

August 22, 2005

Mr. Stephen M. Quennoz  
Vice President, Power Supply/Generation  
Portland General Electric Company  
Trojan Nuclear Power Plant  
71760 Columbia River Highway  
Rainier, OR 97048

SUBJECT: DRAFT ENVIRONMENTAL ASSESSMENT RELATED TO THE TROJAN  
INDEPENDENT SPENT FUEL STORAGE INSTALLATION

Dear Mr. Quennoz:

The U.S. Nuclear Regulatory Commission (NRC) is considering Portland General Electric's (PGE) request submitted by letter dated July 6, 2005, regarding the Trojan Independent Spent Fuel Installation (ISFSI) for an exemption from the requirement to submit an annual radioactive effluent report pursuant to Title 10 of the Code Federal Regulations (10 CFR) 72.44(d)(3). If this exemption is granted, then, as further requested by PGE, the Trojan ISFSI license would be amended to remove this requirement from the Technical Specifications (TS). Also, as requested by PGE, the removal from TS of the language, "The Trojan ISFSI may be included in the environmental monitoring program for the Trojan Nuclear Plant," may be granted since it is administrative in nature and will reflect the current status of the Trojan ISFSI.

In accordance with the requirements of 10 CFR 51.21, we have performed an Environmental Assessment (EA) of the effects of granting these actions. The NRC staff has determined that the proposed actions will not have a significant impact on the environment. A copy of our draft EA is enclosed for your review. Should you have any comments or suggestions on this draft EA, please provide them to me by August 26, 2005.

Please reference Docket No. 72-17 and TAC Nos. L23878 and L23879 in future correspondence related to this licensing action. If you have any questions regarding this matter, you may contact me at (301) 415-8500.

Sincerely,

/RA/

Christopher M. Regan, Senior Project Manager  
Spent Fuel Licensing Section  
Spent Fuel Project Office  
Office of Nuclear Material Safety  
and Safeguards

Docket No.: 72-17  
TAC No.: L23878 (Exemption)  
TAC No.: L23879 (Amendment)

Enclosure: Draft Environmental Assessment

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**U.S. NUCLEAR REGULATORY COMMISSION**

**DOCKET NO. 72-17**

**PORTLAND GENERAL ELECTRIC**

**ISSUANCE OF ENVIRONMENTAL ASSESSMENT**

**AND FINDING OF NO SIGNIFICANT IMPACT**

**REGARDING A PROPOSED EXEMPTION**

**AGENCY:** Nuclear Regulatory Commission

**ACTION:** Issuance of Environmental Assessment and Finding of No Significant Impact.

**FOR FURTHER INFORMATION CONTACT:** Christopher M. Regan, Senior Project Manager, Spent Fuel Project Office, Office of Nuclear Material Safety and Safeguards, U.S. Nuclear Regulatory Commission, Washington, D.C. 20555. Telephone: (301) 415-1179; Fax number: (301) 415-1179; E-mail: [cmr1@nrc.gov](mailto:cmr1@nrc.gov).

**SUPPLEMENTARY INFORMATION:**

The U.S. Nuclear Regulatory Commission (NRC, or the staff) is considering issuance of an exemption, pursuant to 10 CFR 72.7, from the provisions of 10 CFR 72.44(d)(3), to the Portland General Electric Company (PGE, or the licensee). The requested exemption (in conjunction with a conforming license amendment) would relieve PGE from the requirement to submit an annual radioactive effluent report for the Trojan Independent Spent Fuel Storage Installation (ISFSI). PGE submitted the exemption request by letter dated July 6, 2005, in which it also requested an amendment to the Trojan ISFSI license. Specifically, the amendment requested the deletion of item c. and last sentence of item b., Section 5.5.2 of Technical Specification; "Radioactive Effluence Control Program" (Appendix A to License

No. SNM-2509). The licensee is currently storing spent nuclear fuel at the Trojan ISFSI on the site of the decommissioned Trojan Nuclear Power Plant in Rainier, Oregon.

## **ENVIRONMENTAL ASSESSMENT (EA)**

### **I. Identification of Proposed Action**

Portland General Electric (PGE) has requested an exemption and a conforming license amendment to obtain relief from the requirement to submit an annual radioactive effluent report for the Trojan ISFSI in accordance with 10 CFR 72.44(d). The regulations requires licensee to include Technical Specifications regarding radioactive effluents. Specifically, 10 CFR 72.44(d)(3) requires that an annual report be submitted to the NRC specifying the quantity of each of the principal radionuclides released to the environment in liquid and in gaseous effluents during the previous 12 months of ISFSI operation. In addition to the regulation itself, the Trojan ISFSI Technical Specifications, Appendix A to the Special Nuclear Material License No. 2509 (SNM-2509), Section 5.5.2, Radioactive Effluence Control Program, item c., requires an annual report to be submitted pursuant to 10 CFR 72.44(d)(3). Along with the amendment request, PGE requested the deletion of last sentence of item b., Section 5.5.2 of the Appendix A to the License No. SNM-2509 which state: "The Trojan ISFSI may be included in the environmental monitoring program for the Trojan Nuclear Plant."

The proposed action before the NRC is whether to grant the exemption and conforming amendment.

### **II. Need for the Proposed Action**

The requirements of 10 CFR 72.44(d)(3) and Trojan ISFSI Technical Specification 5.5.2.c. impose certain regulatory obligations, with associated costs, on the licensee. In its Safety Evaluation Report related to the ISFSI license (Safety Evaluation Report Amendment

No. 2 to the SNM-2509 License, October 23, 2002), the staff found that there are no credible scenarios by which liquid or gaseous effluents could be release from the dry shielded canister. The licensee further stated that any concerns over small quantities of gaseous or liquid effluent that may be produced during cask loading and transfer decontamination activities are no longer relevant, since all the spent fuel has been transferred to the ISFSI, and that the Holtec International (Holtec) Multi-Purpose Canister (MPC) used at the Trojan ISFSI is a passive system which, by design, produces no gaseous or liquid effluent.

Granting the requested exemption and approving the conforming amendment will relieve the licensee from the requirement to submit an annual radioactive effluent report pursuant to 10 CFR 72.44(d)(3). The requirement to submit an annual radioactive effluent monitoring report is not needed for this facility in its current configuration and is an unnecessary administrative burden. Thus, the licensee will not have to incur the costs associated with preparing and submitting an annual ISFSI radioactive effluent report. Also, the proposed deletion of the last sentence of item b. of Section 5.5.2, "The Trojan ISFSI may be included in the environmental monitoring program for the Trojan Nuclear Plant," is no longer needed since it is administrative in nature to reflect the current status of the Trojan ISFSI.

The staff has reviewed the exemption and amendment requests submitted by the licensee and has determined that relieving the licensee from the requirement to submit an annual report pursuant to 10 CFR 72.44(d)(3) and deletion of the last sentence of item b. of Section 5.5.2 are administrative changes, and are acceptable.

### **III. Environmental Impacts of the Proposed Action:**

The staff has determined that the proposed actions would be administrative actions that would not endanger life or property. Further, the staff concludes that there is reasonable assurance that the proposed exemption and conforming amendment will have no impact on off-site doses.

The proposed actions would not increase the probability or consequences of accidents, no changes would be made to the passive system design resulting in the generation of effluents during fuel storage, and there would be no increase in occupational or public radiation exposure. Therefore, there are no significant radiological environmental impacts associated with the proposed action. Additionally, the proposed action would have no significant non-radiological impacts.

**IV. Alternative to the Proposed Action:**

As an alternative to the proposed action, the staff considered denial of the exemption and conforming amendment requests (i.e., the “no-action” alternative). Approval or denial of the exemption and conforming amendment requests would result in no change in the environmental impacts. Therefore, the environmental impacts of the proposed action and the alternative action are similar.

**V. Agencies and Persons Consulted:**

The NRC staff prepared this environmental assessment (EA); no other sources were used. On <<DATE>>, the staff contacted <<XXXX>>. The NRC staff has determined that consultation under Section 7 of the Endangered Species Act is not required for this specific exemption, which involves an administrative change and will not affect listed species or critical habitat. The NRC staff has also determined that the proposed action is not a type of activity having the potential to cause effects on historic properties. Therefore, no consultation is required under Section 106 of the National Historic Preservation Act.

**V. Conclusions:**

The staff has reviewed the exemption and conforming amendment requests submitted by PGE and has determined that relieving the licensee from the requirement to submit an annual radioactive effluent report pursuant to 10 CFR 72.44(d)(3) and the deletion of; “The Trojan ISFSI may be included in the environmental monitoring program for the Trojan Nuclear

Plant,” from the Trojan ISFSI Technical Specifications is an administrative change, and would have no significant impact on the environment.

#### **FINDING OF NO SIGNIFICANT IMPACT**

The environmental impacts of the proposed action have been reviewed in accordance with the requirements set forth in 10 CFR Part 51. Based upon the foregoing EA, the NRC finds that the proposed action of granting the exemption and approving the conforming amendment to the license will not significantly impact the quality of the human environment. Accordingly, the NRC has determined that an environmental impact statement for the proposed exemption and conforming amendment is not warranted.

#### **FURTHER INFORMATION**

In accordance with 10 CFR 2.390 of NRC’s “Rules of Practice,” final NRC records and documents regarding this proposed action, including the exemption request dated July 6, 2005, are publically available in the records component of NRC’s Agencywide Documents Access and Management System (ADAMS). These documents may be inspected at NRC’s Public Electronic Reading Room at <http://www.nrc.gov/reading-rm/adams.html>. These documents may also be viewed electronically on the public computers located at the NRC’s Public Document Room (PDR), O1F21, One White Flint North, 11555 Rockville Pike, Rockville, MD 20852. The PDR reproduction contractor will copy documents for a fee. Persons who do not have access to ADAMS or who encounter problems in accessing the documents located in

ADAMS, should contact the NRC PDR Reference staff by telephone at 1-800-397-4209 or (301) 415-4737, or by e-mail to [pdr@nrc.gov](mailto:pdr@nrc.gov).

Dated at Rockville, Maryland, this 19<sup>th</sup> day of August 2005.

FOR THE NUCLEAR REGULATORY COMMISSION

/DRAFT/

Christopher M. Regan, Senior Project Manager  
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Dated at Rockville, Maryland, this 18<sup>th</sup> day of August 2005.

FOR THE NUCLEAR REGULATORY COMMISSION

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