

NRC FORM 699
(9-2003)

U.S. NUCLEAR REGULATORY COMMISSION

DATE

06/28/2010

CONVERSATION RECORD

TIME

3:00pm

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

TELEPHONE NO.

Glenn Adams

TYPE OF CONVERSATION

VISIT

CONFERENCE

TELEPHONE

INCOMING

OUTGOING

ORGANIZATION

Prairie Island

SUBJECT

AMD #7 for PI ISFSI - TN-40HT: Clarification (proposed license, TS & TS Bases)

SUMMARY (Continue on Page 2)

SEE ATTACHED.

CALL ENDED APPROXIMATELY 3:45 PM

Continue on Page 2

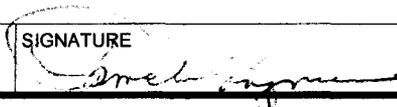
ACTION REQUIRED

SEE ATTACHED.

NAME OF PERSON DOCUMENTING CONVERSATION

SIGNATURE

DATE



06/29/2010

ACTION TAKEN

TITLE OF PERSON TAKING ACTION

SIGNATURE OF PERSON TAKING ACTION

DATE

Attendees:

NSPM Glenn Adams
NSPM Lynne Gunderson
SFST Dr. Pamela Longmire

Date: June 28, 2010
Time: 3:00 – 3:40 Eastern

The objective of the meeting was to clarify the licensing aspects of the pending Prairie Island ISFSI TN-40HT amendment. NSPM was requested to provide a written summary of this telecon and summarize action items at the end before COB. [NSPM Action #1].

NSPM stated that there are 7 observations on the draft amendment to discuss. Each is provided below in the order of the discussion:

1. NSPM requested that an implementation period for the amendment be included in the cover letter. NSPM explained that such an implementation period would allow a timely transition of procedures and training, which ensures compliance. NSPM offered to provide the verbiage that might appear in the amendment. [NSPM Action #2].
2. Proposed license condition 15.A inserts the phrase “and TN-40HT” into the requirement for a pre-operational dry run exercise, which NSPM believes might create the unintended consequence of affecting the upcoming loading campaign for the current cask design (i.e., the TN-40). As written, the license condition would require a TN-40HT dry run prior to the upcoming TN-40 loading campaign. Also, NSPM asked if it was SFST’s intent to require a dry run exercise for a cask system that was operationally similar to the TN-40. NSPM offered to provide a written summary describing the similarities in the cask systems as a potential basis for excluding this dry run requirement from the license. [NSPM Action #3].
3. Similar to the item above, proposed license condition 15.C inserts the phrase “and TN-40HT” into the requirement for overview training, which may create the unintended consequence of affecting the upcoming loading campaign for the current cask design (i.e., the TN-40) loading campaign. As written, the license condition would require completion of TN-40HT overview training prior to the upcoming TN-40 loading campaign. SFST-PM suggested that a separate license section for the TN-40HT may prevent these implementation dilemmas. NSPM offered to provide a proposed license condition specific to the TN-40HT. [NSPM Action #4]
4. As written, proposed License Condition 18 would require base-metal helium leak testing of any future cask prior to loading (including the previously-fabricated TN-40 casks which are soon to be loaded with no base-metal testing). SFST-PM stated that the Staff reviewer was already working on a revision to ensure that this Condition only applied to the TN-40HT and any future cask design.
5. Proposed TS Surveillance Requirement 3.2.2.1 included a footnote to clarify how the cask surface dose rate may be interpreted. NSPM explained that such footnotes to Surveillance requirements were abnormal and might be better represented in the TS Bases. SFST-PM suggested that this could be discussed later in the proposed Staff telecon.
6. Proposed TS 4.3 includes text that “incorporates by reference” certain SAR sections into the TS. SFST-PM explained that this text essentially places the SAR text in the TS and requires prior NRC approval for any changes to that text. NSPM suggested that some of the incorporated SAR text is descriptive in nature (i.e., uses words like “approximate”, and does not relate to safety functions) which may complicate compliance. NSPM suggested that some of the essential requirements of the SAR could be placed directly into the TS (i.e., not

incorporated by reference). SFST-PM requested a written draft TS that the Staff could consider. [NSPM Action #5].

7. The proposed license amendment appears to include administrative elements such as the page-change instructions and TS Bases. If interpreted literally, any subsequent changes to these administrative elements would then require a license amendment. NSPM does not believe Staff would intend to impose this requirement, especially for the TS Bases which were specifically provided (via this license amendment) a Bases Control Program to allow licensee control. SFST-PM requested a written explanation for the perceived problem. [NSPM Action #6]. SFST-PM stated that she would investigate how these other elements have been transmitted previously on site-specific amendments. [SFST-PM Action #1].

Also, the proposed Staff telecon was discussed briefly. NSPM is requesting SFST availability for a 90-minute telecon on July 7, 2010 at 3:00 pm (Eastern).

Actions:

NSPM

1. Provide meeting summary. Completed hereby. (due 6/28)
2. Provide a written purpose for needing a TS implementation period, along with standard verbiage to be provided in the amendment. (due 7/1)
3. Provide a written summary to describe the similarities in the cask systems as a potential basis for excluding the TN-40HT dry run requirement from the license. (due 7/1)
4. Provide a proposed license condition (derived from license condition 15) specific to the TN-40HT. (due 7/1)
5. Provide a written draft TS to insert essential elements of the SAR Sections A9.7.3, A9.7.4, and A9.7.5. (due 7/1)
6. Provide a written explanation for the perceived problem with attaching administrative elements to the license amendment. (due 7/1)

NRC

1. Investigate how the administrative elements (page-change instructions, TS Bases) have been transmitted previously on site-specific amendments.