



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

March 17, 2011
VPN-004-2011

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

Transmittal of Revision 10 to PGE-1069,
Trojan Independent Spent Fuel Storage Installation (ISFSI) Safety Analysis Report (SAR)

Pursuant to 10 CFR 72.70, this letter transmits Revision 10 to Portland General Electric Company's SAR for the Trojan ISFSI. Revision 10 includes changes to the SAR since the last submittal. The Attachment to this letter includes a brief description of the changes included with this revision. Text changes are identified in the SAR by margin bars adjacent to the changes and revision numbers in the page footers.

I hereby certify that Revision 10 accurately presents changes made since Revision 9 necessary to reflect information and analyses prepared pursuant to Commission requirements.

Controlled copy holders are to update their controlled copies per the instructions provided with the enclosure.

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 & Power Supply/Generation

Attachment
Enclosure

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

NMSS01

Summary of Changes Incorporated into Revision 10 of PGE-1069, Trojan ISFSI SAR

The changes incorporated into Revision 10 of the Trojan ISFSI SAR were evaluated in accordance with 10 CFR 72.48 and determination was made that prior NRC approval is not required. Changes summarized below are listed by the Licensing Document Change Request (LDCR) number.

LDCR 2010-002:

1. Revises Section 9.8.1.2, Decommissioning Schedule, to add a new paragraph reflecting the US Department of Energy's withdrawal of the Yucca Mountain License Application and the resulting effect, and Trojan's decision to continue to use previously projected dates for spent fuel shipment (2023 - 2033) and ISFSI decommissioning (2034) to ensure that adequate funds are available in the required decommissioning trusts before 2034.
2. Revises Section 9.8.2.1, Decommissioning Cost Estimate, to change the words "DOE respository receipt requirements" to "DOE spent fuel receipt requirements."

LDCR 2010-003:

1. Revises Section 4.7.4.3, MPC Lift Cleats, to incorporate changes to reflect reanalysis by Holtec that supports changing the MPC lift cleat stud nuts torquing requirement from 793 ft-lbs to wrench tight.
2. Revises Section 4.9, References, to add a new reference 35 for Holtec Report No. HI-992234, Revision 5, "Stress Analysis of MPC Lift Cleat."

Revision 10 to PGE-1069
Trojan Independent Spent Fuel Storage Installation (ISFSI) Safety Analysis Report (SAR)

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REMOVE

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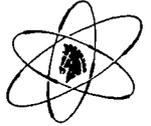
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The Air Pad bearing pressure is calculated based on the bearing area

$$p = \text{Weight} / (\text{air pad area} - \text{inlet duct area} - \text{air pad area outside of cask envelope})$$
$$= 42.5 \text{ psi}$$

Air pad bearing stresses are negligible. No shear forces or bending moments will exist in the Concrete Cask because the air pads effectively cover the whole bottom area. Hence, the concrete will not crush during a bottom lift of the Concrete Cask.

4.7.4.3 MPC Lift Cleats

The adequacy of the MPC lifting devices is demonstrated by considering each of the MPC lift cleats, the lifting holes and attaching studs and nuts, the MPC lid, and its weld to the shell. The design of the MPC incorporates four (4) threaded holes in the top lid, which accept a pair of MPC lift cleats (refer to Figure 8.2-6). A Trojan-specific lifting analysis demonstrates the adequacy of the lifting holes and interfacing studs (Reference 35). The MPC lid and lid-to-shell weld are evaluated in the HI-STAR 100 FSAR for loaded lifting operations. The minimum safety factors for the lid and its peripheral weld are 6.5 and 2.3, respectively. An analysis of the lift cleat, studs and nuts is provided here.

The lift cleat is analyzed using strength of material methods. Bending moments and rotations are conservatively calculated. There are two lift cleats, each supporting 50 percent of the lifted load (i.e., the loaded MPC). The analysis assumes a dynamic load increase factor of 15 percent.

The maximum normal or combined shear stress in each of the lift cleats is limited to the minimum of either 1/10 of the material ultimate strength or 1/6 of the material yield strength for 50 percent of the total lifted load. From the analysis, the minimum safety factor for each MPC lift cleat is 2.21, for each stud is 1.03, and for each nut is 1.98, over and above the 6 and 10 safety factors suggested by ANSI N14.6 (Reference 35).

Refer to Section 4.7.3.4 for a discussion on limiting MPC lift cleat use to an environment where ambient temperature is above 0°F.

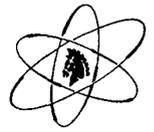
Section 8.2.13.1.2 analyzes the accident condition in which an MPC overlift results in lifting the Transfer Cask.

4.7.5 THERMAL EVALUATION DURING FUEL TRANSFER

The Transfer Cask model and calculations are presented below (Reference 31). These analyses include conditions in which the loaded MPC is in the Transfer Cask and the MPC cavity consists of a helium atmosphere, and the loaded MPC is in the Transfer Cask and is undergoing vacuum drying operations during initial cask loading. As indicated in Table 4.2-12, the thermal analyses



31. Holtec Report No. HI-2012725, "Computation of Peak Cladding Temperature During Vacuum Drying of Trojan Fuel (Trojan ISFSI Completion Project)," Revision 4.
32. Holtec Report No. HI-2012681, "Criticality Evaluation for the Trojan ISFSI Completion Project," Revision 7.
33. Holtec Report No. HI-2012662, "Fuel Parameter Evaluation of TNP Fuel to be Stored at the Trojan ISFSI," Revision 3.
34. Holtec PS-1209, Purchase Specification for the MPC Lift Cleat (Ancillary No. 209).
35. Holtec Report No. HI-992234, "Stress Analysis of MPC Lift Cleat", Rev. 5, and supporting document Holtec Report No. HI-2104737, "Trojan Specific MPC Lifting Analysis," Rev. 0 (Trojan ISFSI Calculation TI-146, Rev. 1).



9.8.1.2 Decommissioning Schedule

The DOE is responsible for the acceptance of spent nuclear fuel and related nuclear material in accordance with the terms of the 1982 Nuclear Waste Policy Act. The PGE contract with DOE, “Standard Contract for Disposal of Spent Nuclear Fuel and/or High-Level Radioactive Waste,” provides the basis for the schedule forecast in DOE’s annual acceptance priority ranking for receipt of spent nuclear fuel and/or high-level radioactive waste. Previously, the published schedule specified that the first shipment of Trojan spent nuclear fuel was to have been in 2002, and PGE projected the final shipment to be in 2018. Subsequently, the DOE schedule published in July 2004 used 2010 for commencing Repository operations and changed the first shipment date for Trojan fuel to 2013. This schedule did not specify a projected date for the final Trojan fuel shipment (the schedule covers only 587 of the 791 spent fuel assemblies). PGE projected the July 2004 schedule out to cover the remaining 204 fuel assemblies and arrived at 2023 as being the estimated date of the final shipment. ISFSI radiological decommissioning costs include the cost of removing the MPCs from storage and packaging them for shipment. ISFSI facility decommissioning will occur following the last spent fuel shipment. In February 2007, the DOE established March 2017 as their new key milestone for commencing Repository operations, which was a seven-year delay from year 2010. The DOE’s Project Decision Schedule published in January 2009 included a new anticipated date of 2020 for commencing Repository operations, which is an additional three-year delay from year 2017. Using the same modeling assumptions, PGE used this three-year delay in DOE’s schedule to project and estimate a new first fuel shipment date of 2023, a final fuel shipment date of 2033, and ISFSI facility decommissioning in 2034. The decommissioning cost estimate and funding plan are based on the assumption that decommissioning will be completed in 2034. This delay in decommissioning will also require continued funding of ISFSI operations and maintenance from the initial projected final fuel shipment date of 2018 through 2033. Annual operations and maintenance costs are estimated at approximately \$3.3 million per year (in 2008 dollars).

In March 2010, the DOE filed a motion with the Atomic Safety and Licensing Board to withdraw its Yucca Mountain license application and asked the Board to dismiss its application with prejudice. An application withdrawn with prejudice cannot be resubmitted for consideration. The DOE motion stated, in part: “DOE seeks this form of dismissal because it does not intend ever to refile an application to construct a permanent geologic repository for spent nuclear fuel and high-level waste at Yucca Mountain.” Based on this, it is unlikely that the DOE will take possession of Trojan’s spent fuel by the currently projected date of 2033 and it may be much later. However, as a conservative measure, Trojan will continue to use the same projected dates for spent fuel shipments (2023-2033) and ISFSI facility radiological decommissioning (2034). This is considered conservative because it will continue to provide funding of PGE’s and PP&L’s decommissioning trust accounts on a schedule that provides adequate funds being collected before 2034.



9.8.2 TROJAN ISFSI DECOMMISSIONING COST ESTIMATE AND FUNDING PLAN

9.8.2.1 Decommissioning Cost Estimate

Summarizing the results of the Trojan ISFSI cost estimate, Table 9.8-1 provides a breakdown of estimated radiological decommissioning costs based on anticipated decommissioning activities. As indicated in Table 9.8-1, the total cost (in 2008 dollars) for decommissioning the ISFSI is estimated at approximately \$12.6 million. As indicated in Section 9.8.1.2, these expenditures are currently scheduled to require funding from 2023 through 2034 to support packaging of spent fuel for shipment and ISFSI decommissioning.

The cost estimate was prepared using the guidance in NUREG-1757, Consolidated NMSS Decommissioning Guidance, Financial Assurance, Recordkeeping, and Timeliness, Section A.3.1, Preparing the Cost Estimate.

In accordance with 10 CFR 72.30(b), the Trojan ISFSI decommissioning cost estimate and associated funding levels are adjusted over the life of the ISFSI as determined to be necessary as part of and on a schedule consistent with Oregon Public Utility Commission (OPUC) rate cases. Since decommissioning of the ISFSI primarily consists of transferring the contents of the sealed MPCs to an off-site facility for final disposal or storage (see Section 9.8.1.1), decommissioning cost estimate adjustments likely would be necessary only upon receipt of any new information indicating that the current co-owner funding levels are no longer adequate to cover decommissioning costs. Such information could include major changes to the timing of decommissioning and associated decommissioning fund expenditures, the scope of Transport Cask loading operations, and/or DOE spent fuel receipt requirements.

9.8.2.2 Decommissioning Funding Plan

Each of the Trojan ISFSI co-owners separately collects through rates the funds for the decommissioning of the Trojan ISFSI. PGE and PP&L deposit these funds in external trust funds in accordance with 10 CFR 50.75(e)(1)(ii) (Reference 5) as allowed by 10 CFR 72.30(c)(5) (Reference 1) together with an NRC partial exemption dated March 17, 2005 (Reference 7). The BPA provides EWEB's portion of Trojan ISFSI decommissioning funds as necessary as described in Section 9.8.2.2.2. Each co-owner maintains a decommissioning fund collection schedule which ensures that sufficient funds are collected and available to fully fund its portion of total decommissioning activity expenditures. As discussed above, in accordance with 10 CFR 72.30(b), the Trojan ISFSI co-owners periodically assess and adjust, as necessary, the financial assurance amount required to complete Trojan ISFSI decommissioning. The manner in which each co-owner provides funding and financial assurance for Trojan ISFSI decommissioning is detailed below.



9.8.2.2.1 PGE Funding

As a majority co-owner in the Trojan ISFSI, PGE is responsible for funding 67.5 percent of the total ISFSI decommissioning costs specified in Section 9.8.2.1. As allowed by 10 CFR 72.30(c)(5) and a related NRC partial exemption (Reference 7), PGE provides ISFSI decommissioning funding assurance using the method of 10 CFR 50.75(e)(1)(ii). Specifically, PGE has established and maintains an external sinking fund in the form of a trust, which is segregated from PGE's assets and outside PGE's administrative control, and into which funds are periodically set aside such that the total amount of funds will be sufficient to pay decommissioning costs. As allowed by 10 CFR 50.75(e)(1)(ii)(A) for licensees such as PGE that recover the total estimated decommissioning costs through ratemaking regulation, this method is the exclusive mechanism that PGE relies upon to provide financial assurance for Trojan ISFSI decommissioning. In accordance with the NRC partial exemption dated March 17, 2005 (Reference 7), in the future, if funds remaining to be placed into PGE's external sinking fund to cover PGE's 67.5 percent ownership share of Trojan ISFSI decommissioning costs are no longer approved for recovery in rates by a competent rate regulating authority (currently OPUC), the subject exemption will be considered no longer effective. In such an event, PGE would no longer be allowed to use the financial assurance mechanisms of 10 CFR 50.75(e), but rather would be required to use financial assurance methods as specified in 10 CFR 72.30(c).

9.8.2.2.2 EWEB/BPA Funding

BPA is obligated through Net Billing Agreements to fund EWEB's 30 percent share of the total Trojan ISFSI decommissioning costs as specified in Section 9.8.2.1. As allowed by 10 CFR 72.30(c)(4), BPA, as a Federal government entity fulfilling the decommissioning funding obligations of EWEB, a licensee, provides financial assurance in the form of a statement of intent. The statement of intent contains a reference to the Trojan ISFSI decommissioning cost estimate, indicating that funds for radiological decommissioning of the Trojan ISFSI will be obtained when necessary.

9.8.2.2.3 PP&L Funding

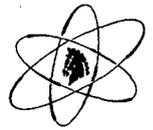
PP&L is responsible for funding its share – 2.5 percent – of the total ISFSI decommissioning costs specified in Section 9.8.2.1. As allowed by 10 CFR 72.30(c)(5) and a related NRC partial exemption (Reference 7), PP&L provides ISFSI decommissioning funding assurance using the method of 10 CFR 50.75(e)(1)(ii). Specifically, PP&L has established and maintains an external sinking fund in the form of a trust, which is segregated from PP&L's assets and outside PP&L's administrative control, and into which funds are periodically set aside such that the total amount of funds will be sufficient to pay decommissioning costs. As allowed by 10 CFR 50.75(e)(1)(ii)(A) for licensees such as PP&L that recover the total estimated decommissioning costs through ratemaking regulation, this method is the exclusive mechanism that PP&L relies upon to provide financial assurance for Trojan ISFSI decommissioning. In accordance with the NRC partial exemption dated March 17, 2005 (Reference 7), in the future, if funds remaining to be placed into PP&L's external sinking fund to cover PP&L's 2.5 percent



ownership share of Trojan ISFSI decommissioning costs are no longer approved for recovery in rates by a competent rate regulating authority (currently OPUC), the subject exemption will be considered no longer effective. In such an event, PP&L would no longer be allowed to use the financial assurance mechanisms of 10 CFR 50.75(e), but rather would be required to use financial assurance methods as specified in 10 CFR 72.30(c).

9.8.3 RECORD KEEPING FOR DECOMMISSIONING

Records of information important to the safe and effective decommissioning of the ISFSI will be maintained for the life of the ISFSI. The types of information that will be maintained as records for decommissioning are listed in 10 CFR 72.30(d).



9.9 NUCLEAR LIABILITY INSURANCE

The NRC requires that PGE maintain a minimum of \$100 million in nuclear liability insurance coverage, as described in Indemnity Agreement No. B-78, “until all the radioactive material has been removed from the location and transportation of the radioactive material from the location has ended as defined in subparagraph 5(b), Article I” (Reference 8), or until the Commission authorizes the termination or modification of such financial protection. It is noted that the site location described in Item 4 of the attachment to the indemnity agreement means the original 10 CFR 50 license site boundaries. This requirement to maintain a minimum of \$100 million in nuclear liability insurance coverage must remain in the Trojan ISFSI Safety Analysis Report unless prior NRC approval is received for its elimination or for a reduction in coverage amount (Reference 8).



9.10 REFERENCES

1. Code of Federal Regulations, Title 10, Part 72.30, "Financial Assurance and Recordkeeping for Decommissioning."
2. Code of Federal Regulations, Title 10, Part 72.130, "Criteria for Decommissioning."
3. NUREG-1757, "Consolidated NMSS Decommissioning Guidance, Financial Assurance, Recordkeeping, and Timeliness," Section A.3.1, "Preparing the Cost Estimate".
4. Deleted in Revision 9.
5. Code of Federal Regulations, Title 10, Part 50.75, "Reporting and Recordkeeping for Decommissioning Planning."
6. PGE-8010, "Portland General Electric (PGE) Nuclear Quality Assurance Program for Trojan Independent Spent Fuel Storage Installation (10 CFR 72) Operations and Radioactive Material Packaging and Transportation (10 CFR 71) Activities," a.k.a., Trojan Nuclear Quality Assurance Program.
7. U.S. Nuclear Regulatory Commission letter, "Partial Conditional Exemption from the Requirements of 10 CFR 72.30(c)(5)," dated March 17, 2005.
8. U.S. Nuclear Regulatory Commission letter, "Termination of Trojan Nuclear Plant Facility Operating License No. NPF-1," dated May 23, 2005.