

November 7, 1996

Ms. Margaret Megehee
Trojan Nuclear Plant
71760 Columbia River Hwy
Rainier OR 97048

72-17
Oregon

DEPARTMENT OF
ENERGY

Dear Ms. Megehee:

On September 25, 1996 and October 8, 1996 you responded to questions from the Oregon Office of Energy concerning the radiological survey of the Independent Spent Fuel Storage Installation (ISFSI) site. We have reviewed your responses and find them satisfactory. We look forward to receiving your report of the results.

However, we have a remaining concern which we believe requires clarification of certain commitments made by PGE in the amended Decommissioning Plan. The concern involves the radiation dose rate limits at the ISFSI boundary.

Background

During our review of the Decommissioning Plan, we asked how the site could meet EFSC's direct exposure standards for free release, in view of the direct radiation from the ISFSI.

Section IV.F.1 of ODOE's January 22, 1996, report, "Review of PGE's Decommissioning Plan for the Trojan Nuclear Plant" cites the following PGE responses to this concern: "A phased release survey will be conducted. The area affected by the ISFSI will be released at an earlier date." The response further states that PGE "...will conduct the final release survey of the areas that will be affected by the fuel storage in the ISFSI prior to movement of the fuel from the Spent Fuel Pool to the ISFSI. Areas of the present site that will have radiation levels due to ISFSI fuel storage that interferes with final site survey will be surveyed prior to fuel movement."

In November 1995, you incorporated your response to ODOE questions into the amended decommissioning plan. We cited this response in our January 22, 1996 report, in making our finding of compliance with the EFSC standards for site release. It is therefore part of the basis for EFSC's Decommissioning Order.

Further, in our review of the ISFSI SAR, we noted that 10 CFR 72 allows dose rates at the ISFSI boundary of up to 25 mr/yr., while the approved Decommissioning Plan states that the site will be unconditionally released from the 10 CFR 50 license based on a dose rate from all sources of 15 mr/yr (as recommended in NUREG 1500). We asked how the 15 mr/yr commitment in the Decommissioning Plan can be reconciled with the 25 mr/yr limit in 10 CFR 72. PGE responded that "...the survey for the ISFSI site (for termination of the 10 CFR 50 license) will be performed prior to radioactive material being stored at the ISFSI. Therefore, the final survey for 10 CFR 50 license termination will not be affected by radiation from the ISFSI" (See PGE June 27, 1996 response to ODOE RAI, item 79).

NF0610
John A. Kitzhaber
Governor



625 Marion Street NE
Salem, OR 97310
(503) 378-4040
FAX (503) 373-7806
Toll-Free 1-800-221-8035

9611290245 961107
PDR ADOCK 05000344
Y PDR

Ms. Margaret Megehee
Page 2

We now understand that it may not be practical to release the entire area affected by the ISFSI at an earlier date, as described above. Part of the site will meet the 10 CFR 72 limit of less than 25 mR/year above background, but will not meet EFSC's 5 μ R/hr standard, because of direct radiation from the ISFSI. Moreover, in its July 16, 1996 request for information on the ISFSI Site Survey Plan, the NRC noted the difficulty of implementing positive controls to prevent contamination during decommissioning. In your response, you stated that the ISFSI Site Survey would include only areas where positive control can be maintained. However, areas outside this boundary may still be subject to direct radiation from storage of spent fuel.

Your September 25 letter to ODOE states that you will still take radiation measurements outside the ISFSI Site Survey boundary, but those measurements will be considered background data and will not be part of a request to the NRC for early release from the part 50 license.

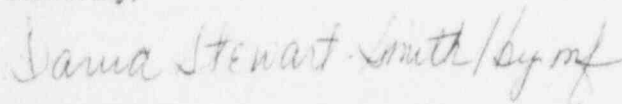
Conclusion

Contrary to the PGE statements cited in ODOE's January 22, 1996 report on the Decommissioning Plan, it appears that PGE may not be able to "conduct the final release survey of the areas that will be affected by the fuel storage in the ISFSI prior to movement of the fuel from the Spent Fuel Pool to the ISFSI.". It will not be practical to do so because certain areas that will be affected by direct radiation from the ISFSI cannot be positively controlled to prevent contamination during decommissioning, and therefore cannot be released early. PGE's statement that "the area affected by the ISFSI will be released at an earlier date" may also not be practical.

We therefore request that you clarify these commitments in light of your recent experience and in light of NRC comments on the ISFSI survey. We are particularly concerned about the area of the site which will be outside the restricted area of your ISFSI but which will exceed the EFSC release limit because of the radiation from the spent fuel. Your response should describe the survey techniques and data reduction methods that you will use to show that areas of the site subject to radiation from the ISFSI have been decontaminated to EFSC's standard for free release.

ODOE recognizes that this concern has come to light largely because of NRC concerns as stated in its letter of July 16, 1996. EFSC rules state that actions which result from NRC requirements need not be approved by EFSC prior to implementation. However, we request that you provide your response to ODOE, for timely presentation to EFSC as an information item. Thank you in advance for your response. A prompt and complete response will enable us to complete our review of the ISFSI SAR on a timely basis.

Sincerely,



David Stewart-Smith
Administrator, Energy Resource Division