UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION II
SAM NUNN ATLANTA FEDERAL CENTER
61 FORSYTH STREET SW SUITE 23T85
ATLANTA, GEORGIA 30303-8931

August 1, 2000

Ms. Merriam A. Bass
Staff Associate for Ecology
Savannah Presbytery
P.O. Box 880
Brunswick, GA 31521-0880

SUBJECT: REPLY TO JULY 3, 2000, FACSIMILE TO THE NUCLEAR REGULATORY COMMISSION'S REGION II OFFICE

Dear Ms. Bass:

This responds to our (Nuclear Regulatory Commission's) copy of your July 3, 2000, letter to the Honorable Roy Barnes, Governor of Georgia, regarding the HI-STAR 100 system casks for the storage of spent fuel at Southern Nuclear Operating Company's Edwin I. Hatch Nuclear Power Plant (Plant Hatch) in Baxley, Georgia. In your letter, copies of which were also sent to a number of Georgia elected officials, you state that the untested storage, which will sit along the Altamaha River near prime agricultural areas, in a flood plain, earthquake zone and region ripe for hurricane damage, will have a powerful impact on the water, air and soil of south coastal Georgia. You also expressed concern with the estimated radioactive emissions from the outdoor casks, questioned how the Southern Company can manage an estimated one million mrems from the casks and called on the Governor to initiate an immediate investigation.

The Independent Spent Fuel Storage Installation (ISFSI) at Plant Hatch is designed and constructed for the interim storage of spent fuel. Plant Hatch, like other facilities operating nuclear power plants under 10 CFR Part 50 of our regulations, is authorized to operate an ISFSI under the general license provisions of 10 CFR Part 72, Subpart K. For the ISFSI at Plant Hatch, the license holder was required to: 1) use an NRC approved cask design; 2) perform written evaluations to demonstrate compliance with cask licensing provisions including site environmental and radiological requirements; 3) revise the site security plan to include ISFSI activities; and 4) perform preoperational testing of all cask loading and unloading activities. With respect to item 2 above, a written evaluation to establish that the requirements of 10 CFR 72.104 were met was among the evaluations the licensee was required to perform. 10 CFR 72.104 limits the annual potential dose to any individual located beyond the controlled area to 25 mrem to the whole body due to the combined contributions of nuclear power plant and associated operations and direct radiation from the ISFSI. The NRC verified that the licensee's calculated dose due to both nuclear power plant and ISFSI operations was less than the regulatory limits specified in 10 CFR 72.104.

Along with ISFSI design and construction activities, the evaluations and preoperational tests described above were all inspected by NRC before cask loading at Plant Hatch. After cask loading, the ISFSI is subject to operational monitoring through inspection.
Dry cask storage is not a new or experimental technology, and cask designs are subject to rigorous reviews and challenging physical tests before they are licensed for use. The cask

designer is required to demonstrate, among other things, that the cask will reasonably maintain confinement of radioactive material under normal, off normal and credible accident conditions so as to prevent unnecessary exposure to individuals and contamination of the environment.

The HI-STAR 100 dry storage system in which spent fuel is stored at Plant Hatch was approved on October 4, 1999, under Certificate of Compliance (CoC) No. 1008. The NRC's approval was based on the review of a safety analysis report (SAR) submitted by the cask designer. The SAR described operational and safety aspects of the cask, including cask integrity during potential accidents resulting from natural phenomena such as earthquakes, floods and tornadoes. We reviewed the SAR, prepared a safety evaluation report (SER) and CoC including technical specifications and published the SER and CoC in the Federal Register for public comment before approving the cask design.

I trust that the foregoing responds to your concerns. Should you have any questions regarding the inspection of the ISFSI at Plant Hatch, you may contact Dr. William B. Gloersen of my staff at (404) 562-4713.

Sincerely,

/RA/

Luis A. Reyes
Regional Administrator

cc: The Honorable Max Cleland
United States Senate

The Honorable Zell Miller
United States Senate

James Setser
Department of Natural Resources
State of Georgia

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NAME	CEvans	SO'Connor	DCollins	BMallett			
DATE	7/31/00	7/31/00	7/31/00	8/1/00			
E-MAIL COPY?	YES NO	YES NO	YES NO	YES NO	YES NO	YES NO	YES NO

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