

72-041: SONGS Exemption Request

Request for Supplemental Information

10 Radiation Protection

RSI 10-1 Revise the application to include the vendor calculations performed on behalf of Southern California Edison (SCE) for: 1) the TN Independent Spent Fuel Storage Installation (ISFSI) Storage dose calculation; 2) the Future ISFSI Units 2/3 Greater than Class C Storage dose calculation; and 3) the Holtec ISFSI dose calculation.

These calculations contain the details of the licensee's dose analysis which supports the exemption request. This information should be included in the application to enable staff review to confirm that the dose analysis demonstrates compliance with Title 10 of the *Code of Federal Regulations* (10 CFR) Section 72.104, "Criteria for radioactive materials in effluents and direct radiation from an ISFSI or MRS."

This information is needed for the staff to confirm compliance with 10 CFR Section 72.104.

RSI 10-2 Revise the application to include References 6 through 9 of Enclosure 3 to the SCE Letter dated December 16, 2021.

HOLTEC Calculation HI-2210810, "SONGS HI-TRAC VW Accident Conditions Dose versus Distance," cites these references for the previous SONGS site specific shielding calculation, bounding radiation source term determination, materials and compositions used in the dose analysis, and the geometry of the HI-TRAC VW transfer cask. This information should be included in the application to enable staff review to confirm that the dose analysis demonstrates compliance with the accident dose limits in 10 CFR Section 72.106, "Controlled area of an ISFSI or MRS."

This information is needed for the staff to confirm compliance with 10 CFR Section 72.106.