NRC FORM 699 (9-2003) U.S. NUCLEAR REGULATORY COMMISSION

CONVERSATION RECORD

DATE: 06/14/2006

TIME: 1:00pm

NAME OF PERSON(S) CONTACTED OR IN CONTACT WITH YOU: Thomas Matthews

TELEPHONE NO.:

ORGANIZATION: Omaha Public Power District (OPPD)

SUBJECT: Discussion of Issues Associated with 6/9/06 OPPD Exemption Request Related to Fort Calhoun's Use a Light Weight Transfer Cask for an Upcoming Dry Fuel Storage Campaign

TYPE OF CONVERSATION:
- [ ] VISIT
- [ ] CONFERENCE
- [x] TELEPHONE
  - [x] INCOMING
  - [ ] OUTGOING

SUMMARY *(Continue on Page 2)*

Omaha Public Power District (OPPD) Attendees: Bernie Van Sant, Tom Matthews, Rich Jaworski, Steve Andersen, and Matt Pohl

NRC Attendees: Shana Helton, Elizabeth Thompson, and Joe Sebrosky

Transnuclear Inc., (TN) Attendees: Jim Axline, Robert Grubb, Jayant Bondre, UB Chopra, Prakesh Narayanan

The purpose of the phone call was to resolve questions that the staff had regarding OPPD's exemption request dated 6/9/06 (see ADAMS ML061650157 for the exemption request).

The staff's 8 questions and the answers provided by OPPD are provided below.

1. What is the minimum cooling time of the assemblies FCS plans to load in the 4 canisters?

OPPD answer: 16.2 years.

2. It's not clear in the exemption request exactly what the procedures for taking cask dose rate measurements will be; will vacuum drying be performed after measuring dose rates for TS 1.2.11?

OPPD answer: OPPD intends to take the TS 1.2.11 radiation measurement as soon as the transfer cask is in the decon area and the supplemental shielding provided by the shielding ring and shield bell is in place.

3. On page 18 - are the off-site doses in Chapter M.10 still bounding for the "hung load due to crane malfunction" scenario described on p. 14 of the exemption request?

OPPD answer: After a brief discussion it was determined that NRC needed to clarify the question

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ACTION REQUIRED

None - for OPPD
NRC to clarify question number 3 and determine if any questions need to be documented in a request for additional information

NAME OF PERSON DOCUMENTING CONVERSATION: Joe Sebrosky

SIGNATURE: [signature]

DATE: 6/26/06

ACTION TAKEN

Not applicable - if a request for additional information is needed it will be documented in a separate correspondence.

TITLE OF PERSON TAKING ACTION

SIGNATURE OF PERSON TAKING ACTION

DATE

CONVERSATION RECORD (Continued)

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4. What is the contingency planning alluded to on p. 14 of Attachment 1 of the exemption request?

OPPD answer: OPPD provided a high-level discussion of the as low as reasonably achievable (ALARA) dose contingency planning it had taken in the event of a hung load due to a crane malfunction. This planning included training the crane operators on how to manually operate the crane to place the transfer cask in a safe position. OPPD also indicated that dose rates for this event had been calculated and that the crane operator could manually operate the crane without exceeding NRC dose limits. The NRC staff asked if the dose rate projections included calculations to determine how the radiation levels at the location for the manual operation of the crane were affected by walls and other objects that could redirect radiation from the transfer cask in addition to the dose rates from direct shine from the transfer cask. OPPD indicated that the calculated dose rates were simple models, however, OPPD planned to take dose rate measurements remotely for the transfer cask and adjust the dose rate calculations accordingly.

The NRC staff indicated that OPPD's answers seemed to address the staff's concern and that the NRC staff would discuss the issue with the Region IV based inspectors to see if there were any additional issues. Subsequent to the 6/14/06 phone call the NRC headquarters staff discussed the issue with the NRC Regional staff. The NRC Regional staff has reviewed OPPD's ALARA contingency planning and will also be onsite when the first cask is moved. Because the ALARA contingency planning will be addressed by the NRC inspection program the staff considers this issue resolved for the exemption request.

5. We have two questions/clarifications regarding the Certificate of Compliance (CoC) reference to drawings and the FSAR reference to drawings.

- Section 2.c of the CoC (on page 2) indicates that the drawings are contained in Appendices E, K, M, N, and P of the FSAR. Section 2.b includes the TC as part of the Standardized NUHOMS System. However, Page 12 of 99 of FCN 721004-321 indicates that the drawings for the NUHOMS OS197L Transfer Cask are contained in Appendix W of the FSAR. Has this been evaluated by Fort Calhoun?

- The staff believes that you are using the HSM-H design can you please confirm this. If is the Model 152, the same page of the FSAR update (page 12 of 99) indicates those drawings are in Appendix R which is not referenced in the CoC. Has this been evaluated by Fort Calhoun?

OPPD answer: Yes, the issue has been evaluated by OPPD and OPPD has concluded that they do not need an exemption from the CoC condition regarding drawings. Subsequent to the phone call the staff reviewed TN's proposed changes to the FSAR to support the use of the light weight transfer cask (attachment 2 of OPPD's exemption request). The staff noted that for the light weight transfer cask TN intends to add a note to Appendix E of the FSAR that the drawings for the light weight transfer cask are contained in Appendix W of the FSAR. Because there is a pointer in Appendix E of the FSAR to the drawings in Appendix W the staff considers this meets the intent of the CoC condition regarding drawings and therefore the staff considers this issue resolved for the OPPD exemption.

6. Explain the rationale for using the 11 kW heat load fuel for the bare transfer cask (TC) dose rate calc, but 24 kW for the dose rate expected outside the supplemental shielding.

OPPD answer: OPPD performed the dose rate calculation for 24 kW to be consistent with the technical specifications which are based on a 24 kW maximum heat load for the 32PT dry shielded canister.

7. On page 22 of the exemption request the statement is made that handling fresh fuel and new control rods has more radiological challenges than normal intra spent fuel pool movements. Explain why this is the case.

OPPD answer: OPPD indicated that the inspection of the new fuel assemblies and new control rods is more complex and uses more tools than normal spent fuel pool movements. The complexity and use of multiple tools increases the time that is involved with these operations. The dose rates in general for the spent fuel pool are lower before a full core from a recently completed operational cycle is offloaded than after the full core is offloaded. Consequently, in part to reduce doses it is OPPD's practice to perform the inspections of the fresh fuel and the control rods prior to entering the refueling outage.

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8. On page 16 of attachment 1 a statement is made that "should the end of vacuum drying not be accomplished within the TS 1.2.17a time limits, the existing TS action statement shall be entered, which requires that a helium atmosphere greater than 0.1 atm be established within 2 hours. Once accomplished, the vacuum drying clock can be reset and the vacuum drying restarted." Is it Fort Calhoun's position that TS 1.2.17a action 2 (determine the cause of the failure) does not have to be completed prior to restarting vacuum drying?

OPPD answer: No, Fort Calhoun will comply with the TS 1.2.17a action statements as written. Therefore, step 2 of the action statement (determine the cause of the failure to achieve the vacuum drying pressure limit as defined in Technical Specification 1.2.2) will be completed prior to proceeding to step 3 of the action statement (initiate vacuum drying after actions in step 2 are completed or unload the DSC within 30 days).

At the end of the call the staff stated that it had an action to clarify question number 3 and to determine if any of the issues needed to be documented in a request for additional information. OPPD had no actions as a result of the call.

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