

Department of Energy

Idaho Operations Office 1955 Fremont Avenue Idaho Falls, ID 83415

October 2, 2018

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

SUBJECT: Submittal of TMI-2 ISFSI FSAR Information and Design Drawings, Docket 72-0020 (EM-NRC-18-024)

REFERENCE: Submittal of Reponses to NRC Requests for Additional Information for the Technical Review of the Three Mile Island Unit 2 Independent Spent Fuel Storage Installation License Renewal Application, Docket 72-0020, dated September 26, 2018

Dear Sir or Madam:

On September 26, 2018, the Department of Energy, Idaho Operations Office (DOE-ID) submitted its response to the Nuclear Regulatory Commission's (NRC's) request for additional information (RAI) pertaining to its March 2017 license renewal application (LRA) for Three Mile Island Unit 2 (TMI-2) Independent Spent Fuel Storage Installation (ISFSI) specific license SNM-2508. In that RAI response, DOE-ID committed to providing the NRC with 1) revised FSAR information, including text, figures, and drawings, and 2) the design drawings for the TMI-2 ISFSI components used, in part, for LRA scoping. Specifically, DOE-ID is providing the following information on two enclosed compact disks (CDs).

Public Information

The enclosed CD entitled "Public Information" (Enclosure 1) contains updated TMI-2 ISFSI FSAR information that modifies TMI-2 ISFSI FSAR Sections 3.1.2 and 4.3.10, modifies Figure 4.3-1, and deletes Figure 4.3-2. The FSAR changes also include replacement of the Dry Shielded Canister (DSC) FSAR drawings located in FSAR Appendix A. These drawings are considered both proprietary and Sensitive Unclassified Non-Safeguards Information (SUNSI) by TN Americas and are included on the "Information to be Withheld from Public Disclosure" CD discussed below.

The changes to the FSAR information pertaining to the DSC were discussed with the NRC in our June 7, 2018 public meeting and do not include any changes to the ISFSI or DSC design or design bases. The changes were made to clarify the FSAR by removing depictions of DSC subcomponents and configurations that are not used during normal storage operation nor are

NM3526 NM3524 credited in mitigating any design basis accidents. As such, these DSC subcomponents and configurations are not germane to the LRA nor appropriate for including in the TMI-2 ISFSI FSAR. Note that to ensure configuration control, the DSC subcomponents and configurations removed from the FSAR, which are either no longer used or are used solely for DSC sampling, purging, testing, or to ship the DSCs off site in a 10 CFR 71-certified transportation package, remain on the DSC design drawings. This distinction in drawing content is now included in a new note on FSAR drawings 219-02-2010 and 219-02-2011, and in the Bills-of-Material (BOMs) of those drawings.

Also included on the CD labeled "Public Information" are the following three design drawings for the TMI-2 canisters, which are not considered proprietary information:

- 1154070-F, Fuel Canister Assembly, Rev. 3
- 1144041-F, Knockout Canister Assembly, Rev. 3
- 1154018-F, Filter Canister Assembly, Rev. 5

Information to be Withheld from Public Disclosure

As requested by the NRC during our June 7, 2018 public meeting, the enclosed CD entitled "Information to be Withheld from Public Disclosure" (Enclosure 2) includes the following FSAR and design drawings that are listed in Table 2-2 of Revision 1 to the LRA. These drawings are considered proprietary information and SUNSI by TN Americas and are marked as such. An appropriately-executed affidavit pursuant to 10 CFR 2.390 is also enclosed with this submittal (Enclosure 3). Note that the FSAR drawings listed in LRA Table 2-2 and not included below are already in the NRC's possession via prior FSAR update submittals made by DOE-ID.

- 219-02-5100, Horizontal Storage Module ISFSI General Arrangement, Sheets 1 and 2, Rev. 1
- 219-02-5101, Standard Module Main Assembly, Sheets 1-4, Rev. 1
- 219-02-5103, Horizontal Storage Module Standard Module Base Unit, Sheets 1-4, Rev. 1
- 219-02-5104, Horizontal Storage Module Roof Slab, Rev. 2
- 219-02-5105, Horizontal Storage Module DSC Support Structure, Sheets 1 and 2, Rev. 1
- 219-02-5107, Horizontal Storage Module Erection Hardware and Misc. Steel Doors and Fabricated Fasteners, Sheets 1-5, Rev. 1
- 219-02-5108, Horizontal Storage Module End Shield Wall, Rev. 0
- 219-02-5200, Horizontal Storage Module Basemat, Sheet 1, Rev. 3
- 219-02-5200, Horizontal Storage Module Basemat, Sheet 2, Rev. 2
- 219-02-1000, Dry Shielded Canister Basket Assembly, Sheets 1 and 2, Rev. 1
- 219-02-1001, Dry Shielded Canister Shell Assembly, Rev. 1
- 219-02-1002, Dry Shielded Canister Basket-Shell Assembly, Sheets 1 and 2, Rev. 1
- 219-02-1003, Dry Shielded Canister Main, Sheets 1-3, Rev. 1
- 219-02-1010, Purge/Port Filter Assembly, Sheets 1-3, Rev. 2
- 219-02-1011, Vent Assembly, Sheets 1-3, Rev. 2
- 219-02-2000, Dry Shielded Canister Basket Assembly, Safety Analysis Report, Sheets 1 and 2, Rev. 2
- 219-02-2001, Dry Shielded Canister Shell Assembly, Safety Analysis Report, Rev. 2

- 219-02-2002, Dry Shielded Canister Basket-Shell, Assembly Safety Analysis Report, Sheets 1 and 2, Rev. 2
- 219-02-2003, Dry Shielded Canister Main, Safety Analysis Report, Sheets 1, 2 and 3, Rev. 2
- 219-02-2010, Purge/Port Filter Assembly, Safety Analysis Report, Sheets 1 and 2, Rev. 2
- 219-02-2011, Vent Assembly, Safety Analysis Report, Sheets 1 and 2, Rev. 3.

Should you have questions or require additional information, please contact myself at (208) 526-4993 or Scott Ferrara at (208) 526-7753.

Sincerely,

Steven Wahnschaffe License Manager

Enclosures:

- 1. Five (5) compact discs containing drawings allowable as public information (also with FSAR changes including Licensing Document Change Request and final versions of Chapters 3 and 4)
- 2. Five (5) compact discs containing drawings to be withheld from public disclosure
- 3. TN Americas Affidavit Pursuant to 10 CFR 2.390

cc: Kristina Banovac, NRC (w/encl. and 5 CDs)
Bernard White, NRC (w/o encl.)
Meraj Rahimi, NRC (w/o encl.)
Scott Ferrara, DOE-ID (w/o encl.)
Nicholas DiNunzio, DOE HQ (w/o encl.)

Greg Sosson, DOE HQ (w/o encl.)