

RAI 6-1 Justify using 8,766 hours as the bounding exposure duration for an individual at the controlled area boundary for the dose rates analysis the CASTOR geo69.

In Section 5.1 of the safety analysis report, the applicant assumed annual doses at the storage site for an array consisting of *[withheld per 10 CFR 2.390]* storage casks as a function of distance, and 100 % occupancy for 8,766 hours. However, there is no information that justify the use of 8,766 hours. For normal conditions, a bounding exposure duration assumes that an individual is present at the controlled area boundary for 1 full year (8,760 hours). The applicant needs to justify the using an alternative exposure duration for the staff making a safety and regulatory finding.

This information is needed to determine compliance with 10 CFR 72.236(b) and (d) for sufficient radiation shielding to meet 10 CFR 72.104.