



CONVERSATION RECORD

08/31/2017

NAME OF PERSON(S) CONTACTED OR IN CONTACT WITH YOU Department of Energy Idaho Operations Office		DATE OF CONTACT 08/23/2017	TYPE OF CONVERSATION <input type="checkbox"/> E-MAIL <input checked="" type="checkbox"/> TELEPHONE <input type="checkbox"/> INCOMING <input checked="" type="checkbox"/> OUTGOING
E-MAIL ADDRESS		TELEPHONE NUMBER	

ORGANIZATION Department of Energy Idaho Operations Office	DOCKET NUMBER(S) 72-20
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LICENSE NUMBER(S) SNM-2508	CONTROL NUMBER(S) L25202, L25203
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SUBJECT
Discuss draft environmental requests for additional information (RAIs) ER-4 and ER-5 on Three Mile Island, Unit 2 (TMI 2) Independent Spent Fuel Storage Installation (ISFSI) renewal application

SUMMARY
Department of Energy Idaho Operations Office (DOE-ID) attendees: Scott Ferrara, Eva Auman, Peggy Hinman, Chris Harvey, David Bland

NRC attendees: Christopher Markley, Diana Diaz-Toro, Kayla Gamin

A teleconference was held between NRC and DOE-ID representatives to discuss the draft environmental RAIs on the TMI-2 ISFSI renewal application (specifically, RAIs ER-4 and ER-5), which were provided to DOE-ID on August 9, 2017.

The purpose of the call was to: (1) ensure a common understanding of the RAIs; (2) ensure that the RAIs are not already addressed in the current submittal; and (3) establish an appropriate response date for DOE-ID to respond to the RAIs.

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ACTION REQUIRED (IF ANY)
The NRC staff will revise RAI ER-4 to focus on generic operational activities and any updated information in this area since the original license was issued.

The NRC will issue the final RAI letter to DOE-ID.

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NAME OF PERSON DOCUMENTING CONVERSATION
Kristina Banovac

SIGNATURE

CONVERSATION RECORD (continued)

SUMMARY: (Continued from page 1)

DOE-ID noted that it is committed to meeting the 2035 TMI-2 fuel debris removal deadline in accordance with the settlement agreement. However, it does not have set or specific plans in place yet for fuel debris removal and subsequent ISFSI decommissioning activities. In the future when the ISFSI ceases operation, specific decontamination and decommissioning activities will be identified, and a decommissioning plan will be submitted to the NRC for review and approval consistent with 10 CFR 72.54. DOE-ID asked if RAIs ER-4 and ER-5 are seeking information beyond the original conditions of the license, such as commitments regarding the fuel debris removal and decommissioning.

The NRC staff clarified that the RAIs are not seeking commitments, decisions, or policy information regarding the future removal of the fuel debris or decommissioning of the ISFSI. Rather, the RAIs are seeking general or high-level information related to the operations or activities associated with the fuel debris removal and the subsequent ISFSI decommissioning, which could occur in the requested license renewal term. In the NRC's cumulative impacts portion of its environmental assessment (EA), the staff will consider the impact of the proposed action (of renewing the TMI-2 ISFSI license) when added to other past, present, or reasonably foreseeable future actions. Because the existence of the settlement agreement, a reasonably foreseeable action is the transfer of the fuel debris out of the ISFSI before the end of the requested license renewal term and subsequent ISFSI decommissioning activities to meet decommissioning timeliness requirements. The information provided by DOE-ID could be general information on what activities would be carried out to remove the fuel debris from the the site, to allow the NRC staff to understand the potential operational activities and assess the environmental impacts of such activities in the cumulative impacts portion of the staff's EA.

DOE-ID noted that information from a 1995 DOE programmatic environmental impact statement (EIS) (used by the NRC in preparing its 1998 EIS in NUREG-1626) may touch on relevant activities and include general impacts of decontamination and decommissioning, and DOE-ID may use and reference such information in its RAI response. The NRC staff noted that it is appropriate for DOE-ID to reference this prior information, if no new information exists. The NRC staff also noted that it helps if the references cited in the response are publicly available.

As the draft RAI ER-4 caused confusion regarding the amount of detail needed to respond to the staff's request, the NRC staff will revise the RAI to focus on generic operational activities and any updated information in this area since the original license was issued.

Regarding draft RAI ER-5, DOE-ID noted that it could be responded to as written. DOE-ID also noted that it may use or reference information from the initial license application, since there have been no further developments in this area since that time. The NRC staff noted that it is appropriate for DOE-ID to reference or use prior information, if no new information exists.

The NRC staff noted its policy to provide the relevant State an opportunity to review the staff's draft EAs. When the staff develops the draft EA for the TMI-2 ISFSI license renewal, it will provide the State of Idaho an opportunity to review it.

DOE-ID confirmed that it could respond to the RAIs within 45 days.