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

November 21, 1996

CPY-093-96

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

Dear Mr. Stewart-Smith:

Response to Request for Additional Information Regarding the
Final Survey Plan for the Trojan ISFSI Site (PGE-1074)

On November 7, 1996, the Oregon Department of Energy sent a letter to PGE which requested clarification of PGE's commitment 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." The letter also requested that PGE describe the survey techniques and data reduction methods that will be used to show that the areas of the site subject to radiation from the ISFSI have been decontaminated to EFSC's standard for free release. The requested commitment clarification and survey technique description is provided in the following paragraphs.

PGE has completed the final survey of the Trojan ISFSI area. The size of the final survey area was reduced to ensure thorough control could be maintained to minimize the potential for reintroduction of radioactive material. The area that was removed from the ISFSI area survey will be included in the Trojan 10CFR50 termination survey. The reduction of the size of the ISFSI survey area will have minimal impact on the Trojan 10CFR50 termination survey.

For termination of the 10CFR50 license, final release survey activities in the area near the ISFSI, which may be impacted by the radioactive material stored in the ISFSI, will utilize shadow shielding to remove the ISFSI radiation. Background radiation will be measured using similar survey techniques and equipment. The shielded radiation measurements (both release and background) will "see" 180° span versus the usual 360°. Background radiation measurements will duplicate this reduced area to ensure the background radiation level subtracted from the survey location radiation levels is appropriate.

Materials in the 10CFR50 final survey area requiring sampling, such as gravel, will not be affected by the increased direct radiation levels. The samples will be collected in the area and taken to a counting facility for analyses.

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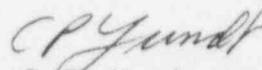
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PGE believes that the area outside the ISFSI survey area that is greater than 5 μ R/hr above background due to direct radiation from the ISFSI may be released from 10CFR50 at an earlier date as stated in previous documents. For release from 10CFR50, the 5 μ R/hr criterion is applicable to 10CFR50 licensed radioactive material only. The direct radiation from the 10CFR72 licensed radioactive material that will be stored in ISFSI need not be considered with respect to release from 10CFR50. The survey technique described above accomplishes the desired result of removing the 10CFR72 licensed radioactive material radiation from the surveys being performed with respect to 10CFR50 license termination.

If you have questions concerning the commitment clarification and survey technique provided above, please contact me or M. H. Megehee of my staff at 503-556-7334.

Sincerely,



C. P. Yundt

General Manager

Plant Support and Technical Functions

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