

## ENCLOSURE 1

### Conversation Record: TN-32 Renewal Request for Additional Information (RAI)s 5 & 6 held on January 21, 2021

**RAI-5.** During a January 13, 2021, clarification call (ML21015A047), TN proposed to supplement RAI-5 response by specifying distances for thermoluminescent dosimeters (TLDs) along the fence line to ensure adequate dose protection to the public, specifically aging management of the neutron shield.

In responding to the clarification questions on January 13, 2021, TN proposed to modify TLDs, trend that data, and use that information to determine if there is degradation. If trends are showing increased degradation, then it is turned over to the Corrective Action Program.

This follow-up clarification call was set up because NRC staff is requesting clarification as to whether distance between the TLDs is a legitimate assumption?

TN proposed the following:

- TLD spacing requirements along the fence line.
- Add a requirement that TLDs will detect intermediate and high energy neutrons.

NRC needs the basis for the maximum distance or how the spacing requirements are determined. TN is proposing that the AMP will capture the basis and make a recommendation on how the GLs will implement.

As part of TN's supplement to RAI-5, TN will also state that workers in the field are protected from neutron shield degradation by standard ALARA practices (e.g., surveys for development of radiation work permits) and, if an anomaly is detected, that condition will be entered into the corrective action program.

In addition, the information below was also captured in the January 13, 2021, conversation record (ML21015A047). TN plans to supplement the response to RAI-6 as follows:

**RAI-6.** NRC staff sought clarification on the following information regarding the TN-32 inspection methods and inspector qualifications for the CoC 1021 Renewal Application Section 4.3.4, Detection of Aging Effects.

1. The general licensee's personnel training and qualifications requirements for conducting the annual inspection of accessible surfaces of all TN-32 casks.
  - TN proposes to add in the AMP.
2. The general licensee's personnel training and qualifications requirements for conducting the 20-year scheduled visual inspection of the lead TN-32 cask.

– TN proposes to add in the AMP.

3. The inspection requirements for 20-year scheduled visual inspection of the lead TN-32 cask, including the components included in the inspection, the codes and standards used to conduct the inspection, and the acceptance criteria for the lead cask inspection.

– TN to provide clarity as to where this is defined in the AMP or RAI response, or the information will be provided in the AMP as a supplement to the RAI response.