

**From:** Leon Daryl A  
**To:** [Trefethen, Jean](#)  
**Cc:** [Coffin, Monika](#); [Howe David M](#); [Carpenter Todd S](#)  
**Subject:** [External\_Sender] RE: Review of the draft Trojan EA  
**Date:** Thursday, May 03, 2018 11:13:21 AM

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Hi Jean,

First of all, thank you for giving Oregon Radiation Protection Services (RPS) the chance to review the draft EA. Most of the questions I had regarding this renewal were answered within the document itself which leaves a few questions and a few comments. I shall ask the questions in the next paragraph.

I was curious about the design life of the Holtec HI-STORM 100 Cask System (Model MPC-24) and found a SER document (not dated, sometime in/after 2000) on the web from the NRC that stated in Section 2.3.1 (General) that the design life of this system is 40 years and that the system is approved for a 20-year storage period. In addition to this in 1999, Portland General Electric stated that the operational lifetime of the ISFSI would be 40 years total, I presume in agreement to the design life. In an NRC FSAR document (Revision 13) from March 31, 2016, it is stated that the service life of these casks may be much longer than the design life but I was unable to open the pdf document on the NRC website to see how much time is added to the design life, if any is given. Are there any other sites at or beyond the 40-year design life of this cask system to use as a comparison? Are there any issues at those sites with the casks? There may be comments/questions directed to this cask design vs. service life issue by concerned parties when an additional 20 years beyond the original 40 year site and cask design lifetime is tacked on to the storage license.

Oregon is very interested in the progress of the consolidated interim storage facility license application in Texas by Waste Control Specialists LLC. Our most recent information is that WCS will request the NRC to resume its review of the CISF license application. Optimistically, the original 20-year license period could easily cover the license approval period through construction of the CISF and movement of the casks to the site and the 40-year license period unnecessary. However, considering past experience with the high-level waste repository, it would be most prudent (while well-within the EA criteria as long as a 60-year cask service life is shown to be safe) to go with the new 40-year licensing period.

The only other comments were on the document itself for spelling and a minor wording issue. I believe these will be corrected for the Final EA but thought I'd include them anyway.

Page 2 – At the bottom of the page, the word off-site is spelled “off-sit”.

Page 17 – Section 4.9.1, end of section statement that “the proposed action would result in a SMALL and no non-radiological

impacts to these resources” should be reworded to match previous sections with “the impacts from the proposed action would be SMALL and result in no non-radiological impacts to these resources”.

Thank you again for allowing Oregon RPS to review this document.

Best regards,  
Daryl

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**From:** Trefethen, Jean [mailto:Jean.Trefethen@nrc.gov]  
**Sent:** Wednesday, May 2, 2018 7:40 AM  
**To:** Leon Daryl A <DARYL.A.LEON@dhsosha.state.or.us>  
**Cc:** Coflin, Monika <Monika.Coflin@nrc.gov>  
**Subject:** RE: Review of the draft Trojan EA

Hello Daryl,  
I am in the process of finalizing the EA and wanted to be sure I did not miss any comments that the State of Oregon wanted included in the Final EA. If you do not have any that is okay as well, that is relatively common in my experience with ISFSI license renewals. I just wanted to reach out one more time so that I don't miss any of your thoughts regarding the action.

Kind regards,  
Jean

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**From:** Trefethen, Jean  
**Sent:** Monday, April 23, 2018 9:38 AM  
**To:** 'daryl.a.leon@state.or.us' <[daryl.a.leon@state.or.us](mailto:daryl.a.leon@state.or.us)>  
**Cc:** Coflin, Monika <[Monika.Coflin@nrc.gov](mailto:Monika.Coflin@nrc.gov)>  
**Subject:** Review of the draft Trojan EA

Good morning Daryl,

I wanted to follow up on your review of the Trojan draft EA. Simple to see if you had any comments or questions you would like to discuss before sending in your official comments. If you do I can be reached at 301-415-0867 or by replying to this email.

Kind regards,  
Jean