



Portland General Electric Company
Trojan ISFSI
71760 Columbia River Hwy
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June 16, 2009
VPN-009-2009

Trojan ISFSI
Docket 72-17
License SNM-2509

ATTN: Document Control Desk
Director, Spent Fuel Project Office
Office of Nuclear Material Safety and Safeguards
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Transmittal of PGE-1071, Trojan Independent Spent Fuel Storage Installation (ISFSI) License
Technical Specifications Bases, Revision 4

This letter transmits Portland General Electric Company's ISFSI License, Technical Specifications Bases, Revision 4. The Attachment provides a description of the change made with this revision.

ISFSI License Technical Specifications Bases pages B 3.2-1 and B 3.2-2 are to be replaced with the enclosed Revision 4 pages.

Any questions concerning this revision may be directed to Mr. Jay Fischer, of my staff, at (503) 556-7030.

Sincerely,

Stephen M. Quennoz
Vice President, Nuclear and
Power Supply/Generation

Attachment

Enclosure

c: Director, NRC, Region IV, DNMS
Shana Helton, NRC, NMSS/DSFST
Thomas M. Stoops, ODOE
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NMSS01

Change to PGE-1071, Trojan ISFSI Technical Specifications Bases Revision 4

The change incorporated into Revision 4 was evaluated in accordance with 10 CFR 72.48 and determination was made that prior NRC approval is not required. The change, addressed by Licensing Document Change Request (LDCR) 2009-004, adds two new paragraphs to the background section for bases B 3.2.1, Transfer Cask Ambient Air Temperature Limit Bases, as follows:

The MPC lift cleats are also limited to an environment where the ambient air temperature is above 0 °F. If a loaded MPC is placed in the Transfer Cask and the ambient air temperature then drops to or below 0 °F, the lift cleats could not be used to complete the required action to place the Transfer Cask in a safe condition. To avoid such a situation, use of the Transfer Cask is administratively restricted to periods when the ambient temperature is > 10 °F. This ensures that the Transfer Cask can be placed in a safe condition before ambient temperature is ≤ 0 °F.

Consideration must also be given to other temperature limitations associated with MPC movement, such as MPC lift slings and rigging components.

This change is made because, if a loaded MPC is supported in the Transfer Cask (TC) on top of the Transfer Station, and the ambient temperature drops to or below 0 °F, the LCO 3.2.1 required immediate action to lift the MPC off the TC doors to place the TC into a safe condition could not be performed, since use of the MPC lift cleats are also restricted to environments where the ambient air temperature is greater than 0 °F.

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ENCLOSURE

B 3.2 TRANSFER CASK INTEGRITY

B 3.2.1 TRANSFER CASK Ambient Air Temperature Limit

BASES

BACKGROUND The TRANSFER CASK is used as a support and shielding container in the TRANSFER STATION during the process of transferring an MPC into a Transport Cask. The analysis of the TRANSFER CASK design assumed an ambient air temperature equal to or greater than 0°F. Since the TRANSFER STATION ambient air temperatures cannot be controlled, use of the TRANSFER CASK must be restricted to occur only when the ambient air temperature is above this limit.

The MPC lift cleats are also limited to an environment where the ambient air temperature is above 0°F. If a loaded MPC is placed in the Transfer Cask and the ambient air temperature then drops to or below 0°F, the lift cleats could not be used to complete the required action to place the Transfer Cask in a safe condition. To avoid such a situation, use of the Transfer Cask is administratively restricted to periods when the ambient temperature is >10°F. This ensures that the Transfer Cask can be placed in a safe condition before ambient temperature is ≤0°F.

Consideration must also be given to other temperature limitations associated with MPC movement, such as MPC lift slings and rigging components.

APPLICABLE SAFETY ANALYSIS The design characteristics of the TRANSFER CASK are considered in the Safety Analysis. Inherent in the design is the assumption that use of the TRANSFER CASK will occur at ambient air temperatures greater than 0°F. Establishing an ambient air temperature limit for use of the TRANSFER CASK ensures that its integrity is maintained and the Safety Analysis is valid.

LCO Limiting use of the TRANSFER CASK to periods when the ambient air temperature is >0°F ensures the TRANSFER CASK will not fail by brittle fracture.

B 3.2 TRANSFER CASK INTEGRITY

B 3.2.1 TRANSFER CASK Ambient Air Temperature Limit

BASES

APPLICABILITY The APPLICABILITY for this LCO is during STORAGE OPERATIONS. In the event a loaded MPC is to be transferred into a Transport Cask, the TRANSFER CASK will be used to support the MPC after it has been raised out of a CONCRETE CASK and until it is lowered back into a Transport Cask at the TRANSFER STATION.

ACTIONS

A.1 and A.2

If ambient air temperature decreases to 0°F or less during use of the TRANSFER CASK to support a loaded MPC, immediate steps will be taken to place the TRANSFER CASK in a safe condition and suspend all further operations involving use of the TRANSFER CASK with a loaded MPC until ambient air temperatures have returned to greater than 0°F. A safe condition is one in which the TRANSFER CASK is not being used to support a loaded MPC. This may involve unloading the TRANSFER CASK.

SURVEILLANCE REQUIREMENTS

SR 3.2.1.1

This SR ensures that the TRANSFER CASK is not used to support a loaded MPC whenever the ambient air temperature is determined to be outside its limit prior to TRANSFER CASK use.

SR 3.2.1.2

This SR ensures that when the TRANSFER CASK is being used to support a loaded MPC with an ambient air temperature less than 5°F, the ambient air temperature is verified greater than 0°F every four hours.

REFERENCES

1. SAR Section 4.7.3.1
 2. SAR Table 3.6-2
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