

5.0 ADMINISTRATIVE CONTROLS

5.5 Programs

The following programs shall be established, implemented, and maintained.

5.5.1 Technical Specifications (TS) Bases Control Program

This program provides a means for processing changes to the Bases of these Technical Specifications.

- a. Changes to the Bases of the TS shall be made under appropriate administrative controls and reviews.
- b. The licensee may make changes to the Bases without prior NRC approval provided the changes do not require prior NRC approval pursuant to 10 CFR 72.48.
- c. The Bases Control Program shall contain provisions to ensure that the Bases are maintained consistent with the SAR.
- d. Proposed changes that do not meet the criteria of 5.5.1.b above shall be reviewed and approved by the NRC prior to implementation. Changes to the Bases implemented without prior NRC approval shall be provided to the NRC on a frequency consistent with 10 CFR 72.48.

5.5.2 Radioactive Effluent Control Program

This program implements the requirements of 10 CFR 72.44 (d).

- a. The Trojan ISFSI does not create any radioactive materials or have any radioactive waste treatment systems. Therefore, specific operating procedures for the control of radioactive effluents are not required. The MPC Lid Weld Helium Leak Rate test that was conducted during cask loading provides assurance that there are essentially no measurable radioactive effluents from the ISFSI.
- b. This program includes an environmental monitoring program. The environmental monitoring program ensures the annual dose equivalent to any real individual located outside the ISFSI Controlled Area does not exceed regulatory limits.

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5.5.3 CONCRETE CASK Thermal Monitoring Program

This program provides guidance for temperature measurements that are used to monitor the thermal performance of each CONCRETE CASK.

- a. The air outlet temperature and the ambient air temperature are measured daily. The temperature difference between the air outlet temperature and the ambient air temperature will be calculated and recorded. The air inlet vents will be inspected and verified free of blockage weekly. In the event of an environmental phenomenon occurring, the frequency of visual inspection will be increased in accordance with the severity and consequences of the event.
- b. If any air outlet temperature or temperature difference between air outlet and ambient temperatures show an unexplained reading, a comparison with predicted and/or baseline data will be performed and appropriate actions taken to determine the cause and return the temperature to an acceptable value. One of the immediate actions will be to increase the frequency of temperature monitoring.
- c. If any air outlet temperature reaches or exceeds the program limit, the NRC will be notified in accordance with 10 CFR 72.75(b), (e), and (f), and actions will be taken to evaluate the effects and impact of the high temperature on the CONCRETE CASK. Taking actions when air outlet temperature reaches the program limit should preclude reaching the short term bulk concrete temperature limit which is 350EF. Concrete temperatures in excess of 350EF could potentially weaken the concrete strength and tests may have to be performed to evaluate the concrete and to justify continued use of the CONCRETE CASK.