
From: Morris, Scott

Sent: Thursday, August 13, 2020 1:43 PM

To: 'Charles Langley' <langley@publicwatchdogs.org>

Cc: Nina Babiarz <ninababiarz@outlook.com>

Subject: RE: Reply: Quick question about Canister downloading simulations at SONGS ISFSI

Dear Mr. Langley,

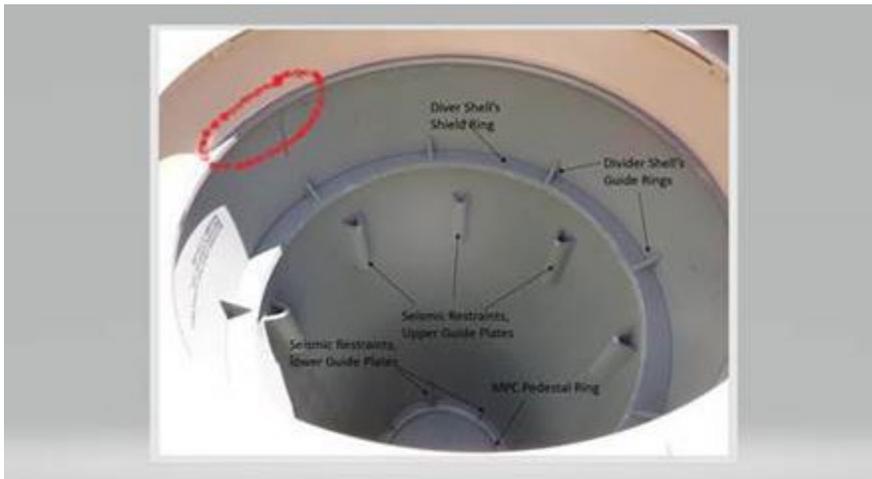
Sorry for the delay in responding to your request!

I agree that it is difficult to determine what can be seen in the picture you provided (i.e., the snapshot from the YouTube video file). As such, it's important to first understand how (from where) this video was taken, as well as the as-built design of the Holtec UMAX storage system and its associated fuel transfer components (e.g., HI-TRAC, etc.). This video was filmed by a NRC Region IV Independent Spent Fuel Storage Installation (ISFSI) inspector and, as explained in the YouTube video description, "The viewpoint is looking down at the (top of the) MPC (multi-purpose canister) simulator (as it is) moving downward in the HI-TRAC transfer cask from an elevated position in a JLG lift." The following picture shows a JLG lift location similar to the location from where the video was taken. It also shows the general location of the top of a UMAX storage module (i.e., underground vault), and a HI-TRAC transfer cask as it is configured during MPC download operations. Finally, the installed shield cone mounted to the top of the MPC during download operations is also shown. The shield cone adds about 2 feet to the overall height of the canister and is also shown in a separate photo below.



The YouTube video snapshot you provided shows the MPC downloaded to a location where the top of the shield cone is near the top of the underground storage vault. In the picture, the top of the MPC has already passed through the HI-TRAC mating device drawer and has entered the storage vault.

The following picture shows an inside look at the top of the SONGS UMAX ISFSI vault that was used in the training scenario captured in the video. In the video, when the MPC reached the fully downloaded position, the top of the shield cone can be seen at a location near the top of the storage module (circled area in the picture below). As such, in the [video](#) it is still very difficult (impossible in the snapshot, in my opinion) to see the components below (and inside) the top of the storage module (e.g., shield ring and guide ring) due to the obstructions created by the installed shield cone.



Therefore, the answer to your specific questions follow:

Question #1: I notice that there appears to be no "shield ring" at the top of the silo in the UMAX ISFSI Vault. Is this correct, or am I missing something?

There is a shield ring in the UMAX ISFSI vault as shown in the picture I have provided above. However, the shield ring is difficult to see in the snapshot from YouTube video due to the obstructions created by the geometry of the installed shield cone.

Question #2: When the canister appears to be fully lowered, there is a green ring near what appears to be the bottom of the vault. Is this the shield ring that is responsible for scratches on the canisters?

Again, the shield ring cannot be clearly observed in the video as previously explained. The small clearances between the MPC and the interior storage vault components contributed to incidental contact during downloading operations, which resulted in some canister scratching.

I am providing this information to you in a good-faith attempt to engage in dialogue about the safety concerns you have raised, and we will continue to do so in the future provided that the questions you raise are, like these, readily answerable and do not (in our view)

implicate issues that are or could be in dispute in litigation. In addition, please be advised that it is our practice to refer any questions you have that relate to an ongoing 2.206 Petition to the Petition Review Board that is considering the matter.

Best Regards,

Scott A. Morris

Regional Administrator

U.S. Nuclear Regulatory Commission / Region IV

|  E-mail: scott.morris@nrc.gov |  Office: (817) 200-1225 |



From: Charles Langley <langley@publicwatchdogs.org>

Sent: Monday, August 10, 2020 9:01 PM

To: Morris, Scott <Scott.Morris@nrc.gov>

Cc: Nina Babiarz <ninababiarz@outlook.com>

Subject: [External_Sender] Reply: Quick question about Canister downloading simulations at SONGS ISFSI

Mr. Morris,

Thank you for the kind reply. I know how overwhelming emails can be, and appreciate the acknowledgement.

Charles Langley

On Mon, Aug 10, 2020, 2:02 PM Morris, Scott <Scott.Morris@nrc.gov> wrote:

Hello Mr. Langley:

I have been away from the office for the last 9 days and just returned today. I am in receipt of your email inquiry and will get back to you by the end of this week. Is that acceptable to you? I am digging out of over 400 unread emails that I received during my absence!!

Respectfully,

Scott A. Morris

Regional Administrator

U.S. Nuclear Regulatory Commission / Region IV

|  E-mail: scott.morris@nrc.gov |  Office: (817) 200-1225 |



From: Charles Langley <langley@publicwatchdogs.org>

Sent: Friday, July 31, 2020 1:39 PM

To: Morris, Scott <Scott.Morris@nrc.gov>

Cc: Nina Babiarz <ninababiarz@outlook.com>

Subject: [External_Sender] Quick question about Canister downloading simulations at SONGS ISFSI

Dear Mr. Morris,

I'm hoping you can answer a couple of questions about the training process / practice runs that used a simulated canister at the SONGS ISFSI.

Here is the actual video of a practice download at SONGS: <https://www.youtube.com/watch?v=-6QKhN4I3jI&feature=youtu.be> (Source NRC-2019-000269 [Final Response - Recording of an MPC simulator canister being downloaded](#) into the SONGS UMAX ISFSI vault).

Question #1: I notice that there appears to be no "shield ring" at the top of the silo in the UMAX ISFSI Vault. Is this correct, or am I missing something?

Question #2: When the canister appears to be fully lowered, there is a green ring near what appears to be the bottom of the vault. Is this the shield ring that is responsible for scratches on the canisters?

I'm asking these questions because it appears that the camera that was used has an extreme wide angle lens. I am wondering if the lens is making the distance between the top of the vault and the shield ring to appear to be longer than it actually is.

image.png



Charles Langley, Executive Director

Public Watchdogs (858) 384-2139

www.publicwatchdogs.org

7867 Convoy Court, Suite 302, San Diego CA 92111

