Portland General Electric Company
Trojan ISFSI
71760 Columbia River Hwy
Rainier, Oregon 97048

January 20, 2011

VPN-001-2011

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

PGE-1080-2011, Biennial Report of the Trojan Independent Spent Fuel Storage Installation for 2009 Through 2010

The enclosure to this letter provides one copy of Portland General Electric (PGE) Company's Biennial Report of the Trojan Independent Spent Fuel Storage Installation (ISFSI) for the calendar years 2009 through 2010. This report is submitted in accordance with the requirements of 10 CFR 72.48(d)(2), and Trojan ISFSI Technical Specification 5.5.1.d.

If you have any questions regarding this correspondence, please contact Mr. Jay Fischer of my staff at (503) 556-7030.

Sincerely,

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

Enclosure

c: Director, NRC Region IV, DNMS
Christopher M. Staab, NRC, NMSS/DSFST
Thomas M. Stoops, ODOE

NMSS01

PGE-1080-2011

BIENNIAL REPORT OF THE

TROJAN INDEPENDENT SPENT FUEL STORAGE INSTALLATION

FOR 2009 THROUGH 2010

Docket 72-17
License SNM-2509

PORTLAND GENERAL ELECTRIC COMPANY
121 S. W. Salmon Street
Portland, Oregon 97204

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INTRODUCTION

The 2011 Biennial Report for the Trojan Independent Spent Fuel Storage Installation (ISFSI) is submitted in accordance with the requirements of 10 CFR 72.48(d)(2), and ISFSI Technical Specification 5.5.1.d.

SUMMARY OF OPERATING EXPERIENCE IN 2009 THROUGH 2010

During years 2009 and 2010, spent nuclear fuel remained in the 34 storage casks at the Trojan ISFSI. There were no license amendments issued during this reporting period.

1. TECHNICAL SPECIFICATIONS BASES CONTROL PROGRAM REPORT

Requirement

Trojan ISFSI License SNM-2509, Technical Specification 5.5.1.d, requires, in part:

"Changes to the Bases implemented without prior NRC approval shall be provided to the NRC on a frequency consistent with 10 CFR 72.48"

Report

One change was made to the Technical Specifications Bases during the reporting period.

The change, addressed by Licensing Document Change Request (LDCR) 2009-004, added 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 was 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.

This 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.

2. CHANGES, TESTS, AND EXPERIMENTS

Requirement

Federal Regulation 10 CFR 72.48(d)(2) requires:

"The licensee and certificate holder shall submit, as specified in §72.4, a report containing a brief description of any changes, tests, and experiments, including a summary of the evaluation of each. A report shall be submitted at intervals not to exceed 24 months"

Report

One 10 CFR 72.48 safety evaluation was performed during the reporting period.

Evaluation Number 2010-001 for Holtec calculation HI-992234, Revision 5, Stress Analysis of MPC Lift Cleat, with supporting document HI-2104737, Revision 0, Trojan Specific MPC Lifting Analysis, and PGE-1069, Trojan ISFSI SAR.

The purpose of the MPC lift cleats is to support and vertically move the loaded MPC inside the Transfer Cask during MPC transfer to a Concrete Cask or Transport Cask. The lift cleats, attaching hardware, and threaded holes in the MPC lid are designed in accordance with NUREG-0612 and ANSI N14.6. The originally approved Holtec design called for the torque of the lift cleat stud nuts to be 793 ft-lbs. In March 2007, Holtec issued an engineering change order eliminating that torque requirement and instead calling for tightening the stud nuts to wrench tight. An effect of the change in torque requirement for the MPC lift cleat studs is a slight decrease in the stud factor of safety.

The Holtec calculation revision updates the stress analysis of Trojan's MPC lift cleats, removing the lift cleat stud preload (torque) requirement, and adding the requirement that the studs and nuts are installed wrench tight. Evaluation 2010-001 was for the implementation of this change of the MPC lift cleat stud nut torque requirement from a preload of 793 foot-pounds to wrench tight, and for conforming changes to the Trojan ISFSI SAR, Section 4.7.4.3. The evaluation concluded that NRC approval was not required prior to implementation.