

Private Fuel Storage, L.L.C.

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May 3, 2000

EIS COMMITMENT RESOLUTION LETTER #11
DOCKET NO. 72-22 / TAC NO. L22462
PRIVATE FUEL STORAGE FACILITY
PRIVATE FUEL STORAGE L.L.C.

- References:
1. April 28, 2000 telephone call between the NRC and Stone and Webster (S&W)
 2. PFS letter, Donnell to U.S. NRC, EIS Commitment Resolution Letter #9, dated April 28, 2000

During the above referenced telephone call the NRC requested additional clarification regarding the occupational doses to individual workers at the Private Fuel Storage Facility (PFSF). The NRC request is documented below along with the PFS response.

NRC Requests/Questions

PFS stated in Attachment 2 of Reference 2 that the total annual dose to operations and radiation protection personnel involved in spent nuclear fuel receipt, transfer, and storage operations is estimated to be approximately 49 person-rem (assuming a storage cask loading rate of 200 casks per year and assuming all storage casks are HI-STORM casks). There will also be additional occupational exposure incurred at the Intermodal Transfer Point and during routine operation and maintenance at the PFSF. Based on the number of people that PFS has identified as being involved in these operations (approximately 11), it appears that occupational exposure to individuals could exceed federal guidelines. PFS should explain how it intends to meet federal guidelines for occupational exposure to individuals working at the PFSF.

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PFS Response

The radiation protection program at the PFSF is described in Chapter 7 of the Safety Analysis Report (SAR). Section 7.1 of the SAR states the following:

The objective for the Private Fuel Storage Facility (PFSF) Radiation Protection Program is to keep radiation exposures to facility workers and the general public as low as is reasonably achievable (ALARA).

A Radiation Protection Program will be implemented at the PFSF in accordance with requirements of 10 CFR 72.126, 10 CFR 20.1101, and 10 CFR 19.12 (References 1, 2, and 3). The program will draw upon the experience and expertise of programs and personnel of the Private Fuel Storage L.L.C. (PFSLLC) member utilities.

The primary goal of the Radiation Protection Program is to minimize exposure to radiation such that the individual and collective exposure to personnel in all phases of operation and maintenance are kept ALARA. This is accomplished by integrating ALARA concepts into design, construction, and operation of the facility.

Trained personnel will develop and conduct the Radiation Protection Program and will assure that procedures are followed to meet PFSLLC and regulatory requirements. Training programs in the basics of radiation protection and exposure control will be provided to all facility personnel whose duties require working in radiation areas.

The radiation protection staff is responsible for and has the appropriate authority to maintain occupational exposures as far below the specified limits as reasonably achievable. Ongoing reviews will be performed to determine how exposures might be reduced. The program will ensure that PFSF personnel receive sufficient training and that radiation protection personnel have sufficient authority to enforce safe facility operation. Periodic training and exercises will be conducted for management, radiation workers, and other site employees in radiation protection principles and procedures, protective measures, and emergency responses. Revisions to operating and maintenance procedures and modifications to PFSF equipment and facilities will be made when the proposed revisions will substantially reduce exposures at a reasonable cost. The program will also ensure that adequate equipment and supplies for radiation protection work are provided.

The PFSLLC is committed to a strong ALARA program. The ALARA program follows the guidelines of Regulatory Guides 8.8 (Reference 4) and 8.10 (Reference 5) and the requirements of 10 CFR 20 (Reference 2). Management is committed to compliance with regulatory requirements regarding control of personnel exposures and will establish and maintain a comprehensive program at the PFSF to keep

individual and collective doses ALARA. Management will assure that each staff member integrates appropriate radiation protection controls into work activities. PFSF personnel will be trained and updated on ALARA practices and dose reduction techniques to assure that each individual understands and follows procedures to maintain his/her radiation dose ALARA. Design, operation, and maintenance activities will be reviewed to ensure ALARA criteria are met.

The ALARA program will ensure that:

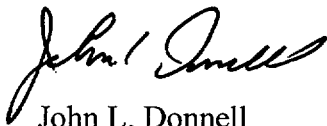
1. An effective ALARA program is administered at the PFSF that appropriately integrates management philosophy and NRC regulatory requirements and guidance.
2. PFSF design features, operating procedures, and maintenance practices are in accordance with ALARA program guidelines. Formal periodic reviews of the Radiation Protection Program will assure that objectives of the ALARA program are attained.
3. Pertinent information concerning radiation exposure of personnel is reflected in design and operation.
4. Appropriate experience gained during the operation of nuclear power stations relative to radiation control is factored into procedures, and revisions of procedures, to assure that the procedures continually meet the objectives of the ALARA program.
5. Necessary assistance is provided to ensure that operations, maintenance, and decommissioning activities are planned and accomplished in accordance with ALARA objectives.
6. Trends in PFSF personnel and job exposures are reviewed to permit corrective actions to be taken with respect to adverse trends.

PFSF personnel will be responsible for ensuring that activities are planned and accomplished in accordance with the objectives of the ALARA program. Staff will ensure that procedures and their revisions are implemented in accordance with the objectives of the ALARA program, and that radiation protection staff is consulted as necessary for assistance in meeting ALARA program objectives. Individual radiation doses, and collective doses associated with tasks controlled by radiation work permits, will be tracked to identify trends and support development of alternative procedures that result in lower doses.

PFS believes that the occupational exposures calculated and reported in the SAR are conservative (i.e., actual occupational doses to individual workers at the PFSF will be a fraction of those calculated). Additionally, doses to workers will be closely monitored during initial operations at the PFSF. Based on actual doses received from the first few canister transfer operations, measures will be implemented to maintain occupational exposure ALARA. These may include additional shielding, optimizing handling operations to maximize distance to the source, and reducing time in the radiation field.

As can be seen from the above discussion, PFS is committed not only to maintaining occupational exposures below federal guidelines but to maintaining exposures ALARA as well. The SAR will be updated in May 2000 to include the additional information provided above. If you have any questions regarding this response, please contact me at 303-741-7009.

Sincerely



John L. Donnell
Project Director
Private Fuel Storage L.L.C.

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