



CONVERSATION RECORD

12/06/2017

NAME OF PERSON(S) CONTACTED OR IN CONTACT WITH YOU Department of Energy Idaho Operations Office		DATE OF CONTACT 11/30/2017	TYPE OF CONVERSATION <input type="checkbox"/> E-MAIL <input checked="" type="checkbox"/> TELEPHONE <input type="checkbox"/> INCOMING <input checked="" type="checkbox"/> OUTGOING
E-MAIL ADDRESS		TELEPHONE NUMBER	
ORGANIZATION Department of Energy Idaho Operations Office	DOCKET NUMBER(S) 72-20		
LICENSE NUMBER(S) SNM-2508	CONTROL NUMBER(S) 001028/L-2017-R ^N W-0019 and 000993/L-2017-L ^N E-0007		
SUBJECT Discuss draft technical request for additional information (RAI) on Three Mile Island, Unit 2 (TMI-2) Independent Spent Fuel Storage Installation (ISFSI) renewal application			
SUMMARY Department of Energy Idaho Operations Office (DOE-ID) attendees: Scott Ferrara (DOE Facility Director), Steven Wahchaffe (DOE License Manager), Chris Backus (Lead Engineer, Areva Federal Services), John Coody (Project Manager, Areva Federal Services), Erik Gonsiorowski (Nuclear Safety Engineer, Areva Federal Services) NRC attendees: Kristina Banovac (Project Manager), Ricardo Torres (Materials Engineer), Mike Call (Nuclear Engineer) A teleconference was held between NRC and DOE-ID representatives to discuss the draft technical RAIs on the TMI-2 ISFSI renewal application, which were provided to DOE-ID on November 21, 2017. The purpose of the call was to: (1) ensure a common understanding of the RAIs; (2) ensure that the RAIs are not already addressed in the current submittal; and (3) establish an appropriate response date for DOE-ID to respond to the RAIs. During the discussion, the NRC staff clarified draft RAIs 2-1, 2-5, 3-3, 3-4, and 3-11, in response to DOE-ID's questions. Continue on Page 2			
ACTION REQUIRED (IF ANY) DOE-ID will provide the expected RAI response date to the NRC by December 15, 2017. NRC staff will clarify RAIs 2-1, 3-3, 3-4, and 3-11 in the final RAI letter that is sent to DOE-ID. NRC to issue the final RAI letter to DOE-ID after receiving the RAI response date from DOE-ID. Continue on Page 3			
NAME OF PERSON DOCUMENTING CONVERSATION Kristina Banovac			
SIGNATURE 			

CONVERSATION RECORD (continued)

SUMMARY: (Continued from page 1)

RAI 2-1 – DOE-ID representatives clarified that the “design drawings” were used in the scoping evaluation because they were more detailed than the final safety analysis report (FSAR) drawings, and DOE-ID does not intend to change the design bases for the ISFSI through the use of these drawings in the scoping evaluation. DOE-ID noted that the design drawings for the dry shielded canister (DSC) contained a higher safety classification (quality category) for every DSC subcomponent, compared to the FSAR drawings. DOE-ID also noted that the design drawings for the horizontal storage module match the FSAR drawings, in terms of the safety classification.

NRC staff noted that referencing the design drawings in the FSAR (as is currently proposed in the license renewal application and the proposed FSAR supplement) may change the design bases by introduction of the design drawings. NRC staff clarified that the RAI and the term “harmonize” is not intended to necessarily request revision of the FSAR drawings or the design drawings. Rather, the staff is seeking to understand the discrepancies between the two sets of drawings and to have the record be clear, especially if the design drawings are introduced into the FSAR and the design bases. NRC staff also clarified that the RAI response should include any associated changes to the proposed FSAR supplement. Both parties recognized that further discussion of this RAI may be beneficial, and this topic could be discussed in a future noticed meeting before DOE-ID formally responds to the RAIs.

The staff also noted that it would be beneficial if the RAI response included a side-by-side comparison (e.g., in a table) clearly showing the safety classifications for the subcomponents between the two sets of drawings, so it is clear how the safety classifications compare for each subcomponent between the two sets of drawings. The NRC staff will revise the RAI to make sure this is clear in the final RAI that is sent to DOE-ID.

RAI 2-5 – The NRC staff clarified that the question is related to storage and the future retrieval of the DSCs from storage, and not transportation.

RAI 3-3 – The NRC staff clarified that the source terms for the TMI-2 canisters, which are the subject of the RAI, are from reference 3.11.24 in the license renewal application. The NRC staff will include this reference in the RAI.

RAI 3-4 – DOE-ID questioned if parts “a-c” of the RAI are only related to the dose rates and radiation environment for Licon, as that is the portion of the license renewal application where this information is included. NRC staff noted that it is trying to understand the radiation environment that SSCs are exposed to and the shielding performance of the dry storage system, in general, and so the question is not restricted to Licon’s role in the shielding performance of the dry storage system. In the portion of the RAI re: fuel weight (part “d” of the RAI), DOE-ID asked if NRC could provide the reference to the fuel weight that it is questioning. The NRC staff took an action to identify where the fuel weight was used (i.e., what reference) and include that reference in the RAI. In the portion of the RAI re: fuel enrichment and burnup (part “e” of the RAI), NRC staff clarified that it is trying to determine if the factor is used appropriately. How the factor is used (i.e., what it is intended to cover, whether enrichment or burnup differences) will affect how it is applied in the LRA radiation effects and thermal analyses.

RAI 3-11 – DOE-ID asked for clarification on the intent of this RAI. NRC staff clarified that it is trying to determine if there are any aging effects from localized corrosion of the TMI-2 canisters that need to be managed in the period of extended operation. NRC staff is asking if there is any data on the condition of the canisters (e.g., if any localized corrosion was observed during inspections of the canisters while in storage in the Test Area North pool or prior to loading the canisters in the DSCs), which could support the justification that there are no aging effects from localized corrosion that need to be managed in the period of extended operation. The NRC staff will revise the RAI to include this clarification.

DOE-ID noted that because of budgeting matters, it will need until December 15, 2017, to determine when it will be able to respond to the RAIs. DOE-ID will then provide the expected RAI response date to the NRC. After NRC receives the expected response date from DOE-ID, NRC will finalize and issue the RAI letter.