prudent judgement is exercised and existing procedural controls are adhered to. Increased RCS activity levels may cause slight increases in radiation levels on the defueling platform, however procedures approved by the NRC staff are currently in place to control the radiological working conditions and will assure no adverse impact on the health and safety of the workers.

We concur with your assessment that the proposed Fines/Debris Vacuum System Modifications are bounded by previously approved safety evaluation and do not present any unreviewed safety questions. We therefore approve the proposed modifications contingent upon your submittal of the applicable procedures subject to Technical Specification 6.8.2.

Sincerely,

/s/ C. Cowgill for

William D. Travers
Director
TRI Cleanup Project Directorate

Attachment: As stated

cc: T. F. Dermitt
R. E. Rogan
S. Levin
W. H. Linton
J. J. Byrne
A. W. Miller

OFFICE	TMICPD	TMICPD	TMICPD <i>afh</i>			
SURNAME	JAThomas:wa	Act. Chief, T.S.	WDTravers			
DATE	2/21/86	2/21/86	2/21/86			