RAS 5652 72-22-ISFSI-State Exhibit 190-Recid 5/16/02

TOPICAL SAFETY ANALYSIS REPORT

for the

HOLTEC INTERNATIONAL STORAGE AND TRANSFER OPERATION REINFORCED MODULE CASK SYSTEM (HI-STORM 100 CASK SYSTEM)

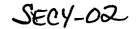
NRC DOCKET NO. 72-1014

HOLTEC REPORT HI-951312, VOLUME II of II

Prepared by



Template = SECY-028



10.3 ESTIMATED ON-SITE COLLECTIVE DOSE ASSESSMENT

This section provides the estimates of the cumulative exposure to personnel performing loading, unloading and transfer operations using the HI-STORM system. This section uses the shielding analysis provided in Chapter 5 and the operations procedures provided in Chapter 8 to develop a dose assessment. The dose assessment is provided in Tables 10.3.1, 10.3.2, and 10.3.3.

The dose rates from the HI-STORM 100 overpack, MPC lid, HI-TRAC transfer cask, and HI-STAR 100 overpack are calculated to determine the dose to personnel during the various loading and unloading operations. The dose rates are also calculated for the various conditions of the cask that may affect the dose rates to the operators (e.g., MPC water level, HI-TRAC annulus water level, neutron shield water level, presence of temporary shielding). The dose rates around the 100-Ton HI-TRAC transfer cask are based on 24 PWR fuel assemblies with a burnup of 35,000 MWD/MTU and cooling of 5 years. The dose rates around the 125-Ton HI-TRAC transfer cask are based on 24 PWR fuel assemblies with a burnup of 35,000 MWD/MTU and cooling of 5 years. The dose rates around the 125-Ton HI-TRAC transfer cask are based on 24 PWR fuel assemblies with a burnup of 45,000 MWD/MTU and cooling of 9 years. The dose rates around the HI-STORM 100 overpack are based on 24 PWR fuel assemblies with a burnup of 45,000 MWD/MTU and cooling of 5 years. The selection of these fuel assembly types in all fuel cell locations bound all possible PWR and BWR loading scenarios for the HI-STORM System from a dose-rate perspective. No assessment is made with respect to background radiation since background radiation can vary significantly by site. In addition, exposures are based on work being performed with the temporary shielding described in Table 10.1.2.

For each step in Tables 10.3.1 through 10.3.3, the operator work location is identified. These correspond to the locations identified in Figure 10.3.1. The dose rate location points around the transfer cask and overpack were selected to model actual worker locations and cask conditions during the operation. Cask operators typically work at an arms-reach distance from the cask. To account for this, an 18-inch distance was used to estimate the dose rate for the worker. This assessment addresses only the operators that perform work on or immediately adjacent to the cask.

Justification for the duration of operations along with the corresponding procedure steps from Chapter 8 are also provided in the tables. The assumptions used in developing time durations are based on mockups of the MPC, review of design drawings, walk-downs using other equipment to represent the HI-TRAC transfer cask and HI-STORM 100 overpack the HI-STAR 100 overpack and MPC-68 prototype, consultation with UST&D (weld examination) and consultation with cask operations personnel from Calvert Cliffs Nuclear Power Plant (for items such as lid installation and decontamination). In addition, for the shielding calculations, only the Temporary Shield Ring was assumed to be in place for applicable portions of the operations.

Tables 10.3.1a and 10.3.1b provide a summary of the dose assessment for a HI-STORM 100

.

System loading operation using the 125-ton HI-TRAC and the 100-ton HI-TRAC, respectively. Tables 10.3.2a and 10.3.2b provide a summary of the dose assessment for HI-STORM 100 System unloading operations operation using the 125-ton HI-TRAC transfer cask and the 100-ton HI-TRAC transfer cask, respectively. Tables 10.3.3a and 10.3.3b provide a summary of the dose assessment for transferring the MPC to a HI-STAR 100 overpack as described in Section 8.5 of the operating procedures using the 125-ton HI-TRAC and the 100-ton HI-TRAC transfer cask, respectively.

10.3.1 Estimated Exposures for Loading and Unloading Operations

The assumptions used to estimate personnel exposures are conservative by design. The main factors attributed to actual personnel exposures are the age and burnup of the spent fuel assemblies and good ALARA practices. To estimate the dose received by a single worker, it should be understood that a canister-based system requires a diverse range of disciplines to perform all the necessary functions. The high visibility and often critical path nature of fuel movement activities have prompted utilities to load canister systems in a round-the-clock mode in most cases. This results in the exposure being spread out over several shifts of operators and technicians with no single shift receiving a majority of the exposure.

The total person-rem exposure from operation of the HI-STORM 100 System is proportional to the number of systems loaded. A typical utility will load approximately four MPCs per reactor cycle to maintain the current available spent fuel pool capacity. Utilities requiring dry storage of spent fuel assemblies typically have a large inventory of spent fuel assemblies that date back to the reactor's first cycle. The older fuel assemblies will have a significantly lower dose rate than the design basis fuel assemblies due to the extended cooling time (i.e., much greater than the values used to compute the dose rates). Users shall assess the cask loading for their particular fuel types (burnup, cooling time) to satisfy the requirements of 10CFR20 [10.1.1].

For licensees using the 100-Ton HI-TRAC transfer cask, design basis dose rates will be higher (than a corresponding 125-Ton HI-TRAC) due to the decreased mass of shielding and longer cooling time for the 125-Ton HI-TRAC transfer cask. Due to the higher expected dose rates from the 100-Ton HI-TRAC, users will need to use the auxiliary shielding (See Table 10.1.2), and should consider preferential loading, and increased precautions (e.g., additional temporary or auxiliary shielding, remotely operated equipment, additional contamination prevention measures). Actual use of optional dose reduction measures must be decided by each user based on the fuel to be loaded.

10.3.2 Estimated Exposures for Surveillance and Maintenance

Table 10.3.4 provides the maximum occupational exposure required for security surveillance and maintenance of an ISFSI. Although the HI-STORM 100 System requires only minimal maintenance during storage, maintenance will be required around the ISFSI for items such as



_



2003 JAN 31 PM 2: 12

OFFICE OF THE SECRETARY RULEMAKINGS AND ADJUDICATIONS STAFF

| CLEAR REGULATORY COMMISSION | |
|-----------------------------|-----------------------|
| Uncret No | Official Exh. No. 190 |
| Staff | |
| Applicant | REJECTED |
| Other | Witness |
| Clork | |

-