

From: <hagersj@id.doe.gov>
To: <JMS3@nrc.gov>
Date: 6/15/05 4:49PM
Subject: RE: followup questions on RAI response

72-20

Joe:

Attached below is our response to your 2 follow-up questions regarding our recent RAI response and a clarification as to why we requested a wording change to clarify TS 4.2.1.3. and TS 4.2.1.4.

Please do not hesitate to call me at 208-526-0758 if you have any questions regarding this response.

Jan

-----Original Message-----

From: Joseph Sebrosky [mailto:JMS3@nrc.gov]
Sent: Tuesday, June 14, 2005 1:09 PM
To: Hagers, Jan
Cc: Tze-Jer Chuang
Subject: followup questions on RAI response

Mr. Hagers,

The staff has the following followup questions regarding your response dated June 9, 2005, regarding the TMI-2 ISFSI.

- 1) In response 4-4 you state the following "(3) The chemical compatibility of the o-ring material and any lubricant will be evaluated before a lubricant is used with the o-rings. No other chemicals are present in this service." What is meant by "will be evaluated" in the first sentence?
- 2) In response 4-4 you state the following, "In addition to the leak test, periodic radiological surveillances provide added assurance that the o-rings are performing their confinement function as designed." What periodic radiological surveillances are you referring to and what is their periodicity?

I also have a clarification question to ask you regarding the request to revise tech spec 4.2.1.3 and 4.2.1.4. In your January 31, 2005, letter you state that these requirements could be interpreted to contradict with the current required action of tech spec 3.1.1. However, 3.1.1 is requested to be revised to remove the requirement to transport the DSC to the TAN or other appropriate facility for corrective actions if the leak test fails. I just want to make sure that I understand the apparent contradiction. Was there ever an expectation that you would have to perform another MT examination, PT examination or leak test of the DSC before you transferred the DSC offsite (for example, Yucca Mountain)?

CC: <hagersj@id.doe.gov>, <bellerba@id.doe.gov>, <gardnemd@id.doe.gov>

Mail Envelope Properties (42B0945F.128 : 19 : 20776)

Subject: RE: followup questions on RAI response
Creation Date: 6/15/05 4:48PM
From: <hagersj@id.doe.gov>

Created By: hagersj@id.doe.gov

Recipients

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 JMS3 (Joseph Sebrosky)

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 bellerba CC

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Priority: Standard
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The staff has the following follow-up questions regarding your response dated June 9, 2005, regarding the TMI-2 ISFSI.

1) In response 4-4 you state the following "(3) The chemical compatibility of the o-ring material and any lubricant will be evaluated before a lubricant is used with the o-rings. No other chemicals are present in this service." What is meant by "will be evaluated" in the first sentence?

The evaluation will be a review of chemical composition and compatibility literature for lubricants. The o-ring vendor's design guide lists chemical compatibility of EPDM with hundreds of specific materials, including lubricants. A lubricant will be selected based on commercial availability, chemical compatibility with EPDM, and chemical compatibility with the hydrogen analyzer. For instance, silicone-based lubricants may poison the catalytic sensor used to determine hydrogen concentrations within the DSC.

2) In response 4-4 you state the following, "In addition to the leak test, periodic radiological surveillances provide added assurance that the o-rings are performing their confinement function as designed." What periodic radiological surveillances are you referring to and what is their periodicity?

Surveillance Requirement 3.2.2.1 of Technical Specification 3.2.2 requires periodic radiation surveys of the filter housings. Per this requirement, the current radiological survey periodicity for all but one DSC is quarterly. Once LCO 3.2.2 has been satisfied for the stipulated 5 years (occurring within the next year for the other 28 DSCs), this survey frequency will be reduced from quarterly to annually per SR 3.2.2.1. Contamination surveys are performed at the same time in order to prudently obtain additional data for the radiological environmental monitoring program.

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No, there never was an expectation that these Technical Specifications would specify the requirements for any facility other than the TMI-2 ISFSI. The requested change to Technical Specifications 4.2.1.3 and 4.2.1.4 was to clarify that these requirements were to be satisfied as part of DSC preparations prior to the DSCs being transferred to the TMI-2 ISFSI and loaded into the associated Horizontal Storage Modules. These non-destructive testing operations were performed at the DOE Test Area North 607 hot shop facility. Other than the periodic requirement to perform in-situ seal leak testing per Technical Specification 3.1.1, DOE does not contemplate the need for performing any future non-destructive testing to the acceptance requirements of TS 4.2.1.3 or 4.2.1.4.