

TMI-2 POL Am. 67 and Safety Evaluation Minor Discrepancies

TMI-2 POL Am. 67

1. Amendment 67 states, in part:

“Accordingly, the license is amended by changes to the TMI-2 License Possession Only License No. DPR-73 and is hereby amended to read as follows:

...

The storage of radioactive materials or radwaste generated at TMI Unit 1 and stored at TMI Unit 2 in accordance with the license for TMI Unit 1 shall not result in a source term that, if released, would exceed that previously analyzed in the **Defueled** Safety Analysis Report in terms of off-site dose consequences.”

Whereas the Amended License states:

“The storage of radioactive materials or radwaste generated at TMI Unit 1 and stored at TMI Unit 2 in accordance with the license for TMI Unit 1 shall not result in a source term that, if released, would exceed that previously analyzed in the would exceed that previously analyzed in the **PDMS** Safety Analysis Report in terms of off-site dose consequences.”

It would appear based on the language in Amendment 67 the intent was to change from the **PDMS** Safety Analysis Report, referenced in the “PDMS” License to **Defueled** Safety Analysis Report in the “DECON” License.

2. The Amended License lists “Enclosure: Technical Specifications A” whereas Section 3.1.5 of the Safety Evaluation Report states the enclosure statement should be modified as follows – “Enclosure: Technical Specifications.”

Safety Evaluation Report

1. Section 1.1 – Letter TMI2-RA-COR-2022-0007 (dated 8 April 2022), a supplement to the LAR which responded to some TMI2 Accident Analyses Questions dated 7 February 2022 (ML22038A936), is not included as a reference.
2. In several locations of the Safety Evaluation Report, statements similar to, “The consequences of the containment fire are bounded by the results of the HIC fire analysis, and remain below regulatory limits,” are made (Section 3.2.4 Criterion 4, NRC Staff Evaluation, Section 3.2.7 Criterion 4, NRC Staff Evaluation and Section 3.2.9 Criterion 4, NRC Staff Evaluation). However as noted in Section 5.2 of the Safety Evaluation Report, “The Licensee’s initial fire evaluation, based on past precedent, was an outdoor fire involving spent ion exchange resins. This scenario was appropriate if the resins used were organic or otherwise combustible. For the processing of contaminated water, the Licensee states it will use a zeolite-based resin which is not combustible, thereby eliminating the scenario. The NRC staff agrees with the Licensee’s conclusion.” TMI-2 Solutions letter TMI2-RA-COR-2023-0002, dated 27 January 2023 ([ML23033A103](#)) provided an update to the containment fire scenario and describes it as the bounding event at TMI-2.
3. Similar to the above, Section 3.2.7 Criterion 3 Licensee’s Evaluation states, “TMI-2 Solutions states in its LAR that sealed sources do not provide a function required to mitigate the effect of

unanticipated occurrences such as the fire in containment and HIC fire as described in Section 2, “Detailed Description And Basis For The Changes (ML21057A047),” As described in paragraph 3, above, TMI-2 Solutions letter TMI2-RA-COR-2023-0002, dated 27 January 2023 ([ML23033A103](#)) provided an update to the containment fire scenario and describes it as the bounding event at TMI-2. Additionally, the Accession Number referenced for the LAR should be revised to ML21057A046.

4. Sections 3.2.5 and 3.2.6 Criterion 4 refer to Calculation TMI2-EN-RPT-0001 “Determination of the Safe Fuel Mass Limit for Decommissioning TMI-2,” Attachment 5. This Calculation was submitted with letter TMI2-RA-COR-2021-0002, the original License Amendment Request, on February 19, 2021 ([ML21057A046](#)). This calculation was revised and submitted to the Nuclear Regulatory Commission as Attachment 1 to letter TMI2-RA-COR-2022-0008, dated 7 April 2022 ([ML22101A077](#)).
5. Section 3.2.5.1 states in part “As agreed to by the Licensee (MLXXXX) ...” If available, the Accession Number for this reference should be provided.
6. Section 3.2.5.1 paragraph under the first reference to TS 6.16.1 states: “Establish written procedures to address applicable MC&A activities in 10 CFR 74.11, 74.13, 74.15, 74.19(a)(1) through (4), 74.19(b), and 74.19(c); however, for 74.19(a)(1) and 74.19(c), the scope is as described in Licensee response to **RAI 14 and 16** (ML22276A024).” However, in several subsequent discussions it reads, in part: “... as described in Licensee response to **RAI 16**.” (See discussion under Recordkeeping (10 CFR 74.19(a)), Written MC&A Procedures (10 CFR 74.19(b)), Physical Inventory (10 CFR 74.19(c)), and MC&A Conclusion). These instances should be corrected to state “... as described in Licensee responses to **RAI 14 and 16**.”
7. Section 3.2.7 states in part, “Further, since the TMI-2 sealed sources are maintained at TMI-1 and managed by the TMI-1 licensee, Constellation Generation Energy, LLC Solutions under a program compliant with the requirements of 10 CFR 70.39(c).” This was the case when letter TMI2-RA-COR-2021-0002, the original License Amendment Request, was submitted on 19 February 2021 ([ML21057A046](#)). However, as indicated in letter TMI2-RA-COR-2023-0002, dated 27 January 2023 ([ML23033A103](#)) this has changed and currently the sealed sources are maintained by TMI-2 Solutions under a program compliant with the requirements of 10 CFR 70.39(c).
8. Section 3.2.9 contains an internal reference to Section 3.7.3; however, this reference should be Section 3.2.3.
9. Section 5.2.2 contains internal references to Sections 3.2.2.3 and 3.2.2.4; however, this reference should be Sections 5.2.3 and 5.2.4, respectively.