



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

FEB 15 2000

REPLY TO THE ATTENTION OF  
**B-19J**

Mr. Anthony J. Mendiola  
Chief, Section 2, Project Directorate III, Division of Licensing  
Project Management, Office of Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555-0001

50-346

Re: EA/FONSI for Davis-Besse Nuclear Power Station, Unit 1, Ottawa Co., OH

Dear Mr. Mendiola,

In accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act, we have reviewed the Environmental Assessment and Finding of No Significant Impacts (EA/FONSI) for the U.S. Nuclear Regulatory Commission (U.S. NRC) consideration to issue an amendment from to Facility Operating License NPF-3, issued to FirstEnergy Nuclear Operating Company (FirstEnergy), for operation of the Davis-Besse Nuclear Power Station, Unit 1, located in Ottawa County, Ohio.

Based on our review, we offer the following comments for your consideration:

In regard to the capability by 289 storage locations by allowing the use of spent fuel racks in the cask pit area adjacent to the spent fuel pool (SFP), our Agency is assuming that this cask pit is an air cooled area within the containment structure. Please confirm this assumption. If our assumption is correct, please also indicate whether emanations will be higher in this area than from the spent fuel pool?

In regard to the licensee's long-term plans which will include submitting a request for a complete re-racking of the SFP. Our Agency assumes that the use of the cask pit will be a temporary measure, and any long-term plans will call for relocating the fuel back in the SFP. Please confirm this assumption. If our assumption is correct, please indicate how long will the spent fuel be stored in the cask pit.

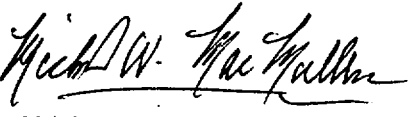
In regard to the small percentage of these fission gases is released to the reactor coolant from the small number of fuel assemblies that are expected to develop leaks during reactor operation. Our Agency is requesting information on whether the terms "small percentage," and "the small number" can be quantified in terms of numbers? In the event all the fuel will eventually be re-racked and placed in the SFP, our Agency also requests information on whether this will have an impact on the heat load, and whether there will be an increase in the evaporation rate at that time.

DFOL  
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Add: Doug Rickett  
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In regard to the additional generation of solid radwaste at DBNPS, our Agency is requests you to quantify the amount of additional solid waste that will be generated.

We appreciate the opportunity to offer comments on this project. We look forward to receiving your comments related to the concerns outlined above. If you should have any questions about this matter, please contact Mazin Enwiya at (312) 353-8414 or by email at [enwiya.mazin@epamail.epa.gov](mailto:enwiya.mazin@epamail.epa.gov).

Sincerely,

*for*   
Shirley Mitchell, Deputy Director  
Office of Strategic Environmental Analysis