



Department of Energy

Idaho Operations Office
1955 Fremont Avenue
Idaho Falls, ID 83415

November 16, 2017

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

SUBJECT: Submittal of Supplemental Information in support of NRC Review of Environmental Request for Additional Information for the Three Mile Island 2 Independent Spent Fuel Storage Installation License Renewal Application Docket 72-0020 (EM-NRC-17-042)

REFERENCES: 1. NRC Letter: Mr. John P. Zimmerman, Deputy Manager, Idaho Cleanup Project, "Request for Additional Information for the Environmental Review of the Application for Renewal of the Three Mile Island Unit 2 Independent Spent Fuel Storage Installation License No. SNM-2508 (CAC Nos. L25202 and L25203)," dated August 31, 2017

2. DOE-ID Letter EM-NRC-17-037: "Submittal of Responses to NRC Requests for Additional Information for the Environmental Review of the Three Mile Island Unit 2 Independent Spent Fuel Storage Installation License Renewal Application, Docket 72 0020," Dated October 3, 2017

Dear Sir or Madam:

On August 31, 2017, the Department of Energy, Idaho Operations Office (DOE-ID) received from the Nuclear Regulatory Commission's (NRC) Requests for Additional Information (RAI) (Ref 1, ADAMS Accession No. ML 17244A054) to support the NRC staffs review the environmental supplement associated with the Three Mile Island Unit 2 (TMI-2) Independent Spent Fuel Storage Installation (ISFSI) License Renewal Application (LRA). DOE responded formally to the aforementioned request and provided the NRC Staff with responses to the RAI's (reference 2).

The NRC staff reviewed the DOE responses and requested a teleconference call with regard to two additional areas in need of clarification. NRC and DOE discussed the two areas that needed further clarification on November 14, 2017 (public conversation record -ADAMS at Accession No. ML17319A176). This letter provides the two minor clarifications requested regarding RAI-ER-3 and RAI-ER-6. For clarity, the original submittal is provided and the supplemental information is provided directly below those responses.

NMSSZD
NMSSZ6

RAI ER-3 (Original NRC Request)

Provide a status update of the consultation with the State of Idaho regarding the Idaho Settlement Agreement, the scope of such consultation, and the timeline for completing the consultation.

Supplemental ER Section 10, "Environmental Approvals and Consultation," states that DOE-ID continues to consult with the State of Idaho regarding the Idaho Settlement Agreement.

This information is necessary to understand and assess the environmental impacts of the activities that will be carried out throughout the proposed license renewal period in accordance with NEPA and 10 CFR 51.30.

DOE-ID Response to RAI ER-3 (Original DOE Response)

DOE-ID communicates regularly with the State of Idaho on matters associated with the Settlement Agreement and will continue to do so throughout the term of the Agreement. Thus, there is no specific timeline for completing the consultation. In-person meetings and phone calls between State and DOE-ID management officials occur periodically during the year, including meetings with the Governor's Office, the Attorney General, and the Idaho Department of Environmental Quality (DEQ). Annual progress reports are provided by DOE-ID to the State of Idaho on Idaho Settlement Agreement milestones. The last progress letter pertaining to the Settlement Agreement was submitted to the State on February 22, 2017. There was no status change with respect to the TMI-2 ISFSI discussed in the last progress letter.

DOE-ID provides updates on the Spent Nuclear Fuel Program progress toward meeting the Settlement Agreement milestones at most Citizens Advisory Board (CAB) meetings that the State of Idaho liaison attends. CAB meetings are open to the public. DOE-ID's Spent Nuclear Fuel Program progress toward meeting the Settlement Agreement milestones, as well as the TMI-2 ISFSI LRA, were discussed at the regular February 2017 and June 2017 CAB meetings and will be discussed at future CAB meetings.

In addition, as part of the DOE-ID communication plan for the TMI-2 ISFSI LRA submittal, the Idaho Offices of the Governor, Attorney General, and Department of Environmental Quality were notified of DOE-ID's intention to submit the TMI-2 ISFSI LRA. That notification took place during the week of February 27, 2017, shortly before the March 16, 2017 submittal of the LRA. Through these notifications, DOE-ID re-affirmed its commitment to meeting its obligations in the Settlement Agreement. DOE-ID also discussed the reasons for requesting renewal of the TMI-2 ISFSI license and outlined the NRC's process for review of the LRA. DOE-ID offered to provide follow-up briefings on the TMI-2 ISFSI LRA to the State of Idaho during the notification process.

DOE Supplemental RAI ER-3 Information

NRC Staff requested a copy of the most recent correspondence between DOE-ID and the State of Idaho regarding the Settlement Agreement progress and also requested further direction on the location of the State of Idaho's tracking and reporting of those Settlement Agreement activities. The requested correspondence is contained in the enclosure. The State of Idaho public Settlement Agreement status information, based on the information provided in the annual Settlement Agreement progress report, is posted on the World Wide Web address / URL below:

<http://www.deq.idaho.gov/inl-oversight/oversight-agreements/cleanup-progress-at-inl/>

RAI ER-6 (Original NRC Request)

Provide the disposal location for solid radioactive waste.

Supplemental ER Section 3.5.4, "Solid Radwaste Systems," states that the solid radioactive waste is taken to the Solid Waste Processing Area where it is prepared for shipment and disposal. The disposal location is not identified.

This information is needed to assess the environmental impacts of the proposed action, as required by 10 CFR 51.30.

DOE-ID Response to RAI ER-6 (Original DOE Response)

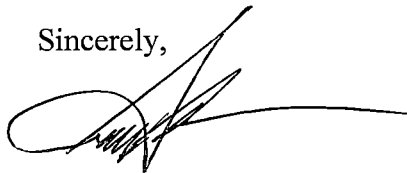
Very little solid radwaste is generated by activities associated with operation and maintenance of the TMI-2 ISFSI. Waste that is generated is transferred to the larger DOE-ID radwaste stream for further processing with other low-level radwaste generated at DOE's Idaho site. This waste transfer occurs at the Idaho Nuclear Technology and Engineering Center (INTEC) low-level waste pad, southwest of the TMI-2 ISFSI. Specifically, the INTEC low-level waste pad is identified as CPP 1790 as shown at the bottom of LRA Figure 3-1 near the southern end of the INTEC west fence.

DOE Supplemental RAI ER-3 Information

NRC Staff requested further clarification of the final disposition of solid radwaste (Low Level Waste) generated at the TMI-2 ISFSI. The waste generated from TMI-2 and other facilities located at DOE's Idaho Site are combined into qualified shipping containers for transport. Currently, DOE-ID ships its low-level radwaste to one of two certified disposal facilities (Energy Solutions LLC, in Utah, or Nevada National Security Site [NNSS]) based on curie content.

Should you have questions or require additional information, please contact me directly at (208) 526-5531 or Steve Ahrendts at (208) 526-8888.

Sincerely,

A handwritten signature in black ink, appearing to read 'Scott Ferrara', with a long horizontal flourish extending to the right.

Scott Ferrara
License Manager Alternate and
Facility Director

Enclosure: DOE-ID Letter "Annual Update of the Department of Energy, Idaho Operations Office Progress in Meeting Requirements and Milestones Contained in the October 16, 1995, Idaho Settlement Agreement (OS-ESD-17-023)," dated February 22, 2017

cc: Kristina Banovac, NRC (w/attach)
Bernard White, NRC (w/attach)
Meraj Rahimi, NRC (w/attach)
Nicholas DiNunzio, DOE HQ (w/attach)
Greg Sosson, DOE HQ (w/attach)
David Bland, STI (w/attach)