



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

March 19, 2015
VPN-004-2015

Trojan ISFSI
Docket 72-17
License SNM-2509

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

Transmittal of Revision 13 to PGE-1069,
Trojan Independent Spent Fuel Storage Installation (ISFSI) Safety Analysis Report (SAR)

Pursuant to 10 CFR 72.70, this letter transmits Revision 13 to Portland General Electric Company's SAR for the Trojan ISFSI. Revision 13 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 13 accurately presents changes made since Revision 12 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. Mark Tursa, 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
Todd Cornett, Siting Division Administrator, ODOE
Controlled Copy Holders

NM 5526

Summary of Changes Incorporated into Revision 13 of PGE-1069, Trojan ISFSI SAR

The changes incorporated into Revision 13 of the Trojan ISFSI SAR were evaluated in accordance with 10 CFR 72.48 and a determination was made that prior NRC approval was not required. Changes summarized below are listed by the Licensing Document Change Request (LDCR) number.

LDCR 2013-001:

Revises ISFSI SAR, Section 9.8, changes include the following:

- Changes to reflect the revised 10 CFR 72.30 Rule that was effective December 17, 2012
- Use PGE-1082, ISFSI Radiological Decommissioning Cost Estimate 2012 dollars versus 2008 dollars

Changes to reflect the revised 10 CFR 72.30 Rule that was effective December 17, 2012

This revised Rule changed Subsection numbering and added new requirements to 10 CFR 72.30 Subsections (b), (c), (d), (e), (f) and (g). The requirements in the revised Rule are contained in and implemented by the proposed PGE-1082 Topical Report (awaiting NRC review and approval) and the contents of this document have been validated. These SAR changes are being made to be consistent with PGE-1082.

Use PGE-1082 ISFSI Radiological Decommissioning Cost Estimate 2012 dollars versus 2008 dollars

In 2012, TLG Services, Inc. prepared a revised ISFSI radiological decommissioning site-specific cost estimate that uses 2012 dollars versus the previous 2008 dollars. The TLG cost estimate is summarized in TLG Report, Table 4.3-1, Radiological Decommissioning Costs, and this Table was incorporated into PGE-1082, Section 4.0 (that contains the TLG detailed site-specific cost estimate, including Table 4.3-1). This Table 4.3-1 contains the Activities and 2012 dollars that are used to update SAR Table 9.8-1 from 2008 dollars to 2012 dollars.

Other changes that are consistent with PGE-1082 include:

- Changed “PP&L” to say “PacifiCorp” – this is consistent with the ISFSI License and PGE-1082.
- Deleted reference to Reference 7 an NRC approved partial Exemption from the old 10 CFR 72.30(c)(5) that is no longer required because of the new wording in 10 CFR 72.30(e)(5).
- Changed references to NUREG-1757 to say NUREG-1757, Volume 3, Revision 1, Consolidated Decommissioning Guidance, Financial Assurance, Recordkeeping, and Timeliness, Section A.3.1, Preparing the Site-Specific Cost Estimate.
- Changed Section 9.8.2.2.2 to reflect that EWEB uses a Statement of Intent instead of BPA. This change was necessary because BPA is not a Trojan ISFSI licensee.
- Changed Section 9.8.3 to add reference to 10 CFR 20.1501(b) that was a part of the same NRC rulemaking for decommissioning planning.

All of the above changes are considered to be administrative changes.

LDCR 2014-001:

Revises Section 2.1.2.1 to reflect the demolition/removal of Trojan North and Training Buildings (both buildings were located outside of the Trojan ISFSI 200 meter Controlled Area Boundary and Controlled Access Area). Although not specifically referenced in the SAR text by name, Section 2.1.2.1 makes reference to facilities or buildings south and west of the ISFSI site that were intended to be made available for commercial activities upon release for unrestricted use. Since the time this was written in the SAR, these referenced facilities have been released for unrestricted use; however, the two structures that were most intended for future commercial use (buildings referenced above) have been demolished.

Other structures south and west of the ISFSI site still being used by PGE may at some point be made available for commercial activities. Hence, Section 2.1.2.1, Paragraph 2, second sentence is changed to read "These facilities are outside the ISFSI controlled access area and may be made available for commercial activities."

This change is considered an administrative change to reflect the true description of the Trojan ISFSI site.

Revision 13 to PGE-1069
Trojan Independent Spent Fuel Storage Installation (ISFSI) Safety Analysis Report (SAR)

Revised pages are to be replaced as follows:

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230kV overhead transmission lines terminate in a switchyard approximately 1000 feet from the ISFSI. The switchyard supplies power to the ISFSI site.

The Controlled Area, as defined in 10 CFR 72.106, immediately surrounds the ISFSI and extends out to 200 meters from the edge of the Storage Pad (Figure 2.1-2). The Controlled Area lies entirely on PGE property with the exception of a portion of the Controlled Area that extends over the Columbia River. U.S. Highway 30 is not within the Controlled Area. PGE has formal agreements with the U.S. Coast Guard to restrict traffic on the Columbia River, and with the state of Oregon to enable PGE to evacuate persons from publicly owned lands (i.e., tidelands) in the event of an emergency at the ISFSI.

The doses that could be anticipated at the Controlled Area boundary from an off-normal event or accident are discussed in Chapter 8 and are below the limits of 10 CFR 72.106 and Oregon Administrative Rule (OAR) 345-026-0390.

2.1.2.1 Other Activities Within the ISFSI Site Boundary

No activities unrelated to ISFSI operation are performed within the ISFSI controlled access area boundary.

Several major physical facilities, which were used during Trojan Nuclear Plant operation, are grouped to the south and west of the ISFSI site. These facilities are outside the ISFSI controlled access area and may be made available for commercial activities. Leases issued to commercial users of these facilities will limit activities to ensure that postulated events and accident analyses remain bounding. Access to these facilities will not afford access to the ISFSI.

2.1.2.2 Boundaries for Establishing Effluent Release Limits

The only potential effluent release points are the Concrete Casks themselves located at the ISFSI. The analyses presented in the HI-STORM FSAR (Reference 14) demonstrate that the MPC remains intact during all postulated off-normal and accident conditions. In summary, there is no mechanistic failure that results in a breach of the confinement boundary. However, the dose resulting from an effluent release due to a non-mechanistic ground-level breach of the confinement boundary during normal operation and anticipated occurrences (i.e., direct radiation) has been estimated at the Controlled Area boundary and is within the limits specified in 10 CFR 72.104 and OAR 345-026-0390.

The Restricted Area, as defined in 10 CFR 20, has the same boundaries as the controlled access area that surrounds the ISFSI Protected Area. Physical access to the Restricted Area is restricted by the controlled access area fence. Access into the Protected Area is controlled as described in the ISFSI Security Plan. Radiation protection procedures specify when dosimetry is required in the Restricted Area.



9.8 ISFSI DECOMMISSIONING PLAN

In accordance with 10 CFR 72.30 (Reference 1), this section describes the plan for radiological decommissioning the ISFSI facility. As required by 10 CFR 72.30(a), this Trojan ISFSI Decommissioning Plan contains sufficient information on proposed practices and procedures for the decontamination of the site and facilities and for disposal of residual radioactive materials after all of the MPCs and their contents have been removed, in order to provide reasonable assurance that the decontamination and decommissioning of the ISFSI at the end of its useful life will provide adequate protection to the health and safety of the public. This plan also discusses those design features of the ISFSI that facilitate its decontamination and decommissioning at the end of its useful life.

In accordance with 10 CFR 72.30(b), the Trojan ISFSI Decommissioning Plan as incorporated into this section also details how reasonable assurance will be provided that funds will be available to decommission the ISFSI. This information includes a cost estimate for radiological decommissioning the Trojan ISFSI and a description of the methods from 10 CFR 72.30(e) that the Trojan ISFSI co-owners will use to assure adequate funds for radiological decommissioning, including means of adjusting the cost estimate and associated co-owner funding levels periodically over the life of the ISFSI.

9.8.1 DECOMMISSIONING ACTIVITIES AND SCHEDULE

9.8.1.1 Decommissioning Activities

The ISFSI was designed to minimize the decontamination efforts required for decommissioning pursuant to the requirements of 10 CFR 72.130 (Reference 2). As discussed in Section 3.5, the design of the MPC and the operational process for handling the MPC during Storage and Transfer Station operations ensure that the radioactive materials are contained within the sealed MPC, which minimize the potential for contamination of the ISFSI components and structures. Thus, after the spent nuclear fuel is transferred to the US Department of Energy (DOE) and removed from the ISFSI for disposal or storage, radiological decommissioning of the ISFSI will primarily consist of contamination and radiation surveys and disposal of radioactive waste.

Contamination and radiation surveys will be performed to determine if the ISFSI is contaminated or if ISFSI components are activated. As indicated in Section 3.5 and Table 4.2-3, no contamination is expected on the Concrete Cask and because of low neutron flux levels, no significant activation of the concrete and steel is anticipated. However, even if contamination were detected, decontamination would be accomplished by routine radiation protection practices. The resultant radioactive waste would be packaged and shipped off site as radioactive waste. Similarly, even if the ISFSI components were found to be significantly activated, the activated components would be packaged and shipped off site as radioactive waste.



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. 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 and a final fuel shipment date of 2033. Preparation of the ISFSI radiological decommissioning plan and characterization of a sample of empty Concrete Casks to determine the level of activation is projected to be performed in 2030. ISFSI facility radiological decommissioning is projected to begin in year 2033, following the last spent fuel shipment. The radiological decommissioning cost estimate and funding plan are based on the assumption that ISFSI facility radiological decommissioning will begin in 2033 and complete in 2034.

In March 2010, the DOE filed a motion with the Atomic Safety and Licensing Board to withdraw its Yucca Mountain license application and subsequently closed down the Yucca Mountain project. 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 (2033-2034). This is considered conservative because it will continue to provide funding of PGE’s and PacifiCorp’s decommissioning trust accounts on a schedule that provides adequate funds being collected by 2033.



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 radiological decommissioning activities. As indicated in Table 9.8-1, the total cost (in 2012 dollars) for radiological decommissioning the ISFSI is estimated at approximately \$3.8 million. As indicated in Section 9.8.1.2, these expenditures are currently scheduled to require funding from 2030 through 2034 to support ISFSI radiological decommissioning, including preparation of the radiological decommissioning plan, characterization of Concrete Casks, and the final status survey.

The cost estimate was prepared using the guidance in NUREG-1757, Volume 3, Revision 1, Consolidated Decommissioning Guidance, Financial Assurance, Recordkeeping, and Timeliness, Section A.3.1, Preparing the Site-Specific Cost Estimate.

In accordance with 10 CFR 72.30(c), the Trojan ISFSI radiological decommissioning cost estimate and associated funding plans are adjusted over the life of the ISFSI at the time of license renewal and at intervals not to exceed 3 years. Since radiological decommissioning of the ISFSI primarily consists of performing contamination and radiation surveys and disposing of radioactive waste (see Section 9.8.1.1), radiological decommissioning cost estimate and funding plan adjustments will normally be made to incorporate increased labor costs, and/or increased radioactive waste burial costs. The ISFSI radiological decommissioning cost estimate and associated funding plan may also be updated to reflect new information from the DOE that would change PGE's assumption that the final spent fuel shipment would occur in 2033 (see Section 9.8.1.2).

9.8.2.2 Decommissioning Funding Plan

Each of the Trojan ISFSI co-owners separately collects through rates the funds for the radiological decommissioning of the Trojan ISFSI. PGE and PacifiCorp 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(e)(5) (Reference 1). The BPA provides EWEB's portion of Trojan ISFSI radiological decommissioning funds as necessary as described in Section 9.8.2.2.2. Each co-owner maintains a radiological decommissioning fund collection schedule which ensures that sufficient funds are collected and available to fully fund its portion of total radiological decommissioning activity expenditures. As discussed above, in accordance with 10 CFR 72.30(c), the Trojan ISFSI co-owners periodically assess and adjust, as necessary, the financial assurance amount required to complete Trojan ISFSI radiological decommissioning. The manner in which each co-owner provides funding and financial assurance for Trojan ISFSI radiological 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 radiological decommissioning costs specified in Section 9.8.2.1. As allowed by 10 CFR 72.30(e)(5), PGE provides ISFSI radiological 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 set aside such that the total amount of funds will be sufficient to pay radiological decommissioning costs. As allowed by 10 CFR 72.30(e)(5) for licensees such as PGE that recover the total estimated radiological decommissioning costs through ratemaking regulation, this method is the exclusive mechanism that PGE relies upon to provide financial assurance for Trojan ISFSI radiological decommissioning. In the event that funds remaining to be placed into PGE's external sinking fund to cover PGE's 67.5 percent ownership share of Trojan ISFSI radiological decommissioning costs are no longer approved for recovery in rates by a competent rate regulating authority [currently Oregon Public Utility Commission (OPUC)], 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(e)(1) through (4).

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 radiological decommissioning costs as specified in Section 9.8.2.1. As allowed by 10 CFR 72.30(e)(4), EWEB, as a government agency, provides financial assurance in the form of a statement of intent. The statement of intent contains a reference to the Trojan ISFSI radiological decommissioning cost estimate, indicating that funds for radiological decommissioning of the Trojan ISFSI will be obtained when necessary.

9.8.2.2.3 PacifiCorp Funding

PacifiCorp is responsible for funding its share – 2.5 percent – of the total ISFSI radiological decommissioning costs specified in Section 9.8.2.1. As allowed by 10 CFR 72.30(e)(5) provides ISFSI radiological decommissioning funding assurance using the method of 10 CFR 50.75(e)(1)(ii). Specifically, PacifiCorp has established and maintains an external sinking fund in the form of a trust, which is segregated from PacifiCorp's assets and outside PacifiCorp's administrative control, and into which funds are set aside such that the total amount of funds will be sufficient to pay radiological decommissioning costs. As allowed by 10 CFR 72.30(e)(5) for licensees such as PacifiCorp that recover the total estimated radiological decommissioning costs through ratemaking regulation, this method is the exclusive mechanism that PacifiCorp relies upon to provide financial assurance for Trojan ISFSI radiological decommissioning. In the event that funds remaining to be placed into PacifiCorp's external sinking fund to cover PacifiCorp's 2.5 percent ownership share of Trojan ISFSI radiological decommissioning costs are no longer approved for recovery in rates by a competent rate regulating authority (currently OPUC), PacifiCorp 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(e)(1) through (4).

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 20.1501(b) and 10 CFR 72.30(f).



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, Volume 3, Revision 1, "Consolidated Decommissioning Guidance, Financial Assurance, Recordkeeping, and Timeliness," Section A.3.1, "Preparing the Site-Specific 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. Deleted in Revision 13.
8. U.S. Nuclear Regulatory Commission letter, "Termination of Trojan Nuclear Plant Facility Operating License No. NPF-1," dated May 23, 2005.



TABLE 9.8-1
ISFSI Radiological Decommissioning Costs

<u>ACTIVITY</u>	<u>ESTIMATED COST</u> <u>(thousands of 2012 dollars)</u>	
Characterization	79	
Decontamination and Disposal ¹	601	
Final Status Survey	1,584	
PGE Staff (post-fuel transfer)	761	
Sub-Total (without contingency)	3,026	
Contingency (25%)	756	
<hr/>		
Total Radiological Decommissioning Cost	3,782	

¹ Assumes separate burial of one Concrete Cask as Low Level Radioactive Waste.