



72-17

Portland General Electric Company  
Trojan Nuclear Plant  
71760 Columbia River Hwy  
Rainier, Oregon 97048  
(503) 556-3713

January 15, 1997

CPY-003-97

Mr. David Stewart-Smith  
Oregon Department of Energy  
625 Marion Street NE  
Salem, OR 97310

Dear Mr. Stewart-Smith:

Proposed Change to the Trojan Decommissioning Plan (PGE-1061)

The purpose of this letter is to transmit a proposed change to the Trojan Decommissioning Plan (PGE-1061) which would permit the option of removal and disposition of the reactor vessel and internals as a single entity. Implementation of this option is subject to receipt of the required regulatory approvals.

Oregon Administrative Rule 345-26-270 (d)(4) specifies that significant revisions to the decommissioning plan must be reviewed and approved by the Council prior to implementation and provides criteria for a determination of significance. This proposed change to the decommissioning plan is significant in that it involves a change in the provisions made for hazardous or radioactive waste material removal. Accordingly, the Council is requested to review and approve the proposed change. To facilitate this review, Attachment 1 to this letter provides a description of the proposed change, the reason for the change and a marked-up version of the Trojan Decommissioning Plan.

Council approval contingent upon receipt of other required approvals is requested by March 17, 1997, or as soon as practical thereafter. Please contact me at (503) 556-7492 or J. M. Floyd at (503) 556-7434 if you have any questions or if any additional information is needed.

Sincerely,

C. P. Yundt  
General Manager, Plant Support and  
Technical Functions

9701300181 970115  
PDR ADDCK 05000344  
W PDR

11F06/1

Attachment

- c:     A. Bless, ODOE w/attachment  
       L. J. Callan, NRC, Region IV w/o attachment  
       L. E. Kokajko, NRC, NMSS w/o attachment  
       M. T. Masnik, NRC, NRR w/o attachment  
       R. A. Scarano, NRC, Region IV w/o attachment

## Description & Reason for Change

### SUMMARY

On April 2, 1996, The PGC Board of Directors approved "The Reactor Vessel Internals Removal Authorization for Project" (RVIR AFP) which entailed two options. One option would remove the vessel internals by segmentation, as currently proposed in the Decommissioning Plan. The second option would remove the Trojan reactor vessel with internals intact inside and ship the resulting package as a single unit to the US Ecology low-level radioactive waste disposal facility at Hanford, WA.

As described above, the current Decommissioning Plan (PGE-1061) proposes the reactor internals to be removed from the vessel, segment the internals, and ship the disposable (per 10CFR61) pieces to US Ecology, and store the remaining nondisposable (high radioactivity) pieces on site. The nondisposable reactor internals pieces will be stored in the Spent Fuel Pool to be transferred to the Independent Spent Fuel Storage Installation (ISFSI) with spent fuel. Later, as a separate project, the reactor vessel will be removed from the site.

The RVIR AFP option which removes and disposes the reactor vessel and internals as a single entity is commonly identified as the Reactor Vessel and Internals Removal (RVAIR) option. To implement the RVAIR option, after securing the necessary approval(s), an amendment to PGE-1061 is required. Because PGE-1061 is a Licensing Document per Section 3.5 of TPP 18-22, any change mandates obtaining appropriate reviews and approvals via a Licensing Document Change Request (LDCR).

### SPECIFIC CHANGES

A description of the specific changes to PGE-1061, on a Section-by-Section basis, along with the reason for the change is delineated, in Tabular form, in the attachment. These changes, contingent upon receipt of required regulatory approvals, will permit implementation of the RVAIR option.

### RVAIR DECOMMISSIONING PLAN REVISIONS

DECOMMISSIONING PLAN SECTION	DESCRIPTION OF CHANGE	REASON FOR CHANGE
§1.2.1.1	The second to last paragraph is modified to include RVAIR as a potential major activity to be performed during the transition period.	The RVAIR option is scheduled to be performed during the transition period.
§1.2.3	RVAIR is added to the schedule for decommissioning during early 1997 - mid 1998. Schedule for the separate removal of reactor internals (if RVAIR is cancelled) is revised to late 1998 - early 2000.	The RVAIR option is scheduled to occur during this time frame of the transition period. The separate removal of reactor internals (if RVAIR project is cancelled) reflects the sequence in which the activity will be performed.
§2.2.2	Item No. 3 under the major activities planned during the transition period is modified to include RVAIR.	The RVAIR option is scheduled to be performed during the transition period.
§2.2.3	The discussion addressing the removal of reactor vessel internals during the transition period is modified to include the option of performing RVAIR during this time.	The RVAIR option is scheduled to be performed during the transition period.
§2.2.5.1	The second paragraph is modified to: 1. include the option of performing RVAIR prior to the completion of spent fuel transfer to the ISFSI; and 2. delay the option of removing the internals by segmentation after the transfer of spent fuel to the ISFSI.	The changes reflect the current decommissioning activities schedule.

DECOMMISSIONING PLAN SECTION	DESCRIPTION OF CHANGE	REASON FOR CHANGE
§2.2.5.3	This section is modified to provide for the option of performing RVAIR as a method of disposing of the reactor vessel internals. The original option of segmenting the internals is retained.	The RVAIR option will allow for the disposal of the reactor vessel internals without segmentation and the generation of greater than Class C waste.
§2.2.5.4	This section is modified to include the RVAIR project as an option for removing and disposing of the reactor vessel (and internals). When packaged together, the reactor vessel and internals together can be disposed of as Class C waste. The vessel and internals will be shipped as a NRC approved, Type B package.	Removal and segmentation of the reactor internals is the option currently discussed in the Decommissioning Plan. This option results in greater than Class C waste that must be stored at the ISFSI. The proposed RVAIR option does not result in greater than Class C waste. However, the vessel and internals package will be shipped as a Type B package and thus requires NRC approval of the package.
§2.2.7	This section is modified to reflect that a specific estimate was performed to determine the projected waste volume for the RVAIR option. In addition, a clarification is added to reflect that greater than Class C waste results from the option to separately remove and segment the reactor internals.	The radioactive waste volume projections currently in the Decommissioning Plan are based on the option of separate removal and disposal of the reactor vessel and internals. A specific estimate of the RVAIR option radioactive waste volume was prepared. The RVAIR option does not result in greater than Class C waste, whereas the separate removal and internal segmentation option does.

DECOMMISSIONING PLAN SECTION	DESCRIPTION OF CHANGE	REASON FOR CHANGE
Table 2.2-1	A note is added to this table to indicate that exposure projections listed represent the option of removing internals separate from the reactor vessel and segmenting them. The exposure projection for the RVAIR project is 67 person-rem.	The exposure projections listed in the table are for the separate removal of the internals and reactor vessel. The exposure projection for the RVAIR option, 67 person-rem, is less than that for the separate removal of the internals and reactor vessel option.
Table 2.2-2	A note is added to this table to indicate that waste projections listed represent the option to dispose of the internals and the reactor vessel separately. The waste projection for the RVAIR project is 8341 cubic feet of Class C waste.	The waste projections (volume and classification) listed in the table are for the option to separately remove and dispose of the internals and reactor vessel. The waste projection for the RVAIR option is 8341 cubic feet of Class C waste.
Table 2.2-4	A note is added to this table to indicate that the waste projections listed represent the option of removing internals separate from the reactor vessel and segmenting them. The waste projection for the RVAIR project is 8341 cubic feet of Class C waste.	The waste projections listed in the table are for the option to separately remove and segment the reactor vessel internals. The waste projection for the RVAIR option is 8341 cubic feet of Class C waste.
Figure 2-11	The figure is modified to show RVAIR as a major decommissioning activity. In addition a note is added to this figure to clarify that if the RVAIR option is canceled and the option of separate removal of the reactor vessel and internals is selected, then completion of the project is scheduled for late 1998 to early 2000.	This note clarifies the schedule for the two options.

DECOMMISSIONING PLAN SECTION	DESCRIPTION OF CHANGE	REASON FOR CHANGE
§3.1.2.3	The last paragraph is deleted and a new one is inserted to clarify that greater than Class C waste results from the option to separately remove and dispose of the reactor vessel and internals and not from the RVAIR option. The RVAIR waste package will meet the Class C burial criteria.	This change clarifies the difference in waste classification associated with the two options for disposal of the reactor vessel and internals.
§3.1.3	A clarification is added to this section to indicate that greater than Class C waste results from the option to segment the reactor internals and dispose of them separate from the reactor vessel.	The RVAIR option does not result in greater than Class C waste while the separate internals removal and segmentation option results in greater than Class C waste.
§3.3.3	A clarification is added to this section to indicate that greater than Class C waste results from the option of segmenting the internals and disposing of them separate from the reactor vessel. The RVAIR option results in waste which meets the Class C burial criteria.	The Decommissioning Plan currently addresses the option to segment the reactor internals and dispose of them separate from the reactor vessel. This change addresses the RVAIR option which does not result in greater than Class C waste, while the separate internals removal and segmentation option results in greater than Class C waste.
§3.4.4.2.1	A clarification is added to indicate that the reactor internals may be disposed of intact with the reactor vessel or removed separately and segmented.	As currently written, the Decommissioning Plan addresses the separate removal and segmentation of the reactor vessel internals. This change adds the option of disposing of the internals by the RVAIR project which eliminates the need to segment the internals.



DECOMMISSIONING PLAN SECTION	DESCRIPTION OF CHANGE	REASON FOR CHANGE
Table 3.1-6	A note is added to this table to indicate that the burial volume projections listed in the table are based on the option to separately remove and dispose of the reactor vessel and internals. The burial volume projection for the RVAIR option, 8341 cubic feet of Class C waste, is identified in the note.	The table currently shows the burial volume projections for the option to separately remove the reactor vessel and the internals. The added note provides the burial volume projection for the RVAIR option.
§5.1.2.1	The last paragraph is modified to indicate that a specific cost estimate was performed for the RVAIR option. Additional discussion is provided to clarify that the cost estimates shown in Tables 5.1-1 and 5.1-2 represent the separate vessel and internal removal option. The estimated cost for the RVAIR option is approximately 38% less.	The decommissioning cost estimate is based on the option to separately remove and dispose of the reactor vessel and reactor internals. This change provides clarification that a specific cost estimate for the RVAIR option was performed and that the resulting RVAIR costs are estimated to be approximately 38% less than those for the other option.