

SONGS ISFSI Controlled Area Boundary Minimum Distance Exemption Request

Pre-submittal Conference
February 23, 2021

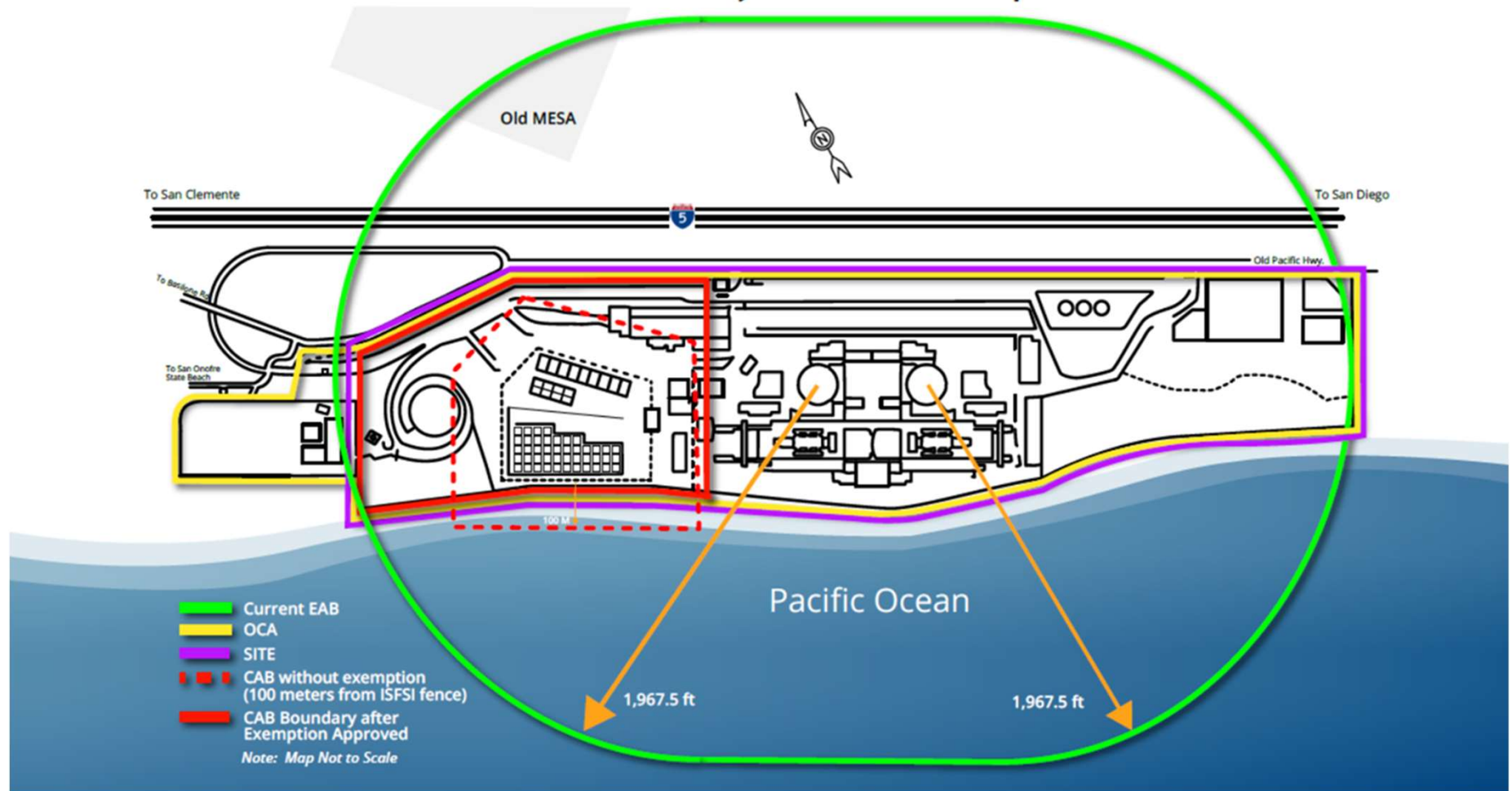
Agenda

- Boundary descriptions
- CSLC Lease condition
- Proposed change
- Contents of submittal
- Q&A/Discussion

Exclusion Area Boundary

- Existing Exclusion Area Boundary (EAB)(see green line on map)
 - 1967 ft semi-elliptical area based on Units 2 and 3 containments
 - Traversed by I-5, Basilone Rd, Rail Line, Beach Walkway and Pacific Ocean
 - Pre-existing arrangements are established with offsite agencies for removal of the public from these areas during an emergency (as needed)

Site Boundary Location Map



Controlled Area – requirements

- ISFSI Controlled Area - requirements
 - Partial Definition - Area for which the licensee “exercises authority over its use” (10CFR72.3)
 - 10 CFR 72.106(b) requires establishment of a controlled area boundary
 - Establishes acceptable dose limits from design basis accidents for any individual located on or beyond the nearest boundary of the controlled area
 - Requires that the minimum distance of the controlled area boundary from ISFSI be 100 meters ← The requirement from which an exemption is to be requested
 - May be traversed by thruways (10CFR72.106)
 - Must have “Appropriate and effective arrangements” for protection of public health and safety when public has access to such thruways.

SONGS CAB historical links to the EAB

- In licensing the SONGS ISFSI (circa 2000), the SONGS ISFSI Controlled Area Boundary (CAB) was established as the same boundary as the EAB
 - Thus, all of the arrangements with local agencies for the ability to remove people from the thruways post-accident applied to the reactors and the ISFSI
 - Some minor changes to the boundary were made following completion of fuel transfer operations

CSLC Lease Condition

- Lease condition 32 from the California State Lands Commission

“At the conclusion of the transfer of the SONGS spent nuclear fuel to the Approved Independent Spent Fuel Storage Installation (Approved ISFSI), the Lessee shall seek approval from the NRC to decrease the size of the Exclusion Area Boundary to the minimum required by law.

Lessee and Lessor shall jointly consult with the California Coastal Commission (CCC) to ensure that such an approval, if granted, will not interfere with Lessee’s compliance with CCC permit conditions.”

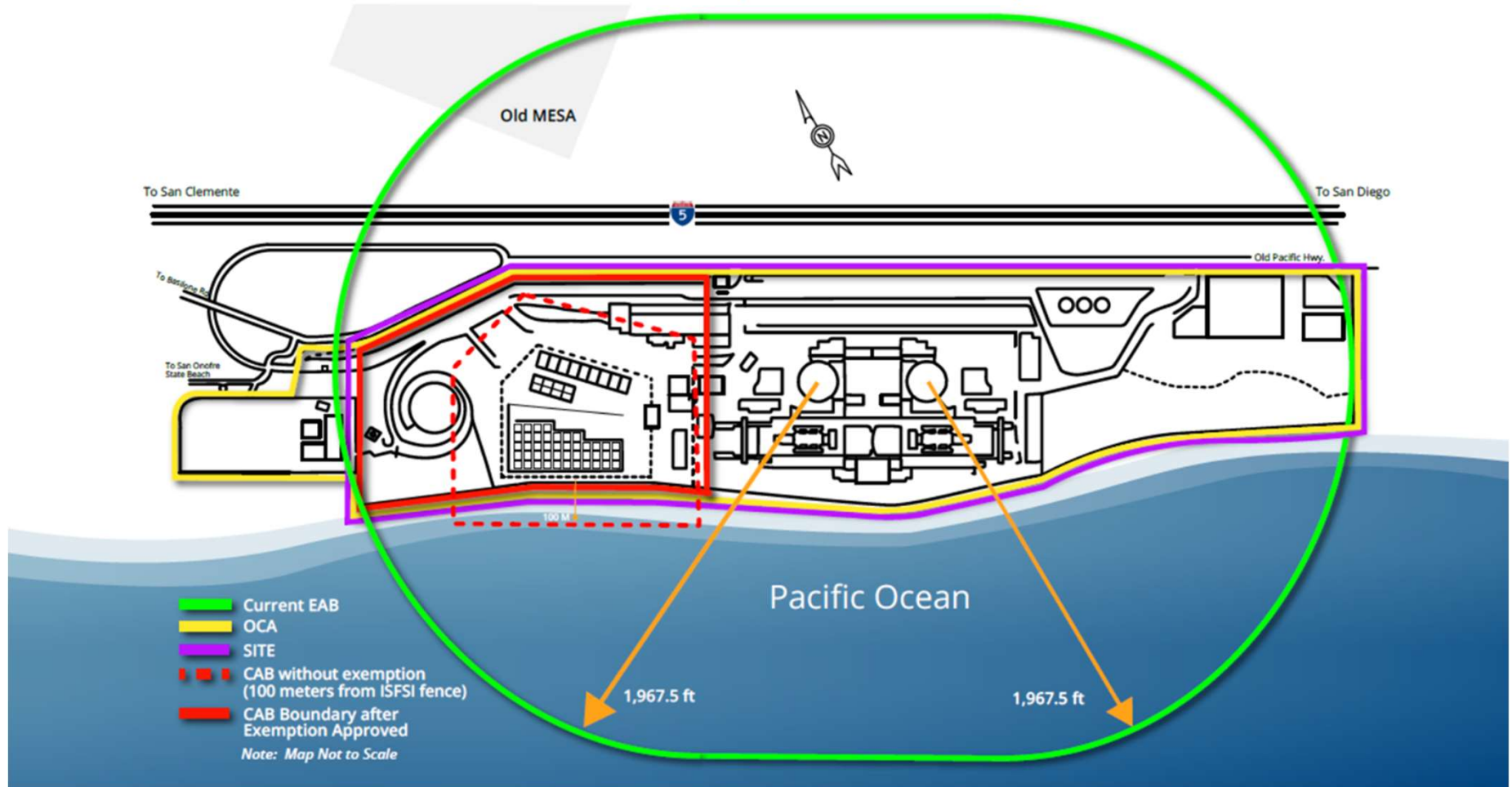
Plan to comply with the CSLC lease condition

- EAB will be eliminated via 10CFR50.59 once supporting calculations are complete
- Initial changes to the CAB under 10CFR72.48
 - Reduce the CAB to the 100 meter minimum requirement
- Submit exemption request to eliminate the 100 meter requirement
- Upon approval of the exemption request
 - Reduce the controlled area boundary to areas completely within the control of SONGS.

Proposed Change

- Proposed exemption is from the requirement for a 100 meter standoff distance (see the solid red line on the drawing)
 - SONGS can decrease the size of the CAB without prior approval, but needs an exemption to bring the boundary in to the site boundary
- Consistent with public interest of beach access and the spirit of CSLC lease condition 32
 - Eliminates the need for offsite agency agreements for control of the public on the beach walkway.
- Reflects absence of design-basis accidents with off-site consequences during storage period
- Control of the public on the beach and beach walkway is no longer required because the proposed revised boundary would meet 10 CFR 72.106 accident dose criteria with substantial margin, as demonstrated by the dose analysis

Site Boundary Location Map



Contents of Submittal - outline

- Description of change
- Summary of Dose analysis showing 10CFR72.104 criteria are met
- Interactions with other programs/boundaries
- Responses to the exemption criteria of 10CFR72.7
- Environmental Assessment (no categorical exclusion)

Contents of Submittal – Dose Analysis

- Summary of Dose analysis showing 10 CFR 72.104 criteria are met
 - No X/Q (direct dose only)
 - No design-basis accidents that have dose consequences to the public
 - Occupancy Factors

Contents of Submittal – Program Impacts

- Interactions with other programs/boundaries
 - No change to any physical boundaries
 - EP impact – driven by EAB elimination
 - No Security impact
 - ODCM/Effluent impact – driven by EAB elimination

Contents of Submittal – Exemption Criteria of 10 CFR 72.7

10 CFR 72.7: “The Commission may, upon application by any interested person or upon its own initiative, grant such exemptions from the requirements of the regulations in this part as it determines are authorized by law and will not endanger life or property or the common defense and security and are otherwise in the public interest.”

- **Public Interest:** coastal access for the public
- **Safety:** meets dose limits of 10 CFR 72.106(b) and 10 CFR 72.104
- Boundaries of the proposed controlled area consistent with physical barriers (seawall and fences), thus facilitating exclusive control of the area by the licensee

Q&A/Discussion