

**From:** [Eckholt, Jennie K.](#)  
**To:** [Longmire, Pamela](#)  
**Subject:** RE: ACTION: RSI response date  
**Date:** Thursday, December 22, 2011 4:05:19 PM

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I'm sorry I missed your call! I missed you by just a few seconds! We picked February 8th for the following reasons: we started our clock on January 2nd because of everyone being gone for the holidays. Then, we estimated it would take about 30 days to prepare, review and approve that many responses. Last, we weren't able to send the responses the last week of January because we'll actually be in Japan to check on the TN40HT fabrication activities. So, we would request atleast 30 days to provide a response to the questions. Note that this estimation was based off the preliminary list that was sent. If more questions are added that request significant work to prepare (new calculations, analyses, etc.) then 30 days may not be appropriate.

Again, I'm sorry I missed your call! I'm at home today, so my cell phone is the best way to reach me.

-Jennie

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From: Longmire, Pamela [Pamela.Longmire@nrc.gov]  
Sent: Thursday, December 22, 2011 11:37 AM  
To: Eckholt, Jennie K.  
Subject: RE: ACTION: RSI response date

Please clarify for me the assumed start date; that will give me the length of time needed. That is the number I need from you.

-----Original Message-----

From: Eckholt, Jennie K. [<mailto:Jennie.Eckholt@xenuclear.com>]  
Sent: Thursday, December 22, 2011 12:00 PM  
To: Longmire, Pamela  
Subject: RE: ACTION: RSI response date

Please note that I meant February 8, 2012. I'm not used to the new year yet!

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From: Eckholt, Jennie K.  
Sent: Thursday, December 22, 2011 10:43 AM  
To: Longmire, Pamela  
Subject: RE: ACTION: RSI response date

Thanks for clarifying, Pam! We understand that these questions may be subject to change and are not finalized until they are issued in the letter. We have reviewed these preliminary questions, and have estimated a date that we can respond to these questions. We can have a response completed by February 8, 2011. This date includes enough time for our internal reviews and approvals. Please let me know if this date is acceptable.

-Jennie

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From: Longmire, Pamela [Pamela.Longmire@nrc.gov]  
Sent: Thursday, December 22, 2011 7:36 AM  
To: Eckholt, Jennie K.  
Subject: ACTION: RSI response date

Jennie, I need to clarify what I need from you. The list of potential questions in the request for supplemental information (RSI) has not been cleared through our internal process. So the RSI you receive is subject to change. I provided them so as to facilitate your being able to estimate the amount of time NSPM will require to address the various areas of the application that appear to be incomplete. So to be clear, please provide an estimate of the amount of time required to address these items. Once the RSI package has cleared our internal process you will receive the final RSI and the attached letter

will have a date based on the estimate provided. PL

From: Longmire, Pamela  
Sent: Wednesday, December 21, 2011 2:18 PM  
To: 'Eckholt, Jennie K.'  
Subject: ACTION: RSI response date

Jennie,

Staff performed an acceptance review of the PI-ISFSI license renewal application to determine if the application contains sufficient technical information in scope and depth to allow the staff to complete the detailed technical review. Based on our acceptance review, the application does not contain sufficient technical information. The information needed (i.e., RSI) to continue our review is described below in draft form (final RSI will be provided as an enclosure to the letter being prepared). Please provide to me by COB 12/22 the date NSPM will provide this information. Please note that if the information is not received by the prescribed date, the application will not be accepted for review.

PL

Request for Supplemental Information:

#### MATERIALS

1. Demonstrate the condition of the high-burn up fuel in dry-cask storage past 20 years.

Low-burn up fuel was used in the DOE/Surry cask demonstration program (cited by the applicant). This demonstration program may not be applicable to the storage of high-burn up fuel.

The continued operation of the ISFSI Pressure Monitoring System is required to meet 72.122(h)(5).

2. Justify why the Pressure Monitoring System is not included with Systems, Structures and Components that are within the scope of the licensing renewal.

The operation of the ISFSI Pressure Monitoring System is necessary to detect any leakage from the cask lid assembly.

This information is required to demonstrate compliance with required 10 CFR Part 72.122(h)(4).

3. Provide the inspection results of the casks to the staff for independent review.

The license renewal application provides a summary of inspection results, but the supporting data, e.g., images and reports, were not provided to the staff for review.

This information is required to demonstrate compliance with required 10 CFR Part 72.24(c)(1).

4. Provide a copy of the ISFSI Inspection and Monitoring Program to the staff.

The ISFSI Inspection and Monitoring Program which describes the specifics of the aging management activities should be provided to the staff for review.

This information is required to demonstrate compliance with required 10 CFR Part 72.24(c)(1).

5. Specify what industrial codes are used to describe the acceptance criteria for visual examinations of SSCs.

The license application make frequent references to visual inspections of SSCs but does not mention what acceptance criteria is used.

This information is required to demonstrate compliance with required 10 CFR Part 72.24(c)(4).

6. Justify seven-year inspection intervals under the ISFSI Inspection and Monitoring Activities Program.

Concrete damage to the ISFSI is monitored on a seven-year interval using ACI 349.R acceptance criteria, but ACI 349.R recommends a 5-year inspection interval for concrete.

This information is required to demonstrate compliance with required 10 CFR Part 72.24(c)(4).

7. Provide changes made the ISFSI under 10 CFR Part 72.48, including the technical bases for these changes.

Any changes which have been made to the ISFSI under 10 CFR Part 72.48 should be presented to the staff in order to conduct a complete licensing review. Summaries of Part 72.48 changes may not be sufficient to make a safety evaluation finding.

This information is required to demonstrate compliance with required 10 CFR Part 72.24(c)(1).

## CONFINEMENT

8. Provide confinement/dose analyses for the casks located at the ISFSI during the license renewal period.

Considering this is a 40 year license renewal, a confinement/dose analysis should be provided that includes the presence of the TN-40 and TN-40HT casks at the ISFSI. The confinement/dose analysis should include normal, off-normal, and accident conditions and take into account the dose associated with gases, volatiles, fines, and crud for both the TN-40 and TN-40HT casks. The response should include a step-by-step calculation methodology. For example, the equation and factors (release fractions to the environment, etc.) for determining the amount of material released (defined by Q on page A7A.8-9 of the SAR) should be included. Guidance for the analysis can be found in NUREG-1567 (and NUREG-1536).

This information is required to evaluate compliance with 10 CFR 72.104 and 72.106.

9. Clarify the use of airborne radioactivity monitoring for verifying site dose.

Page E-48 of the "Application for Renewed ISFSI Site-Specific License" states: "There is no need for airborne radioactivity monitoring since no airborne radioactivity is anticipated." It appears that this statement indicates that there is no ISFSI-specific airborne radioactivity monitoring. However, there should be a plant airborne radioactivity monitoring system that has monitors located at the site perimeter. Provide the historic data (~1990 - 2010) of the airborne radioactivity monitoring system for the plant site.

This information is required to evaluate compliance with 10 CFR 72.104 and 72.106.

10. Provide historical smear sample data for the casks located at the ISFSI.

Page A-21 of the "Application for Renewed ISFSI Site-Specific License" provides some historical cask gamma and neutron dose rates. In addition, however, smear samples of casks are often taken as part of a radiation/health physics program. The historical smear sample data for casks should be provided.

This information is required to evaluate compliance with 10 CFR 72.104 and 72.106.

## FINANCIAL ASSURANCE

In order to demonstrate financial qualifications in order to be issued a license extension, 10 CFR 72.22(e) provides that the applicant must submit information that shows that the applicant either possesses the necessary funds, or has reasonable assurance of obtaining the necessary funds to cover (construction), operating, and decommissioning costs.

The provisions of 10 CFR 72.30 require the licensee to provide financial assurance for decommissioning an ISFSI. Based on information provided within the application, the NRC needs the following additional information in order to complete its review:

11. The minimum prescribed amount of decommissioning financial assurance required of reactor licensees specified in 10 CFR 50.75 does not include the costs of decommissioning an ISFSI.

For an ISFSI, provide the estimated decommissioning costs, and the latest and updated version of the decommissioning funding plan used to provide reasonable assurance that funds for decommissioning the ISFSI will be available when needed.

12. Explain the procedure that will be used to add financial assurance adequate to cover the cost of decommissioning an ISFSI.

13. Explain the procedure that will be used to separately identify the amounts of financial assurance provided for each reactor and ISFSI.

14. Estimated operating costs over the planned life of the ISFSI.

Received: from HQCLSTR01.nrc.gov ([148.184.44.79]) by OWMS01.nrc.gov  
([148.184.100.43]) with mapi; Tue, 24 Jan 2012 13:03:21 -0500  
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To: "Damiano, Debra" <Debra.Damiano@nrc.gov>  
Date: Tue, 24 Jan 2012 13:03:19 -0500  
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