

June 18, 2015

Mr. Richard B. Provencher, Manager
U.S. Department of Energy
Idaho Operations Office
1955 Fremont Avenue
Idaho Falls, ID 83415

SUBJECT: LICENSE AMENDMENT REQUEST FOR THE FORT SAINT VRAIN
INDEPENDENT SPENT FUEL STORAGE – SUPPLEMENTAL INFORMATION
NEEDED (DOCKET NO.: 72-00009)

Dear Mr. Provencher:

By letter dated February 17, 2015, the U.S. Department of Energy (DOE), Idaho Operations Office, submitted an license amendment request to the Fort Saint Vrain (FSV) Independent Spent Fuel Storage Installation (ISFSI) materials license SNM-2504 in accordance with Section 72.56 of Title 10 of the *Code of Federal Regulations* (10 CFR) Part 72. DOE is seeking to amend Technical Specification (TS) 3.3.1, "Seal Leak Rate," which requires that the fuel storage containers (FSC) or storage well seal leak rate does not exceed 1×10^{-3} standard cc/sec. The licensee verifies this limiting condition for operation (LCO) via surveillance performed on a 5-year frequency. Specifically, DOE would like to revise the completion time of the required actions identified in TS 3.3.1 if the leak rate limit is exceeded for one or two seals (on FSCs or storage wells).

The U.S. Nuclear Regulatory Commission (NRC) staff has reviewed your application and, based on the scope of the request, the NRC will need to conduct an environmental review to fulfill its obligations under the National Environmental Policy Act of 1969, as amended (NEPA), and the NRC's NEPA implementing regulations at 10 CFR Part 51. Thus, environmental information is necessary to commence this environmental review, as identified in the enclosure. We request that you provide a response to the enclosed request for additional information within 60 days from the date of this letter, or submit a schedule within 15 days for providing this information. If you are unable to provide a response within that time, our review may be delayed. Please inform us at your earliest convenience if you are unable to provide the information within the timeframe specified above. If you wish to discuss these issues in more detail prior to submitting your response, the NRC staff is available for a public meeting. Please reference Docket No.: 72-00009 in future correspondence related to this action.

In accordance with 10 CFR 2.390 of the NRC's "Agency Rules of Practice and Procedure," a copy of this letter will be available electronically for public inspection in the NRC Public Document Room located at One White Flint North, 11555 Rockville Pike, Rockville, Maryland 20852, or from the NRC's Agencywide Documents Access and Management System (ADAMS). The ADAMS Public Electronic Reading Room is accessible at:
<http://www.nrc.gov/reading-rm/adams.html>.

If you have any questions, please contact Ms. Jean Trefethen by telephone at 301-415-0867 or via email at Jean.Trefethen@nrc.gov. Thank you for your assistance.

Sincerely,

/RA/

Lydia W. Chang, Chief
Environmental Review Branch
Division of Fuel Cycle Safety, Safeguards,
and Environmental Review
Office of Nuclear Material, Safety
and Safeguards

Enclosure:
Request for Additional Information

Docket No.: 72-00009
License No.: SNM-2504

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Lydia W. Chang, Chief
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Office of Nuclear Material, Safety
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Enclosure:
Request for Additional Information

Docket No.: 72-00009
License No.: SNM-2504

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OFC	FCSE/ERB	FCSE/ERB	FCSE/ERB	FCSE/ERB
NAME	JTrefethen	DDiaz-Toro	AWalker-Smith	LChang
DATE	6/05/2015	6/18/2015	6/18/2015	6/18/2015

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REQUEST FOR ADDITIONAL INFORMATION

The purpose of the following request for additional information is to provide information and data necessary for the U.S. Nuclear Regulatory Commission (NRC) to fulfill its obligations under the National Environmental Policy Act of 1969, as amended (NEPA) and the NRC's NEPA implementing regulations at Title 10 of the *Code of Federal Regulations* (10 CFR) Part 51, "Environmental Protection Regulations for Domestic Licensing and Related Regulatory Functions."

In order for NRC to conduct an environmental review of the proposed request, the NRC needs certain information normally contained in an environmental report (ER). Therefore, the NRC is requesting you to submit an ER that addresses the topics identified in 10 CFR 51.30 as they relate to your amendment request. You may find 10 CFR 51.60 and 10 CFR 51.45 helpful in developing your ER. In addition, the NRC guidance contained in NUREG-1748, "Environmental Review Guidance for Licensing Actions Associated with Nuclear Material Safety and Safeguards Programs" may be useful. To the extent the information has been provided in documents already submitted to NRC, you may provide the appropriate references in the ER.

The ER should include the following information:

1. A description of the proposed action (e.g., planned activities, their duration, maps showing location and facilities, as applicable). We understand the request to be three fold:
 - a. The first is an administrative change to add Section 5.5.5, "Aging Management Program" that was erroneously left off the Technical Specifications (TS) Table of Contents.
 - b. The second request is to change TS 3.3.1 to lengthen the time allowed to transfer a cask with a faulty (leaking) seal to the Standby Storage Well from 7 days to 21 days.
 - c. Thirdly is the change to TS 3.3.1 which lengthens the completion time allowed for the required action A.2, "Test 2 Additional Fuel Storage Casks from each vault," from 30 days to 45 days. Please confirm that the revised TS on page 5 of the attachment is correct as the mark up of the TS on page 3 does not indicate this change.

Please confirm that these are the only changes being requested through this license amendment request and that these changes will not result in changes to routine operations or construction activities.

2. A description of the alternatives considered, including but not limited to the no-action alternative (i.e., status quo). This description should discuss the alternatives that could accomplish the need for the proposed action.

Enclosure

3. Identify applicable regulatory requirements and permits. The information provided should identify the issuing agency, describe the type of license, permit or approval needed, and provide the status of securing the license, permit or approval.
4. Discussion of the environmental impacts of the proposed action and alternatives including but not limited to the following environmental resources: (i) public and occupational health impacts (radiological and non-radiological), (ii) transportation impacts (e.g., doses to workers and public, impacts to traffic flow), (iii) air quality impacts, (iv) water quality impacts, (v) noise impacts, (vi) waste management impacts, (vii) potential impacts to historic and cultural resources, and (viii) threatened and endangered species or critical habitats. The discussion should clearly state which resources are affected by the proposed action and those that would not be affected and an explanation of the determination that the impacts are significant or not significant. The discussion should focus on issues of significance; it may not be necessary for every resource to receive the same level of detail.
 - a. As part of the impacts to public health and safety discussion, please identify the location and distance to the nearest resident.
5. Discuss any past, present, or reasonably foreseeable future actions which could result in cumulative impacts when combined with the proposed action. These future actions may be occurring on or near the Fort Saint Vrain Independent Spent Fuel Storage Installation.

Finally, the information the NRC uses to conduct and inform its NEPA environmental reviews, including the information in the ER, must be publicly available, as appropriate. Therefore, please ensure that the information included in the ER can be made publicly available.