



Department of Energy

Idaho Operations Office
1955 Fremont Avenue
Idaho Falls, ID 83415

June 9, 2008

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555-0001

SUBJECT: Request for Exemption from 10 CFR 20.1501(c) Requirement for National Voluntary Laboratory Accreditation Program for the Idaho Spent Fuel Facility Independent Spent Fuel Storage Installation (Docket 72-0025) (EM-FMDP-08-015)

REFERENCE: 1) Letter, E. Sellers, DOE-ID, to Document Control Desk, NRC; Submittal of Application for the Transfer, with Revision of License Conditions, of 10 CFR Part 72 Materials License No. SNM-2512 for the Idaho Spent Fuel Facility, an Independent Spent Fuel Storage Installation, from Foster Wheeler Environmental Corporation to the United States Department of Energy", Docket 72-0025 (FMDP-MDP-08-008), dated May 30, 2008.
2) Letter, Wilczynski, DOE-ID, to Kane, NRC; "Request for Exemption from 10 CFR 20.1501(c) Requirement for National Voluntary Laboratory Accreditation Program for the Three Mile Island Unit 2 Independent Spent Fuel Storage Installation (TMI-2 ISFSI) (Docket 72-20)" (OPE-SFP-98-420), dated December 18, 1998

Dear Sir or Madam:

Reference 1 submitted an application for the transfer of Materials License 2512 for the Idaho Spent Fuel (ISF) Facility Independent Spent Fuel Storage Installation (ISFSI) from Foster Wheeler Environmental Corporation to the Department of Energy (DOE). Upon license transfer, DOE hereby requests an exemption from the 10 CFR 20.1501(c) National Voluntary Laboratory Accreditation Program (NVLAP) dosimetry processor accreditation requirements and instead requests that the Department of Energy Laboratory Accreditation Program (DOELAP) be approved as an authorized alternative for the ISF Facility ISFSI.

DOE is currently the Nuclear Regulatory Commission (NRC) licensee for the Three Mile Island ISFSI (Docket 72-0020) and made a similar request via Reference 2 that was subsequently approved. Similarly, the Fort St. Vrain ISFSI, also under license to DOE

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(Docket 72-0009), is also approved to use DOELAP in lieu of NVLAP accreditation.

DOE's Idaho National Laboratory (INL) dosimetry processor is not NVLAP accredited but is accredited by DOELAP.

The *ISF Facility Final Safety Analysis Report*, Section 7.2 identifies the major source of radiation as the spent nuclear fuel that will be transferred to the facility to be packaged for interim storage, interim storage, and eventual retrieval (for shipment out of the State of Idaho). The three basic fuel types to be handled at the facility are Peach Bottom fuel elements (Core 1 and Core 2), TRIGA fuel elements, and Shippingport reflector modules. The mean photon and neutron energies for these fuel types, weighted based on percent of total production rate, are calculated and summarized based on information in the *ISF Facility Final Safety Analysis Report*, Tables 7.2-6 and 7.2-7. The range of photon energy is less than 0.01 MeV to greater than 9 MeV. The range of neutron energy is 0.5 MeV to greater than 10 MeV.

Single Fuel Element / Fuel Module Type	Mean Photon Energy (MeV)	Mean Neutron Energy (MeV)
Peach Bottom (Core 1)	0.028	3.74
Peach Bottom (Core 2)	0.276	3.74
Shippingport Type IV Reflector	0.259	N/A
Shippingport Type V Reflector	0.254	N/A
TRIGA	0.484	1.93

The DOELAP Proficiency Test Categories I, II, III, IV, V, VI, and VII for accident and occupational ranges of radiation exposure utilize radiation types and energies which approximate the radiation environment to which personnel at the ISF Facility will potentially be exposed. The INL dosimetry processor is accredited in each of these categories for one or more dosimeters and associated processing systems including the Panasonic UD-814 and the UD-808 plus Harshaw 6776 until May 22, 2009. Re-accreditation will be necessary every two years as required by 10 CFR 835.402(b) and as discussed in the *DOELAP Handbook* (DOE/EH-0026).

For the ISF Facility, DOELAP accreditation in each of the test categories is deemed equivalent to NVLAP accreditation for the purpose of demonstrating compliance with 10 CFR 20.1501(c).

Please contact the DOE Idaho Operations Office NRC Licensing Manager, Jan Hagers, at 208-526-0758 should you have any questions in this regard.

Sincerely,



Elizabeth D. Sellers
Manager

cc: R. Hall, USNRC
B. Spitzberg, USNRC Region IV