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January 30, 2008

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D.C. 20555-0001

Subject: Duke Power Company LLC d/b/a Duke Energy Carolinas, LLC
Oconee Nuclear Station
Docket Number 72-04, License No. SNM-2503
Site-Specific Independent Spent Fuel Storage Installation (ISFSI)
License Renewal Application

Pursuant to 10 CFR 72, §72.42(b) and (c), Duke Power Company LLC d/b/a Duke Energy Carolinas, LLC, (Duke) hereby submits an application for renewal of the Oconee Nuclear Station (ONS), Site-Specific Independent Spent Fuel Storage Installation (ISFSI) license. The current license expires on January 31, 2010. Based on the expected duration of the ONS plant licenses and the estimated time needed to remove the storage casks from the site, Duke is requesting a license renewal period of 40 years. An exemption request to support the license renewal period is provided as Enclosure 2. The application for renewal of the Site-Specific ISFSI license, Enclosure 3, was prepared in accordance with applicable provisions of 10 CFR 72, Subpart B, and the Preliminary NRC Staff Guidance for 10 CFR 72 License Renewal. A list of the regulatory commitments associated with this submittal is provided as Enclosure 4. The ONS Site-Specific ISFSI Updated Final Safety Analysis Report, Revision 17, is provided as Enclosure 5 for reference as an information copy.

If there are any questions regarding this submittal, please contact Reene' Gambrell, Oconee Regulatory Compliance Group, at (864) 885-3364.

Sincerely,

D. A. Baxter, Vice President
Oconee Nuclear Station

Enclosures (see next page)

NMSS01

NMSS

Enclosures:

1. Notarized Affidavit
2. Request for Exemption from 10 CFR 72, §72.42(a)
3. ONS Site-Specific Independent Spent Fuel Storage Installation Application for Renewed Site-Specific Materials License
4. List of Regulatory Commitments
5. ONS Site-Specific ISFSI Updated Final Safety Analysis Report, Revision 17

c w/enclosures and attachments:

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File – Site-Specific ISFSI (LAR 2007-06)
ONS Document Management

ENCLOSURE 1

NOTARIZED AFFIDAVIT

AFFIDAVIT

D. A. Baxter, being duly sworn, states that he is Vice President, Oconee Nuclear Station, Duke Energy Carolinas, LLC, that he is authorized on the part of said Company to sign and file with the U. S. Nuclear Regulatory Commission this license renewal application and exemption request to extend the Oconee Nuclear Station Site-Specific ISFSI Material License No. SNM-2503; and that all statements and matters set forth herein are true and correct to the best of his knowledge.

D. A. Baxter, Vice President
Oconee Nuclear Station

Subscribed and sworn to before me this 30th day of January, 2008

Sheila A Smith
Notary Public

My Commission Expires:

6-12-2013
Date

SEAL

ENCLOSURE 2

OCONEE NUCLEAR STATION SITE-SPECIFIC INDEPENDENT SPENT FUEL STORAGE INSTALLATION REQUEST FOR EXEMPTION FROM 10 CFR 72, §72.42(a)

OCONEE NUCLEAR STATION
SITE-SPECIFIC INDEPENDENT SPENT FUEL STORAGE INSTALLATION
REQUEST FOR EXEMPTION FROM 10 CFR 72, §72.42(a)

In accordance with the provisions of 10 CFR 72, §72.7, "Specific exemptions," Duke Power Company LLC d/b/a Duke Energy Carolinas, LLC (Duke), requests an exemption from certain requirements of 10 CFR 72, §72.42, "Duration of License; Renewal." Specifically, Duke requests exemption from the Independent Spent Fuel Storage Installation (ISFSI) license renewal period in 10 CFR 72, §72.42(a), which the NRC has interpreted in a November 7, 2000, letter from Mr. E. William Brach, NRC, to Mr. W. R. Matthews, Virginia Electric and Power Company, to be 20 years. Duke is requesting a license renewal period of 40 years.

Spent fuel storage at Oconee Nuclear Station (ONS) is now dependent upon operation of the ONS spent fuel pools, the ONS Site-Specific and General License ISFSIs, and the construction of additional storage at the ONS General license ISFSI.

Spent fuel storage at the ONS Site-Specific ISFSI will continue to be necessary since the United States Department of Energy (DOE) has not begun, and will not soon be able, to take spent nuclear fuel as it was required to do under the provisions of the Nuclear Waste Policy Act (NWPA). Therefore, the license renewal period for the ONS Site-Specific ISFSI must consider both the future operation of ONS and this failure by DOE to fulfill its NWPA obligations.

Absent NRC approval of an extended period for license renewal, Duke will be required to request a second license renewal for the Site-Specific ISFSI over the course of plant operations. This would create an unnecessary diversion of Duke and NRC resources.

This request for an exemption is based on the need for a longer license renewal period and is supported by a technical justification that demonstrates the ability of the ONS Site-Specific ISFSI to safely perform its intended function for a 40 year license renewal period.

Need For 40 Year License Renewal Period

The current Renewed Facility Operating Licenses (FOLs) for Oconee Units 1, 2, and 3, expire on February 6, 2033; October 6, 2033; and July 19, 2034 respectively.

The current Site-Specific ISFSI Material license (SNM-2503) expires on January 31, 2010. A license renewal of only 20 years for the ONS Site-Specific ISFSI would expire on January 31, 2030, which is approximately four years before the ONS Renewed FOLs expire. During that time, Duke anticipates that the ONS Site-Specific ISFSI will continue to be required for spent fuel storage in concert with the ONS spent fuel pools and the ONS General License ISFSI.

It is unclear when DOE will begin to accept spent nuclear fuel at the Federal geological repository mandated by the NWPA of 1982. Development of the repository continues to experience delays and it is not projected to commence operation until 2017, at the earliest.

Even if DOE does begin taking spent fuel in 2017, it is unlikely that the ONS Site-Specific ISFSI could be emptied of spent fuel before 2030. Duke's most recent decommissioning analyses, which assume DOE accepts ONS spent fuel beginning in 2015, project operation of the ONS ISFSI(s) through 2044.

Offsite shipment of the spent fuel from the ONS Site-Specific ISFSI prior to a 2030 expiration of the renewed license would not be practical for a variety of reasons. Currently there are no commercial or federal facilities available to accept spent fuel. If such a facility becomes available, shipment would require repackaging of the spent fuel since the ONS Site-Specific ISFSI canisters are not licensed for transport. Spent fuel shipping containers would have to be either leased or purchased. Also, this would result in considerable occupational exposure for both ONS personnel and personnel at the receiving facility. Finally, the spent fuel would still have to be shipped to the repository once it becomes available.

Transfer of the spent fuel from the ONS Site-Specific ISFSI into the ONS General License ISFSI prior to a 2030 expiration of the renewed license would not be practical, either. Since the Site-Specific storage units are not approved for use under the General License, this would require repackaging the spent fuel assemblies from the ONS Site-Specific ISFSI into General License storage units. The cost of an additional 40 storage units coupled with the additional occupational exposure and the potential for fuel handling incidents, render this option impractical

Therefore, Duke is requesting a renewal period of 40 years, which would allow the ONS Site-Specific ISFSI to continue to store spent fuel until January 31, 2050.

Technical Justification

The technical justification that the ONS Site-Specific ISFSI will be able to fulfill its safety functions over a license renewal period of 40 years is provided in the application for renewed Site-Specific ISFSI license, which is included as

Enclosure 3. The Site-Specific ISFSI license renewal application addresses the applicable provisions of 10 CFR 72, Subpart B, as required by 10 CFR 72, §72.42(b). The systems, structures, and components (SSCs) that are within the scope of license renewal, and the required evaluations, are identified. Aging management reviews identify the SSC materials and environments to which these SSCs are exposed, as well as any aging effects requiring management. Time-limited aging analyses included in the current licensing basis are identified and revised for SSCs within the license renewal scope. Aging management activities are identified that provide reasonable assurance that SSCs within the scope of license renewal will continue to perform their intended functions consistent with the current licensing basis for the renewal period. This process is also consistent with the process used for the recent renewal of the ONS Facility Operating Licenses for a total operational period of 60 years.

Requirements of 10 CFR 72, §72.7

The specific requirements for granting an exemption from 10 CFR 72 regulations are set forth in 10 CFR 72, §72.7. Under 10 CFR 72, §72.7, the NRC is authorized to grant an exemption upon demonstration that the exemption: (i) is authorized by law, (ii) will not endanger life or property or the common defense and security, and (iii) is in the public interest. The following addresses each of these requirements and demonstrates that the NRC should grant the exemption request.

A. The Exemption Request is Authorized by Law

The NRC's authority to grant an exemption from 10 CFR 72 is established by law as discussed in 10 CFR 72, §72.7. Therefore, granting an exemption is explicitly authorized by the NRC's regulations.

B. The Exemption Request Will Not Endanger Life or Property or the Common Defense and Security

Continued operation does not endanger life or property, as discussed in the Environmental Report Supplement, which is provided as Appendix E to the Site-Specific ISFSI License Renewal Application (Enclosure 3). A 40 year license renewal period has been evaluated in the Site-Specific ISFSI License Renewal Application and it has been determined that new and existing monitoring activities provide reasonable assurance that SSCs within the scope of license renewal will continue to perform their intended functions. The common defense and security of the United States is not endangered by the renewal of the Site-Specific ISFSI license for 40 years.

A 40 year Site-Specific ISFSI license renewal period will support continued spent fuel storage capability at Oconee until 2050. Since the spent fuel pools at ONS are filled, continued operation of the plant is dependent on an operational Site-Specific ISFSI. The continued safe operation of nuclear power plants, including ONS, enhances the common defense and security of the United States by providing dependable, low-cost electricity.

C. The Exemption is in the Public Interest

The subject exemption would allow ONS to continue spent fuel storage activities for the duration of the proposed renewed Operating License (until 2050) without having to repeat the Site-Specific ISFSI license renewal process. The granting of this exemption would conserve both Duke and NRC resources, permitting more focused attention to areas of nuclear safety significance.

Conclusion

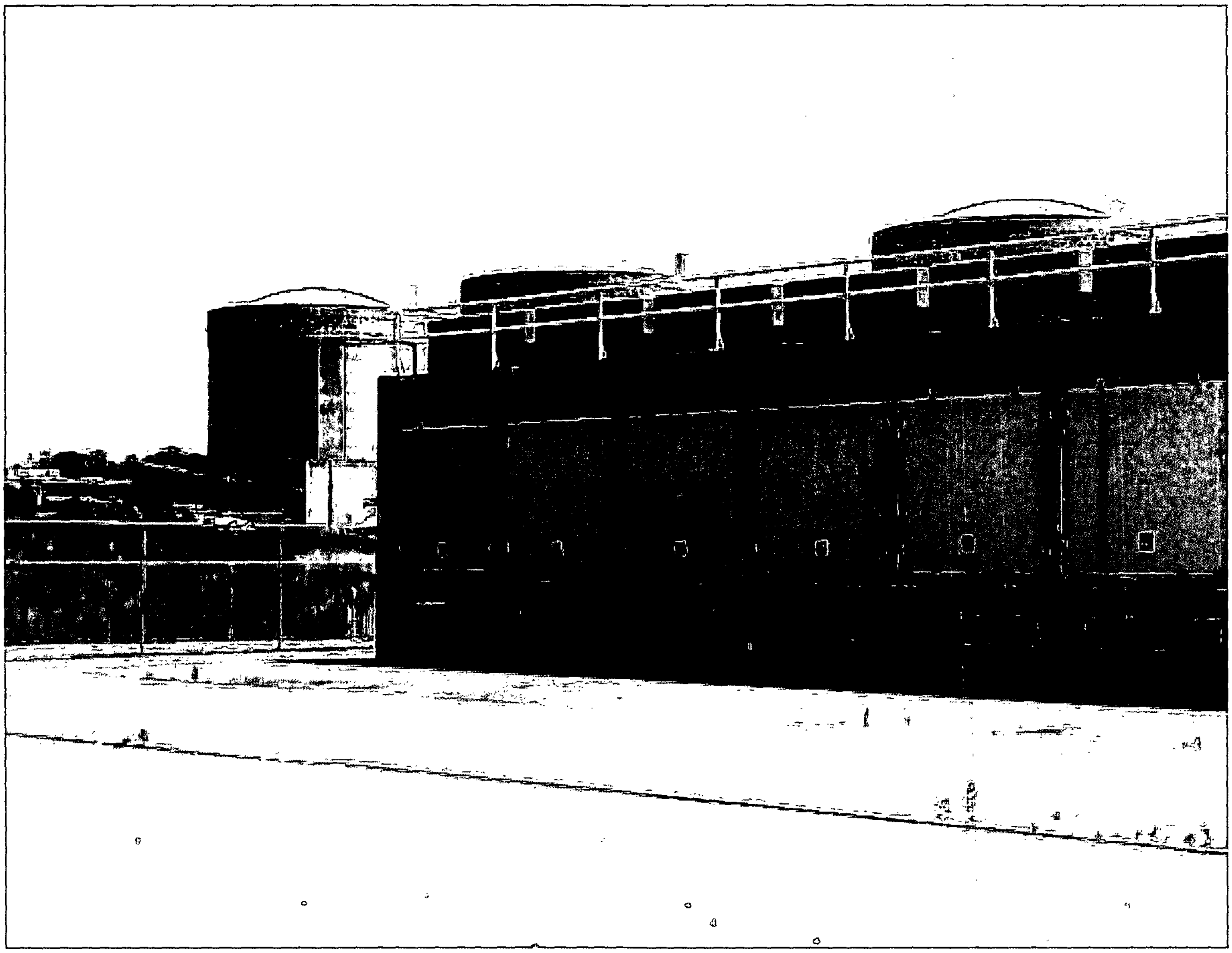
The requested exemption from the NRC's accepted 20 year Site-Specific ISFSI license renewal period has no adverse impact on safety. Since operation of ONS is now dependent on the continued ability of the Site-Specific ISFSI to store spent fuel, the Site-Specific ISFSI must be available to store spent fuel for the expected duration of the ONS Renewed Facility Operating Licenses. In addition, the Site-Specific ISFSI must be available to store spent fuel until the last fuel assembly is removed from the site. The Site-Specific ISFSI is, therefore, required until the DOE is able to accept all of the spent fuel stored at ONS.

Since there is a clear need for the Site-Specific ISFSI, subsequent renewal of the license for a third period is an unnecessary use of Duke and NRC resources. Technical justification provided in the Site-Specific ISFSI License Renewal Application establishes that new and existing monitoring activities provide reasonable assurance that SSCs within the scope of license renewal will continue to perform their intended functions.

Therefore, because the requested exemption for the Site-Specific ISFSI license renewal period is authorized by law, will not endanger life or property or the common defense and security, is in the public interest, and is requested for good cause, Duke requests that, in accordance with the provisions of 10 CFR 72, §72.7, the NRC grant the requested exemption.

ENCLOSURE 3

OCONEE NUCLEAR STATION SITE-SPECIFIC INDEPENDENT SPENT FUEL STORAGE INSTALLATION APPLICATION FOR RENEWED SITE-SPECIFIC MATERIAL LICENSE



ACRONYMS AND ABBREVIATIONS

AMA	Aging Management Activity
AMP	Aging Management Program
AMR	Aging Management Review
ASME	American Society of Mechanical Engineers
ASTM	American Society of Testing and Materials
CLB	Current Licensing Basis
CFR	Code of Federal Regulations
cm	centimeter
CNS	Catawba Nuclear Station
DOE	U. S. Department of Energy
DSC	Dry Storage Canister
EPRI	Electric Power Research Institute
ft	Foot/Feet
FOL	Facility Operating License
GWd/MTU	Gigawatt-Days per Metric Tonne Uranium
HBRSEP, Unit No. 2	H. B. Robinson Steam Electric Plant, Unit No. 2 (also referred to as Robinson Nuclear Plant
HSM	Horizontal Storage Module
IFA	Irradiated Fuel Assembly
in	Inch/Inches
ISFSI	Independent Spent Fuel Storage Installation
LBS	Pounds
LRA	License Renewal Application
MeV	Million Electron Volts
MNS	McGuire Nuclear Station
MWd/MTU	Megawatt-Days per Metric Tonne Uranium
N/A	Not Applicable
NFPA	National Fire Protection Association
NMSS	NRC Office Nuclear Material Safety and Safeguards
NRC	Nuclear Regulatory Commission
NUHOMS®	NUTECH, Inc. Horizontal Modular Storage (system)
OE	Operating Experience
ONS	Oconee Nuclear Station
ppm	parts per million
RCA	Radiation Control Area
RNP	Robinson Nuclear Plant
SAR	Safety Analysis Report
SER	Safety Evaluation Report
SFPO	Spent Fuel Project Office
SNF	Spent Nuclear Fuel
SSC	System, Structure and Component
SPS	Surry Power Station
UFSAR	Updated Final Safety Analysis Report

TABLE of CONTENTS

ACRONYMS AND ABBREVIATIONS i

TABLE OF CONTENTS ii

LIST OF TABLES v

1.0 GENERAL INFORMATION 1-1
1.1 APPLICATION FORMAT AND CONTENT 1-1
1.2 FACILITY DESCRIPTION 1-2
1.3 INFORMATION REQUIRED BY 10 CFR 72, §72.22 1-3
1.3.1 NAME OF APPLICANT 1-3
1.3.2 ADDRESS OF APPLICANT 1-3
1.3.3 ADDRESS OF ONS ISFSI 1-3
1.3.4 DESCRIPTION OF BUSINESS OR OCCUPATION OF APPLICANT 1-3
1.3.5 ORGANIZATION AND MANAGEMENT OF APPLICANT 1-3
1.3.6 FINANCIAL QUALIFICATIONS 1-5
1.4 ABBREVIATIONS AND INTENDED FUNCTION CODE DEFINITIONS 1-6
1.4.1 ABBREVIATIONS 1-6
1.4.2 INTENDED FUNCTION CODE DEFINITIONS 1-6
1.5 REFERENCES (SECTION 1.0, GENERAL INFORMATION) 1-7
2.0 SCOPING EVALUATION 2-1
2.1 INTRODUCTION 2-1
2.2 SCOPING METHODOLOGY 2-2
2.3 SCOPING RESULTS 2-3
2.4 REFERENCES (SECTION 2.0, SCOPING EVALUATION) 2-5
3.0 AGING MANAGEMENT REVIEWS 3-1
3.1 AGING MANAGEMENT REVIEW METHODOLOGY 3-1
3.1.1 IDENTIFICATION OF IN-SCOPE SUBCOMPONENTS REQUIRING AMR 3-1
3.1.2 IDENTIFICATION OF MATERIALS AND ENVIRONMENTS 3-2
3.1.3 IDENTIFICATION OF AGING EFFECTS REQUIRING MANAGEMENT 3-3
3.1.4 DETERMINATION OF THE ACTIVITIES REQUIRED TO MANAGE THE EFFECTS OF AGING 3-6

3.1.5 OPERATING EXPERIENCE REVIEW FOR PROCESS CONFIRMATION 3-7
3.1.6 DOCUMENTATION OF SOURCES USED FOR THE AMR PROCESS 3-8
3.2 AGING MANAGEMENT REVIEW RESULTS – HSMs 3-9
3.2.1 DESCRIPTION OF HSM SUBCOMPONENTS 3-9
3.2.2 HSM MATERIALS EVALUATED 3-12
3.2.3 ENVIRONMENTS FOR THE HSMs 3-12
3.2.4 AGING EFFECTS REQUIRING MANAGEMENT FOR THE HSMs 3-13
3.2.5 AGING MANAGEMENT ACTIVITIES FOR THE HSMs 3-14
3.2.6 AMR CONCLUSION FOR THE HSMs 3-14
3.3 AGING MANAGEMENT REVIEW RESULTS – DSCs 3-14
3.3.1 DESCRIPTION OF DSC SUBCOMPONENTS 3-15
3.3.2 DSC MATERIALS EVALUATED 3-17
3.3.3 ENVIRONMENTS FOR THE DSCs 3-17
3.3.4 AGING EFFECTS REQUIRING MANAGEMENT FOR THE DSCs 3-18
3.3.5 AGING MANAGEMENT ACTIVITIES FOR THE DSCs 3-18
3.3.6 AMR CONCLUSION FOR THE DSCs 3-19
3.4 AGING MANAGEMENT REVIEW RESULTS – IFAs 3-19
3.4.1 DESCRIPTION OF IFA SUBCOMPONENTS 3-19
3.4.2 IFA MATERIALS EVALUATED 3-22
3.4.3 ENVIRONMENTS FOR THE IFAs 3-22
3.4.4 AGING EFFECTS REQUIRING MANAGEMENT FOR THE IFAs 3-23
3.4.5 AGING MANAGEMENT ACTIVITIES FOR THE IFAs 3-23
3.4.6 AMR CONCLUSION FOR THE IFAs 3-23
3.5 AGING MANAGEMENT REVIEW RESULTS – TRANSFER CASK 3-23
3.5.1 DESCRIPTION OF TRANSFER CASK SUBCOMPONENTS 3-24
3.5.2 TRANSFER CASK MATERIALS EVALUATED 3-26
3.5.3 ENVIRONMENTS FOR THE TRANSFER CASK 3-26
3.5.4 AGING EFFECTS REQUIRING MANAGEMENT FOR THE TRANSFER CASK 3-27
3.5.5 AGING MANAGEMENT ACTIVITIES FOR THE TRANSFER CASK 3-27
3.5.6 AMR CONCLUSION FOR THE TRANSFER CASK 3-27
3.6 AGING MANAGEMENT REVIEW RESULTS – TRANSFER CASK LIFTING YOKE AND LIFT EXTENSION 3-28
3.6.1 DESCRIPTION OF TRANSFER CASK LIFTING YOKE AND LIFT EXTENSION 3-28

3.6.2 TRANSFER CASK LIFTING YOKE AND LIFT EXTENSION MATERIALS EVALUATED ... 3-30
3.6.3 ENVIRONMENTS FOR THE TRANSFER CASK LIFTING YOKE AND LIFT EXTENSION ... 3-30
3.6.4 AGING EFFECTS REQUIRING MANAGEMENT FOR THE TRANSFER CASK LIFTING YOKE AND LIFT EXTENSION ... 3-30
3.6.5 AGING MANAGEMENT ACTIVITIES FOR THE TRANSFER CASK LIFTING YOKE AND LIFT EXTENSION ... 3-30
3.6.6 AMR CONCLUSION FOR THE TRANSFER CASK LIFTING YOKE AND LIFT EXTENSION ... 3-31
3.7 AGING MANAGEMENT REVIEW RESULTS – CASK PIT SUPPORT STAND ... 3-31
3.7.1 DESCRIPTION OF CASK PIT SUPPORT STAND ... 3-32
3.7.2 CASK PIT SUPPORT STAND MATERIALS EVALUATED ... 3-32
3.7.3 ENVIRONMENTS FOR THE CASK PIT SUPPORT STAND ... 3-32
3.7.4 AGING EFFECTS REQUIRING MANAGEMENT FOR THE CASK PIT SUPPORT STAND ... 3-32
3.7.5 AGING MANAGEMENT ACTIVITIES FOR THE CASK PIT SUPPORT STAND ... 3-32
3.7.6 AMR CONCLUSION FOR THE CASK PIT SUPPORT STAND ... 3-33
3.8 REFERENCES (SECTION 3.0, AGING MANAGEMENT REVIEWS) ... 3-34
AGING MANAGEMENT RESULTS TABLES (SECTION 3.0, AGING MANAGEMENT REVIEWS) ... 3-35

APPENDICES:

A AGING MANAGEMENT PROGRAMS ... A-1
B TIME-LIMITED AGING ANALYSES (TLAAs) ... B-1
C SAFETY ANALYSIS REPORT SUPPLEMENT and CHANGES ... C-1
D TECHNICAL SPECIFICATIONS CHANGES ... D-1
E ENVIRONMENTAL REPORT SUPPLEMENT ... E-1
F ADDITIONAL INFORMATION ... F-1

LIST OF TABLES:

TABLE 2.3-1 SCOPING RESULTS 2-4

TABLE 3.2-1 AGING MANAGEMENT REVIEW RESULTS FOR THE HORIZONTAL STORAGE MODULES (HSMs) 3-36

TABLE 3.3-1 AGING MANAGEMENT REVIEW RESULTS FOR THE DRY STORAGE CANISTERS (DSCs) 3-39

TABLE 3.4-1 AGING MANAGEMENT REVIEW RESULTS FOR THE IRRADIATED FUEL ASSEMBLIES (IFAs) 3-42

TABLE 3.5-1 AGING MANAGEMENT REVIEW RESULTS FOR THE TRANSFER CASK 3-43

TABLE 3.6-1 AGING MANAGEMENT REVIEW RESULTS FOR THE TRANSFER CASK LIFTING YOKE AND LIFT EXTENSION 3-47

TABLE 3.7-1 AGING MANAGEMENT REVIEW RESULTS FOR THE CASK PIT SUPPORT STAND 3-49

1.0 GENERAL INFORMATION

Duke Power Company LLC d/b/a Duke Energy Carolinas, LLC, (Duke) has prepared this application for renewal of the license for the Site-Specific Independent Spent Fuel Storage Installation (ISFSI) located at the Oconee Nuclear Station (ONS). This application supports license renewal for an additional 40 year period beyond the end of the current license term of Materials License Number SNM-2503 (Docket No. 72-4). The original 20 year license will expire on January 31, 2010. This application includes the applicable general, technical, and environmental supporting information required by 10 CFR 72, §72.42(b).

The information contained in this section includes:

1. Information on the organization of the application (Section 1.1),
2. A general description of the ONS Site-Specific ISFSI (Section 1.2),
3. The administrative information required by 10 CFR 72, §72.22 (Section 1.3),
4. Summary of abbreviations and intended function code definitions (Section 1.4), and
5. A list of the references for Section 1.0, General Information (Section 1.5).

1.1 APPLICATION FORMAT AND CONTENT

The format and content of the application are based on 10 CFR 72 (Reference 1.5-1), the NRC's preliminary guidance for renewal of site-specific 10 CFR 72 licenses (Reference 1.5-2) and Virginia Power Company's (VEPCO's) comments (Reference 1.5-3); and on the precedent of the H. B. Robinson Steam Electric Plant (HBRSEP), Unit 2, Site-Specific ISFSI, license renewal application (Reference 1.5-4) and include:

1. General Information – Section 1.0 has been expanded beyond the general administrative requirements of 10 CFR 72, §72.22 to provide (1) information on the format and content of the application, (2) general facility description, and (3) a summary of abbreviations and intended function code definitions used in the application.
2. Scoping Evaluation - Section 2.0 provides the scoping evaluation for the Site-Specific ISFSI systems, structures, and components (SSCs).
3. Aging Management Reviews – Section 3.0 includes the methodology and results of the aging management reviews (AMRs) performed for Site-Specific ISFSI SSCs that are in the scope of license renewal.

4. Appendices:

   Appendix A: Aging Management Programs

   Appendix B: Time-Limited Aging Analyses (TLAAs)

   Appendix C: UFSAR Supplement and Changes

   Appendix D: Technical Specifications Changes

   Appendix E: Environmental Report Supplement

   Appendix F: Additional Information (training and qualifications, financial assurance for decommissioning and emergency planning)

1.2 FACILITY DESCRIPTION

The ONS Site-Specific ISFSI is located on the ONS site in Oconee County, South Carolina, approximately 8 miles northeast of Seneca, South Carolina. Duke owns and operates three nuclear units on the site. The ONS Site-Specific ISFSI is located within the ONS protected area.

The ONS Site-Specific ISFSI uses the NUHOMS®-24P system to provide for the horizontal, dry storage of irradiated fuel assemblies (IFAs) in a reinforced concrete module. The principal components are a Horizontal Storage Module (HSM) comprised of concrete and structural steel and a steel Dry Storage Canister (DSC) with an internal basket which holds the IFAs. The exterior walls and roof of the HSM are 3 feet thick, and the interior walls are two feet thick. Each HSM contains one DSC and each DSC contains 24 fuel assemblies.

In addition to these primary components, the Site-Specific ISFSI also requires transfer equipment to move the DSCs from the spent fuel pool (where they are loaded with the IFAs) to the HSMs where they are stored. This transfer system includes a Transfer Cask, a hydraulic ram, a trailer and a cask skid. The transfer system interfaces with the existing spent fuel pool, the cask handling crane, and the site layout (i.e., roads and topography).

Although the ONS Site-Specific ISFSI was licensed to allow for as many as 88 HSMs, only 40 HSMs have been constructed to date. These were constructed in two separate phases. Phase 1 consists of a 2x10 array that was completed in 1990. Phase 2 consists of a 2x10 array that was completed in 1992.

A complete description of the ONS Site-Specific ISFSI is provided in the Independent Spent Fuel Storage Installation Updated Final Safety Analysis Report (Site-Specific ISFSI UFSAR).

1.3 INFORMATION REQUIRED BY 10 CFR 72.22

1.3.1 NAME OF APPLICANT

Duke Power Company LLC d/b/a
Duke Energy Carolinas, LLC

1.3.2. ADDRESS OF APPLICANT

526 South Church Street
Charlotte, North Carolina 28202

1.3.3 ADDRESS OF ONS ISFSI

7800 Rochester Highway
Seneca, South Carolina 29672

1.3.4. DESCRIPTION OF BUSINESS OR OCCUPATION OF APPLICANT

Duke Energy Carolinas, LLC, (Duke) is a wholly-owned subsidiary of Duke Energy Corporation. Duke is engaged in the business of generating, transmitting, distributing and selling electric power and energy. It is a public utility under the laws of North Carolina and subject to the jurisdiction of the North Carolina Utilities Commission with respect to its operations in that State. The company also transacts business and is an "electrical utility" under the laws of the State of South Carolina; accordingly, its operations in that State are subject to the jurisdiction of the Public Service Commission of South Carolina. Duke is also a public utility under the Federal Power Act, and certain of its operations are subject to the jurisdiction of the Federal Energy Regulatory Commission. The company owns and operates regulated electric facilities, including seven nuclear units licensed by the NRC, as well as electric distribution and transmission facilities. The NRC licenses for these nuclear units are currently held under the name "Duke Power Company LLC." On March 14, 2007, a "License Amendment Request for Change of Licensee Name" was filed in order to change the name on these licenses from "Duke Power Company LLC" to "Duke Energy Carolinas, LLC." NRC approval of this request is pending.

1.3.5 ORGANIZATION AND MANAGEMENT OF APPLICANT

The business of Duke is conducted by its own board of directors, although for internal governance purposes, the Duke Energy Corporation Board of Directors also has approval authority over certain types of transactions. Additionally, the group executive and chief nuclear officer of Duke reports to James E. Rogers, Chairman, President and Chief Executive Officer, Duke Energy Corporation.

States of Establishment and Places of Business

Duke is a limited liability company duly organized and existing under the laws of the State of North Carolina. The Company's general office, and principle place of business, is located in North Carolina, and it also transacts business on a regular basis in South Carolina.

The Company is not owned, controlled or dominated by an alien, a foreign corporation, or a foreign government. The Company makes this application on its own behalf and is not acting as an agent or representative of any other person.

Directors, Executive Officers of Applicant

The business address, names, and citizenship of the current directors of Duke Energy Carolinas, LLC are as follows:

Duke Energy Carolinas, LLC
526 South Church Street
Charlotte, North Carolina 28202

Name	**Citizenship**
Hauser, David L.	US
Rogers, James E.	US
Turner, James L.	US

The business address, names, current titles, and citizenship of Duke Energy Carolinas, LLC, current executive officers and senior nuclear leadership are as follows:

Duke Energy Carolinas, LLC
526 South Church Street
Charlotte, North Carolina 28202

Name	**Position**	**Citizenship**
Barron, Jr., Henry B.[1]	Group Executive and Chief Nuclear Officer	US
Baxter, David A.	Site Vice President, Oconee	US
Dolan, Bryan J.	Vice President, Nuclear Plant Development	US

[1] Henry B. Barron, Duke Energy group executive and chief nuclear officer, has announced his decision to retire, effective March 31, 2008. Dhiaa M. Jamil, currently Duke Energy's senior vice president of nuclear support, will assume the group executive and CNO role effective Feb. 17, 2008.

Geer, Thomas C.	Vice President, Nuclear Engineering	US
Hamilton, Bruce H.	Site Vice President, McGuire	US
Harrall Jr., Thomas P	Vice President, Plant Support	US
Hauser, David L.	Group Executive and Chief Financial Officer	US
Jamil, Dhiaa M.	Senior Vice President, Nuclear Support	US
Jones, Ronald A.	Senior Vice President, Nuclear Operations	US
Manly, Marc E.	Group Executive and Chief Legal Officer	US
McRainey, Daniel K.	Vice President, Nuclear Special Projects	US
Mohler, David W.	Vice President and Chief Technology Officer	US
Morris, James R.	Site Vice President, Catawba	US
Rogers, James E.	Chief Executive Officer	US
Rolfe, Christopher C.	Group Executive and Chief Administrative Officer	US
Ruff, Ellen T.	President	US
Trent, B. Keith	Group Executive and Chief Strategy, Policy and Regulatory Officer	US
Turner, James L.	Group Executive	US

1.3.6 FINANCIAL QUALIFICATIONS OF DUKE

Operating Financial Qualifications

Duke Energy Carolinas, LLC, will remain financially qualified to carry out the operation and decommissioning of the ISFSI during the period of the renewed material license as required by 10 CFR 72.22(e).

Data, including corporate annual reports, to support the conclusion that Duke is financially qualified to operate the ISFSI may be accessed at the following website:

http://www.duke-energy.com/investors/publications.asp

1.4 ABBREVIATIONS AND INTENDED FUNCTION CODE DEFINITIONS

1.4.1 ABBREVIATIONS

The acronyms and abbreviations that pertain to the administrative and technical information in this application, Appendices A through D, and Appendix F are listed prior to the Table of Contents. The abbreviations that pertain to the environmental information are included in the front of Appendix E, Environmental Report Supplement.

1.4.2 INTENDED FUNCTION CODE DEFINITIONS

This section provides the meanings for the Subcomponent Intended Function represented by the abbreviations used in subsequent sections of this application, including Table 3.2-1 through Table 3.7-1. Subcomponent Intended Functions are the specific functions that support the Intended Function of the structure and component of which they are a part.

Abbreviation	Definition
CC	Provides criticality control of spent fuel
HT	Provides heat transfer
PB	Directly or indirectly maintains a pressure boundary (confinement)
SH	Provides radiation shielding
SS	Provides structural support and/or functional support of important to safety equipment (structural integrity)

1.5 REFERENCES (SECTION 1.0, GENERAL INFORMATION)

1.5-1 10 CFR 72, Licensing Requirements for the Independent Storage of Spent Nuclear Fuel and High-Level Radioactive Waste, Code of Federal Regulations, NRC

1.5-2 Enclosure to letter from Mr. E. William Brach, NRC, to Mr. W.R. Matthews, Virginia Electric and Power Company, Docket Nos. 72-2 (50-280/281), *Preliminary NRC Staff Guidance for 10 CFR 72 License Renewal*, March 29, 2001

1.5-3 Attachment to letter from Mr. L. N. Hartz, Virginia Electric Power Company (Dominion), to NRC Document Control Desk, Serial No. 01-367, *Surry Independent Spent Fuel Storage Installation, Comments on NRC Preliminary Guidance,* June 26, 2001

1.5-4 Letter from J.F. Lucas, Progress Energy to NRC Serial Number RNP-RA/04-0027, "Request for Renewal of Independent Spent Fuel Storage Installation License," dated February 27, 2004 (TAC Nos. L23715 and L23716)

2.0 SCOPING EVALUATION

2.1 INTRODUCTION

A general description of the ONS Site-Specific ISFSI is provided in Section 1.2, Facility Description. A more thorough description of the ONS Site-Specific ISFSI is contained in the Site-Specific ISFSI UFSAR.

Duke's license renewal process for the ONS Site-Specific ISFSI is consistent with the pilot Site-Specific ISFSI license renewal process developed by Dominion (Virginia Electric and Power Company) and the NRC for the Surry Power Station (SPS) Site-Specific Independent Spent Fuel Storage Installation (ISFSI) and subsequently followed by Progress Energy for the Robinson Nuclear Plant (RNP) Site-Specific ISFSI license renewal.

The ONS Site-Specific ISFSI license renewal methodology follows the *"Preliminary Guidance for License Renewal for Site-Specific Independent Spent Fuel Storage* Installations (ISFSIs)" (Reference 2.4-1) and the comments that were provided to the NRC (Reference 2.4-2) by Dominion (Virginia Electric and Power Company) on June 26, 2001. The proposed Part 72 license renewal process adopts the regulatory philosophy of 10 CFR 54, the License Renewal Rule (Reference 2.4-3). This philosophy is summarized in the two principles of license renewal from the Part 54 Final Rule Statements of Consideration (Reference 2.4-4) which are re-stated below:

> *"The first principle of license renewal was that, with the exception of age-related degradation unique to license renewal and possibly a few other issues related to safety only during the period of extended operation of nuclear power plants, the regulatory process is adequate to ensure that the licensing bases of all currently operating plants provides and maintains an acceptable level of safety so that operation will not be inimical to public health and safety or common defense and security. Moreover, consideration of the range of issues relevant only to extended operation led the Commission to conclude that the detrimental effects of aging is probably the only issue generally applicable to all plants. As a result, continuing this regulatory process in the future will ensure that this principle remains valid during any period of extended operation if the regulatory process is modified to address age-related degradation that is of unique relevance to license renewal...*
>
> *The second and equally important principle of license renewal holds that the plant-specific licensing basis must be maintained during the renewal term in the same manner and to the same extent as during the original licensing term. This principle would be accomplished, in part, through a program of age-related degradation management for systems, structures, and components that are important to license renewal ..."*

Based on these principles, license renewal is not intended to impose requirements beyond those that were met by the facility when it was initially licensed by the NRC. Therefore, the current licensing basis (CLB) for the Site-Specific ISFSI will be carried forward through the renewed license period.

The scoping process involves identification of the systems, structures, and components (SSCs) of the Site-Specific ISFSI that are within the scope of license renewal, and thus require evaluation for the effects of aging. A description of the scoping process is provided in Section 2.2, Scoping Methodology.

2.2 SCOPING METHODOLOGY

The first step in the license renewal process involves the identification of the in-scope Site-Specific ISFSI SSCs. This is done by evaluating the SSCs that comprise the Site-Specific ISFSI against the following scoping criteria provided in the comments on the Preliminary Guidance for License Renewal for Site-Specific Independent Spent Fuel Storage Installations (ISFSIs) (Reference 2.4-2):

"Any SSC that meets either of the criteria shall be evaluated further in the aging management review (AMR) process described later. The categories of SSCs are those that are:

1. *Important to safety; as they are relied upon to:*

   a) *Maintain the conditions required to store spent fuel safely,*
   b) *Prevent damage to the spent fuel during handling and storage.*
   c) *Provide reasonable assurance that spent fuel can be received, handled, packaged, stored, and retrieved without undue risk to the health and safety of the public, as identified in the current licensing basis (CLB).*

   These SSCs ensure that these important safety functions are met: (1) criticality, (2) shielding, (3) confinement, (4) heat transfer, and (5) structural integrity.

2. *Classified as not important to safety, but, according to the CLB, whose failure could prevent an important to safety function from being fulfilled or whose failure as a support SSC could prevent an important to safety function from being fulfilled.*

The function performed by an SSC that causes it to be within the scope of license renewal is its intended function..."

"...Also, SSCs which perform ISFSI support functions are generally not within the scope of license renewal. The fuel in storage is considered to be within the scope of license renewal."

Any Site-Specific ISFSI SSC that meets either Scoping Criterion 1 or 2 above is considered within the scope of license renewal (in-scope), and the function(s) it is required to perform during the extended term is identified. The results of the Scoping evaluation are presented in Section 2.3, Scoping Results.

A basic premise of the license renewal scoping process is that the CLB identifies SSCs and their Intended Functions. Thus, the CLB is reviewed to determine those SSCs with Intended Functions that meet either Scoping Criterion 1 or 2, as defined above. The following documents comprise the CLB for the ONS Site-Specific ISFSI:

- Updated Final Safety Analysis Report (UFSAR)
- Materials License No. SNM – 2503 (Reference 2.4-6)
- Technical Specifications (Reference 2.4-6, Appendix A)
- Docketed Licensing Correspondence

The Site-Specific ISFSI UFSAR provides a description of the Site-Specific ISFSI, Site-Specific ISFSI SSCs and their functions, including safety classifications as established by the safety analyses. The Technical Specifications govern the safety of, the receipt, possession, and storage of irradiated nuclear fuel at the Site-Specific ISFSI, and the transfer of such irradiated fuel to and from ONS Units 1, 2, and 3, and the Site-Specific ISFSI. Additionally, the Safety Evaluation Report (Reference 2.4-5), which summarizes the results of the NRC staff's safety review of the original licensing, and the Safety Evaluation Reports associated with subsequent amendments were used in the license renewal scoping process.

Other design and design basis documents such as the NUHOMS®-24P Topical Report (Reference 2.4-7) were consulted as appropriate to further clarify SSC descriptions, classifications, and Intended Functions.

2.3 SCOPING RESULTS

The SSCs comprising the Site-Specific ISFSI are identified in Table 2.3-1, Scoping Results. Those SSCs meeting Scoping Criterion 1 or 2 are identified in the table as being within the scope of license renewal.

As indicated in Table 2.3-1, only the Horizontal Storage Modules (including the attached lightning protection system), Dry Storage Canisters, Irradiated Fuel Assemblies stored in the canisters, Transfer Cask, Transfer Cask Lifting Yoke and Lift Extension, and Cask Pit Support Stand were determined to be within the scope of license renewal and to require further review in the aging management review process. The intended functions performed by the individual subcomponents of these in-scope SSCs are identified in the aging management review summary tables (Tables 3.2-1, 3.3-1, 3.4-1, 3.5-1, 3.6-1, and 3.7-1, respectively), which are located at the end of Section 3.0, Aging Management Reviews.

Table 2.3-1 Scoping Results

SSC	Criterion 1	Criterion 2	In-Scope
Horizontal Storage Modules (HSMs)(1)	N	Y	Y
Dry Storage Canisters (DSCs)	Y	N/A	Y
Irradiated Fuel Assemblies (IFAs)(2)	Y	N/A	Y
Transfer Cask	Y	N/A	Y
Transfer Cask Lifting Yoke and Lift Extension	Y	N/A	Y
Cask Pit Support Stand	Y	N/A	Y
Transfer Components(3)	N	N	N
Instrumentation	N	N	N
Support Equipment(4)	N	N	N
Security Equipment(5)	N	N	N
Approach Concrete Slab, Miscellaneous Concrete/Asphalt, and Joint Material	N	N	N

(1) Includes the foundation and attached lightning protection system.
(2) Includes control components.
(3) Includes transfer trailer, cask skid, skid positioning system, hydraulic ram.
(4) Includes annulus seal, vacuum drying system, welding equipment, slings, DSC lift rig, Site-Specific ISFSI electrical power supply, miscellaneous equipment (e.g. tools, hoses).
(5) Including lighting, communication and alarm systems.

Y – Yes
N – No
N/A – Not Applicable

2.4 REFERENCES (SECTION 2.0, SCOPING EVALUATION)

2.4-1 Enclosure to letter from Mr. E. William Brach, NRC, to Mr. W.R. Matthews, Virginia Electric and Power Company, Docket Nos. 72-2 (50-280/281), *Preliminary NRC Staff Guidance for 10 CFR 72 License Renewal*; March 29, 2001

2.4-2 Attachment to letter from Mr. L. N. Hartz, Virginia Electric Power Company (Dominion), to NRC Document Control Desk, Serial No. 01-367, *Surry Independent Spent Fuel Storage Installation, Comments on NRC Preliminary Guidance,* June 26, 2001

2.4-3 10 CFR 54, *Requirements for Renewal of Operating Licenses for Nuclear Power Plants*, Code of Federal Regulations, NRC

2.4-4 Federal Register, Volume 60, No. 88, page 22464, *Nuclear Power Plant License Renewal; Revisions, 10 CFR Parts 2, 51, and 54;* May 8, 1995

2.4-5 *Safety Evaluation Report of the Oconee Nuclear Station Independent Spent Fuel Storage Installation*, NRC, Docket 72-4, January 29, 1990

2.4-6 *SNM-2503, License for Independent Storage of Spent Nuclear Fuel and High-Level Radioactive Waste,* Duke Power Company LLC, Amendment 8, dated April 3, 2006

2.4-7 *Topical Report for the NUTECH Horizontal Modular Storage System for Irradiated Nuclear Fuel, NUHOMS®-24P,* NUH-002, NUTECH, Inc., San Jose, California, July 1989, Revision 1A

3.0 AGING MANAGEMENT REVIEWS

3.1 AGING MANAGEMENT REVIEW METHODOLOGY

The scoping process identifies the Site-Specific ISFSI SSCs within the scope of license renewal which require evaluation for the effects of aging in the AMR process.

The purpose of the AMR process is to assess the in-scope SSCs with respect to aging effects that could affect the ability of the SSC to perform its intended function during the renewed license period. The AMR process involves the following four (4) major steps:

1. Identification of in-scope subcomponents requiring AMR (screening);
2. Identification of materials and environments;
3. Identification of aging effects requiring management; and,
4. Determination of the activities/programs required to manage the effects of aging.

Each of these steps is discussed in Subsections 3.1.1 through 3.1.4, respectively. Also, the operating experience review for confirmation of the AMR process and the document sources used in the process are discussed in Subsections 3.1.5 and 3.1.6, respectively.

The results of the aging management review for the subcomponents of the Site-Specific ISFSI SSCs that are in the scope of license renewal are provided in the following sections:

- Section 3.2, Aging Management Review Results – HSMs
- Section 3.3, Aging Management Review Results – DSCs
- Section 3.4, Aging Management Review Results – IFAs
- Section 3.5, Aging Management Review Results – Transfer Cask
- Section 3.6, Aging Management Review Results – Transfer Cask Lifting Yoke and Lift Extension
- Section 3.7, Aging Management Review Results – Cask Pit Support Stand.

Corresponding tables that summarize the aging management review for these Site-Specific ISFSI SSCs are located at the end of Section 3.0, Aging Management Reviews.

3.1.1 IDENTIFICATION OF IN-SCOPE SUBCOMPONENTS REQUIRING AMR

The scoping process does not identify the specific subcomponents for the in-scope Site-Specific ISFSI SSCs that require AMR. Therefore, in the first step of the AMR process, the in-scope SSCs are further reviewed to identify and describe the subcomponents that support the SSC intended function. The subcomponents and associated intended functions are identified by reviewing the documentation sources identified in Subsection 3.1.6.

Subcomponents that perform or support any one of the identified intended functions in a passive manner, without moving parts or a change in configuration or properties, are determined to require an aging management review.

Those subcomponents that either do not support an intended function, or perform an intended function by a change in configuration or properties (active), or have their condition monitored at some established frequency, are excluded from further evaluation in the aging management review with supporting justification.

Tables 3.2-1, 3.3-1, 3.4-1, 3.5-1, 3.6-1, and 3.7-1, respectively, identify the intended functions for the Site-Specific ISFSI subcomponents that require aging management review. The tables also identify subcomponents that do not support the SSC intended function and are not subject to aging management review.

3.1.2 IDENTIFICATION OF MATERIALS AND ENVIRONMENTS

The second step of the AMR process involves the identification of the materials of construction and the environments to which these materials are exposed, for the Site-Specific ISFSI subcomponents that require an AMR.

The materials of construction were identified through a review of pertinent design and/or design basis documents, which are discussed in Subsection 3.1.6. A summary of the materials of construction is provided in Subsection 3.2.2 for the HSM subcomponents, Subsection 3.3.2 for the DSC subcomponents, Subsection 3.4.2 for the IFA subcomponents, Subsection 3.5.2 for the Transfer Cask subcomponents, Subsection 3.6.2 for the Transfer Cask Lifting Yoke and Lift Extension, and Subsection 3.7.2 for the Cask Pit Support Stand. The materials of construction are also reflected in the corresponding aging management review summary tables (Tables 3.2-1, 3.3-1, 3.4-1, 3.5-1, 3.6-1, and 3.7-1).

The environments to which components are exposed play a critical role in the determination of potential aging mechanisms and effects. A review of plant documentation, discussed in Subsection 3.1.6, was performed to quantify the environmental conditions to which the Site-Specific ISFSI SSCs are continuously or frequently exposed. The environmental conditions identified during this review include any conditions known to exist on a recurring basis. They are based on operating experience, unless design features have been implemented to preclude those conditions from recurring. Descriptions of the internal and external environments, which have been used in the aging management review, are included in Subsections 3.2.3, 3.3.3, 3.4.3, 3.5.3, 3.6.3, and 3.7.3, and are reflected in the corresponding AMR summary tables.

3.1.3 IDENTIFICATION OF AGING EFFECTS REQUIRING MANAGEMENT

The third step in the AMR process involves the identification of the aging effects requiring management. Aging effects requiring management during the renewed license period are those that could cause a loss of passive SSC intended function(s). If degradation of a subcomponent would be insufficient to cause a loss of function, or the relevant conditions do not exist at the ONS Site-Specific ISFSI for the aging effect to occur and propagate, then no aging management is required.

Potential aging effects, presented in terms of material and environment combinations, have been evaluated and those aging effects requiring management determined. Both potential aging effects that theoretically occur, as well as aging effects that have actually occurred based upon industry and ONS operating experience, were considered. The evaluation was applied to subcomponents, regardless of form (i.e., canister body, cover, lid, guide tube, etc.).

As described above, the environments considered in this evaluation are the environments that the subcomponents normally experience. Environmental stressors that are conditions not normally experienced (such as accident conditions), or that may be caused by a design problem, are considered event-driven situations and have not been characterized as sources of aging. Such event-driven situations would be evaluated and corrective actions, if any, implemented at the time of the event.

Aging effects are the manifestation of aging mechanisms. In order to effectively manage an aging effect, it is necessary to determine the aging mechanisms that are potentially at work for a given material and environment application. Therefore, the AMR process identifies both the aging effects and the associated aging mechanisms which cause them. Various mechanisms are only applicable at certain conditions, such as high temperature or moisture, for example. Each identified mechanism was characterized by a set of applicable conditions that must be met for the mechanism to occur and/or propagate. Given this evaluation process, each Site-Specific ISFSI subcomponent that was subjected to AMR was evaluated to determine if the potential aging effects/mechanisms were credible considering the material, environment, and conditions of storage.

3.1.3.1 Identification of Aging Effects Related to NUHOMS® Storage System

The potential aging effects/mechanisms that were considered for the ONS Site-Specific ISFSI were based primarily upon the ONS license renewal (10 CFR 54) process. These were compared to the following guidance documents and reports to ensure that all aging effects/mechanisms applicable to ONS were identified:

- NRC Preliminary Guidance for License Renewal including comments provided by Dominion (Reference 3.8-3)
- ASTM C 1562-03 (Reference 3.8-5)

- EPRI report TR-1003416 (Reference 3.8-7)
- EPRI report TR-108757 (Reference 3.8-6)
- EPRI report TR-1002882 (Reference 3.8-4)
- IAEA Technical Report Series No. 443 (Reference 3.8-8)
- NRC Interim Staff Guidance 11, Revision 3 (Reference 3.8-9)

A summary of aging effects requiring management for the subcomponents of the HSMs, DSCs, Transfer Cask, Lifting Yoke, Transfer Cask Lift Extension, and Cask Pit Support Stand is provided in Subsections 3.2.4, 3.3.4, 3.5.4, 3.6.4, and 3.7.4, respectively. The aging effects that require management during the renewed license period are also reflected in the corresponding aging management review summary tables.

3.1.3.2 Identification of Aging Effects Related to Fuel Assemblies

This section identifies the possible effects of storage on irradiated fuel assemblies (IFA). Relevant EPRI, ASTM, and NRC documents were used to identify the possible aging effects. The following sections discuss those documents.

<u>EPRI Report on Data Needs for Storage</u>

The Electric Power Research Institute (EPRI) contracted with Battelle's Pacific Northwest Division to prepare a report (Reference 3.8-6) on data needs for long-term dry storage. The report is helpful in that it is not limited to data needs. The report also discusses available data and its usefulness in treating some degradation mechanisms. The emphasis of this report is on fuel performance during the period from 20 to 100 years after the fuel is put into dry storage.

The report's summary section provides an assessment of the durability of spent fuel: "The results obtained so far lead to the view that any concerns about long-term dry storage, in all likelihood, do not lie with the behavior of the spent-fuel assemblies - at least for those with burnups lower than ~50,000 MWd/MTU." The remainder of the report provides details to support this conclusion.

<u>EPRI Report on Bases for Extended Dry Storage</u>

EPRI produced a second report (Reference 3.8-7), which to some extent is a supplement to Reference 3.8-6. The report reviews possible fuel and cladding degradation mechanisms. As discussed in Reference 3.8-6, only hydrogen embrittlement was considered applicable to extended dry storage under normal conditions.

ASTM Standard on Extended Dry Storage

The American Society for Testing and Materials (ASTM) produced a consensus standard (Reference 3.8-5), which discusses possible fuel and cladding degradation mechanisms. This standard also views hydrogen embrittlement a degradation mechanism applicable to extended dry storage.

Cladding Considerations for the Transportation and Storage of Spent Fuel

The NRC developed Interim Staff Guidance 11 (Reference 3.8-9) to define the acceptance criteria needed to provide reasonable assurance that commercial spent fuel is maintained in the configuration that is analyzed in the licensee's safety analysis report for spent fuel storage. ISG-11 broadened the NRC's technical basis for storage of spent fuel with average burnups exceeding 45 GWd/MTU. At fuel burnups exceeding 45 GWd/MTU, the buildup of hydrogen in the cladding and wall thinning due to corrosion are a concern. ISG-11 emphasizes the need to limit the formation of radial hydrides, which can occur when high burnup cladding (high hydrogen content) experiences a high tensile stress. Therefore, the ISG limits the peak cladding temperature (peak tensile stress) and the number of thermal cycles.

The NRC discussed the applicability of this ISG to storage of fuel with burnups less than 45 GWd/MTU. "Based on staff's evaluation, it is expected that fuel assemblies with burnups less than 45 GWd/MTU are not likely to have a significant amount of hydride reorientation due to limited hydride content ... Even if hydride reorientation occurred during storage, the network of reoriented hydrides is not expected to be extensive enough in low burnup fuel to cause fuel rod failures."

Dry Cask Storage Characterization Project

In the mid-1980s DOE sponsored a program to evaluate the thermal performance of a Castor dry storage cask (Reference 3.8-4). Surry PWR fuel was placed in it and exposed to six thermal cycles (referred to as "benchmark testing"); the two hottest cycles reached fuel temperatures of 415 °C and 398 °C. After the last thermal test, the cask was stored on a concrete pad for about 15 years.

As part of an EPRI and NRC program to evaluate dry storage facility license renewal, fuel from this cask was then removed and examined. The fuel assembly was a Westinghouse 15×15 assembly with an assembly-averaged burnup of 35.7 GWd/MTU. The fuel was 3.11% enriched and 95% dense. The cladding was cold-worked/stressed-relieved Zircaloy-4.

Detailed examination showed that the fuel was suitable for extended storage. No deleterious effects such as fission gas release, cladding creep, cladding hydride reorientation, or cladding property degradation was observed.

In terms of cladding material, assembly burnup, and pellet enrichment, this fuel is similar to that being stored by Duke. Therefore, the report's observations are also applicable to Duke's license renewal, which are as follows:

1. The rods experienced very little thermal creep during benchmark testing and storage. Little additional creep would be expected for additional storage duration because of the low temperature.

2. No additional fission gas appears to have been released. This means further pressurization of the cask is not expected.

3. No evidence of hydrogen pickup or hydride reorientation was observed. A small amount of axial migration of hydrogen to cooler sections might have occurred.

4. Little or no cladding annealing occurred during either the benchmark testing or long term storage

5. Creep tests on post-storage samples showed residual creep strains exceeding 1% with the 400 °C sample exceeding 6%. The cladding retains significant creep ductility.

6. The fuel was suitable for extended storage.

7. No deleterious effects from 15 years of dry cask storage were observed.

Conclusions

This section identified hydrogen embrittlement (References 3.8-6 and 3.8-7) and radial hydride formation (Reference 3.8-4) as possible degradation mechanisms. Low to moderate burnup fuel is not impacted by either of these mechanisms (References 3.8-6 and 3.8-9). The fuel stored under this application is considered low to moderate burnup, because the assembly average burnups were limited to 40 GWd/MTU. The results of the Dry Cask Storage Characterization Project (Reference 3.8-4) support the conclusion that the condition of irradiated fuel assemblies will not degrade under extended storage.

3.1.4 DETERMINATION OF THE ACTIVITIES REQUIRED TO MANAGE THE EFFECTS OF AGING

The final step in the AMR process involves the determination of the Aging Management Activities (AMAs) or Aging Management Programs (AMPs) to be credited or developed for managing the effects of aging. To the extent practical, existing Site-Specific ISFSI programs and/or activities were credited for the management of aging effects that could cause a loss of component intended function during the renewed license period.

As indicated in Subsections 3.3.4 and 3.4.4, and reflected in the corresponding aging management review summary tables (Tables 3.3-1 and 3.4-1), there are no aging effects requiring management during the renewed license period for the subcomponents of the DSCs or IFAs. The AMPs for the HSM, Transfer Cask, Transfer Cask Lifting Yoke, Transfer Cask Lift Extension, and Cask Pit Support Stand subcomponents are described in Subsections 3.2.5, 3.5.5, 3.6.5, and 3.7.5, respectively, and are listed in the corresponding aging management review summary tables (Tables 3.2-1, 3.5-1, 3.6-1, and 3.7-1).

The demonstration of the effectiveness of the AMPs that were selected for the HSMs, Transfer Cask, Transfer Cask Lifting Yoke, Transfer Cask Lift Extension, and Cask Pit Support Stand is discussed in Appendix A, Aging Management Programs (Sections A.2.1, A.2.2, A.2.3, and A.2.4, respectively).

3.1.5 OPERATING EXPERIENCE REVIEW FOR PROCESS CONFIRMATION

As described in Subsection 3.1.3, the potential aging effects for ONS Site-Specific ISFSI material and environment combinations were compiled from common industry and plant operating experience through the use of accepted industry standards and reference materials, including various metallurgical literary references relating specific materials and environments to aging effects and mechanisms.

These aging effects/mechanisms were evaluated, as described above, based on the premise that similar materials in similar environments experience similar aging effects and mechanisms. Further review of industry and plant-specific operating experience for the Site-Specific ISFSI was also performed in order to confirm the applicability of previously identified potential aging effects/mechanisms and to identify any aging effects not previously addressed in aging effect evaluations.

This Site-Specific ISFSI operating experience review is described in the following subsections. A discussion of operating experience, as it pertains to the effectiveness of AMPs credited with the management of aging, is also contained in the appropriate subsections of Appendix A, Aging Management Programs.

The ONS Site-Specific ISFSI design employs a rugged sealed canister and concrete storage module for dry storage of irradiated fuel, as described in this application. However, for completeness, operating experience for dry storage casks was also considered for applicability to the ONS Site-Specific ISFSI SSCs.

3.1.5.1 Cask/Canister Degradation

A review of industry operating experience returned a large number of events related to dry storage. However, most of these were event-driven incidents, and almost none were related to aging management. Those few are bounded by the aging management review performed for the ONS SSCs. Furthermore, the only instance of the possible degradation of a sealed canister was identified for ONS. The impact of plastic foreign material in a sealed DSC was evaluated and determined to pose no concern because of the small quantity of material and the inert environment.

3.1.5.2 Fuel Assembly Degradation

The conditions and findings of the Dry Cask Storage Characterization Project conducted by EPRI (Reference 3.8-4) are considered to be representative of the conditions and materials inside a DSC at the ONS Site-Specific ISFSI. This project evaluated the condition of fuel rods following approximately 15 years of dry storage. Detailed examination showed that the fuel was suitable for extended storage. No deleterious effects such as fission gas release, cladding creep, cladding hydride reorientation, or cladding property degradation was observed.

Additional support for extended dry storage of low burnup spent fuel (i.e. $\leq$ 40 GWd/MTU) is found in References 3.8-5, 3.8-6, 3.8-7, and 3.8-8.

3.1.5.3 Summary of Operating Experience

Duke's review of operating experience did not identify any potential aging effects and associated mechanisms for the Site-Specific ISFSI beyond those described in Subsection 3.1.3, Identification of Aging Effects Requiring Management. Additionally, the appropriateness of the ONS Site-Specific ISFSI aging management review was confirmed by the operating experience review.

3.1.6 DOCUMENTATION OF SOURCES USED FOR THE AMR PROCESS

The following documents were the primary sources for determination of the safety classifications, intended functions, materials, and environmental conditions for Site-Specific ISFSI SSCs identified as in-scope for license renewal:

- ONS Site-Specific ISFSI UFSAR
- NUHOMS®-24P Topical Report (Reference 3.8-2)

Other plant documents such as drawings, technical reports, vendor manuals, procedures were consulted, as appropriate, to further clarify SSC subcomponent safety classifications, intended functions, materials, and environmental conditions.

The documents listed at the end of Section 2.2, Scoping Methodology, were also used in the AMR process.

Lastly, industry topical reports, reference books, and standards were consulted as appropriate for the description and evaluation of aging effects/mechanisms as discussed in Section 3.1.3.1.

3.2 AGING MANAGEMENT REVIEW RESULTS – HSMs

This section provides the results of the aging management review of the HSMs (referred to as concrete overpack in Site-Specific ISFSI license renewal guidance documents) which were determined to be in the scope of license renewal as identified in Section 2.3, Scoping Results.

A summary of the results of the aging management review for the HSM subcomponents is provided in Table 3.2-1. The table provides the following information related to each subcomponent determined to require aging management review: (1) the intended function, (2) the material group, (3) the environment, (4) the aging effects requiring management, and (5) the specific aging management activities that manage those aging effects. The table also identifies subcomponents that did not support, or whose failure would not compromise, the SSC intended function and were, therefore, not subjected to further aging management review.

A description of the HSM subcomponents that support an SSC intended function is provided in Subsection 3.2.1, and a summary of the materials and environments for the HSMs is provided in Subsection 3.2.2 and Subsection 3.2.3, respectively. Subsection 3.2.4 and Subsection 3.2.5 provide a discussion of the aging effects requiring management for the applicable HSM subcomponents and the aging management activities used to manage the effects of aging, respectively.

3.2.1 DESCRIPTION OF HSM SUBCOMPONENTS

The HSMs provide a unitized, low profile, modular storage location for irradiated fuel. Each HSM structure is constructed from reinforced concrete and structural steel. The thick concrete walls and roof of the HSM provide neutron and gamma shielding. Inlets and outlets, and associated pathways, are provided in each HSM for the dissipation of decay heat. A description of each subcomponent is as follows:

Concrete Walls and Roof

Above the foundation, concrete and reinforcing rebar form the roof slab, outer walls, and the between-module walls with each HSM serving as a storage bay. An air inlet precast slab is included in each HSM. This slab is supported on the front wall and an interior wall in each bay. Removable concrete blocks, which provide shielding for the air outlets, are located on the roof slab of each HSM. The concrete codes for design and construction are included in the Site-Specific ISFSI UFSAR.

Concrete Foundation

A concrete foundation, including rebar, supports the HSMs, and is underground (below grade). The concrete codes for design and construction are included in the Site-Specific ISFSI UFSAR.

Anchorages/Embedments

Anchorages/embedments are the steel members, studs, etc., that are embedded in concrete. These anchors also have an exposed surface above the concrete.

Expansion Anchors

Expansion anchors, wedge anchors, and shell type anchors may be floor, wall, or ceiling mounted, and may be used alone or in combination with a base plate.

DSC Support Assembly

Each HSM includes a DSC Support Assembly comprised of two longitudinal support rails that extend approximately the full length of the module. For the Phase 1 HSMs, the longitudinal rails are supported at the front, rear and mid-length by cross-members (beams) attached to embeds in the HSM side walls. For the Phase 2 HSMs, the longitudinal rails are supported at the front and rear by embeds in the HSM front and rear walls, and mid-length by a cross-member (beam) attached to embeds in the HSM side walls. Stainless steel cover plates are attached to the longitudinal support rails to provide a sliding surface for the DSCs.[2] The sliding surface of the DSC support rails is coated with a dry film lubricant (Permaslik RN, Everlube 823, or Everlube EX 154).

Heat Shield

A stainless steel heat shield is installed inside in each HSM bay. The heat shield is comprised of formed and slotted plates which are mounted to the ceiling and interior walls with approximately 1 inch stand-off by stainless steel wedge anchors.

HSM Door

A removable access door is provided at the front of each HSM. For the Phase 1 HSMs, the door is comprised of a 1/4 inch thick steel outer plate, 3 inch thick steel inner plate, and 2 inches of neutron shielding material (BISCO NS-3). For the Phase 2 HSMs, the door is comprised of a 7/8 inch thick steel inner and outer plates and 9-1/2 inches of neutron shielding material (concrete).

HSM Door Frame and Cask Restraint Plates

A steel frame attached to the front outside wall of each HSM supports the HSM Door. Cask Restraint Plates are attached to the front face of each HSM to provide restraint of the Transfer Cask during DSC transfer operations.

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[2] Nitronics 60 plates were added to the support rail cover plates for all of the Phase 2 HSMs and to Phase 1 HSMs E6-E10 and W6-W10.

Inlet/Outlet Screens and Frames

Stainless steel screens are mounted at the air inlet and air outlet openings of each HSM to prevent the entry of debris and birds/rodents. The screens are supported by a stainless steel frame which is attached to the concrete.

Seismic Restraints

For the Phase 1 HSMs, a steel tube member that seismically retains the DSC in place is welded to each of the DSC support rails at the rear of each HSM. For the Phase 2 HSMs, a steel plate is welded to each of the DSC support rails at the rear of each HSM[3]. After placement of the DSC, a removable seismic restraint is placed into slots in the access sleeve at the front of the HSM.

Threaded Fasteners

Threaded fasteners are used for the DSC support assembly.

Lightning Protection

The Site-Specific ISFSI is provided with a lightning protection system that is attached to HSMs and provides protection for all 40 Phase 1 and Phase 2 HSMs. The system includes the HSM roof handrails (in lieu of air terminals), connectors, cable with lead sheathing, and ground rods.

Dry Film Lubricant

The lubricant discussed above, for DSC Support Assembly, is used only for reducing friction while sliding a DSC along the support assembly inside an HSM. Once the DSC is in place, the lubricant performs no function.

Excluded Subcomponents

The following subcomponents were excluded from aging management review because they do not support or impact the intended function of the HSM during the renewed license period:

- PVC pipe (drain and electrical conduit)
- Ladder and attachments (Phase 1)
- Alignment targets
- Caulk
- Galvanized flashing and concrete nails
- Lubricants for DSC support structure rails
- Clips for attachment of lightning protection system cables
- Electrical conduit, boxes, and cable attached to the HSMs

[3] Except for HSM W14 which used a tube steel section.

3.2.2 HSM MATERIALS EVALUATED

The materials of construction for HSM subcomponents that are subject to further aging management review are described below and generally include metals, concrete, and cementatious neutron absorbing materials. The material type of the individual HSM subcomponents is identified in Table 3.2-1.

Metals:

- Carbon Steel
- Stainless Steel
- Lead
- Copper
- Bronze

Concrete (and carbon steel rebar):

- Concrete compressive strength is 5000 psi

Neutron Shielding in HSM Doors:

- BISCO NS-3
- Concrete

3.2.3 ENVIRONMENTS FOR THE HSMs

The environments that are experienced by HSM subcomponents, continuously or on a recurring basis, are described below:

The HSMs are located outdoors at the ONS Site-Specific ISFSI site, in Oconee County, South Carolina. The Yard Environment for the HSMs is bounded by the ambient temperatures considered in the Site-Specific ISFSI design (-30°F to 116°F), except as noted below.

Portions of the HSM (foundation) are below grade and experience the same outdoor conditions with the added exposure to ground water. Aggressive chemical attack was found not to be applicable to below grade concrete structures during the ONS reactor license renewal process (10 CFR 54). Groundwater pH is greater than the threshold for degradation (5.5) and the chloride and sulfate concentrations are below thresholds for degradation (500 and 1500 ppm, respectively).

Inside each HSM, considered to be a Sheltered Environment with no air conditioning, subcomponents are protected from outdoor effects (e.g., precipitation), but do experience higher temperatures and radiation in an air environment.

Based on the original shielding analysis for an HSM, the gamma energy flux deposited in the HSM concrete is 6.8×10^{10} MeV/cm^2-sec (Reference 3.8-2). Similarly, the accumulated neutron flux for the HSM is 1.2×10^{14} neutrons/cm^2 in 50 years (Reference 3.8-2), which extrapolates to 1.44×10^{14} neutrons/cm^2 for 60 years.

3.2.4 AGING EFFECTS REQUIRING MANAGEMENT FOR THE HSMs

This section describes the aging effects that could, if left unmanaged, cause degradation of HSM subcomponents and result in loss of the SSC intended function(s) during the renewed license period. The aging management review results for individual HSM subcomponents are reflected in Table 3.2-1.

Based on the HSM material and environment combinations and consideration of the conditions during extended storage, the following aging effect was determined to require management for the applicable metal subcomponents of the HSMs:

- *Loss of Material due to General Corrosion and Pitting – Carbon steel subcomponents of the HSMs* (Yard Environment and Sheltered Environment) *and bronze subcomponents of the lightning protection system* (Yard Environment)

The review of industry and operating experience discussed in Subsection 3.1.5 supported the management of the above aging effects, but did not identify any other aging effects for an HSM during extended storage.

With respect to concrete (and reinforcing steel), no aging effects/mechanisms were identified that require management for the above grade concrete. However, the current NRC position for plant (10 CFR 54) license renewal is to include concrete in an aging management program for the period of extended operation and that loss of material, cracking, and change in material properties are plausible and applicable aging effects for above ground concrete structures. (Reference 3.8-10). To meet the current NRC position, the condition of accessible HSM concrete that is above grade is conservatively considered to require management.

Additional remote inspections of the interior concrete and steel surfaces are planned during the renewal period as described in Appendix A, Aging Management Programs.

With respect to below grade concrete (and reinforcing steel), no aging effects/mechanisms were identified.

With respect to the BISCO NS-3 shielding material in the HSM doors, there are no aging effects that require management during the renewed license period since the material is fully encapsulated and temperatures expected inside an HSM, per Section 3.2.3, are insufficient to cause degradation. In addition, degradation due to radiation was considered a Time Limited Aging Analysis (TLAA), which is discussed in the pertinent section of Appendix B. The result of the TLAA confirms that the radiation exposure of the shielding is such that the BISCO NS-3 will remain serviceable through the renewed license period.

3.2.5 AGING MANAGEMENT ACTIVITIES FOR THE HSMs

The activities associated with the Site-Specific ISFSI aging management program, when continued in the renewed license period, will manage the aging effects for steel and concrete portions of the HSMs, and will include the conservative evaluation of the condition of accessible concrete for the HSM subcomponents identified in Table 3.2-1.

A description of this aging management program is provided in Appendix A, Aging Management Programs, along with the demonstration that the aging will be effectively managed during the renewed license period.

3.2.6 AMR CONCLUSION FOR THE HSMs

Based on the demonstrations provided in Appendix A, Aging Management Programs, the aging of applicable HSM subcomponents will be adequately managed so that there is reasonable assurance that SSC intended function(s) will be maintained for all current licensing basis conditions during the renewed license period.

3.3 AGING MANAGEMENT REVIEW RESULTS – DSCs

This section provides the results of the aging management review of the DSCs which were determined to be in the scope of license renewal as identified in Section 2.3, Scoping Results.

A summary of the results of the aging management review for the DSC subcomponents is provided in Table 3.3-1. The table provides the following information related to each subcomponent determined to require aging management review: (1) the intended function, (2) the material group, (3) the environment, (4) the aging effects requiring management, and (5) the specific aging management activities that manage those aging effects. The table also identifies subcomponents that did not support, or whose failure would not compromise, the SSC intended function and were, therefore, not subjected to further aging management review.

A description of the DSC subcomponents that support an SSC intended function is provided in Subsection 3.3.1, and a summary of the materials and environments for the DSCs is provided in Subsection 3.3.2 and Subsection 3.3.3, respectively. Subsection 3.3.4 and 3.3.5 provide a discussion of the aging effects requiring management for the applicable DSC subcomponents, if any, and any aging management activities used to manage the effects of aging, respectively.

3.3.1 DESCRIPTION OF DSC SUBCOMPONENTS

As discussed in Site-Specific ISFSI UFSAR Sections 1.3.1.1 and 4.3.2.2, each DSC serves as the confinement vessel during transfer of irradiated fuel assemblies (IFAs) to and from a horizontal storage module (HSM), as well as during storage of the IFAs in an HSM. The shielded end plugs provide biological shielding during closure and transfer operations, and also provide shielding at the front access to the HSM. A single DSC is sized to hold twenty-four irradiated pressurized water reactor (PWR) fuel assemblies. As described in Table A-12 of the Site-Specific ISFSI UFSAR, and in Table 1.3-1 of Reference 3.8-2, the DSCs are comprised of the following subcomponents:

DSC Basket

The DSC basket is an assembly that provides structural support for the IFAs. The basket assembly is comprised of the following subcomponents - 24 guide sleeves, 24 over sleeves, eight spacer discs, and four support rods. A guide sleeve surrounds each of the 24 IFAs. The guide sleeves are square stainless steel tubes, open at the top and bottom, and are inserted through the spacer discs. They are connected only to the bottom spacer disc.

The over sleeves are square stainless steel tubes which are placed over the 12 interior guide sleeves, at the ends (i.e. the open span the between 1st and 2nd spacer discs, and also between the 7th and 8th spacer discs).

Eight spacer discs support the guide sleeves and IFAs in the radial direction. The spacer discs have 24 square holes to accept the guide sleeves and IFAs. As discussed in the Site-Specific ISFSI UFSAR Section 1.3.1.1, stainless steel was used in the original design.

The spacer discs are welded to four support rods which run the length of DSC interior. As discussed in Site-Specific ISFSI UFSAR Section 1.3.1.1, stainless steel was used in the original design.

An option was added for support rods and spacer discs fabricated from carbon steel with an aluminum coating, beginning with DSC no. 22.

DSC Shell (Body)

The main component of construction of each DSC is a stainless steel cylinder. The DSC shell serves as a portion of the confinement boundary and consists of a rolled and welded plate.

Shielded End Plugs

Shielded end plugs are provided at both ends of each DSC for biological shielding when the DSC is in the Transfer Cask for closure and transfer operations, or in an HSM.

The bottom shield plug is installed during fabrication and consists of an inner confinement plate and outer plate, which encapsulates the shielding material. The bottom shield plug in the original DSC design used lead for the shielding material. The "long cavity" design (described in Site-Specific ISFSI UFSAR Section 1.3.1.1 for DSC no. 22 and subsequent DSCs) also used lead for the bottom shield plug. The "short cavity" design used a thick carbon steel plate for this purpose.

The bottom shield plug includes a stainless steel grapple ring that is used for extraction of the DSC from the HSM. The grapple ring is comprised of a ring and an end plate with a hole that accommodates the hydraulic ram grapple.

The top shield plug is placed into the DSC at ONS, after the IFAs are loaded and before the DSC is removed from the spent fuel pool. It is supported by a shield plug support ring which is welded to the interior circumference of the DSC. In the original DSC design, the top shield plug consists of lead encased by stainless steel with a bottom plate, top plate, and side casing. In this design, the top shield plug is welded to the DSC shell to form the inner confinement barrier.

The top shield plug design was revised to a 2-piece version as described in the Site-Specific ISFSI UFSAR Section 1.3.1.1 for DSC no. 22 and subsequent DSCs. In the 2-piece version, the top shield plug is no longer welded to the DSC shell. Instead, a separate stainless steel inner cover plate is placed on top of the top shield plug after the DSC is removed from the spent fuel pool. The inner confinement boundary is established by welding the inner top cover plate to the DSC shell. In the "long cavity" version, the top shield plug consists of lead encased by aluminum coated carbon steel plates with a bottom plate, top plate, and side casing. In the "short cavity" version, the top shield plug consists of a thick aluminum coated carbon steel plate.

<u>Top Cover Plate</u>

The top cover plate provides a redundant confinement boundary. It is placed on top of the top shield plug after the drying and helium backfill operations are complete, and welded to the DSC shell. The top cover plate has an attached rolled ring for handling purposes. For all versions of the DSC, the top cover plate is a stainless steel plate.

<u>Vent and Siphon Ports</u>

The shield plug support ring assembly at the top of each DSC includes a stainless steel vent/siphon block that includes two penetrations into the canister cavity. The penetrations include a two plane, dog-leg type offset to prevent radiation streaming. Swagelok quick-connect fittings are installed in recesses at the top of the vent/siphon block. The vent penetration opens to the DSC interior just below the top shield plug. The siphon penetration incorporates a tube that continues to the bottom of the DSC interior cavity. Stainless steel plugs were welded over the vent/siphon port recesses prior to installation of the top cover plate.

Control Spacer

A stainless steel control spacer was used in long cavity DSCs loaded with IFAs containing no control components. The control spacer is welded to the bottom side of the top shield plug.

The following DSC subcomponents were excluded from further aging management review because they do not support or impact the intended function of the DSC during the renewal period:

- Dry film lubricant (Everlube 823) on the exterior sliding surfaces of the DSCs
- Swagelok quick disconnects for vent/siphon blocks and associated Teflon tape or sealant
- Siphon tubing
- Aluminum coating on carbon steel subcomponents
- Nickel-based thread lubricant, tape, or sealant
- Non-structural stainless steel plugs or bolts
- DSC lifting lugs

3.3.2 DSC MATERIALS EVALUATED

The materials of construction for DSC subcomponents that are subject to further aging management review include stainless steel, carbon steel, and lead. The material type of individual DSC subcomponents is identified in Table 3.3-1.

3.3.3 ENVIRONMENTS FOR THE DSCS

The environments that affect the subcomponents of each DSC, both externally and internally, are those that are normally (continuously) experienced and are described below:

External

Each DSC is positioned for long-term storage inside an HSM. As such, the external surface of each DSC is exposed to the same environment, including neutron fluence and integrated gamma dose, described in Section 3.2.3 for the interior of an HSM - that is, a Sheltered Environment which is protected from precipitation and wetting. The normal operating temperature of the outside DSC surface is highest at the top of the cylinder and was expected to be 247°F (for 70°F ambient air) during the original license term (Reference 3.8-2). This surface temperature is conservatively extended into the license renewal period.

Internal

A design temperature of 400°F was used for DSC internal structures in the aging management review. The heat generated in the fuel regions of the IFAs inside a sealed DSC is transferred towards the canister shell by conduction, convection, and radiation. Helium is present in the canister to facilitate the conduction and convection. A parametric study of temperature versus time has shown that the fuel temperature and, therefore, the helium temperature and DSC internal structure temperature, will decrease over time (Reference 3.8-2). For conditions of 70°F ambient temperatures, the normal expected helium temperature during the original license term was determined to be 375°F (Reference 3.8-2). As such, the use of the higher temperature is conservative for evaluation of the long-term effects of temperature on stainless steel.

After 20 years of dry storage, the fast neutron flux and gamma radiation doses are expected to be on the order of 1×10^{14} neutrons/cm^2 and 1×10^9 Rads respectively (Reference 3.8-5). In Table 3.3-1, the helium inside a DSC is listed as an Air and Gas Environment.

3.3.4 AGING EFFECTS REQUIRING MANAGEMENT FOR THE DSCS

Based on a review of the DSC materials of construction and the environments (e.g., relevant conditions and stressors) experienced during extended Site-Specific ISFSI storage, there are no aging effects requiring management during the renewed license period for the subject DSC subcomponents.

There are no aging effects requiring management for the carbon steel, stainless steel, or lead subcomponents of the DSCs because of the durable construction, double seal-welded closure, and the environments to which each DSC is exposed. Each DSC was sealed during the original license term to contain 24 appropriately aged fuel assemblies and an Inert (helium) Environment. Each sealed DSC was then placed into an HSM and, thereafter, exposed to only a relatively mild Sheltered External Environment. In addition, a continued decrease of IFA temperatures and radiation levels are expected over time.

The operating experience discussed in Subsection 3.1.5 is applicable to the DSCs, which together with the HSMs serve as dry storage for the IFAs. However, this experience review found issues related to contamination, corrosion, and failed leak tests during loading of the canister/cask and no age-related degradation of double seal-welded DSCs. Aging management review results for individual DSC subcomponents are shown in Table 3.3-1.

3.3.5 AGING MANAGEMENT ACTIVITIES FOR THE DSCS

There are no aging management programs or activities required for DSC subcomponents during the renewed license period. Therefore, no aging management activities are credited.

3.3.6 AMR CONCLUSION FOR THE DSCS

Based on the absence of Aging Effects Requiring Management for all in-scope subcomponents, reasonable assurance is provided that the intended functions of DSC subcomponents will be maintained under all current licensing basis (CLB) conditions during the renewed license (extended storage) period.

Furthermore, each sealed DSC will continue to store its original contents during the renewal period. Except in the case of a design basis accident, or the shipment of IFAs to an approved permanent federal repository or other interim storage facility, it is not anticipated that the stored DSCs will be removed from storage or opened.

It is not currently anticipated that any DSC would be re-used after removal of the IFAs. However, if such circumstances were to arise, a rigorous re-qualification would be performed to ensure such DSCs would meet the CLB and to ensure that no Aging Effects Requirement Management are introduced.

3.4 AGING MANAGEMENT REVIEW RESULTS – IFAs

This section provides the results of the aging management review of the IFAs, also referred to as spent nuclear fuel (SNF), which were determined to be in the scope of license renewal as identified in Section 2.3, Scoping Results.

A summary of the results of the aging management review for the IFA subcomponents is provided in Table 3.4-1. The table provides the following information related to each subcomponent determined to require aging management review: (1) the intended function, (2) the material group, (3) the environment, (4) the aging effects requiring management, and (5) the specific aging management activities that manage those aging effects. The table also identifies subcomponents that did not support, or whose failure would not compromise, the SSC intended function and were, therefore, not subjected to further aging management review.

A description of the IFA subcomponents which support an SSC intended function is provided in Subsection 3.4.1, and a summary of the materials and environments for the IFAs is provided in Subsection 3.4.2 and Subsection 3.4.3, respectively. Subsections 3.4.4 and 3.4.5 provide a discussion of the aging effects requiring management for the subject IFA subcomponents, if any, and any aging management activities used to manage the effects of aging, respectively.

3.4.1 DESCRIPTION OF IFA SUBCOMPONENTS

Each DSC contains 24 pressurized water reactor (PWR) spent fuel assemblies which, at the time of loading, had a maximum heat generation limit of 0.66 kilowatt per assembly, or 15.84 kilowatts per DSC; a maximum average burnup of 40,000 MWd/MTU uranium; and that were cooled for at least ten years prior to storage or met the alternative fuel specifications for neutron and gamma sources (Reference 3.8-1).

The intended functions of the IFAs were conservatively determined during scoping to include criticality control, pressure boundary, structural integrity, and heat transfer. The geometry of the IFAs is a factor in the proper conduction and convection of heat to the DSC surface and in the criticality model. The fuel cladding provides a confinement barrier, and its structural integrity is necessary to maintain a favorable geometry and for retrieval. After fuel loading and DSC drying, the spent fuel assemblies are not moderated, assuring subcriticality during subsequent operations and configurations. Furthermore, a total cladding failure has been evaluated from the perspective of both DSC pressurization and DSC leakage, with the dose consequences determined to be acceptable (Reference 3.8-2). The IFAs principle function during dry storage is to maintain proper geometry and position of radioactive material through confinement.

All IFAs currently in storage at the ONS Site-Specific ISFSI are B&W 15X15 which is the reference fuel assembly type in Reference 3.8-2. Specific fuel designs currently in storage include the Mark B2, B3, B4, B4Z, B5, and B5Z. The following subcomponents are applicable to the IFAs currently in storage at the ONS Site-Specific ISFSI:

- Fuel Rods (Cladding, End Caps/Plugs)
- Guide Tubes
- Instrumentation Tube Assembly
- Spacer Grid Assemblies
- Lower End Fitting (and related subcomponents)
- Upper End Fitting (and related subcomponents)

These subcomponents are further described below and included in Table 3.4-1:

<u>Fuel Rods (Cladding, End Caps/Plugs)</u>

The fuel rods consist of enriched UO_2 pellets inserted into the cladding tubes. Plug-type end caps are seal welded to each end. The material of construction for the fuel rods (cladding and end caps) currently in storage at the ONS Site-Specific ISFSI is Zircaloy-4. The cladding and end caps confine the fuel pellets and fission gases. Each rod is pressurized with helium during fabrication.

<u>Guide Tubes</u>

The guide tubes are mechanically attached and secured to the top and bottom end fittings as described in the ONS UFSAR (Reference 3.8-11). The material of construction for the guide tubes is Zircaloy-4 for all IFAs currently in storage at the ONS Site-Specific ISFSI.

Instrumentation Tube Assembly

The instrumentation tube assembly consists of the instrument tube, a retainer, and seven spacer sleeves. The instrumentation tube is restrained by a sleeve in the lower end fitting. The spacer sleeves fit around the instrument tube between the spacer grid assemblies and position the spacer grid assemblies (Reference 3.8-11). The material of construction for the instrument tubes, retainers, and spacer sleeves is Zircaloy-4 for all IFAs currently in storage at the ONS Site-Specific ISFSI.

Spacer Grid Assemblies

Each IFA includes spacer grid assemblies located at the top and six intermediate locations at the bottom. The spacer grid assemblies provide support for the fuel rods and maintain correct rod-to-rod spacing. The top and bottom spacer grid assemblies were made of Inconel. The intermediate spacer grid assemblies on the Mark B2, B3, B4, and B5 designs were made with Inconel, while the Mark B4Z and B5Z designs used Zircaloy-4.

The intermediate spacer grid assemblies are not attached to the guide tubes. A tubular spacer (see instrument tube description) is placed over the instrument tube between each grid. These spacers maintain the axial location of the grids.

The spacer grid assemblies are constructed from strips which are slotted and fitted together in "egg crate" fashion. Each grid has 32 strips (16 perpendicular to another 16) which form the 15x15 lattice (Reference 3.8-11).

Lower End Fitting (and related subcomponents)

The lower end fitting is a square, box-like structure that is mechanically connected to the guide tubes with connectors. It positions the guide tube array and functions as the bottom structural element of a fuel assembly. The material of the lower end fitting is stainless steel. The connectors are stainless steel.

Upper End Fitting (and related subcomponents)

The upper end fitting is a square, box-like structure that is mechanically connected to the guide tubes with connectors. It maintains the guide tube array and functions as the top structural element of a fuel assembly. It also interfaces with the fuel assembly grapple as the lifting point for the IFA during inspection or removal from the DSC. The material of the upper end fitting is stainless steel. The connectors are stainless steel.

The upper end fitting also contains a holddown spring and holddown retainer. The material for the holddown spring is Inconel or Alloy 718. The material for the holddown retainer is stainless steel.

Excluded IFA Subcomponents

In addition to the above IFA subcomponents, the following IFA subcomponents, although in the scope of license renewal, were excluded from further aging management review because they do not support or impact the intended function of the DSC during the renewed license (extended storage) period:

- Fuel assembly control components (e.g. control rods, burnable poison rod assemblies, orifice rod assemblies, etc)
- Fuel pellets and other fuel rod internals

Also, the holddown spring and retainer were determined not to provide or impact an intended function, but were conservatively included in the aging management review.

3.4.2 IFA MATERIALS EVALUATED

The materials of construction for the subcomponents of each IFA that are subject to aging management review are zirconium-based alloy (Zircaloy-4), stainless steel, and nickel-based alloy (Inconel).

3.4.3 ENVIRONMENTS FOR THE IFAS

External Environment

For IFAs, External Environment refers to the internal DSC atmosphere. For purposes of this evaluation, the storage atmosphere was assumed to be predominantly helium with trace amounts of water vapor and air.

Additionally, residual boron may coat the IFA surfaces since they were exposed to a Borated Water Environment in the spent fuel pool prior to storage. Any boric acid residue remaining on the IFAs will have no deleterious effects due to the absence of water and the materials of construction for the IFAs.

In dry storage, the IFA subcomponents that are subject to aging management review are stored in an Air and Gas Environment.

Following initial cask loading, the temperature of the fuel cladding was limited to 644°F (340°C) for normal storage conditions (Reference 3.8-2). After roughly 6 years of dry storage (16 years after discharge from the reactor), the maximum fuel cladding temperature is expected to be less than 608°F (320°C) (Reference 3.8-2).

Internal Environment

For IFAs, Internal Environment refers to the fuel rod interior. The fuel rods were pressurized with helium during manufacturing. For purposes of this evaluation, the fuel rod Internal Environment is assumed to be a combination of the original helium fill gas and fission products produced during reactor operation.

3.4.4 AGING EFFECTS REQUIRING MANAGEMENT FOR THE IFAS

Possible fuel and cladding degradation mechanisms were discussed in Section 3.1.3. The aging management review was performed by combining this information with the materials of construction identified in Section 3.4.1 and the environmental conditions discussed in Section 3.4.3. Based on that information, there are no aging effects that require management for low to moderate burnup fuel that is stored in an Inert Environment. The fuel stored under this application is considered low to moderate burnup, because the assembly average burnup was limited to 40 GWd/MTU.

3.4.5 AGING MANAGEMENT ACTIVITIES FOR THE IFAS

There are no aging effects requiring management for the IFAs. Therefore, no aging management program or activities are credited during the renewed license period for IFA subcomponents.

3.4.6 AMR CONCLUSION FOR THE IFAS

As discussed in Section 3.4.4, there are no aging effects that require management for low to moderate burnup fuel that is stored in an Inert Environment. The fuel stored under this application is considered low to moderate burnup because the assembly average burnup was limited to 40 GWd/MTU. Therefore, reasonable assurance is provided that the intended functions of the Site-Specific ISFSI irradiated fuel assemblies will be maintained under current licensing basis conditions during the renewed license period.

3.5 AGING MANAGEMENT REVIEW RESULTS – TRANSFER CASK

This section provides the results of the aging management review of the cask that is used for Site-Specific ISFSI transfers to and from an HSM, also referred to as the Transfer Cask. This cask was determined to be in the scope of license renewal as identified in Section 2.3, Scoping Results.

As discussed in the Site-Specific ISFSI UFSAR Section 1.3.1.3, the Transfer Cask provides shielding during the DSC drying operation and during transfer to the HSMs.

A summary of the results of the aging management review for the Transfer Cask subcomponents are provided in Table 3.5-1. The table provides the following information related to each subcomponent determined to require aging management review: (1) the intended function, (2) the material group, (3) the environment, (4) the aging effects requiring management, and (5) the specific aging management activities that manage those aging effects. The table also identifies subcomponents that did not support, or whose failure would not compromise, the SSC intended function and were, therefore, not subjected to further aging management review.

A description of the Transfer Cask subcomponents that support an SSC intended function is provided in Subsection 3.5.1, and a summary of the materials and environments for the Transfer Cask is provided in Subsection 3.5.2 and Subsection 3.5.3, respectively. Subsections 3.5.4 and 3.5.5, respectively, provide a discussion of the aging effects requiring management for the applicable Transfer Cask subcomponents and the aging management activities used to manage the effects of aging.

3.5.1 DESCRIPTION OF TRANSFER CASK SUBCOMPONENTS

The major cask portions are divided into sub-components that are included in Table 3.5-1, along with the particular function the individual sub-component performs to support the overall cask intended functions. A summary of those cask subcomponents is provided below:

Cask Body

The cask body is a cylindrical shape enclosed on one end and consists of the following:

- The structural shell assembly is comprised of a carbon steel cylinder that is welded at the top to the forged stainless steel top flange. At the other end, it is welded to the cask bottom which is comprised of a forged stainless steel bottom ring and a stainless steel bottom plate.
- The inner shell is comprised of a stainless steel cylinder that is welded to the forged stainless steel top flange on one end and to the forged stainless steel bottom ring at the other end.
- The cavity between the structural shell cylinder and the inner shell cylinder is filled with lead to serve as the radiological or biological shield for the cask.

Cask Attachments

The Transfer Cask includes the following attachments to the cask body:

- Two parallel rails (Nitronics 60) welded to the inner shell to facilitate sliding of the DSC as it is transferred to the HSM
- Two upper trunnion assemblies (carbon steel, stainless steel, Inconel, and BISCO NS-3) for lifting the Transfer Cask and for support by the Cask Skid in the horizontal position
- Two lower trunnion assemblies (carbon steel, stainless steel, Inconel, and BISCO NS-3) for support and rotation of the Transfer Cask during upending and downending to the Cask Skid

Cask Penetrations

The Transfer Cask includes the following penetrations of the cask body:

- The bottom plate (stainless steel, BISCO NS-3) includes the ram access penetration ring (stainless steel) to allow access to the DSC for transfer operations
- The bottom support ring (stainless steel) includes a penetration for the annulus drain valve
- The top flange (stainless steel) includes a penetration for the annulus fill valve

Cask Neutron Shield

A neutron shield jacket surrounds the cask structural shell, extending axially from the bottom ring to the top flange. It is comprised of an outer stainless steel jacket, top and bottom support rings, and axially spaced support angles. The neutron shielding material is BISCO NS-3. Relief valves are provided to protect the neutron shield jacket from any internal pressurization.

Additionally, BISCO NS-3 is included for neutron shielding in the upper and lower trunnions, cask bottom, ram access cover plate, top cover assembly, inner plug assembly, and outer plug assembly. Relief valves are provided to protect the bottom end plate from any internal pressurization.

Cask Cover Plates and Accessories

The cask is provided with a top cover assembly which is bolted to the cask body during transport of loaded DSC from the fuel building to the HSM. Lifting eyes are provided to allow removal from the Transfer Cask when it is in either a horizontal or vertical orientation.

Threaded Fasteners

Threaded fasteners are used in the following locations for the Transfer Cask:

- Top cover assembly to top flange connections
- Annulus drain valve cover plate to bottom ring connections
- Annulus fill valve cover plate to top flange connections
- Bottom cover assembly to ram access penetration ring connections
- Trunnion cover plate to upper trunnion assembly connections
- Cask top cover assembly to top flange connections
- Two guide pins provide closure alignment and orientation for the top cover assembly

Excluded Subcomponents

The following subcomponents were excluded from aging management review because they do not support or impact the intended function of the Transfer Cask during the renewed license period:

- Coatings, lubricants, sealants, Teflon tape
- Eyebolts for bottom access plate and top cover plate and associated helicoils
- Cover plates, gaskets, and screws for annulus fill/drain valves
- Swagelok relief valves for solid neutron shield
- Polyethylene caps for Swagelok valves
- Alignment pin for top cover plate
- Stick-on alignment targets

3.5.2 TRANSFER CASK MATERIALS EVALUATED

The materials of construction for the individual subcomponents of the Transfer Cask that are subject to aging management review are listed in Table 3.5-1 and include carbon steel, stainless steel, Inconel, lead, and BISCO NS-3.

3.5.3 ENVIRONMENTS FOR THE TRANSFER CASK

The cask exterior is exposed to borated water during fuel loading while the cask is in the spent fuel pool, and to demineralized water in the annulus between the DSC and inner cavity wall of the cask. Following fuel loading into the DSC, the Transfer Cask is removed from the pool. Then, the external surfaces are decontaminated and rinsed with demineralized water. The annulus water is removed following welding of the lid(s) to the DSC body, purging of the water in the DSC, vacuum drying and backfilling with helium.

During transfer to and loading operations at the Site-Specific ISFSI, the Transfer Cask is briefly exposed to outside, ambient conditions.

The brief exposure of the Transfer Cask to the borated and demineralized water while in the fuel building, and to the Outside Environment during transfer/loading operations, does not contribute to the aging of the Transfer Cask materials during the renewal period. It is the prolonged or frequently recurring exposure to environmental conditions and stresses that must be evaluated for aging effects, such as those encountered during storage or staging prior to use for Site-Specific ISFSI transfers.

The environment to which the Transfer Cask is exposed during storage or staging prior to and between infrequent use for Site-Specific ISFSI transfers is Sheltered.

Additionally, the Transfer Cask experiences radiation exposure during Site-Specific ISFSI transfers.

3.5.4 AGING EFFECTS REQUIRING MANAGEMENT FOR THE TRANSFER CASK

Because of the durable steel construction and relatively mild environments to which the Transfer Cask subcomponents are normally exposed during staging prior to and between infrequent Site-Specific ISFSI transfers, only the following require aging management:

- Carbon steel subcomponents

The top cover assembly and associated bolts/washers, and the bolts/washers associated with the bottom plate are constructed of carbon steel. The Transfer Cask (including these subcomponents) is stored in a Sheltered Environment between loadings. Consequently, no credit is taken for the coating on the top cover assembly. Thus the following aging effect was determined to require management during the renewed license period:

- *Loss of Material due to General Corrosion and Pitting* (Sheltered Environment)

Operating experience described in Subsection 3.1.5 supports age-related degradation primarily in Wetted Environments. Table 3.5-1 provides a summary listing of the aging effects requiring management and the activity used to manage the effects.

3.5.5 AGING MANAGEMENT ACTIVITIES FOR THE ONS TRANSFER CASK

The Transfer Cask Aging Management Program is credited with managing either the effect of loss of material, or the relevant conditions that could lead to the onset and propagation of a mechanism leading to loss of material during the renewed license (extended storage) period as identified in Table 3.5-1 for:

- Carbon steel subcomponents

A description of this aging management activity is provided in Appendix A, Aging Management Programs, along with the demonstration that the identified aging effect will be effectively managed for the renewed license period.

3.5.6 AMR CONCLUSION FOR THE TRANSFER CASK

Based on the demonstration provided in Appendix A, Aging Management Programs, the aging of applicable subcomponents of the Transfer Cask will be adequately managed so that there is reasonable assurance that SSC intended function(s) will be maintained under all current CLB conditions during the renewed license period.

3.6 AGING MANAGEMENT REVIEW RESULTS – TRANSFER CASK LIFTING YOKE AND LIFT EXTENSION

This section provides the results of the aging management review of the lifting devices used for handling of the Transfer Cask within the spent fuel building. These devices, referred to as the Transfer Cask Lifting Yoke and Lift Extension, were determined to be in the scope of license renewal as identified in Section 2.3, Scoping Results.

As discussed in Site-Specific ISFSI UFSAR Section 4.4.1.1, the Transfer Cask Lifting Yoke adapts the Transfer Cask to the 100 ton crane hook and is used for all lifts including upending in the fuel building; and, the Transfer Cask Lift Extension is placed between the 100 ton crane hook and the Transfer Cask Lifting Yoke when the Transfer Cask is placed into the cask loading pit.

A summary of the results of the aging management review for the subcomponents of the Transfer Cask Lifting Yoke and Lift Extension are provided in Table 3.6-1. The table provides the following information related to each subcomponent determined to require aging management review: (1) the intended function, (2) the material group, (3) the environment, (4) the aging effects requiring management, and (5) the specific aging management activities that manage those aging effects. The table also identifies subcomponents that did not support, or whose failure would not compromise, the SSC intended function and were, therefore, not subjected to further aging management review.

A description of the Transfer Cask Lifting Yoke and Lift Extension subcomponents that support an SSC intended function is provided in Subsection 3.6.1. A summary of the materials and environments for the Transfer Cask Lifting Yoke and Lift Extension is provided in Subsection 3.6.2 and Subsection 3.6.3, respectively. Subsection 3.6.4 provides a discussion of the aging effects requiring management for the applicable Transfer Cask Lifting Yoke and Lift Extension subcomponents. Subsection 3.6.5 provides a discussion of the aging management activities used to manage the effects of aging.

3.6.1 DESCRIPTION OF THE TRANSFER CASK LIFTING YOKE AND LIFT EXTENSION

The Transfer Cask Lifting Yoke is a bolted assembly consisting of two parallel lift beams and two open J-hooks. The lift beams and J-hooks are fabricated from carbon steel plate. A carbon steel connecting pin is used to attach the Transfer Cask Lifting Yoke to either the 100 ton crane hook or the Transfer Cask Lift Extension. Stainless steel sling assemblies are attached the bottom of the lift beams and are used for remote removal and replacement of the DSC shield plug when the Transfer Cask is in the cask loading pit. The slings are stainless steel.

The Transfer Cask Lift Extension consists of a welded assembly of two parallel plates. The parallel plates are fabricated from carbon steel plate. Pin holes are provided at the top and the bottom of the assembly. A carbon steel connecting pin is used to connect the top of the Transfer Cask Lift Extension to the 100 ton crane hook. The lower portion of the Transfer Cask Lift Extension has an elongated pin hole through which the Transfer Cask Lifting Yoke connecting pin is inserted. A carbon steel screw actuator is included with a stainless steel screw/connecting pin sleeve. The screw actuator allows the Transfer Cask Lifting Yoke to be raised within the elongated pin hole. This allows the Transfer Cask Lifting Yoke/Lift Extension assembly to be shortened so that it will clear the spent fuel pool operating deck when the Transfer Cask is left in the cask loading pit for fuel loading. The screw actuator is designed to support only the Transfer Cask Lifting Yoke and the DSC shield plug when it is in the raised position. In the full down position, the screw actuator provides no support; the Transfer Cask Lifting Yoke pin is supported by the bottom of the elongated hole. This position is used when the Transfer Cask is moved from the cask loading pit to the cask platform in the spent fuel pool.

Excluded Subcomponents - Transfer Cask Lifting Yoke

The following subcomponents were excluded from aging management review because they do not support or impact the intended function of the Transfer Cask Lifting Yoke during the renewed license period:

- Pin handle
- Pin support angle
- Front pin stop
- Miscellaneous screws, nuts, and washers
- Bumpers and mounting plates
- Coatings, sealants, grease
- McMaster-Carr wire rope slings and swaged sleeves
- Hook bearing plate, bronze

Excluded Subcomponents - Transfer Cask Lift Extension

The following subcomponents were excluded from aging management review because they do not support or impact the intended function of the Transfer Cask Lift Extension during the renewed license period:

- Pin handle
- Pin support angle
- Front pin stop
- Miscellaneous bolts, nuts, washers, clevis pins, and cotter pins
- Machine screw and actuator components
- Coatings and grease

3.6.2 TRANSFER CASK LIFTING YOKE AND LIFT EXTENSION MATERIALS EVALUATED

The materials of construction for the Transfer Cask Lifting Yoke and Transfer Cask Lift Extension that are subject to further aging management review are carbon steel and stainless steel. The materials type of individual subcomponents is identified in Table 3.6-1.

3.6.3 ENVIRONMENTS FOR THE TRANSFER CASK LIFTING YOKE AND TRANSFER CASK LIFT EXTENSION

The Transfer Cask Lifting Yoke and Transfer Cask Lift Extension are exposed to borated water during operations with the Transfer Cask in the spent fuel pool. After removal of the loaded DSC/Transfer Cask from the spent fuel pool, the Transfer Cask Lifting Yoke and Transfer Cask Lift Extension are rinsed with demineralized water.

The brief exposure to borated and demineralized water does not contribute to the aging of the materials during the license renewal period. It is the prolonged or frequently recurring exposure to environmental conditions and stresses that must be evaluated for aging effects, such as those encountered during storage or staging prior to use for Site-Specific ISFSI transfers.

The environment to which the Transfer Cask Lifting Yoke and Lift Extension are exposed during storage or staging prior to and between infrequent use for Site-Specific ISFSI transfers is Sheltered.

3.6.4 AGING EFFECTS REQUIRING MANAGEMENT FOR THE TRANSFER CASK LIFTING YOKE AND LIFT EXTENSION

For the carbon steel subcomponents, no credit is taken for coating. The following aging effect could result in loss of component intended function(s), and thus requires management during the renewal period:

- *Loss of Material Due to General Corrosion and Pitting* (Sheltered Environment)

For the stainless steel subcomponents, no aging effects are identified.

Table 3.6-1 provides a summary listing of the aging effects requiring management and the activity used to manage the effects.

3.6.5 AGING MANAGEMENT ACTIVITIES FOR THE TRANSFER CASK LIFTING YOKE AND LIFT EXTENSION

The Transfer Cask Lifting Yoke and Lift Extension Aging Management Program is credited with managing the aging effects for the carbon steel. A description of this program is provided in Appendix A, Aging Management Programs, along with the demonstration that the identified aging effect will be effectively managed during the renewal period.

3.6.6 AMR CONCLUSION FOR THE TRANSFER CASK LIFTING YOKE AND LIFT EXTENSION

Based on the demonstration provided in Appendix A, Aging Management Programs, the aging of applicable subcomponents of the Transfer Cask Lifting Yoke and Lift Extension will be adequately managed so that there reasonable assurance that SSC intended function(s) will be maintained under all current CLB conditions during the renewed license period.

3.7 AGING MANAGEMENT REVIEW RESULTS – CASK PIT SUPPORT STAND

This section provides the results of the aging management review of the Cask Pit Support Stand which was determined to be in the scope of license renewal as identified in Section 2.3, Scoping Results.

As discussed in the ONS Site-Specific ISFSI UFSAR, Section 4.4.1.1, the Cask Pit Support Stand is a removable platform which is placed into the spent fuel pool cask loading pit.

A summary of the results of the aging management review for the subcomponents of the Cask Pit Support Stand is provided in Table 3.7-1. The table provides the following information related to each subcomponent determined to require aging management review: (1) the intended function, (2) the material group, (3) the environment, (4) the aging effects requiring management, and (5) the specific aging management activities that manage those aging effects. The table also identifies subcomponents that did not support, or whose failure would not compromise, the SSC intended function and were, therefore, not subjected to further aging management review.

A description of the Cask Pit Support Stand subcomponents that support an SSC intended function is provided in Subsection 3.7.1. A summary of the materials and environments for the Cask Pit Support Stand is provided in Subsection 3.7.2 and Subsection 3.6.3, respectively. Subsection 3.7.4 provides a discussion of the aging effects requiring management for the applicable Cask Pit Support Stand subcomponents. Subsection 3.7.5 provides a discussion of the aging management activities used to manage the effects of aging.

3.7.1 DESCRIPTION OF THE CASK PIT SUPPORT STAND

The Cask Pit Support Stand is a welded assembly of stainless steel plates that supports the Transfer Cask. It is placed in the spent fuel pool cask loading pit and is designed to be removable. It positions the Transfer Cask at the appropriate elevation for loading IFAs into the DSC.

No subcomponents of the Cask Pit Support Stand were excluded from aging management review.

3.7.2 CASK PIT SUPPORT STAND MATERIALS EVALUATED

The materials of construction for the Cask Pit Support Stand that are subject to aging management review are stainless steel. The material type of the individual subcomponents is identified in Table 3.7-1.

3.7.3 ENVIRONMENTS FOR THE CASK PIT SUPPORT STAND

The Cask Pit Support Stand is continuously exposed to a Borated Water Environment as it remains in the spent fuel pool during and between Site-Specific ISFSI transfers.

3.7.4 AGING EFFECTS REQUIRING MANAGEMENT FOR THE CASK PIT SUPPORT STAND

Based on the stainless steel material and Borated Water Environment combination, the following aging effects were determined to require management during the renewed license period:

- *Loss of Material and Cracking due to Pitting and Stress Corrosion Cracking* (Borated Water) – Stainless Steel

Table 3.7-1 provides a summary listing of the Cask Pit Support Stand Subcomponents.

The review of industry and site-specific operating experience discussed in Subsection 3.1.5 supports the management of the above aging effects. No other aging effects were identified for stainless steel components in the spent fuel pool.

3.7.5 AGING MANAGEMENT ACTIVITIES FOR THE CASK PIT SUPPORT STAND

The Chemistry Control Program is credited with managing the aging effects for stainless steel in a Borated Water Environment. A description of this program is provided in Appendix A, Aging Management Programs, along with the demonstration that the identified aging effect will be effectively managed during the renewal period.

3.7.6 AMR CONCLUSION FOR THE CASK PIT SUPPORT STAND

Based on the demonstration provided in Appendix A, Aging Management Programs, the aging of applicable subcomponents of the Cask Pit Support Stand will be adequately managed so that there is reasonable assurance that SSC intended function(s) will be maintained under all current CLB conditions during the renewed license period.

3.8 REFERENCES (SECTION 3.0, AGING MANAGEMENT REVIEWS)

3.8-1 *Independent Spent Fuel Storage Installation Material License No. SNM- 2503*, Duke Power Company LLC, through Amendment No. 8, April 3, 2006, and Appendix A (Technical Specifications)

3.8-2 *Topical Report for the NUTECH Horizontal Modular Storage System for Irradiated Nuclear Fuel, NUHOMS®-24P,* NUH-002, NUTECH, Inc., San Jose, California, July 1989, Revision 1A (SER Included)

3.8-3 Attachment to letter from Mr. L. N. Hartz, Virginia Electric Power Company (Dominion), to NRC Document Control Desk, Serial No. 01-367, *Surry Independent Spent Fuel Storage Installation, Comments on NRC Preliminary Guidance,* June 26, 2001

3.8-4 EPRI TR-1002882, *Dry Cask Storage Characterization Project, Final Report*, Electric Power Research Institute, Palo Alto, CA. September 2002

3.8-5 *Standard Guide for Evaluation of Materials Used in Extended Storage of Interim Spent Nuclear Fuel Dry Storage Systems*, American Society for Testing and Materials, ASTM C 1562-03, March 2004

3.8-6 EPRI TR-108757, R. E. Einziger, D. L. Baldwin, and S. G. Pitman, *Data Needs for Long-Term Dry Storage of LWR Fuel*, Electric Power Research Institute, Palo Alto, CA, 1998

3.8-7 EPRI TR-1003416, J. Kessler and R. Einziger, *Technical Bases for Extended Dry Storage of Spent Nuclear Fuel*, Electric Power Research Institute, Palo Alto, CA, December 2002

3.8-8 Technical Report Series No. 443, *Understanding and Managing Ageing of Material in Spent Fuel Storage Facilities,* International Atomic Energy Agency, Vienna, 2006

3.8-9 Interim Staff Guidance 11, Rev. 3, *Cladding Considerations for the Transportation and Storage of Spent Fuel*, NRC, Spent Fuel Project Office, November 17, 2003

3.8-10 *Proposed Revision of Chapters II and III of Generic Aging Lessons Learned (GALL) Report on Aging Management of Concrete Elements,* Interim Staff Guidance (ISG-3), NRC, November 23, 2001

3.8-11 Duke Energy Company, ONS, *Updated Final Safety Analysis Report*, Chapter 4.0, Reactor

AGING MANAGEMENT RESULTS TABLES
(Section 3.0, Aging Management Reviews)

Table 3.2-1 Aging Management Review Results for the Horizontal Storage Modules (HSMs)

Subcomponent [1]	Intended Function	Material Group	Environment	Aging Effects Requiring Management	Aging Management Activity
Concrete (Above Grade)	HT, SH, SS	Concrete	Yard	Loss of Material Cracking [2] Change in Material Properties [2]	Site-Specific ISFSI Aging Management Program
Concrete (Below Grade)	HT, SS	Concrete	Underground	None Identified	None Required
Anchorages / Embedments/ Rebar	SS	Carbon Steel	Embedded	None Identified	None Required
Anchorages / Transfer Cask Restraints (Exposed)	SS	Carbon Steel	Yard	Loss of Material	Site-Specific ISFSI Aging Management Program
			Sheltered	Loss of Material	Site-Specific ISFSI Aging Management Program
Expansion Anchors	SS	Carbon Steel	Sheltered	Loss of Material	Site-Specific ISFSI Aging Management Program
		Stainless Steel	Sheltered	None Identified	None Required
		Stainless Steel	Yard	None Identified	None Required
DSC Support Assembly	SS	Carbon Steel	Sheltered	Loss of Material	Site-Specific ISFSI Aging Management Program
		Stainless Steel	Sheltered	None Identified	None Required
HSM Access Ring (exposed embedment)	SS	Carbon Steel	Sheltered	Loss of Material	Site-Specific ISFSI Aging Management Program
Inlet/Outlet Screens and Frames	HT	Stainless Steel	Yard	None Identified	None Required

Table 3.2-1 Aging Management Review Results for the Horizontal Storage Modules (HSMs)

Subcomponent [1]	Intended Function	Material Group	Environment	Aging Effects Requiring Management	Aging Management Activity
HSM Access Door Support Frame	SS	Carbon Steel	Yard	Loss of Material	Site-Specific ISFSI Aging Management Program
HSM Access Door	SH, SS	Carbon Steel	Yard	Loss of Material	Site-Specific ISFSI Aging Management Program
		BISCO NS-3 (Phase 1)	Embedded	None Identified	None Required
		Concrete (Phase 2)	Embedded	None Identified	None Required
Heat Shield	HT	Stainless Steel	Sheltered	None Identified	None Required
Seismic Restraint Assembly for DSC	SS	Carbon Steel	Sheltered	Loss of Material	Site-Specific Aging Management Program
Fasteners	SS	Carbon Steel	Sheltered	Loss of Material	Site-Specific ISFSI Aging Management Program
Connectors [3]	SS	Bronze	Yard	Loss of Material	Site-Specific Aging Management Program
			Embedded	None Identified	None Required
			Underground	None Identified	None Required
		Stainless Steel	Yard	None Identified	None Required
Cable [3]	SS	Copper	Yard	None Identified	None Required
			Embedded	None Identified	None Required
			Underground	None Identified	None Required
Lead Sheathing [3]	SS	Lead	Yard	None Identified	None Required
Ground Rod [3]	SS	Copper	Underground	None Identified	None Required

Table 3.2-1 Aging Management Review Results for the Horizontal Storage Modules (HSMs)

Subcomponent [1]	Intended Function	Material Group	Environment	Aging Effects Requiring Management	Aging Management Activity
Handrail and Bracing [3]	SS	Carbon Steel	Yard	Loss of Material	Site-Specific ISFSI Aging Management Program
Galvanized Flashing/Concrete Nails	None	N/A	N/A	N/A	N/A
Ladder and Attachments (Phase 1)	None	N/A	N/A	N/A	N/A
Caulk, Sealants, Expansion Joint Fillers	None	N/A	N/A	N/A	N/A
Lubricants (Permaslik RN and Everlube 823	None	N/A	N/A	N/A	N/A
PVC Drain Pipe/ PVC Electrical Conduit (Embedded)	None	N/A	N/A	N/A	N/A
Electrical Conduit, Boxes, and Cable	None	N/A	N/A	N/A	N/A
Alignment Targets	None	N/A	N/A	N/A	N/A

(1) Each individual HSM contains the listed subcomponents unless indicated otherwise.
(2) Aging effect conservatively included to meet current NRC position for 10 CFR 54 plant license renewal (ISG-3)
(3) Lightning Protection System only

Table 3.3-1 Aging Management Review Results for the Dry Storage Canisters (DSCs)

Subcomponent (1)	Intended Function	Material Group	Environment (2)(3)	Aging Effects Requiring Management	Aging Management Activity
DSC Shell (Body)	PB, SH, SS, HT	Stainless Steel	Sheltered	None Identified	None Required
			Air and Gas	None Identified	None Required
Shield Plug Support Ring	SS	Stainless Steel	Air and Gas	None Identified	None Required
Vent/Siphon Block	PB, SH	Stainless Steel	Air and Gas	None Identified	None Required
Vent/Siphon Cover Plates	PB, SH	Stainless Steel	Air and Gas	None Identified	None Required
Shielded End Plugs - Plates	PB, SH, SS	Stainless Steel	Sheltered	None Identified	None Required
			Air and Gas	None Identified	None Required
	SH	Carbon Steel	Sheltered	None Identified	None Required
			Air and Gas	None Identified	None Required
Shielded End Plugs - Side Casing	SS	Stainless Steel	Sheltered	None Identified	None Required
			Air and Gas	None Identified	None Required
		Carbon Steel	Sheltered	None Identified	None Required
			Air and Gas	None Identified	None Required
Shielded End Plugs - Shielding	SH	Common Lead	Embedded	None Identified	None Required
		Carbon Steel	Sheltered	None Identified	None Required
Shielded End Plugs - Plug Post, Retainer Plate, Lifting Lug, Backing Bar	SH	Stainless Steel	Sheltered	None Identified	None Required
			Air and Gas	None Identified	None Required
		Carbon Steel	Embedded	None Identified	None Required
Grapple Ring	SS	Stainless Steel	Sheltered	None Identified	None Required
			Embedded	None Identified	None Required

Table 3.3-1 Aging Management Review Results for the Dry Storage Canisters (DSCs)

Subcomponent (1)	Intended Function	Material Group	Environment (2)(3)	Aging Effects Requiring Management	Aging Management Activity
Inner Top Cover Plate	PB, SH	Stainless Steel	Sheltered	None Identified	None Required
Outer Top Cover Plate	SS, PB	Stainless Steel	Sheltered	None Identified	None Required
Basket Assembly - Spacer Disks	SS	Stainless Steel	Air and Gas	None Identified	None Required
		Carbon Steel	Air and Gas	None Identified	None Required
Basket Assembly - Support Rods	SS	Stainless Steel	Air and Gas	None Identified	None Required
		Carbon Steel	Air and Gas	None Identified	None Required
Guide Sleeves, Over Sleeves, and Attachment Angles	SS, CC	Stainless Steel	Air and Gas	None Identified	None Required
Control Spacer	SS	Stainless Steel	Air and Gas	None Identified	None Required
Dry Film Lubricant	None	N/A	N/A	N/A	N/A
Swagelok Quick Disconnects	None	N/A	N/A	N/A	N/A
Siphon Tube	None	N/A	N/A	N/A	N/A
Aluminum Coating (Carbon Steel Spacer Discs and Top Shield Plugs)	None	N/A	N/A	N/A	N/A
Nickel-based Thread Lubricant; Thread Tape or Sealant	None	N/A	N/A	N/A	N/A

Table 3.3-1 Aging Management Review Results for the Dry Storage Canisters (DSCs)

Subcomponent (1)	Intended Function	Material Group	Environment (2)(3)	Aging Effects Requiring Management	Aging Management Activity
Stainless Steel Plugs/Bolts (Non-Structural)	None	N/A	N/A	N/A	N/A
DSC Lifting Lugs	None	N/A	N/A	N/A	N/A

(1) Each individual DSC may not contain all of the listed subcomponents.
(2) Air and Gas Environment is helium inside DSC cavity, with possible trace amounts of air and fission product gases. Temperature and radiation have been considered as described in Section 3.3.3, Environments for the DSCs.
(3) Sheltered Environment for DSC interior surfaces that not part of helium filled DSC cavity.

Table 3.4-1 Aging Management Review Results for the Irradiated Fuel Assemblies (IFAs)

Subcomponent	Intended Function	Material Group	Environment	Aging Effects Requiring Management	Aging Management Activity
Fuel Rod Cladding and End Caps	CC, HT, PB	Zircaloy-4	Air and Gas[1]	None Identified	None Required
			Air and Gas[2]	None Identified	None Required
Guide Tubes	SS	Zircaloy-4	Air and Gas[1]	None Identified	None Required
Instrument Tube	SS	Zircaloy-4	Air and Gas[1]	None Identified	None Required
Spacer Grid Assemblies	CC, SS	Zircaloy-4	Air and Gas[1]	None Identified	None Required
		Inconel	Air and Gas[1]	None Identified	None Required
Lower End Fitting (And Connectors)	SS (CC, SS)	Stainless Steel	Air and Gas[1]	None Identified	None Required
Upper End Fitting (And Connectors)	SS (CC, SS)	Stainless Steel	Air and Gas[1]	None Identified	None Required
Holddown Spring	None	N/A	N/A	N/A	N/A
Holddown Spring Retainer and Upper End Plugs	None	N/A	N/A	N/A	N/A
Fuel Assembly Control Components	None	N/A	N/A	N/A	N/A
Fuel Rod Pellets and Other Internal Portions	None	N/A	N/A	N/A	N/A

(1) Air and Gas environment outside the Fuel Rods (inside the DSC) is helium at atmospheric pressure with trace amounts of air. Minimal amounts of fission product gases may also be present. Temperature and radiation have been considered as described in Section 3.4.3, Environments for the IFAs.
(2) Air and Gas Environment inside the Fuel Rods is pressurized helium and fission product gases. Temperature and radiation have been considered as described in Section 3.4.3, Environments for the IFAs.

Table 3.5-1 Aging Management Review Results for the Transfer Cask

Subcomponent	Intended Function	Material Group	Environment (1)	Aging Effects Requiring Management	Aging Management Activity
Cask Body - Structural Shell	SS, HT, SH	Carbon Steel	Embedded	None Identified	None Required
Cask Body - Bottom Ring	SS	Stainless Steel	Sheltered	None Identified	None Required
Cask Body - Bottom Structural Plate	SS	Stainless Steel	Sheltered	None Identified	None Required
Cask Body - Top Flange	SS	Stainless Steel	Sheltered	None Identified	None Required
Cask Body - Inner Shell	SS, HT, SH	Stainless Steel	Sheltered	None Identified	None Required
Cask Body - Lead	SH, HT	Lead	Embedded	None Identified	None Required
Attachments - Rails	SS	Stainless Steel	Sheltered	None Identified	None Required
Attachments - Upper Trunnion	SS	Stainless Steel	Sheltered	None Identified	None Required
Attachments - Upper Trunnion Sleeve	SS	Carbon Steel	Embedded	None Identified	None Required
Attachments - Upper Trunnion Sleeve Nickel Alloy Weld Overlay	SS	Inconel	Sheltered	None Identified	None Required
Attachments - Upper Trunnion - Neutron Shielding	HT, SH	BISCO NS-3	Embedded	None Identified	None Required
Attachments - Upper Trunnion Cover Plate	SS, SH	Stainless Steel	Sheltered	None Identified	None Required

Table 3.5-1 Aging Management Review Results for the Transfer Cask

Subcomponent	Intended Function	Material Group	Environment [1]	Aging Effects Requiring Management	Aging Management Activity
Attachments - Lower Trunnion	SS	Stainless Steel	Sheltered	None Identified	None Required
Attachments - Lower Trunnion Sleeve	SS	Carbon Steel	Embedded	None Identified	None Required
Attachments - Lower Trunnion Sleeve Nickel Alloy Weld Overlay	SS	Inconel	Sheltered	None Identified	None Required
Attachments - Lower Trunnion - Neutron Shielding	HT, SH	BISCO NS-3	Embedded	None Identified	None Required
Attachments - Lower Trunnion Cover Plate	SS, SH	Stainless Steel	Sheltered	None Identified	None Required
Penetrations - Ram Access Penetration Ring	SS,	Stainless Steel	Sheltered	None Identified	None Required
Cask Neutron Shield - Upper and Lower Rings, Outer Shell, Relief Valve Support Plates	SH, HT	Stainless Steel	Sheltered	None Identified	None Required
Cask Neutron Shield - Inner and Outer Support Angle	SH, HT	Stainless Steel	Embedded	None Identified	None Required
Cask Neutron Shield - Shielding Material	SH, HT	BISCO NS-3	Embedded	None Identified	None Required

Table 3.5-1 Aging Management Review Results for the Transfer Cask

Subcomponent	Intended Function	Material Group	Environment [1]	Aging Effects Requiring Management	Aging Management Activity
Top Cover Assembly - Inner, Outer, and Side Plates; Ring; Eye Bolt Stand-offs	SS, SH	Carbon Steel	Sheltered	Loss of Material	Transfer Cask Aging Management Program
Top Cover Assembly - Neutron Shielding	SH	BISCO NS-3	Embedded	None Identified	None Required
Bottom Cover Assembly - Inner, Outer, and Side Plates	SH	Stainless Steel	Sheltered	None Identified	None Required
Bottom Cover O-ring Seals	HT, SH	Polymer	Sheltered	Materials Property Change	NA- subject to routine replacement
Bottom Cover Assembly - Neutron Shielding	SH	BISCO NS-3	Embedded	None Identified	None Required
Cask Bottom Cover Plate	SH	Stainless Steel	Sheltered	None Identified	None Required
Cask Bottom - Neutron Shielding	SH	BISCO NS-3	Embedded	None Identified	None Required
Helicoils inserts in Top Flange (for installation of Top Cover Assembly)	SS	Stainless Steel	Sheltered	None Identified	None Required
Bolts and Washers for Top Cover Plate and Ram Access Plate	SS	Carbon Steel	Sheltered	Loss of Material	Transfer Cask Aging Management Program

Table 3.5-1 Aging Management Review Results for the Transfer Cask

Subcomponent	Intended Function	Material Group	Environment [1]	Aging Effects Requiring Management	Aging Management Activity
Helicoils inserts in Ram Access Penetration Ring (for installation of Bottom Cover Assembly)	None	N/A	N/A	N/A	N/A
Helicoils inserts in Bottom Ring (for Installation of Ram Trunnion Support Assembly)	None	N/A	N/A	N/A	N/A
Miscellaneous Subcomponents (Bolts, Eyebolts, Alignment Pins, Dry Film Lubricant, Swagelock Disconnects and Caps, Gaskets, Neutron Shield Relief Valves, Teflon Tape, Alignment Targets, Teflon Tape)	None	N/A	N/A	N/A	N/A

(1) Sheltered Environment represents ambient conditions on the interior of the Transfer Cask, conservatively including connecting and Embedded surfaces. Some subcomponents may have interior surfaces that are considered Embedded. No aging effects are identified for the Embedded surfaces and no aging management is required. Temperature and radiation were considered, as described in Section 3.5.3, Environments for the Transfer Cask.

Table 3.6-1 Aging Management Review Results for the Transfer Cask Lifting Yoke and Lift Extension

Subcomponent	Intended Function	Material Group	Environment	Aging Effects Requiring Management	Aging Management Activity
Transfer Cask Lifting Yoke					
Hook Plates	SS	Carbon Steel	Sheltered	Loss of Material	Transfer Cask Lifting Yoke and Lift Extension Aging Management Program
Beam Plates	SS	Carbon Steel	Sheltered	Loss of Material	Transfer Cask Lifting Yoke and Lift Extension Aging Management Program
Brace Flange	SS	Carbon Steel	Sheltered	Loss of Material	Transfer Cask Lifting Yoke and Lift Extension Aging Management Program
Brace Web	SS	Carbon Steel	Sheltered	Loss of Material	Transfer Cask Lifting Yoke and Lift Extension Aging Management Program
Pin	SS	Stainless Steel	Sheltered	None Identified	None Required
Main Assembly Bolts, Nuts, Washers	SS	Carbon Steel	Sheltered	Loss of Material	Transfer Cask Lifting Yoke and Lift Extension Aging Management Program
Pin handles, support angles, and stops; miscellaneous screws, nuts, and washers; bumpers and mounting plates; eyebolts, connectors, turnbuckles, wire rope; hook bearing plate	None	N/A	N/A	N/A	N/A

Table 3.6-1 Aging Management Review Results for the Transfer Cask Lifting Yoke and Lift Extension

Subcomponent	Intended Function	Material Group	Environment	Aging Effects Requiring Management	Aging Management Activity
Transfer Cask Lift Extension					
Lifting Plates	SS	Carbon Steel	Sheltered	Loss of Material	Transfer Cask Lifting Yoke and Lift Extension Aging Management Program
Stiffener Plates	SS	Carbon Steel	Sheltered	Loss of Material	Transfer Cask Lifting Yoke and Lift Extension Aging Management Program
Pin	SS	Stainless Steel	Sheltered	None Identified	None Required
Sleeve Guide Rail	SS	Carbon Steel	Sheltered	Loss of Material	Transfer Cask Lifting Yoke and Lift Extension Aging Management Program
Screw Actuator Mounting Plate	SS	Carbon Steel	Sheltered	Loss of Material	Transfer Cask Lifting Yoke and Lift Extension Aging Management Program
Screw Actuator	None	N/A	N/A	N/A	N/A
Screw	None	N/A	N/A	N/A	N/A
Coatings and Grease	None	N/A	N/A	N/A	N/A
Miscellaneous Bolts, Washers, Nuts, Clevis Pins, and Cotter Pins	None	N/A	N/A	N/A	N/A
Pin Handle, Support Angle, and Stop	None	N/A	N/A	N/A	N/A

Table 3.7-1 Aging Management Review Results for the Cask Pit Support Stand

Subcomponent	Intended Function	Material Group	Environment	Aging Effects Requiring Management	Aging Management Activity
Flange Plates	SS	Stainless Steel	Borated Water	Loss of Material, Cracking	ONS Chemistry Control Program
Alignment Stiffener Plates	SS	Stainless Steel	Borated Water	Loss of Material, Cracking	ONS Chemistry Control Program
Alignment Plates	SS	Stainless Steel	Borated Water	Loss of Material, Cracking	ONS Chemistry Control Program
Guide Plates	SS	Stainless Steel	Borated Water	Loss of Material, Cracking	ONS Chemistry Control Program
Web Plates	SS	Stainless Steel	Borated Water	Loss of Material, Cracking	ONS Chemistry Control Program
Stiffener Plates	SS	Stainless Steel	Borated Water	Loss of Material, Cracking	ONS Chemistry Control Program
Target Plates	SS	Stainless Steel	Borated Water	Loss of Material, Cracking	ONS Chemistry Control Program

APPENDIX A

AGING MANAGEMENT PROGRAMS

TABLE of CONTENTS (Appendix A)

COVER PAGE (Appendix A) A-1

TABLE of CONTENTS (Appendix A) A-2

A1.0 INTRODUCTION A-3

A2.0 EXISTING AGING MANAGEMENT PROGRAMS A-3

A2.1 SITE SPECIFIC ISFSI AGING MANAGEMENT PROGRAM A-3

A2.2 TRANSFER CASK AGING MANAGEMENT PROGRAM A-7

A2.3 TRANSFER CASK LIFTING YOKE AND LIFT EXTENSION AGING MANAGEMENT PROGRAM A-10

A2.4 CASK PIT SUPPORT STAND AGING MANAGEMENT PROGRAM A-14

A3.0 REFERENCES (AGING MANAGEMENT PROGRAMS) A-17

APPENDIX A: AGING MANAGEMENT PROGRAMS

A1.0 INTRODUCTION

Appendix A summarizes the activities that manage the effects of aging for Site-Specific ISFSI subcomponents that have been identified in the License Renewal Application (LRA) as being subject to aging management review. The following aging management programs (AMPs) have been credited for the ONS Site-Specific ISFSI:

- Site-Specific ISFSI Aging Management Program
- Transfer Cask Aging Management Program
- Transfer Cask Lifting Yoke and Lift Extension Aging Management Program
- Cask Pit Support Stand Aging Management Program

The Site-Specific ISFSI Aging Management Program is discussed in Section A2.1 below. Section A2.2 discusses the Transfer Cask Aging Management Program. Section A2.3 discusses the Transfer Cask Lift Yoke and Lift Extension Aging Management Program. Section A2.4 discusses the Cask Pit Support Stand Aging Management Program. These sections provide a description of the AMP which includes an introduction, an evaluation of the AMP in terms of the attributes of an effective aging management program, and a summary.

Section 3.0, Aging Management Reviews, provides tables that summarize the results of the AMRs. These tables identify the programs/activities credited for managing the aging effects for each subcomponent listed in the AMR. The identified aging management program manages the aging effects, or the relevant conditions that could lead to the aging effects; applicable to the subcomponent, and provides reasonable assurance that the integrity of the subcomponent will be maintained under CLB conditions during the renewed license period.

A2.0 EXISTING AGING MANAGEMENT PROGRAMS

A2.1 SITE-SPECIFIC ISFSI AGING MANAGEMENT PROGRAM

The ONS Site-Specific ISFSI provides for long-term dry interim storage for irradiated fuel assemblies until such time that the irradiated fuel assemblies may be shipped off site for final disposition. The fuel assemblies are confined in stainless steel canisters. Each canister is protected and shielded by a concrete horizontal storage module. Each canister rests on a steel support rail assembly that is anchored to the walls of the corresponding storage module and restrained inside the storage module. Other steel components provide heat shielding, screens, and attachments, both inside and outside the modules. The Site-Specific ISFSI Aging Management Program includes the concrete and steel members associated with the horizontal storage modules (HSMs).

The purpose of the Site-Specific ISFSI Aging Management Program is to:

- Ensure that no significant degradation to the horizontal storage modules occurs
- Maintain the air inlets and outlets free from obstructions

A description of the Site-Specific ISFSI Aging Management Program is provided below using each attribute of an effective aging management program as described in the preliminary guidance for the renewal of site specific Part 72 licenses (Reference A3-1):

Scope

The scope of the ONS Site-Specific ISFSI Aging Management Program involves monitoring the exterior surfaces of the Site-Specific ISFSI. It includes visual inspection of the accessible concrete and exposed steel. It also includes monitoring area radiation levels for compliance with dose limits and ensuring that the inlets and outlets do not become blocked.

Preventive Actions

This is primarily a condition monitoring program. With the exception of daily surveillances to ensure HSM inlets and outlets are not obstructed, no preventive actions are performed.

Maintaining the inlets and outlets free from obstruction ensures temperatures are not elevated for prolonged periods, the concrete is not subject to related damage, and overheating of the components inside an HSM is prevented.

Parameters Monitored or Inspected

Consistent with the current NRC position relative to including concrete in an aging management program, the accessible concrete is visually examined for indication of surface deterioration. Degradation could affect the ability of the concrete to provide support to the DSCs, to provide radiation shielding, to provide missile shielding, or to provide a path for heat transfer from each module. The above grade exterior concrete is accessible. The below grade exterior concrete surfaces are inaccessible. Interior concrete is accessible for remote exams. The above grade exterior concrete is a leading indicator for the interior concrete.

Accessible steel, that is steel on the external surface of the HSMs and subject to wetting/moisture, is visually examined for the aging effect of loss of material (corrosion). This aging effect could affect the ability of the miscellaneous structural steel to perform its intended function.

Surveillances of area radiation levels are made and compared to established limits. Levels exceeding limits are investigated for potential degradation of the Site-Specific ISFSI components. Increased levels could indicate a reduction in the ability of the concrete and steel to provide adequate radiation shielding, or could indicate a breach in the containment function of the DSC and/or IFA. Dose rates are measured at predetermined HSM locations.

Daily surveillances are performed to ensure the air inlets and outlets are free from obstructions, thereby preventing reduced air flow and potential overheating of the components located inside an HSM. Existing plant procedures are in place for these inspections and surveillances.

Detection of Aging Effects

The examination method used for the accessible concrete and steel is primarily a visual examination at an established frequency. A baseline inspection was performed, with subsequent examination frequencies determined by ONS Engineering based on the condition observed. The results of this baseline inspection are discussed for the Operating Experience attribute below.

This program involves monitoring the interior and exterior surfaces of the HSMs, including visual inspection of the accessible concrete; any exposed steel subcomponents, embedments, and attachments; and the lightning protection system. Interior inspections are conducted on a sampling basis (minimum of one HSM) on a 10 year frequency. Exterior inspections are conducted on a 5 year frequency.

Monitoring and Trending

The visual examinations are performed for the Site-Specific ISFSI as described above. A baseline examination was performed. In addition, the Site-Specific ISFSI System Engineer completes a System Health Report that includes an indicator of Site-Specific ISFSI performance, reliability, and material condition (at a minimum of once per year).

The surveillance tests for monitoring radiation and contamination could identify a crack in the shielding or a loss of the containment function. This surveillance is performed monthly. If any pre-established limits are exceeded, ONS Engineering is required to be notified.

Acceptance Criteria

An Engineering Directive provides a set of inspection attributes and acceptance standards for steel and concrete that is commensurate with industry codes, standards, and guidelines. Components are determined to be Acceptable, Acceptable with defects, or Unacceptable. Acceptable signifies that the components are free of significant deficiencies or degradation that could lead to the loss of structural integrity. Acceptable with defects signifies that components contain deficiencies or degradation but will remain able to perform their design basis function until the next inspection or repair. Unacceptable signifies components contain deficiencies or degradation that either prevent (or could prevent prior to the next inspection) the ability to perform their design basis function.

The daily surveillance procedure ensures that the inlet and outlet vents are free from obstruction consistent with the Site-Specific ISFSI Technical Specifications.

Corrective Actions

Corrective actions, including root cause determinations and prevention of recurrence, are performed in accordance with the Corrective Action Program. This may include initiation of a Work Request or Problem Investigation Program (PIP) or Engineering Change (EC). Corrective actions are taken in a timely manner commensurate with the significance of the defect in accordance with the significance of the PIP. As such, deficiencies are either promptly corrected or are evaluated to be acceptable through engineering analysis, which provides reasonable assurance that the intended function is maintained consistent with current licensing basis conditions.

Confirmation Process

Activities initiated in accordance with the implementing procedures for the Site-Specific ISFSI Aging Management Program, such as corrective actions, are subject to Quality Assurance Program controls. Thus, the effectiveness is monitored using Corrective Action Program procedures, review and approval processes, and administrative controls, which are implemented in accordance with the requirements of 10 CFR 50, Appendix B. Use of these procedures, processes, and controls ensures that corrective actions are taken and are effective.

Administrative Controls

The Site-Specific ISFSI Aging Management Program is subject to Corporate and ONS Corrective Action and Quality Assurance procedures, review and approval processes, and administrative controls. These are implemented in accordance with the requirements of Appendix B to 10 CFR 50, and will continue to be adequate for the renewed license (extended storage) period.

Operating Experience

The ONS Site-Specific ISFSI has been in operation since the late 1980s. Examinations and inspections are performed in accordance with plant procedures. A review of the Corrective Action Program indicated that any deficiencies identified for the Site-Specific ISFSI have been administrative and were not related to aging mechanisms and effects. Minor corrosion was noted on some of the exterior carbon steel components, which required touchup painting.

As discussed in Section 3.1.5, plant specific and industry operating experience, as well as a review of the system files, did not indicate any aging related deficiencies with the Site-Specific ISFSI components.

For additional confirmation, an extensive baseline inspection of the ONS Site-Specific ISFSI was performed in December 2006 to support license renewal. The entire exterior of the HSMs (above grade), including the lightning protection system, were inspected for any evidence of aging effects. The interior of three HSMs was examined remotely, using a camera and/or fiber optic technology. The access doors these three HSMs were removed for inspection of the accessible interior carbon steel. Additionally, the concrete approach pads and storm water drainage features were examined for any impairment.

The results of the baseline inspections revealed no indications of degradation or distress that would impair the ISFSI from performing its intended functions. All inspected items and surfaces were determined to be in good structural condition.

Summary

Operating experience to date has not indicated any significant degradation to any of the Site-Specific ISFSI components. Inspections and surveillances continue to be implemented that would identify any deficiencies. A Corrective Action Program is in place to track and correct deficiencies in a timely manner. Continued implementation of the Site-Specific ISFSI Aging Management Program provides reasonable assurance that the aging effects will be managed, such that the intended functions of the Site-Specific ISFSI components, particularly the structural concrete and steel of the HSMs, will be maintained under current licensing basis conditions for the renewed license period.

A2.2 TRANSFER CASK AGING MANAGEMENT PROGRAM

The ONS Transfer Cask is used to transport the dry storage canisters containing the irradiated fuel assemblies from the ONS spent fuel pool to the corresponding horizontal storage modules (and back as necessary). The ONS Transfer Cask subcomponents, materials, environments and aging effects requiring management are described in Section 3.5, Aging Management Review Results – ONS Transfer Cask.

The purpose of the Transfer Cask Aging Management Program is to ensure that no significant degradation to the ONS Transfer Cask occurs, with the focus being on the continuously and intermittently wetted surfaces, as well as carbon steel surfaces, prior to its use for future retrieval of a DSC from the corresponding HSM.

A description of the Transfer Cask Aging Management Program is provided below using each attribute of an effective aging management program as described in the preliminary guidance for the renewal of site specific Part 72 licenses (Reference A3-2).

Scope

The Transfer Cask Aging Management Program is applicable to the ONS Transfer Cask and the pertinent subcomponents. The focus of this aging management program is on the stainless steel subcomponents that have continuously wetted surfaces and, conservatively, those external surfaces exposed to outdoor conditions and intermittent wetting. It also conservatively includes carbon steel subcomponents that are exposed to weather and/or other forms of moisture (e.g., humidity).

The program performs visual inspections of the exterior surfaces.

Preventive Actions

The Transfer Cask Aging Management Program includes guidance and direction for maintaining a suitable environment that precludes the onset or propagation of a loss of material due to crevice or pitting corrosion for continuously wetted surfaces.

The parameter inspected by the Transfer Cask Aging Management Program is visual evidence of degradation of external surfaces of the ONS Transfer Cask.

Visual inspections of external cask, cask collar, and cask lid surfaces are performed annually or prior to moving a DSC (if no other inspection has been performed), to ensure that the intended function of the pertinent cask subcomponents are not compromised. Visual inspections look for signs of deterioration (corrosion).

Detection of Aging Effects

Loss of material for stainless steel subcomponents, due to crevice and/or pitting corrosion in wetted locations, and for carbon steel subcomponents, due to general corrosion in moist atmospheric environments, is an aging effect that is managed by this aging management program. The Transfer Cask Aging Management Program relies upon a visual inspection to determine the physical condition of the exterior surfaces of the ONS Transfer Cask, including cask collar and lid, prior to its use for Site-Specific ISFSI unloading or transfers. These inspections check for loss of material (corrosion).

Monitoring and Trending

Visual inspections will determine the existence of loss of material on the external surfaces of the ONS Transfer Cask, and observations regarding the material condition recorded in accordance with inspection procedures and are corrected or evaluated as satisfactory before use of the Transfer Cask. These inspections are either performed periodically or during the preparations for retrieval of a DSC from the corresponding HSM.

Evaluation of this information during the preparations for DSC retrieval/transfers provides adequate predictability and allows for corrective action prior to the need for the component intended function to be performed.

Acceptance Criteria

The acceptance criteria for the Transfer Cask Aging Management Program for exterior surfaces is no unacceptable loss of material that could result in a loss of component intended function(s), as determined by ONS Engineering.

Unsatisfactory degradation is entered in the Corrective Action Program for resolution.

Corrective Actions

Corrective actions, including root cause determinations and prevention of recurrence, are performed in accordance with the Corrective Action Program. This may include initiation of a Work Request or PIP. Corrective actions are taken in a timely manner in accordance with the significance of the PIP. As such, deficiencies are either promptly corrected or are evaluated to be acceptable through engineering analysis, which provides reasonable assurance that the intended function is maintained consistent with current licensing basis conditions. Each of the implementing procedures associated with the Transfer Cask Aging Management Program is within the scope of the Corrective Action Program.

Confirmation Process

Activities initiated in accordance with the implementing procedures for the Transfer Cask Aging Management Program, such as corrective actions, are subject to Quality Assurance Program controls. Thus, the effectiveness is monitored using Corrective Action Program procedures, review and approval processes, and administrative controls, which are implemented in accordance with the requirements of 10 CFR 50, Appendix B. Use of the procedures, processes, and controls ensures that corrective actions are taken and are effective.

Administrative Controls

The Transfer Cask Aging Management Program is subject to Corrective Action and Quality Assurance Program procedures, review and approval processes, and administrative controls. These are implemented in accordance with the requirements of Appendix B to 10 CFR 50, and will continue to be adequate for the renewed license (extended storage) period.

Operating Experience

The ONS Site-Specific ISFSI has been in operation since the late 1980s. The ONS Transfer Cask has been in use since the initial loading of the ONS Site-Specific ISFSI.

This Transfer Cask has continued to be utilized for Site-Specific ISFSI shipments under the TN General License at ONS.

Inspections have been performed on the Transfer Cask prior to each shipment to the Site-Specific ISFSI. These examinations and inspections are currently performed in accordance with a combination of procedures. The overall effectiveness of these inspections in maintaining the condition and functionality of the cask is confirmed by the continued use of the cask. Any deficiencies identified are promptly corrected prior to shipping fuel. This same process will be followed, as applicable, for moving the DSCs from the HSM back to the ONS spent fuel pool.

A discussion of pertinent operating experience is contained in Section 3.1.5, Operating Experience Review for Process Confirmation. Furthermore, the lack of identification of cask degradation through the existing inspections is evidence that Transfer Cask activities have been effective in maintaining the condition and functionality of the ONS Transfer Cask.

A review of the operating experience provided objective evidence that the effects of aging have, and will continue to be, adequately managed following the expiration of the license.

Summary

The Transfer Cask Aging Management Program is credited for the management of relevant conditions that could lead to degradation of ONS Transfer Cask subcomponents from the associated aging effects/mechanisms as shown in Table 3.5-1, and for the management of actual degradation. Based on the above, the continued implementation of the Transfer Cask Aging Management Program activities will provide reasonable assurance that aging effects will be managed, such that the ONS Transfer Cask subcomponents within the scope of license renewal will continue to perform their intended functions consistent with the current licensing basis throughout the renewed license period.

A2.3 TRANSFER CASK LIFTING YOKE AND LIFT EXTENSION AGING MANAGEMENT PROGRAM

The Transfer Cask Lifting Yoke and Lift Extension are used to move the ONS Transfer Cask between the spent fuel pool and the transport trailer. The Transfer Cask Lifting Yoke and Lift Extension subcomponents, materials, environments and aging effects requiring management are described in Section 3.6, Aging Management Review Results – Transfer Cask Lifting Yoke and Lift Extension.

The purpose of the Transfer Cask Lifting Yoke and Lift Extension Aging Management Program is to ensure that no significant degradation to the Transfer Cask Lift Yoke and

Lift Extension occurs, with the focus being on the continuously and intermittently wetted surfaces, prior to its use for movement of the ONS Transfer Cask.

A description of the Transfer Cask Lifting Yoke and Lift Extension Aging Management Program is provided below using each attribute of an effective aging management program as described in the preliminary guidance for the renewal of site specific Part 72 licenses (Reference A3-1):

Scope

The Transfer Cask Lifting Yoke and Lift Extension Aging Management Program is applicable to the Transfer Cask Lift Yoke and Lift Extension and the pertinent subcomponents. The focus of this aging management program is on the subcomponents that have external surfaces exposed to intermittent wetting.

The program performs visual inspections of the exterior surfaces.

Preventive Actions

The Transfer Cask Lifting Yoke and Lift Extension Aging Management Program includes guidance and direction for maintaining a suitable environment that precludes the onset or propagation of a loss of material due to corrosion for intermittently wetted surfaces.

Parameters Monitored or Inspected

The parameter inspected by the Transfer Cask Lifting Yoke and Lift Extension Aging Management Program is visual evidence of degradation of external surfaces of the Transfer Cask Lifting Yoke and Lift Extension.

Visual inspections of Transfer Cask Lifting Yoke and Lift Extension are performed annually or prior to moving a DSC (if no other inspection has been performed), to ensure that the intended function of the pertinent subcomponents are not compromised. Visual inspections look for signs of deterioration (corrosion).

Detection of Aging Effects

Loss of material due to corrosion in wetted locations or due to general corrosion in moist atmospheric environments is an aging effect that is managed by this aging management program. The Transfer Cask Lifting Yoke and Lift Extension Aging Management Program relies upon a visual inspection to determine the physical condition of the exterior surfaces of the Transfer Cask Lifting Yoke and Lift Extension, prior to its use for Site-Specific ISFSI unloading or transfers. These inspections check for loss of material (corrosion).

Monitoring and Trending

Visual inspections will determine the existence of loss of material on the external surfaces of the Transfer Cask Lifting Yoke and Lift Extension, and observations regarding the material condition recorded in accordance with inspection procedures and are corrected or evaluated as satisfactory before use of the Transfer Cask Lifting Yoke and Lift Extension. These inspections are either performed periodically or during the preparations for movement of the ONS Transfer Cask.

Evaluation of this information during the preparations for DSC retrieval/transfers provides adequate predictability and allows for corrective action prior to the need for the component intended function to be performed.

Acceptance Criteria

The acceptance criteria for the Transfer Cask Lifting Yoke and Lift Extension Aging Management Program for exterior surfaces is no unacceptable loss of material that could result in a loss of component intended function(s), as determined by the ONS Engineering Section.

Unsatisfactory degradation is entered in the Corrective Action Program for resolution.

Corrective Actions

Corrective actions, including root cause determinations and prevention of recurrence, are performed in accordance with the Corrective Action Program. This may include initiation of a Work Request or PIP. Corrective actions are taken in a timely manner in accordance with the significance of the PIP. As such, deficiencies are either promptly corrected or are evaluated to be acceptable through engineering analysis, which provides reasonable assurance that the intended function is maintained consistent with current licensing basis conditions. Each of the implementing procedures associated with the Transfer Cask Lifting Yoke and Lift Extension Aging Management Program is within the scope of the Corrective Action Program.

Confirmation Process

Activities initiated in accordance with the implementing procedures for the Transfer Cask Lifting Yoke and Lift Extension Aging Management Program, such as corrective actions, are subject to Quality Assurance Program controls. Thus, the effectiveness is monitored using Corrective Action Program procedures, review and approval processes, and administrative controls, which are implemented in accordance with the requirements of 10 CFR 50, Appendix B. Use of the procedures, processes, and controls ensures that corrective actions are taken and are effective.

Administrative Controls

The Transfer Cask Lifting Yoke and Lift Extension Aging Management Program is subject to Corrective Action and Quality Assurance Program procedures, review and approval processes, and administrative controls. These are implemented in accordance with the requirements of Appendix B to 10 CFR 50, and will continue to be adequate for the renewed license (extended storage) period.

Operating Experience

The ONS Site-Specific ISFSI has been in operation since the late 1980s. The Transfer Cask Lifting Yoke and Lift Extension has been in use since the initial loading of the ONS Site-Specific ISFSI. This Transfer Cask Lifting Yoke and Lift Extension has continued to be utilized for Site-Specific ISFSI shipments under the TN General License at ONS.

Inspections are performed on the Transfer Cask Lifting Yoke and Lift Extension annually. These examinations and inspections are currently performed in accordance with a combination of procedures. Any deficiencies identified are promptly corrected prior to shipping fuel.

A discussion of pertinent operating experience is contained in Section 3.1.5, Operating Experience Review for Process Confirmation. Furthermore, the lack of identification of Transfer Cask Lifting Yoke and Lift Extension degradation through the existing inspections is evidence that Transfer Cask Lifting Yoke and Lift Extension activities have been effective in maintaining the condition and functionality of the ONS Transfer Cask Lifting Yoke and Lift Extension.

A review of the operating experience provided objective evidence that the effects of aging have, and will continue to be, adequately managed following the expiration of the license.

Summary

The Transfer Cask Lifting Yoke and Lift Extension Aging Management Program is credited for the management of relevant conditions that could lead to degradation of Transfer Cask Lifting Yoke and Lift Extension subcomponents from the associated aging effects/mechanisms as shown in Table 3.6-1, and for the management of actual degradation. Based on the above, the continued implementation of the Transfer Cask Lifting Yoke and Lift Extension Aging Management Program activities will provide reasonable assurance that aging effects will be managed, such that the Transfer Cask Lifting Yoke and Lift Extension subcomponents within the scope of license renewal will continue to perform their intended functions consistent with the current licensing basis throughout the renewed license period.

A2.4 CASK PIT SUPPORT STAND AGING MANAGEMENT PROGRAM

The Cask Pit Support Stand is a removable platform that is placed in the spent fuel pool cask loading pit. It positions the Transfer Cask at the appropriate elevation for loading IFAs into the DSC. The Cask Pit Support Stand materials, environments and aging effects requiring management are described in Section 3.7, Aging Management Review Results – Cask Pit Support Stand.

The purpose of the Cask Pit Support Stand Aging Management Program is to ensure that no significant degradation occurs while the Cask Pit Support Stand is in the Borated Water Environment of the spent fuel pool.

A description of the Cask Pit Support Stand Aging Management Program is provided below using each attribute of an effective aging management program as described in the preliminary guidance for the renewal of site specific Part 72 licenses (Reference A3-1):

Scope

The Cask Pit Support Stand Aging Management Program is applicable to the Cask Pit Support Stand and the pertinent subcomponents. The focus of this aging management program is on the stainless steel subcomponents that are continuously exposed to borated water.

The Cask Pit Support Stand Aging Management Program credits the ONS Chemistry Control Program which monitors chlorides in the spent fuel pool water.

Preventive Actions

The Cask Pit Support Stand Aging Management Program includes guidance and direction for maintaining a suitable environment that precludes the onset or propagation of a loss of material and cracking due to pitting and/or stress corrosion for stainless steel components in the spent fuel pool.

The parameter inspected by the Cask Pit Support Stand Aging Management Program is chloride concentration in the spent fuel pool water. Samples are taken on a monthly basis.

Detection of Aging Effects

Loss of material and cracking for stainless steel subcomponents, due to pitting and/or stress corrosion in borated water, and for stainless steel subcomponents, is an aging effect that is managed by this aging management program. The Cask Pit Support Stand Aging Management Program relies upon chloride sampling of the spent fuel pool water to ensure favorable conditions for this aging effect do not develop.

Monitoring and Trending

Chloride sampling will determine whether conditions favorable for development of this aging effect have developed. In that event, additional inspections would be required before use of the Cask Pit Support Stand.

Acceptance Criteria

The acceptance criterion for the Cask Pit Support Stand Aging Management Program is spent fuel pool chlorides within acceptable limits.

Unsatisfactory results are entered in the Corrective Action Program for resolution.

Corrective Actions

Corrective actions, including root cause determinations and prevention of recurrence, are performed in accordance with the Corrective Action Program. This may include initiation of a Work Request or PIP. Corrective actions are taken in a timely manner in accordance with the significance of the PIP. As such, deficiencies are either promptly corrected or are evaluated to be acceptable through engineering analysis, which provides reasonable assurance that the intended function is maintained consistent with current licensing basis conditions. Each of the implementing procedures associated with the Cask Pit Support Stand Aging Management Program is within the scope of the Corrective Action Program.

Confirmation Process

Activities initiated in accordance with the implementing procedures for the Cask Pit Support Stand Aging Management Program, such as corrective actions, are subject to Quality Assurance Program controls. Thus, the effectiveness is monitored using Corrective Action Program procedures, review and approval processes, and administrative controls, which are implemented in accordance with the requirements of 10 CFR 50, Appendix B. Use of the procedures, processes, and controls ensures that corrective actions are taken and are effective.

Administrative Controls

The Cask Pit Support Stand Aging Management Program is subject to Corrective Action and Quality Assurance Program procedures, review and approval processes, and administrative controls. These are implemented in accordance with the requirements of Appendix B to 10 CFR 50, and will continue to be adequate for the renewed license (extended storage) period.

Operating Experience

Since initial operation, and continuing through present day operation, ONS has maintained a well-defined chemistry control program for most fluid systems (e.g., the chemistry of service water systems is not controlled). A key aspect of the ONS Chemistry Control Program which is credited by the Cask Pit Support Stand Aging Management Program is the sampling and analysis of fluid systems to determine the concentration of chemical impurities and chemical additives. Fluid systems at ONS are sampled and analyzed by procedure, which is controlled by the ONS Administrative Controls. Parameters monitored, frequency of sampling, acceptance criteria (i.e., specifications), and corrective actions for out-of-specification results are similarly addressed by procedure. Furthermore, chemical analyses are governed by a quality control program to ensure that accurate results are produced. Over the years, the analytical techniques, sampling systems, and chemistry laboratories have been upgraded to reflect ongoing technological developments. Since 1985, chemistry data produced at ONS has been maintained in an electronic database (prior to 1985, the data was recorded in handwritten logs which have been archived on microfilm). Chemistry data for monitored parameters is routinely trended to identify subtle trends in the data which may be indicative of an underlying operational problem. In many cases, this allows correction prior to a parameter becoming out-of-specification.

The overall effectiveness of the chemistry program is supported by the excellent operating experience for those systems, structures, and components influenced by the chemistry control program. With exception of the steam, no significant chemistry-related degradation is known to have occurred on any systems for which the fluid chemistry is actively controlled.

A discussion of pertinent operating experience is contained in Section 3.1.5, Operating Experience Review for Process Confirmation.

Summary

The Cask Pit Support Stand Aging Management Program credits the ONS Chemistry Control Program for the management of relevant conditions that could lead to degradation of Cask Pit Support Stand subcomponents from the associated aging effects/mechanisms as shown in Table 3.7-1, and for the management of actual degradation. Based on the above, the continued implementation of the Cask Pit Support Stand Aging Management Program activities will provide reasonable assurance that aging effects will be managed, such that the Cask Pit Support Stand subcomponents within the scope of license renewal will continue to perform their intended functions consistent with the current licensing basis throughout the renewed license period.

A3.0 REFERENCES (AGING MANAGEMENT PROGRAMS)

A3-1 Letter from NRC, Steven Baggett to CP&L, John Moyer, *Preliminary NRC Staff Guidance for 10 CFR Part 72 License Renewal*, May 17, 2001

Appendix B

Time-Limited Aging Analyses

TABLE of CONTENTS (Appendix B)

COVER PAGE B-1
TABLE of CONTENTS (Appendix B) B-2
B1.0 INTRODUCTION B-3
B2.0 IDENTIFICATION OF TIME-LIMITED AGING ANALYSES (TLAAs) B-3
B2.1 IDENTIFICATION PROCESS AND RESULTS FOR THE TLAAs B-4
B2.2 EVALUATIONS AND DISPOSITION OF THE IDENTIFIED TLAAs B-4
B2.2.1 DSC SHELL CRACKING DUE TO FATIGUE B-4
B2.2.2 BISCO NS-3 AND CONCRETE RADIATION EXPOSURE B-5
B2.2.3 TRANSFER CASK TRUNNIONS AND LIFT EQUIPMENT FATIGUE B-5
B2.2.4 HSM CONCRETE THERMAL CYCLING B-6
B2.2.5 DSC SUPPORT STRUCTURE THERMAL CYCLING B-7
B2.2.6 OTHER POTENTIAL TLAA CONSIDERATIONS B-7
B2.3 CONCLUSIONS B-7
B3.0 REFERENCES (TIME-LIMITED AGING ANALYSES) B-8

APPENDIX B: TIME-LIMITED AGING ANALYSES (TLAAs)

B1.0 INTRODUCTION

ONS's Site-Specific ISFSI license renewal methodology uses the methodology described in the comments on the Preliminary Guidance for License Renewal for Site-Specific Independent Spent Fuel Storage Installations (ISFSIs) that was provided to the NRC by the Surry Nuclear Station on June 26, 2001 (Reference B3-1).

B2.0 IDENTIFICATION OF TIME-LIMITED AGING ANALYSES (TLAAs)

TLAAs are defined in the comments on the Preliminary Guidance for License Renewal for Site-Specific Independent Spent Fuel Storage Installations (ISFSIs) (Reference B3-1) as those licensee calculations and analyses that meet all of the following criteria:

1. *Involve systems, structures, and components within the scope of license renewal.*

2. *Consider the effects of aging.*

3. *Involve time-limited assumptions defined by the current licensing term (e.g., 20 years).*

   The defined licensing term should be explicit in the analyses. Simply asserting that the SSC is designed for a service life or ISFSI life is not sufficient. The assertions must be supported by a calculation, analyses, or testing that explicitly include a time limit.

4. *Must be pertinent to a specific safety determination that exists in the CLB. Such analyses would have initially provided the basis for the applicant's initial safety determination, and without the analyses, the applicant may have reached a different safety conclusion.*

5. *Must provide conclusions or a basis for conclusions regarding the capability of the SSC to perform its intended function.*

   Analyses that do not affect the intended functions of the SSCs are not considered TLAAs, and

6. *Must already be contained or incorporated by reference in the CLB for the ISFSI.*

   Facility-specific documentation contained or incorporated by reference in the CLB includes SARs, SERs, Technical Specifications, fire protection plan/hazards analyses, correspondence to and from the NRC, QA plan, and *topical reports included as references in the SAR. Calculations and analyses that are not in the CLB or not incorporated by reference are not TLAAs.*

B2.1 IDENTIFICATION PROCESS AND RESULTS FOR THE TLAAs

Both generic and potential ONS-specific Site-Specific ISFSI TLAAs were considered. The Site-Specific ISFSI License Renewal Application for other utilities (e.g., Dominion's for the Surry Site-Specific ISFSI, Progress's for the Robinson Site-Specific ISFSI), and the associated Requests for Additional Information (RAIs), were reviewed to identify any generic Site-Specific ISFSI TLAAs.

For ONS-specific TLAAs, ONS and vendor calculations and evaluations that could potentially meet the six criteria, as described above, were identified. Keyword and manual searches of current license basis documents were performed, including the Materials License, Technical Specifications, UFSAR, docketed licensing correspondence, and vendor topical reports incorporated by reference in the UFSAR.

Calculations and analyses that meet the six criteria listed in Section B2.0 are considered the time-limited aging analyses for the ONS Site-Specific ISFSI.

B2.2 EVALUATIONS AND DISPOSITION OF THE IDENTIFIED TLAAs

Evaluations of the TLAAs identified using the process described in Section B2.1 were performed to demonstrate that each identified TLAA for the ONS Site-Specific ISFSI has been dispositioned using one of three different approaches described below:

i. The analysis will remain valid for the renewed license period.
ii. The analysis has been projected to the end of the renewed license period.
iii. The effects of aging on the intended function(s) will be adequately managed for the renewed license period.

The results of these evaluations are discussed below.

B2.2.1 DSC SHELL CRACKING DUE TO FATIGUE

The original fatigue analysis of the DSC is documented as proprietary information in Section C.4.1 of Reference B3-4 for a service life of 50 years. The fatigue effects were addressed using the criteria contained in Section III NB-3222.4 of the ASME Code. The analysis evaluated the DSC under the six criteria and concluded that the DSC and other components satisfy the criteria and no consideration of fatigue is required for the 50 year service life.

A new analysis evaluates the DSC against the six criteria for a service life of 60 years, using an approach consistent with that utilized in Reference B3-4. The analysis concludes that all six criteria are satisfied for a service life of 60 years.

B2.2.2 BISCO NS-3 AND CONCRETE RADIATION EXPOSURE

HSMs

The Phase 1 HSM doors use BISCO NS-3 as a shielding material. The gamma dose rate in the door cavity of the HSM was calculated to be 330 mrem/hr (Table 7.3-2 of Reference B-3). This dose rate is conservative since the shielding effect of the steel inner plate is not considered in the calculation. This results in a gamma dose of approximately 1.8×10^5 Rads for a service life of 60 years. This is well below the service limit of 1.5×10^{10} Rads for the BISCO NS-3 material.

The integrated neutron fluence in the HSM concrete for 50 years was calculated to be 1.2×10^{14} neutrons/cm^2 (Section 8.1.1.5.D of Reference B-3). This value is conservative since the effect of cooling time on the neutron source strength was not considered. This results in an integrated fluence of approximately 1.44×10^{14} neutrons/cm^2 for a service life of 60 years. This is well below the service limits for the material for fast and thermal neutron exposure, 1.6×10^{17} neutrons/cm^2 and 1.5×10^{19} neutrons/cm^2, respectively.

Transfer Cask

The Transfer Cask contains BISCO NS-3 neutron shielding between the cask outer shell and the neutron shield jacket. The bounding estimated gamma and neutron dose rates at the inner surface of NS-3 in the cask are 250 mrem/hr and 959 mrem/hr, respectively. The gamma exposure for a 60 year service life is bounded by the Phase 1 HSM door evaluation, above.

The neutron dose rate for the Transfer Cask neutron shielding is lower than the dose rate on the HSM interior concrete surface. The integrated fluence is estimated to be approximately 1.44×10^{14} neutrons/cm^2 for a service life of 60 years for the HSM concrete as documented in the HSM evaluation, above. This fluence can be conservatively assumed for the NS-3 in the Transfer Cask because the neutron dose is lower and, also, the NS-3 is not continuously exposed to this fluence. This fluence is well below the service limits for the BISCO NS-3 material for fast and thermal neutron exposure, 1.6×10^{17} neutrons/cm^2 and 1.5×10^{19} neutrons/cm^2, respectively.

B2.2.3 TRANSFER CASK TRUNNIONS AND LIFT EQUIPMENT FATIGUE

The Transfer Cask, Transfer Cask Lifting Yoke, and Transfer Cask Lift Extension are used for the General License version of the NUHOMS® systems that is currently being used at ONS for new loadings. If it is conservatively assumed that this equipment will be used for all future dry storage loadings until the end of reactor operations at ONS (i.e. 2034), including removal of IFAs from the spent fuel pool, approximately 300 loadings will be required. If it is further assumed this equipment will be required for returning the loaded DSCs to the spent fuel pools, 300 unloading cycles would be required. With ten lifts required for each loading cycle, six lifts required for each unloading cycle, and another 100 miscellaneous lifts (for dry runs, annual maintenance, etc.), it is estimated that a total of 4,900 lifts will be required for the 60 year service life of the equipment.

Transfer Cask Trunnions

The fatigue analysis for the Transfer Cask trunnions shows the limiting number of lifts is 4,859 for the insert plate where the trunnions attach to the cask structural shell.

Since this limit is less than the 4,900 lifts estimated for a 60 year service life, corrective action will be required to ensure the lift limit is not exceeded. To ensure timely corrective action is taken, the fatigue calculation will be periodically reviewed throughout the service life of the Transfer Cask.

Transfer Cask Lifting Yoke

The fatigue analysis for the Transfer Cask Lifting Yoke shows the limiting number of lifts is 1.3×10^5. This is well above the conservative estimate for number of lifts required for a 60 year service life.

Transfer Cask Lift Extension

The fatigue analysis for the Transfer Cask Lift Extension shows the limiting number of fatigue cycles is 2.3×10^5. This is well above the conservative estimate for number of lifts required for a 60 year service life.

B2.2.4 HSM CONCRETE THERMAL CYCLING

The maximum predicted temperature of concrete at the beginning of storage was estimated to be below 150 °F from Figure 8.1-27 of Reference B-3 using a bounding decay heat at the beginning of storage life. The maximum concrete temperatures for the additional 40 years of service will be lower because the decay heat reduces monotonically as function of time. Hence, the heating effect on the concrete for the 40 year renewal period will be less severe than the original 20 years of service.

The original thermal cycling analysis of the HSM concrete is documented in Reference B-3 for a service life of 50 years. The number of thermal cycles was calculated as 18,250 for the 50 year service life. Prorating this value to a 60 year service life yields a value of 21,900 cycles. This is well below the thermal cycling limit of 1×10^7 cycles for reinforced concrete.

B2.2.5 DSC SUPPORT STRUCTURAL THERMAL CYCLING

The original thermal fatigue analysis of the DSC support structure inside the HSMs was based on a 50 year service life. The number of thermal cycles was conservatively calculated as 18,250 (one per day) for the 50 year service life. It was concluded that thermal fatigue need not be considered based on Section III, NF-3331.1 of the ASME code which requires such analysis for components with greater than 20,000 cycles.

Using the original conservative assumption of one thermal cycle per day, a service life of 60 years would result in 21,900 cycles.

The fatigue analysis was revised to reflect 10,950 thermal cycles for a 60 year service life, using a less conservative assumption of 182.5 cycles per year. This revised assumption is still conservative based on actual stress conditions and historical daily temperature variations at ONS. This is well below the ASME code requirement for consideration of thermal fatigue for components with greater than 20,000 cycles.

B2.2.6 OTHER POTENTIAL TLAA CONSIDERATIONS

No TLAAs were identified for the irradiated fuel assemblies. The potential aging mechanisms of creep, stress corrosion cracking, and delayed hydride cracking were considered during the aging management review process documented in Section 3.4, Aging Management Review Results for the IFAs.

B2.3 CONCLUSIONS

The following TLAAs have been identified and will remain valid for the renewed license period in accordance with approach (ii) defined in Section B2.1:

- DSC Shell Cracking Due to Fatigue
- BISCO NS-3 and Concrete Radiation Exposure
- Transfer Cask Trunnions and Lift Equipment Fatigue
- HSM Concrete Thermal Cycling
- DSC Support Structure Thermal Cycling

B3.0 REFERENCES (TIME-LIMITED AGING ANALYSES)

B3-1 Letter Serial No. 01-367, *Surry Independent Spent Fuel Storage Installation, Comments on NRC Preliminary Guidance,* L. N. Hartz to NRC Document Control Desk, June 26, 2001

B3-2 Letter from NRC, Steven Baggett to CP&L, John Moyer, *Preliminary NRC Staff Guidance for 10 CFR Part 72 License Renewal*, May 17, 2001

B3-3 *Topical Report for the NUTECH Horizontal Modular Storage System for Irradiated Nuclear Fuel, NUHOMS®-24P,* NUH-002, NUTECH, Inc., San Jose, California, July 1989, Revision 1A (SER Included)

B3-4 Letter from W. P. McConaghy (NUTECH) to L.C. Rouse (NRC); *NUHOMS®-24P Topical Report (NUH-002), Revision 1 (Project M-49)*; dated August 10, 1988.

APPENDIX C

UPDATED FINAL SAFETY ANALYSIS REPORT SUPPLEMENT AND CHANGES

TABLE of CONTENTS (Appendix C)

COVER PAGE C-1

TABLE of CONTENTS (Appendix C) C-2

C1.0 INTRODUCTION C-3

C2.0 CHANGES TO EXISTING ONS SITE-SPECIFIC ISFSI UFSAR INFORMATION C-3

C2.1 SITE-SPECIFIC ISFSI UFSAR SECTION 1.0 CHANGES C-3

C3.0 NEW ONS SITE-SPECIFIC ISFSI UFSAR SECTION C-4

C3.1 AGING MANAGEMENT PROGRAMS C-4

C3.1.1 SITE-SPECIFIC ISFSI AGING MANAGEMENT PROGRAM C-4

C3.1.2 TRANSFER CASK AGING MANAGEMENT PROGRAM C-5

C3.1.3 TRANSFER CASK LIFT LIFTING YOKE AND LIFT EXTENSION AGING MANAGEMENT PROGRAM C-5

C3.1.4 CASK PIT SUPPORT STAND AGING MANAGEMENT PROGRAM C-5

C3.2 TIME-LIMITED AGING ANALYSIS C-5

C3.2.1 DSC SHELL CRACKING DUE TO FATIGUE C-5

C3.2.2 BISCO NS-3 AND CONCRETE RADIATION EXPOSURE C-6

C3.2.3 TRANSFER CASK TRUNNIONS C-7

C3.2.4 HSM CONCRETE THERMAL CYCLING C-7

C3.2.5 DSC SUPPORT STRUCTURE THERMAL FATIGUE C-8

C4.0 REFERENCES (SITE-SPECIFIC ISFSI UFSAR SUPPLEMENT AND CHANGES) C-8

APPENDIX C: UPDATED FINAL SAFETY ANALYSIS REPORT SUPPLEMENT AND CHANGES

C1.0 INTRODUCTION

This appendix provides a supplement and identifies pertinent changes to the ONS Site-Specific ISFSI Updated Final Safety Analysis Report (UFSAR). Section C2.0 of this appendix contains proposed changes to the existing ONS Site-Specific ISFSI UFSAR. Section C3.0 of this appendix contains a proposed new section for the Site-Specific ISFSI UFSAR to be added under Section 9, Conduct of Operations. The new Section 9.7, Aging Management, provides a summarized description of the activities for managing the effects of aging of Site-Specific ISFSI SSCs. This proposed new UFSAR section will also present the evaluations of time-limited aging analyses (TLAAs) for the renewed license period.

C2.0 CHANGES TO EXISTING ONS SITE-SPECIFIC ISFSI UFSAR INFORMATION

C2.1 SITE-SPECIFIC ISFSI UFSAR SECTION 1.0 CHANGES

- Add the following to the last paragraph in section 1.1:

  ", or for a maximum of 40 years under the renewed license period (60 years, total)", and

  "If such circumstances were to arise, a rigorous re-qualification would be performed to ensure such DSCs would meet the CLB and to ensure that no aging effects requiring management are introduced."

The revised paragraph will read as follows (The words to be added are shown in bold underline font):

"Operation of the Oconee Site-Specific ISFSI will continue past the first year for up to 20 years under the initial license and continue under license renewal as necessary until the fuel can be shipped to a permanent repository**<u>, or for a maximum of 40 years under the renewed license period (60 years, total)</u>**. During this service life, while any given HSM could be unloaded and later reloaded with a new DSC, reloading a given DSC following removal of the original fuel assemblies is not anticipated due to the potential destructive nature of the top end shield plug removal process. However, enhanced techniques may be developed which prevent DSC damage during plug removal. **<u>If such circumstances were to arise, a rigorous re-qualification would be performed to ensure such DSCs would meet the CLB and to ensure that no aging effects requiring management are introduced.</u>** Eventual reuse of the HSMs will depend upon the schedule and restrictions for spent fuel deliveries to DOE under the NWPA."

C3.0 NEW ONS SITE-SPECIFIC ISFSI UFSAR SECTION

The following information will be integrated into the Site-Specific ISFSI UFSAR Section 9.7 to document aging management programs credited in the ONS Site-Specific ISFSI license renewal review, and time-limited aging analyses evaluated to demonstrate acceptability during the period of extended operation. The following information will be numbered sequentially within the new Site-Specific ISFSI UFSAR Section 9.7, Aging Management.

C3.1 AGING MANAGEMENT PROGRAMS

An assessment of the ONS Site-Specific ISFSI, Transfer Cask, Transfer Cask Lifting Yoke, Transfer Cask Lift Extension, and Cask Pit Support Stand inspection and monitoring activities identified existing activities necessary to provide reasonable assurance that Site-Specific ISFSI and Transfer Cask components within the scope of license renewal will continue to perform their intended functions consistent with the current licensing basis (CLB) for the renewal period. This section describes these aging management programs.

C3.1.1 SITE-SPECIFIC ISFSI AGING MANAGEMENT PROGRAM

The ONS Site-Specific ISFSI Aging Management Program credits the ONS Part 50 "Inspection Program for Civil Engineering Structures and Components," as described in Chapter 18 of the ONS UFSAR (Reference C4-1). This program involves monitoring the interior and exterior surfaces of the HSMs, including visual inspection of the accessible concrete; any exposed steel subcomponents, embedments, and attachments; and the lightning protection system. Interior inspections are conducted on a sampling basis (minimum of one HSM) on a 10 year frequency. Exterior inspections are conducted on a 5 year frequency.

Monitored conditions include the following:

- Concrete – spalling, cracking, delaminations, honey combs, leaching, discoloration, loss of material, or any other property that would be noted by visual inspection
- Structural Steel – corrosion, peeling paint, deflection, lost or missing anchors /fasteners, missing or degraded grout under base plates, twisted beams, cracked welds
- Equipment Foundations – settlement, cracked concrete

- Equipment Supports – cracked concrete, loose connections, corroded steel
- Roof Systems – structural integrity, deteriorated penetrations (i.e. drains, vents, etc.), signs of water infiltration, cracks, ponding, and flashing degradation
- Seismic Gaps – gaps or loss of joint filler material
- Lightning Protection System (above grade) – corrosion

C3.1.2 TRANSFER CASK AGING MANAGEMENT PROGRAM

The Transfer Cask Aging Management Program credits the Transfer Cask annual maintenance procedure. This procedure includes visual inspections of the carbon steel subcomponents. Monitored conditions include corrosion.

C3.1.3 TRANSFER CASK LIFTING YOKE AND LIFT EXTENSION AGING MANAGEMENT PROGRAM

The Transfer Cask Lifting Yoke and Lift Extension Aging Management Program credits the Transfer Cask lifting equipment annual inspection procedure. This procedure includes visual inspections of the Transfer Cask Lifting Yoke and Lift Extension carbon steel subcomponents. Monitored conditions include corrosion.

C3.1.4 CASK PIT SUPPORT STAND AGING MANAGEMENT PROGRAM

The Cask Pit Support Stand aging management program credits the ONS Part 50 "Oconee Chemistry Control Program," as described in Chapter 18 of the ONS UFSAR (Reference C.4-1). Loss of material and cracking are prevented through control of specified limits on chloride in the spent fuel pool water. The spent fuel pool water is sampled on a monthly basis.

C3.2 TIME-LIMITED AGING ANALYSIS

This section discusses the results for each of the time-limited aging analyses (TLAAs) evaluated for license renewal. The evaluations have demonstrated that the analyses have been projected to the end of the renewed license period.

C3.2.1 DSC SHELL CRACKING DUE TO FATIGUE

The original fatigue analysis of the DSC was conducted for a service life of 50 years. The fatigue effects were addressed using the criteria contained in Section III NB-3222.4 of the ASME Code. The analysis evaluated the DSC under the six criteria and concluded that the DSC and other components satisfy the criteria and no consideration of fatigue is required for the 50 year service life.

A new analysis evaluates the DSC against the six criteria for a service life of 60 years. The analysis concludes that all six criteria are satisfied for a service life of 60 years.

Thus, DSC shell cracking due to fatigue has been reanalyzed and has been determined not to be a concern for the renewed license period.

C3.2.2 BISCO NS-3 AND CONCRETE RADIATION EXPOSURE

HSMs

The Phase 1 HSM doors use BISCO NS-3 as shielding material. The gamma dose rate in the door cavity of the HSM was calculated to be 330 mrem/hr. This results in a gamma dose of approximately 1.8×10^5 Rads for a service life of 60 years. This is well below the service limit of 1.5×10^{10} Rads.

The integrated neutron fluence in the HSM concrete for 50 years was calculated to be 1.2×10^{14} neutrons/cm^2. This results in an integrated fluence of approximately 1.44×10^{14} neutrons/cm^2 for a service life of 60 years. This is well below the service limits for the material for fast and thermal neutron exposure, 1.6×10^{17} neutrons/cm^2 and 1.5×10^{19} neutrons/cm^2, respectively.

Thus, the effects of radiation on the HSM concrete and BISCO NS-3 has been reanalyzed and is projected not to be a concern for the renewed license period.

Transfer Cask

The Transfer Cask contains BISCO NS-3 neutron shielding between the cask outer shell and neutron shield jacket. The bounding estimated gamma and neutron dose rates at the inner surface of NS-3 in the cask are 250 mrem/hr and 959 mrem/hr, respectively. The gamma exposure for a 60 year service life is bounded by the Phase 1 HSM door evaluation, above.

The neutron dose rate for the Transfer Cask neutron shielding is lower than the rate on the HSM interior concrete surface. The integrated fluence is estimated to be approximately 1.44×10^{14} neutrons/cm^2 for a service life of 60 years for the HSM concrete as documented in the HSM evaluation, above. This fluence is well below the service limits for the material for fast and thermal neutron exposure – 1.6×10^{17} neutrons/cm^2 and 1.5×10^{19} neutrons/cm^2, respectively.

Thus, the effects of radiation on the HSM concrete and BISCO NS-3 has been reanalyzed and has been determined not to be a concern for the renewed license period.

C3.2.3 TRANSFER CASK TRUNNIONS AND LIFT EQUIPMENT FATIGUE

The Transfer Cask, Transfer Cask Lifting Yoke, and Lift Extension are used for the General License version of the NUHOMS® systems that is currently being used at ONS for new loadings. If it is conservatively assumed that this equipment will be used for all future dry storage loadings until the end of reactor operations at ONS (i.e., 2034), including removal of IFAs from the spent fuel pool, approximately 300 loadings will be required. If it is further assumed this equipment will be required for returning the loaded DSCs to the spent fuel pools, 300 unloading cycles would be required. With ten lifts required for each loading cycle, six lifts required for each unloading cycle, and another 100 miscellaneous lifts (for dry runs, annual maintenance, etc.), it is estimated that a total of 4,900 lifts will be required for the 60 year service life of the equipment.

Transfer Cask Trunnions

The fatigue analysis for the Transfer Cask trunnions shows the limiting number of lifts is 4,859 for the insert plate where the trunnions attach to the cask structural shell.

Since this limit is less than the 4,900 lifts estimated for a 60 year service life, corrective action will be required to ensure the lift limit is not exceeded. To ensure timely corrective action is taken, the fatigue calculation will be periodically reviewed throughout the service life of the Transfer Cask.

Transfer Cask Lifting Yoke

The fatigue analysis for the Lifting Yoke shows the limiting number of lifts is 1.3×10^5. This is well above the conservative estimate for number of lifts required for a 60 year service life.

Transfer Cask Lift Extension

The fatigue analysis for the Transfer Cask Lift Extension shows the limiting number of fatigue cycles is 2.3×10^5. This is well above the conservative estimate for number of lifts required for a 60 year service life.

Thus, fatigue of the Transfer Cask Trunnions, Transfer Cask Lifting Yoke, and Transfer Cask Lift Extension has been reanalyzed and has been determined not to be a concern for the renewed license period.

C3.2.4 HSM CONCRETE THERMAL CYCLING

The original thermal cycling analysis of the HSM concrete was conducted for a service life of 50 years. The number of thermal cycles was calculated as 18,250 for the 50 year service life. Prorating this value to a 60 year service life yields a value of 21,900 cycles. This is well below the thermal cycling limit of 1×10^7 cycles for reinforced concrete.

Thus, thermal cycling of the HSM concrete has been reanalyzed and has been determined not to be a concern for the renewed license period.

C3.2.5 DSC SUPPORT STRUCTURE THERMAL FATIGUE

The original thermal fatigue analysis of the DSC support structure was performed for a 50 year service life. The number of thermal cycles was conservatively calculated as 18,250 (one per day). The analysis concludes that thermal fatigue need not be considered based on Section III, NF-3331.1 of the ASME code which requires such analysis for components with greater than 20,000 cycles.

The fatigue analysis was revised to reflect 10,950 thermal cycles for a 60 year service life, using a less conservative assumption of 182.5 cycles per year. The revised assumption is still conservative based on actual stress conditions and historical daily temperature variations at ONS. This is well below the ASME code requirement for consideration of thermal fatigue for components with greater than 20,000 cycles.

Thus, fatigue of the DSC support structure has been reanalyzed and has been determined not to be a concern for the renewed license period.

C4.0 REFERENCES (SITE-SPECIFIC ISFSI UFSAR SUPPLEMENT AND CHANGES)

C4-1 Duke, ONS, *Updated Final Safety Analysis Report*, Chapter 18.0 - Aging Management Programs and Activities.

Appendix D

Technical Specifications Changes

APPENDIX D: TECHNICAL SPECIFICATIONS CHANGES

10 CFR 72, §72.42 provides the requirements for renewal of an independent spent fuel storage installation license. The preliminary guidance for license renewal for Site-Specific ISFSIs requires that an application for license renewal include any Technical Specifications changes, or additions, that are necessary to manage the effects of aging during the renewal period. Review of the information provided in the ONS Site-Specific ISFSI license renewal application and in the Site-Specific ISFSI Technical Specifications has confirmed that no changes to the Site-Specific ISFSI Technical Specifications are needed.

APPENDIX E

ENVIRONMENTAL REPORT SUPPLEMENT

TABLE OF CONTENTS (APPENDIX E)

APPENDIX E E-1

TABLE OF CONTENTS E-2

ACRONYMS AND ABBREVIATIONS E-7

E1.0 INTRODUCTION E-8

E1.1 PURPOSE AND NEED FOR THE PROPOSED ACTION E-8
E1.2 ENVIRONMENTAL BACKGROUND E-8
E1.3 ENVIRONMENTAL REPORT SCOPE AND METHODOLOGY E-11
E1.4 REFERENCES E-14

E2.0 SITE CHARACTERISTICS E-17

E2.1 GENERAL SITE ENVIRONMENT AND SETTING E-17
E2.2 GEOLOGY, SOILS, SURFACE WATER AND GROUNDWATER E-20
E2.3 THREATENED OR ENDANGERED SPECIES E-22
E2.4 REGIONAL DEMOGRAPHY E-24
E2.4.1 GENERAL POPULATION E-24
E2.4.2 MINORITY AND LOW-INCOME POPULATIONS E-26
E2.4.2.1 MINORITY POPULATIONS E-26
E2.4.2.2 LOW-INCOME POPULATIONS E-28
E2.5 TAXES E-37
E2.6 LAND USE PLANNING E-38
E2.7 SOCIAL SERVICES AND PUBLIC FACILITIES E-38
E2.8 HISTORIC AND ARCHAEOLOGICAL RESOURCES E-39
E2.9 REFERENCES E-40

E3.0 PROPOSED ACTION E-42

E3.1 GENERAL INSTALLATION INFORMATION E-42
E3.2 INVENTORY E-45
E3.3 CONSTRUCTION E-46
E3.4 AGING MANAGEMENT ACTIVITIES E-46
E3.5 EMPLOYMENT E-46

E3.6 DECOMMISSIONING E-46
E3.7 REFERENCES E-47

E4.0 ENVIRONMENTAL CONSEQUENCES AND MITIGATING ACTIONS E-48

E4.1 NRC REVIEWS E-48
E4.2 IMPACTS FROM REFURBISHMENT AND CONSTRUCTION E-48
E4.3 IMPACTS FROM OPERATIONS E-48
E4.3.1 OCCUPATIONAL AND PUBLIC HEALTH E-48
E4.3.2 OTHER IMPACTS E-52
E4.4 IMPACTS FROM POTENTIAL ACCIDENTS E-53
E4.4.1 CATEGORY I EVENT ANALYSIS E-53
E4.4.2 CATEGORY II EVENT ANALYSIS E-53
E4.4.3 CATEGORY III AND IV EVENT ANALYSIS E-54
E4.5 REFERENCES E-60

E5.0 ASSESSMENT OF NEW AND SIGNIFICANT INFORMATION E-61

E5.1 DISCUSSION E-61
E5.2 REFERENCES E-63

E6.0 SUMMARY OF LICENSE RENEWAL IMPACTS AND MITIGATING ACTIONS E-64

E6.1 LICENSE RENEWAL IMPACTS E-64
E6.2 MITIGATION E-65
E6.3 UNAVOIDABLE ADVERSE IMPACTS E-65
E6.4 IRREVERSIBLE AND IRRETRIEVABLE RESOURCE COMMITMENTS E-65
E6.5 SHORT TERM USE VERSUS LONG TERM PRODUCTIVITY E-65

E7.0 ALTERNATIVES E-66

E7.1 ALTERNATIVES CONSIDERED IN THE ORIGINAL SITE-SPECIFIC E-67
E7.1.1 SHIP SPENT FUEL TO A PERMANENT FEDERAL REPOSITORY E-67
E7.1.2 SHIP SPENT FUEL TO ANOTHER SITE E-67
E7.1.3 CONSTRUCT A NEW INDEPENDENT SPENT FUEL STORAGE POOL E-67
E7.1.4 EXPAND THE STORAGE CAPABILITIES OCONEE SPENT FUEL POOLS THROUGH THE USE OF SPENT FUEL ROD CONSOLIDATION. E-68

E7.2 ALTERNATIVES NOT CONSIDERED IN THE ORIGINAL ISFSI LICENSING ANALYSIS E-68
E7.2.1 INCREASE THE STORAGE CAPACITY OF THE EXISTING SPENT FUEL POOL E-68
E7.2.2 SHIP SPENT FUEL TO A REPROCESSING FACILITY E-68
E7.2.3 SHIP SPENT FUEL TO A FEDERAL INTERIM STORAGE FACILITY E-69
E7.2.4 SHIP SPENT FUEL TO OTHER UTILITY COMPANIES' REACTORS FOR STORAGE E-69
E7.2.5 CONSTRUCT A NEW ISFSI AT THE ONS SITE E-69
E7.2.6 CONSTRUCT A NEW ISFSI AWAY FROM THE ONS SITE E-69
E7.3 NO ACTION E-70
E7.4 REFERENCES E-71
E8.0 COMPARISON OF THE IMPACTS OF LICENSE RENEWAL WITH THE ALTERNATIVES E-72
E9.0 STATUS OF COMPLIANCE E-74
E9.1 PROPOSED ACTION E-74
E9.1.1 GENERAL E-74
E9.1.2 THREATENED AND ENDANGERED SPECIES CONSULTATIONS E-74
E9.1.3 NATIONAL HISTORIC PRESERVATION ACT E-75
E9.1.4 AIR REGULATED FACILITIES E-75
E9.2 REFERENCES E-76
ATTACHMENT 1 ENDANGERED SPECIES CORRESPONDENCE E-77
ATTACHMENT 2 CULTURAL RESOURCES CORRESPONDENCE E-91
ATTACHMENT 3 AIR REGULATED FACILITIES E-94

LIST OF TABLES

E1-1 NRC ENVIRONMENTAL REVIEWS OF SPENT FUEL STORAGE IN SITE-SPECIFIC ISFSIS E-10

E1-2 SECTIONS OF THIS ENVIRONMENTAL REPORT THAT RESPOND TO LICENSE RENEWAL ENVIRONMENTAL REGULATORY REQUIREMENTS OF 10 CFR 51 .... E-11

E2-1 ENDANGERED, THREATENED, AND SOUTH CAROLINA STATE LISTED PLANT AND ANIMAL SPECIES FOUND ON OR HISTORICALLY OCCURRING IN THE VICINITY OF THE ONS E-24

E2-2 POPULATION GROWTH IN OCONEE, PICKENS, AND ANDERSON COUNTIES, SOUTH CAROLINA (1980-2005) E-25

E2-3 MINORITY AND LOW-INCOME POPULATION BLOCK GROUPS E-29

E2-4 MINORITY AND LOW-INCOME BLOCK GROUPS WITHIN 10 MILES OF ONS SITE-SPECIFIC ISFSI E-30

E2-5 ONS PROPERTY TAXES PAID TO OCONEE COUNTY COMPARED TO TOTAL REVENUES, 2000-2006 .... E-37

E6-1 ENVIRONMENTAL IMPACTS RELATED TO THE LICENSE RENEWAL OF THE ONS SITE-SPECIFIC ISFSI E-64

E7-1 ALTERNATIVES ANALYZED IN INDEPENDENT SPENT FUEL STORAGE INSTALLATION LICENSE APPLICATIONS E-66

E8-1 COMPARISON OF ONS SITE-SPECIFIC ISFSI LICENSE RENEWAL WITH THE ALTERNATIVES E-73

E9-1 ENVIRONMENTAL AUTHORIZATIONS FOR ONS SITE-SPECIFIC ISFSI LICENSE RENEWAL E-74

LIST OF FIGURES

E2-1 50-MILE VICINITY MAP OF ONS E-18

E2-2 10-MILE VICINITY MAP OF ONS E-19

E2-3 ONS LAYOUT E-21

E2-4 AMERICAN INDIAN OR ALASKAN NATIVE MINORITY POPULATIONS E-31

E2-5 BLACK RACES MINORITY POPULATIONS E-32

E2-6 OTHER MINORITY POPULATIONS E-33

E2-7 AGGREGATE OF MINORITY POPULATIONS E-34

E2-8 HISPANIC ETHNICITY MINORITY POPULATIONS E-35

E2-9 LOW INCOME POPULATION LOCATIONS E-36

E3-1 LAYOUT OF ONS SHOWING LOCATION OF SITE-SPECIFIC ISFSI E-43

ACRONYMS AND ABBREVIATIONS

ALARA	As Low As Reasonably Achievable
CFR	Code of Federal Regulations
CNS	Catawba Nuclear Station
DBT	Design Basis Tornado
DOE	U.S. Department of Energy
DSC	Dry Storage Canister
EA	Environmental Assessment
EIS	Environmental Impact Statement
EPA	U.S. Environmental Protection Agency
EPRI	Electric Power Research Institute
ft	foot/feet
FOL	Facility Operating License
FERC	Federal Energy Regulatory Commission
GL	Generic Letter
HSM	Horizontal Storage Module
IFA	Irradiated Fuel Assembly
IN	Inch(es)
INPO	Institute of Nuclear Power Operations
ISFSI	Independent Spent Fuel Storage Installation
kW	Kilowatts
lbs	pounds
mrem/hr	millirem per hour
msl	mean sea level
MHE	Maximum Hypothetical Earthquake
MNS	McGuire Nuclear Station
MWd/MTU	Megawatt-Days per Metric Tonne Uranium
NEPA	National Environmental Policy Act
NMSS	NRC Office of Nuclear Material Safety and Safeguards
NPDES	National Pollutant Discharge Elimination System
NRC	U.S. Nuclear Regulatory Commission
NSD	Nuclear System Directive
ONS	Oconee Nuclear Station
ppm	parts per million
SCDHEC	South Carolina Department of Health and Environmental Control
SCDHA	South Carolina Department of History and Archives
SCDNR	South Carolina Department of Natural Resources
SFPO	Spent Fuel Project Office
SHPO	State Historic Preservation Office
TMI	Three Mile Island
UFSAR	Updated Final Safety Analysis Report
USFWS	United States Fish and Wildlife Service
VAC	Volts AC
w/o	weight percent

E1.0 INTRODUCTION

E1.1 PURPOSE AND NEED FOR THE PROPOSED ACTION

Independent Spent Fuel Storage Installations (ISFSIs) for storing spent fuel and associated radioactive materials are licensed by the U.S. Nuclear Regulatory Commission (NRC). The licensing is done in accordance with the Atomic Energy Act of 1954 (42 USC 2011, et seq.) and NRC implementing regulations.

Oconee Nuclear Station (ONS) is owned and operated by Duke Power Company LLC d/b/a Duke Energy Carolinas LLC (Duke). The ONS ISFSI operates pursuant to NRC license SNM-2503 issued on January 31, 1990. The Site-Specific ISFSI license will expire on January 31, 2010. The purpose and need for the proposed action, renewal of the ONS Site-Specific ISFSI license, is to provide the continued storage of spent fuel beyond the current Site-Specific ISFSI license term. The license renewal will allow the storage of spent fuel for 40 years beyond the current license period. This will also allow ONS to operate its Site-Specific ISFSI for 16 years beyond expiration of the station's renewed facility operating licenses (FOLs).

This supplemental report was prepared by Duke as part of its application to the NRC for license renewal as provided by the following NRC regulations:

- 10 CFR 72, Licensing Requirements for the Independent Storage of Spent Nuclear Fuel and High Level Radioactive Waste, §72.42, Duration of License; Renewal, and §72.34, Environmental Report
- 10 CFR 51, Environmental Protection Requirements for Domestic Licensing and Regulatory Functions, 10CFR51, §51.60, Environmental Report-Materials License (Reference E1.4-4)

E1.2 ENVIRONMENTAL BACKGROUND

The NRC has extensive experience evaluating environmental impacts from ISFSIs in accordance with the National Environmental Policy Act (NEPA). This experience includes the following:

- Preparing an environmental impact statement in conjunction with establishing the ISFSI regulation in 10 CFR 72 (Reference E1.4-5) and two environmental assessments for substantive revision to the regulation
- Preparing an environmental impact statement for an ISFSI at the Idaho National Engineering and Environmental Laboratory for Three Mile Island Unit 2 spent fuel
- Preparing a generic environmental impact statement for station license renewals
- Preparing environmental assessments for site-specific ISFSI licenses at nine nuclear power plant sites
- Approving ISFSI operation under general license provisions at 17 nuclear power plant sites

- Preparing an environmental impact statement for a private, commercial ISFSI (Skull Valley)
- Issuing, and twice updating, its waste confidence decision (codified as 10 CFR 51, §51.23) that considers, among other things, operation of spent fuel storage for 30 years beyond the term of a renewed reactor operating license

Table E1-1 identifies each NEPA evaluation and summarizes its conclusions. In the course of these evaluations, the NRC has not identified any significant environmental impact associated with ISFSI operation.

The U.S. Department of Energy (DOE) has also analyzed ISFSI environmental impacts. As part of its evaluation of the impact of constructing a national repository for spent nuclear fuel, DOE analyzed environmental impacts from a no-action alternative that included leaving spent nuclear fuel in power plant ISFSIs (Reference E1.4-1). The analysis accounted for the fuel at all operating nuclear power plants, including ONS. DOE concluded that environmental impacts would be small for at least 100 years and, with appropriate institutional controls, could continue to be small for thousands of years.

Table E1-1

NRC Environmental Reviews of Spent Fuel Storage in Site-Specific ISFSI[a]

Date	Subject	Conclusion
1979	Establishment of regulation 10 CFR 72 authorizing spent fuel storage at a Site-Specific ISFSI (Reference E1.4-7)	Regulations in place will ensure protection of the environment
1984	Final Waste Confidence Decision (Reference E1.4-8)	Spent fuel generated in any reactor can be stored without significant impacts for at least 30 years beyond expiration of the reactor's operating license at that reactor's spent fuel storage basin or at an onsite or offsite ISFSI
1984	Revision of regulation 10 CFR 72 to authorize offsite ISFSI (monitored retrievable storage) (Reference E1.4-9)	Environmental consequences of long-term storage not significant
1985	Surry Site-Specific ISFSI EA (Reference E1.4-10)	No significant environmental impact
1986	Robinson Site-Specific ISFSI EA (Reference E1.4-12)	No significant environmental impact
1988	Revision of regulation 10 CFR 72 to authorize ISFSI general license (Reference E1.4-13)	No significant environmental impact
1988	ONS Site-Specific ISFSI EA (Reference E1.4-14)	No significant environmental impact.
1990	Review and final revision of waste confidence decision (Reference E1.4-15)	Spent fuel generated in any reactor can be stored without significant impacts for at least 30 years beyond the licensed life for operation (which may include the term of a revised or renewed license) of that reactor at its spent fuel storage basin or at an onsite or offsite ISFSI
1991	Fort St. Vrain ISFSI EA (Reference E1.4-16)	No significant environmental impact
1991	Calvert Cliffs ISFSI EA (Reference E1.4-17)	No significant environmental impact
Undated	Prairie Island ISFSI EA (Reference E1.4-18)	No significant environmental impact
1994	Rancho Seco ISFSI EA (Reference E1.4-19)	No significant environmental impact
1996	Trojan ISFSI EA (Reference E1.4-20)	No significant environmental impact
1996	Nuclear plant license renewal (Reference E1.4-21)	No significant environmental impact from spent fuel storage
1997	North Anna ISFSI EA (Reference E1.4-22)	No significant environmental impact
1998	TMI 2 ISFSI at Idaho National Engineering and Environmental Laboratory EIS (Reference E1.4-23)	Small and acceptable effects on the environment
1999	Waste Confidence Decision Review Status (Reference E1.4-24)	No significant and unexpected events have occurred that would cast doubt on NRC's waste confidence findings
2001	Skull Valley ISFSI EIS (Reference E1.4-25)	Environmental impacts from operation would be small
2003	Diablo Canyon ISFSI EA (Reference E1.4-26)	No significant environmental impact
2005	Surry ISFSI license Renewal EA (Reference E1.4-27)	No significant environmental impact
2005	Robinson Site-Specific ISFSI License Renewal (Reference E1.4-28)	No significant environmental impact

a. In addition to the site-specific reviews listed, NRC prepares an environmental assessment for each dry storage cask listed in 10 CFR 72, §72.214. Currently, 13 casks are listed.
b. EA completed in 1984; rule revised in 1988.

E1.3 ENVIRONMENTAL REPORT SCOPE AND METHODOLOGY

NRC regulation 10 CFR 72, §72.42 provides for Site-Specific ISFSI license renewal, and regulation 10 CFR 72, §72.34 requires an application to include an environmental report that meets the requirements of 10 CFR 51 Subpart A. In Subpart A, 10 CFR 51, §51.60 (Reference E1.4-4) requires that the environmental report be a separate document entitled "Supplement to Applicant's Environmental Report" and specifies environmental report contents. The regulation focuses on presenting any significant environmental change from the previously submitted environmental report. Duke has prepared Table E1-2 to verify conformance with the regulatory requirements. For each requirement of 10 CFR 51, §51.60, including 10 CFR 51, §51.45 as adopted by reference, Table E1-2 indicates which environmental report section provides responsive information.

Table E1-2

Sections of this Environmental Report that Respond to License Renewal Environmental Regulatory Requirements of 10 CFR 51

Regulatory Requirement	Section	Responsive Environmental Report Section
10 CFR 51, §51.60(a)		Entire Document
10 CFR 51, §51.45(a) description of proposed action	E3.0	Proposed Action
10 CFR 51, §51.45(a) statement of purposes	E1.1	Purpose and Need for the Proposed Action
10 CFR 51, §51.45(a) affected environment	E2.0	Site and Environmental Interfaces
10 CFR 51, §51.45(b)(1)	E4.0	Environmental Consequences and Mitigating Actions
10 CFR 51, §51.45(b)(2)	E4.0 E6.3	Environmental Consequences and Mitigating Actions Unavoidable Adverse Impacts
10 CFR 51, §51.45(b)(3)	E7.0 E8.0	Alternatives Comparison of the Impacts of License Renewal with the Alternatives
10 CFR 51, §51.45(b)(4)	E6.5	Short-Term Use Versus Long-Term Productivity of the Environment
10 CFR 51, §51.45(b)(1)	E6.4	Irreversible and Irretrievable Resource Commitments
10 CFR 51, §51.45(c) alternative for reducing or avoiding effects	E4.0 E6.2	Environmental Consequences and Mitigating Actions Mitigation
10 CFR 51, §51.45(d)	E9.0	Status of Compliance
10 CFR 51, §51.53(c)(3)(iv)	E5.0	Assessment of New and Significant Information

In determining the appropriate scope for the Site-Specific ISFSI license renewal environmental report, Duke had to determine an appropriate license renewal term. The Site-Specific ISFSI license authorizes Duke to store 2,112 spent fuel assemblies removed from the ONS spent fuel pools.

Storage at the Site-Specific ISFSI is intended by Duke and the NRC to be interim pending the availability of a federal repository. There is, however, uncertainty regarding when a repository will be available and the schedule under which it will accept spent fuel shipments. The repository schedule drives the Site-Specific ISFSI schedule; the longer it takes for the repository to begin accepting spent fuel shipments, the longer the Site-Specific ISFSI must store fuel. The best achievable schedule that the DOE anticipates to begin accepting shipments at Yucca Mountain repository is in 2017 (Reference E1.4-2). Duke believes it is prudent to plan for the possibility that shipments to a federal repository will be delayed until later in the first quarter or early second quarter of the 21st century, consistent with the NRC's finding in its Waste Confidence Rule (Reference E1.4-8). Based on the inventory of spent fuel that Duke will have at ONS when a repository becomes available, and the time that Duke will need to eliminate the spent fuel inventory, Duke proposes the year 2050 as the end of the period of extended Site-Specific ISFSI operation. This is 16 years after expiration of the renewed FOLs for ONS. This environmental report analyzes renewal of the Site-Specific ISFSI license assuming that shipments will be according to plans and consistent with the NRC's Waste Confidence Rule.

As mentioned previously, NRC has prepared a generic environmental impact statement (GEIS) for station license renewal (Reference E1.4-21). The GEIS considers spent fuel storage during the license renewal of an ISFSI license as being an inherent part of reactor license renewal. The GEIS described spent fuel generation and storage during current station license terms and during station license renewal terms. This discussion includes the ONS spent fuel (Reference E1.4-21). The GEIS generically discusses land use and terrestrial resources; water use and aquatic resources; radiological impacts of normal operation; off-normal events and accidents; off-site dose; occupational dose; other effects; and resources committed.

ISFSIs located at nuclear plant sites, such as ONS, share many attributes such as affected environment, monitoring and reporting programs, and staffing with the power plant. The Duke application to renew the ONS operating license includes an environmental report supplement (Reference E1.4-3). Because the GEIS addresses ISFSI operations during a station license renewal term, and because Duke recently prepared an environmental report for station license renewal, Duke has adopted by reference [per 10 CFR 51, §51.53(a) and 10 CFR 51, §51.60] in the Site-Specific ISFSI license renewal environmental report appropriate material from the GEIS and the station license renewal environmental report. The Site-Specific ISFSI license renewal is for a period 16 years longer than the operating license renewal term. For instances where the analysis in the plant operating license environmental report did not adequately address impacts that might occur during the additional 16 years, this environmental report performs those analyses.

The Site-Specific ISFSI license renewal environmental report is comprised of nine sections. This section describes the purpose and need for the proposed action, i.e., renewal of the Site-Specific ISFSI materials license. Section E2.0 describes the environs affected by Site-Specific ISFSI operations, and Section E3.0 describes pertinent aspects of the installation. Section E4.0 provides the results of analyses of impacts on the environment from Site-Specific ISFSI license renewal. Section E5.0 describes the process Duke used to identify any new and significant information regarding environmental impacts. Section E6.0 summarizes the impacts of license renewal and mitigating actions. Section E7.0 describes feasible alternatives to the proposed action and their environmental impacts. Section E8.0 compares the impacts of license renewal with those alternatives. Section E9.0 discusses Site-Specific ISFSI compliance with regulatory requirements.

E1.4 REFERENCES

E1.4-1 Final Environmental Impact Statement for a Geologic Repository for the Disposal of Spent Nuclear Fuel and High-Level Radioactive Waste at Yucca Mountain, Nye County, Nevada," DOE/EIS-0250F, February 2002 Washington, D.C

E1.4-2 DOE. 2006 Yucca Mountain Repository Schedule. July 19, 2006. Accessed September 6, 2006 online at: http://www.ocrwm.doe.gov/info_library/newsroom/documents/CtrSchedule.pdf

E1.4-3 Application for Renewed Operating Licenses, Oconee Nuclear Station, Units 1, 2, and 3, Applicants Environmental Report, Operating License Renewal Stage, Rev. 0, Duke, June 1998

E1.4-4 10 CFR 51, Environmental Protection Requirements for Domestic Licensing and Regulatory Functions, 10CFR51, §51.60, Environmental Report - Materials License

E1.4-5 10 CFR 72, Licensing Requirements for the Independent Storage of Spent Nuclear Fuel and High Level Radioactive Waste

E1.4-6 Oconee Nuclear Station Independent Spent Fuel Storage Installation Updated Final Safety Analysis Report, Duke

E1.4-7 Final Generic Environmental Impact Statement on Handling and Storage of Spent Light Water Power Reactor Fuel. NUREG-0575, NRC, August 1979. Washington, D.C

E1.4-8 "Waste Confidence Decision". Federal Register August 31, 1984. p 34658 et seq.

E1.4-9 Environmental Assessment: Licensing Requirements for the Independent Storage of Spent Fuel and High-Level Radioactive Waste, NUREG-1092, NRC, August 1984, Washington, D.C.

E1.4-10 Environmental Assessment Related to the Construction and Operation of Surry Dry Cask Independent Spent Fuel Storage Installation, NRC, April 1985, Washington, D.C.

E1.4-11 License for Independent Storage of Spent Nuclear Fuel and High-Level Radioactive Waste, License Number SNM-2502, NRC, July 2, 1986, Washington, D.C.

E1.4-12 Environmental Assessment Related to the Construction and Operation of the H. B. Robinson Independent Spent Fuel Storage Installation, NRC, March 1986, Washington, D.C.

E1.4-13 Environmental Assessment for Proposed Rule Entitled "Storage of Spent Nuclear Fuel in NRC-Approved Storage Casks at Nuclear Power Reactor Sites" Enclosure 5 of Commission Paper, concerning Storage of Spent Nuclear Fuel at Nuclear Power Sites, Memo for Hugh Thompson, Director, NMSS, July 26, 1988, NRC, Washington, D.C.

E1.4-14 Environmental Assessment Related to the Construction and Operation of the Oconee Nuclear Station Independent Spent Fuel Storage Installation, October, 1988, NRC, Washington, D.C.

E1.4-15 "Consideration of Environmental Impacts of Temporary Storage of Spent Fuel After Cessation of Reactor Operation;" NRC; Federal Register; September 18 p 38472-4; and "Waste Confidence Decision Review," NRC; Federal Register; September 18, 1990, p 38474-514

E1.4-16 Environmental Assessment Related to the Construction and Operation of the Fort St. Vrain Independent Spent Fuel Storage Installation, NRC, February 1991, Washington, D.C.

E1.4-17 Environmental Assessment Related to the Construction and Operation of the Calvert Cliffs Independent Spent Fuel Storage Installation, NRC, March 1991, Washington, D.C.

E1.4-18 Environmental Assessment Related to the Construction and Operation of the Prairie Island Independent Spent Fuel Storage Installation, August (undated), Washington, D.C.

E1.4-19 Environmental Assessment Related to the Construction and Operation of the Rancho Seco Independent Spent Fuel Storage Installation, NRC, August, 1994, Washington, D.C.

E1.4-20 Environmental Assessment Related to the Construction and Operation of the Trojan Independent Spent Fuel Storage Installation, NRC, November, 1996, Washington, D.C.

E1.4-21 Generic Environmental Impact Statement for License Renewal of Nuclear Power Plants, NUREG-1437, NRC, May 1996, Washington, D.C.

E1.4-22 Environmental Assessment Related to the Construction and Operation of the North Anna Independent Spent Fuel Storage Installation, NRC, March 1997, Washington, D.C.

E1.4-23 Final Environmental Statement for the Construction and Operation of an Independent Spent Fuel Storage Installation to Store the Three Mile Island Unit 2 Spent Fuel at the Idaho National Engineering and Environmental Laboratory. NUREG-1626, NRC, March 1998, Washington, D.C.

E1.4-24 "Waste Confidence Decision Review Status," NRC, Federal Register. December 6, 1999, p 68005-7

E1.4-25 Final Environmental Statement for the Construction and Operation of an Independent Spent Fuel Storage Installation on the Reservation of the Skull Valley Band of Goshute Indians and the Related Transportation Facility in Tooele County, Utah; NUREG-1714; NRC; December 2001, Washington, D.C.

E1.4-26 Environmental Assessment Related to the Construction and Operation of the Diablo Canyon Independent Spent Fuel Storage Installation, NRC, March 2003, Washington, D.C.

E1.4-27 Notice of Issuance of Environmental Assessment and Finding of No Significant Impact for the License Renewal of the Surry Independent Spent Fuel Storage Installation, NRC, February 2005, Washington, D.C.

E1.4-28 Notice of Issuance of Environmental Assessment and Finding of No Significant Impact for the License Renewal of the H. B. Robinson, Unit 2, Independent Spent Fuel Storage Installation (TAC No. L23716), NRC, March 2005, Washington, D.C.

E2.0 SITE CHARACTERISTICS

Duke owns and operates ONS, which is part of Duke's integrated energy-producing area called the Keowee-Toxaway Complex. The Keowee-Toxaway Complex is located in the upper Savannah River drainage basin, at the foot of the Blue Ridge Mountains in northwestern South Carolina.

The Site-Specific ISFSI is located on the ONS site. ONS is located in eastern Oconee County, South Carolina, approximately 8 miles northeast of Seneca, South Carolina. Lake Keowee occupies the area immediately north and west of the site. The Corps of Engineer's Hartwell Reservoir is located south and downstream from the site. Lake Jocassee lies approximately 11 miles to the north.

E2.1 GENERAL SITE ENVIRONMENT AND SETTING

The ONS site is located within the Inner Piedmont Belt, at this locality the westernmost component of the Piedmont Physiographic Province. The topography of the area is undulating to rolling; the surface elevations range from about 700 ft to 900 ft. The region is moderately well dissected with rounded hilltops, representing a mature regional development. The area is well drained by several intermittent streams flowing away from the center of the site in a radial pattern. The general station area is shown on Figure E2-1. The ONS site lies within the drainage area of the Little and Keowee Rivers, which flow southerly into the Seneca River, and subsequently discharge into the main drainage course of the Savannah River.

The region surrounding ONS was classified by the GEIS as having a medium population classification, based on the population near the site, and the proximity and size of nearby cities (GEIS Appendix C, C.1.4). Nearby towns include the cities of Seneca, Walhalla, Clemson, and Central, SC. (Figure E2-2). Forests cover the majority of the land area, with pasture, cropland, and residential development each contributing significant proportions of total land-use. The shoreline of Lake Keowee is developed with both vacation and permanent residences, along with campgrounds, boat launch areas, marinas, golf courses, and small retail establishments. There are no permanent residences within the 1.6 km (1 mile) radius (exclusion zone) of ONS.

Figure E2-1 50-mile vicinity map of Oconee Nuclear Station

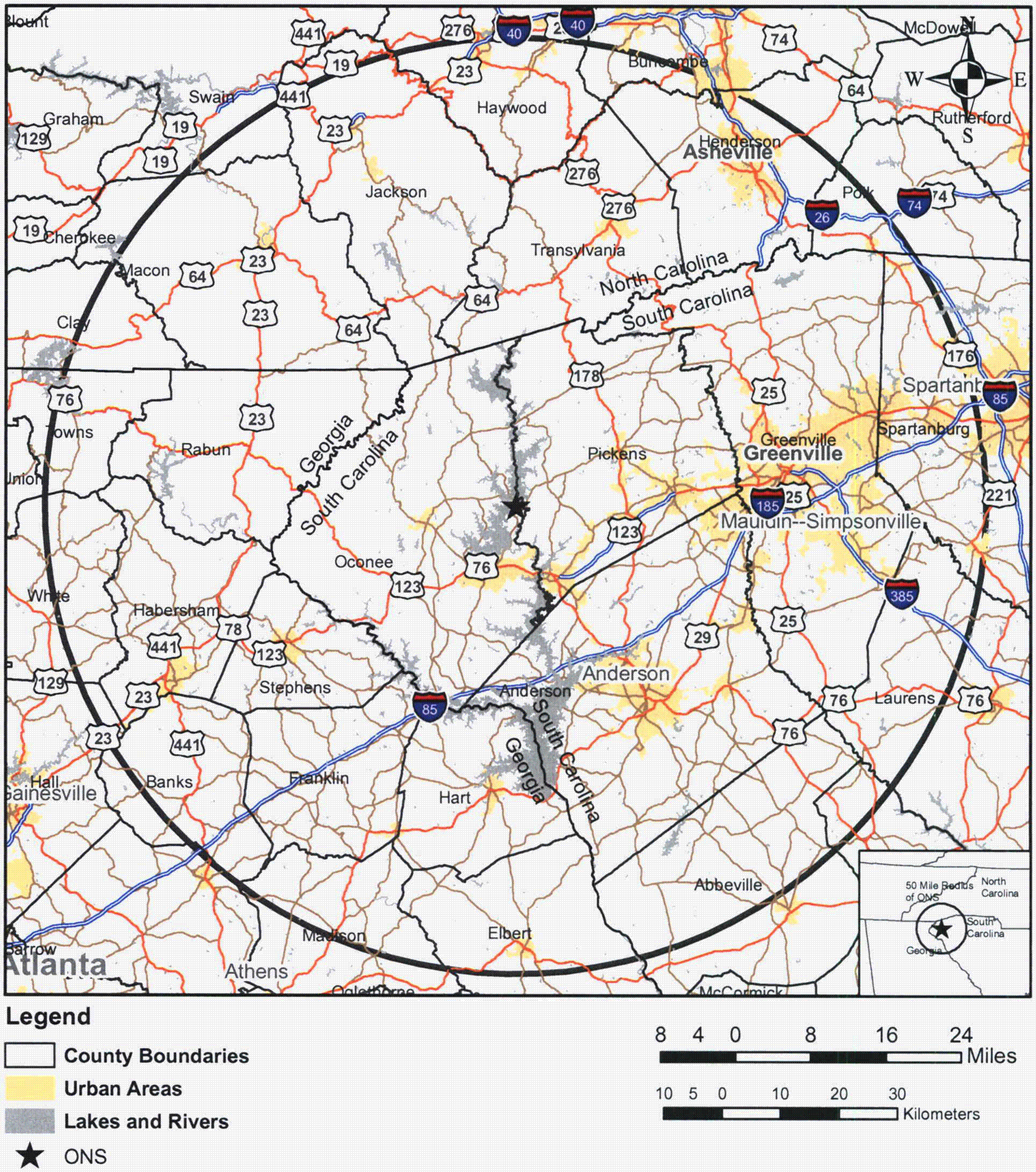
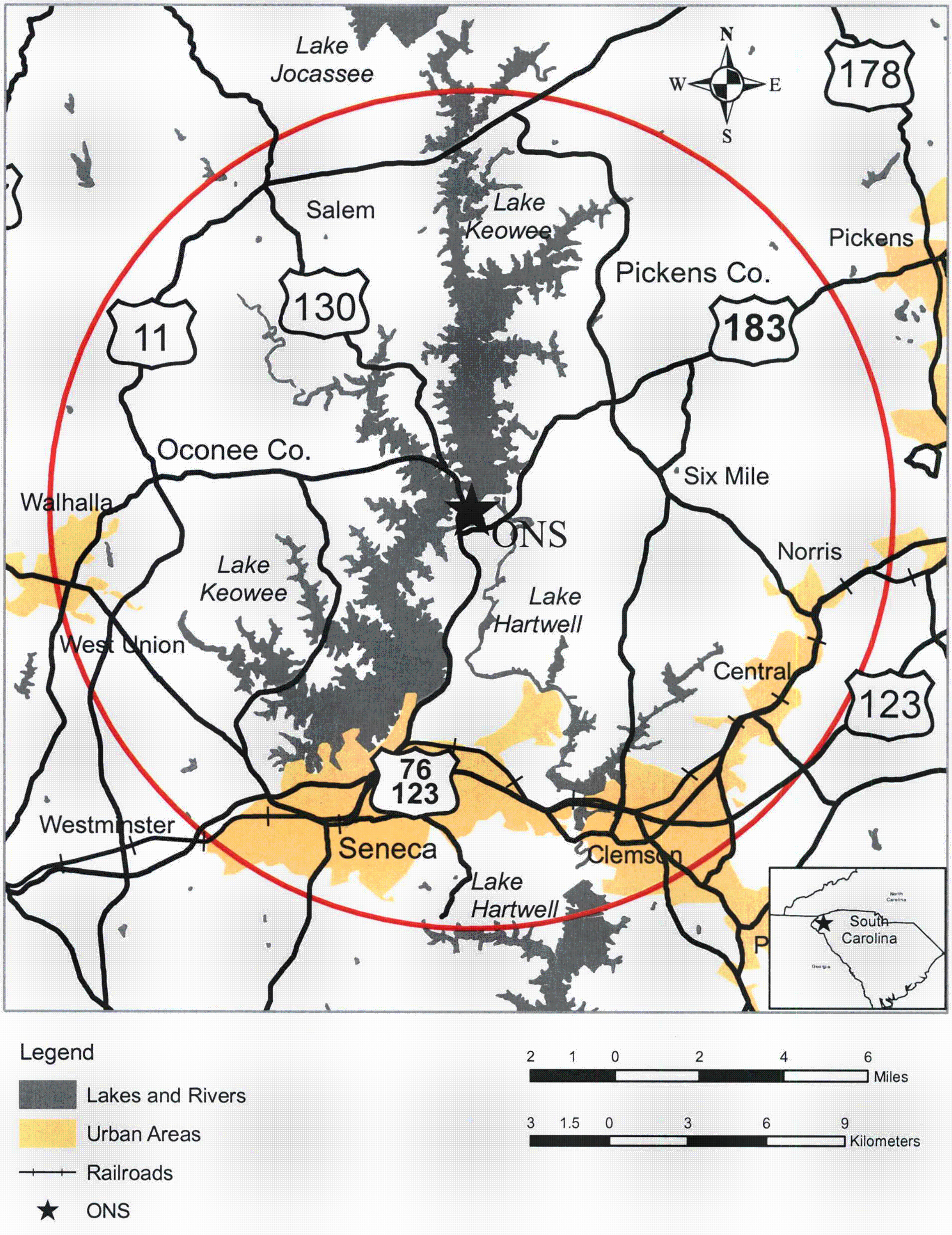


Figure E2-2 10-Mile Vicinity Map of Oconee Nuclear Station

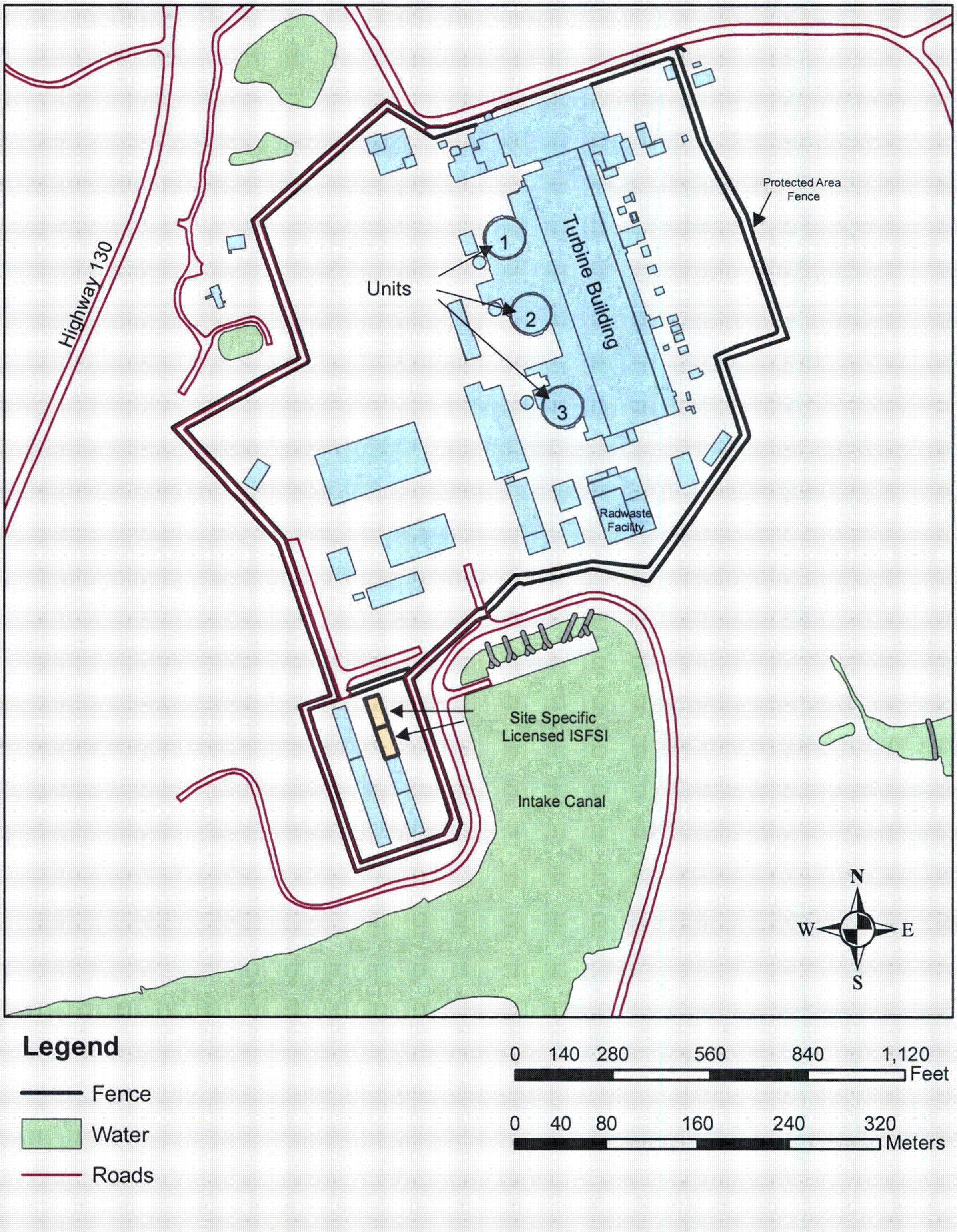


E2.2 GEOLOGY, SOILS, SURFACE WATER AND GROUNDWATER

The ONS site is located in the western most component of the Piedmont Physiographic Province, within the Inner Piedmont Belt. The regional geology is typical of the southeastern piedmont, with narrow metamorphic belts trending northeast and dipping generally to the southeast. Overlying the foundation bed are saprolite soils, a product of weathering of the underlying parent rock. These soils range in thickness from a few feet to over 100 ft (30 m) and show decreasing degrees of weathering and decomposition with increasing depth. A light to medium gray granite gneiss is dominant among the three rock types found at the site. Biotite hornblende gneiss is the second most common rock type. This rock type is generally weathered to a greater depth than the granite gneiss most likely because of the higher percentage of biotite mica. The third rock type is a hard quartz pegmatite with local concentrations of mica. This is present in layers of generally less than three feet. The Site-Specific ISFSI's concrete foundation rests on soil of partially weathered rock. Site analysis done prior to construction indicated that liquefaction of the soil and foundation rock was not a concern.

The ONS Site-Specific ISFSI is located within the plant site protected area boundary in Oconee County, South Carolina. Lake Keowee, which is formed by the Keowee Dam, is located adjacent to ONS to the north and east of the site. The Army Corps of Engineers Lake Hartwell is located to the south of the Site-Specific ISFSI. Figure E2-3 shows the Site-Specific ISFSI site location relative to ONS.

Figure E2-3 Oconee Nuclear Station Layout



The Site-Specific ISFSI is located at elevation 825.0 ft msl. The concrete slabs and shield structure bases are set at elevation 825.0 ft msl. Maximum flood level for Lake Keowee is EL 808.0 ft msl, well below the site grade of the Site-Specific ISFSI. This includes the potential wave runup and postulated seismic failure of the Jocassee dam as discussed in the ONS UFSAR Section 2.4 (Reference E2.9-3).

The main hydrologic features influencing the ONS plant site are the Jocassee and Keowee Reservoirs. Lake Jocassee was created in 1973 with the construction of the Jocassee Dam on the Keowee River. The lake provides pump storage capacity to the reversible turbine-generators of the Jocassee Hydroelectric Station, located approximately 11 miles north of the plant. At full pond, elevation 1,110 ft msl, Lake Jocassee has a surface area of 7,565 acres, a shore-line of approximately 75 miles, a volume of 1,160,298 acre-ft, and a total drainage area of about 148 square miles.

Lake Keowee was created in 1971 with the construction of the Keowee Dam on the Keowee River and the Little River Dam on the Little River. Its primary purpose is to provide cooling water for the plant and water to turn the turbines of the Keowee Hydroelectric Station. At full pond, elevation 800 ft msl, Lake Keowee has a surface area of 18,372 acres, a shoreline of approximately 300 mi, a volume of 955,586 acre-ft, and a total drainage area of about 439 square miles. The Jocassee and Keowee Reservoirs and the hydroelectric stations located at these reservoirs are owned and operated by Duke.

Lakes Keowee and Hartwell presently provide water for several municipal and industrial raw water users. The city of Greenville and the town of Seneca take their raw water supplies from Lake Keowee. The towns of Anderson, Clemson, and Pendleton, Clemson University, and several industrial plants take their raw water supplies from the Hartwell Reservoir, downstream of Lake Keowee.

A field survey in the late 1960's determined that groundwater was derived from the permeable zones within the saprolite with only minor amounts obtained from the underlying fractured bedrock. The wells were generally low yielding, less than 5 gpm. Most of the groundwater comes from shallow wells, 40-60 ft deep, and is used domestically for homes, irrigation of lawns and gardens, and for livestock in limited amounts. Presently there is little industrial demand for groundwater within the area. The average annual rainfall at the site area is approximately 53 inches.

E2.3 THREATENED OR ENDANGERED SPECIES

The general ecological setting for ONS is described in the ONS Environmental Report and the Final Environmental Statement. The ecological features in the immediate area of the facility consist of highly disturbed, second growth mixed pine and hardwoods. Approximately 3-4 acres of habitat was affected by construction of the Site-Specific ISFSI. See Figure E2-3.

Much of the region near ONS was cleared for cotton production in the late 1800's and subsequently abandoned in the 1930's. Therefore, second growth forests are representative of the majority of the present day forests in the vicinity of ONS. The dominant conifers are; loblolly pine (*Pinus taeda*), shortleaf pine (*P. echinata*), and Virginia pine (*P. virginiana*). The most common deciduous hardwoods are; red oak (*Quercus rubra*), white oak (*Q. alba*), hickory (*Carya sp.*), and tulip poplar (*Liriodendron tulipifera*). Dogwood (*Cornus florida*), mountain laurel (*Kalmia latifolia*), and redbud (*Cercis canadensis*) are the dominant understory shrubs as well as many species of herbs and grasses.

White-tailed deer (*Odocoileus virginianus*), black bear (*Ursus americanus*), raccoon, (*Procyon lotor*), cottontail rabbits (*Sylvilagus floridanus*), squirrels (*Sciurus carolinensis*), chipmunks (*Tamiasciurus hudsonicus*), beavers (*Castor canadensis*), muskrats (*Ondatra zibethica*), gray and red foxes (*Urocyon cinereoargenteus* and *Vulpes vulpes*), opossums (*Didelphis marsupialis*), striped and eastern spotted skunks (*Mephitis mephitis* and *Spilogale putorius*), river otters (*Lutra canadensis*), mink (*Mustela vison*), and various mice, voles, and shrews are typical wildlife species of the ONS area.

The most common game birds found in the ONS area are; turkey (*Meleagris gallopavo*), bobwhite quail (*Volinus virginianus*), and mourning dove (*Zenaida macroura*). Songbirds typical of the area are: eastern bluebird (*Sialia sialis*), red-eyed vireo (*Vireo olivaceus*), cardinal (*Cardinalis cardinalis*), tufted titmouse (*Parus bicolor*), woodthrush (*Hylocichla mustelina*), summer tanager (*Piranga rubra*), blue-gray gnatcatcher (*Polioptila caerulea*), hooded warbler (*Wilsonia citrine*), Carolina chickadee (*Poecile carolinensis*), and Carolina wren (*Thryothorus ludovicianus*). The eastern box turtle (*Terrapene Carolina*), common garter snake (*Thamnophis sirtalis*), timber rattlesnake (*Crotalus horridus*), and assorted frogs, toads and salamanders are typical of the herpetofauna.

Many areas of ONS are managed or protected as upland natural areas, wetlands, or wildlife areas. In 1998, as part of the environmental report for the ONS renewed operating license, Duke funded a survey of all lands within a 1.6 km (1 mile) radius of the plant site (Reference E2.9-17). The survey identified several areas that retain characteristics of mature upland forest. Duke has designated these areas as protected natural areas. Wetlands were also identified and are managed as sensitive environmental areas.

An inventory of endangered, threatened, and otherwise noteworthy plant and animal species within 1.6 km (1 mile) radius of ONS was also performed (Table E2-1). No federally listed, proposed, or candidate threatened or endangered species were identified during the survey. Three state listed plant species and one plant species not previously known in South Carolina were identified. All four species populations were confined to "natural areas" located near the periphery of the survey area. These areas are well away from areas used for normal plant operations. Historically, three additional state listed plant and one animal species have been reported from the general area; none of these species were located within the 1.6 km (1 mile) radius of the ONS plant site.

Table E2-1

Endangered, Threatened, and South Carolina State Listed Plant and Animal Species Found on or Historically Occurring in the Vicinity of the ONS.

Scientific Name	Common Name	State Status[a]	Occurrence[b]
	Animals		
Sigmora robusta	A centipede	SC	Historical
	Plants		
Carex laxiflora	Loose-flowered sedge	SR	Present
Carex prasina	Drooping sedge	SC	Present
Echinacea laevigata	Smooth coneflower	FE, SC	Historical
Nestronia umbellula	Indian olive	SC	Present
Orobanche uniflara	One-flowered broomrape	SC	Historical
Pachysandra procumbens	Allegheny spurge	SC	Historical
Viola tripartita	Three-parted violet	SC	Present

(a) FE = Federally endangered, SC = Species of Concern in South Carolina, SR = new state record for species.

(b) Historical = species have been reported from the general area in the past, but were not located within the 1.6 km (1 mile) radius of ONS during the most recent survey; Present = species was found within 1.6 km (1 mile) radius of ONS.

During the summer of 2006, Duke contacted the USFWS and the SCDNR requesting information and concurrence with Duke's assessment of the impacts to threatened and endangered species that may occur in the vicinity of the ONS.

The bald eagle (Haliaeetus leucocephalus) was delisted from the Endangered Species list on June 28, 2007 (Reference E2.9-18). Eagles remain a protected species under the Bald and Golden Eagle Protection Act and the Migratory Bird Treaty Act in the lower 48 states. Bald eagles are not known to nest or reside near the ONS Site-Specific ISFSI site for long periods of time. They are occasional visitors near the site.

E2.4 REGIONAL DEMOGRAPHY

E2.4.1 GENERAL POPULATION

The GEIS for license renewal of nuclear power plants presents a population characterization method that is based on two factors: "sparseness" and "proximity" (See Section C.1.4 of Reference E2.9-14). "Sparseness" measures population density and city size within 20 miles of a site. "Proximity" measures population density and city size within 50 miles.

Duke used geographic information system software (ArcView®) and 2000 U.S. Census Bureau data provided by the Environmental Systems Research Institute, Inc. (Reference E2.9-4) to determine demographic characteristics in the ONS vicinity. The Census Bureau provides updated annual projections, in addition to decennial data, for selected portions of its demographic information.

As derived from 2000 Census Bureau information, 187,679 people lived within 20 miles of ONS. This is a population density of 149 persons per square mile within 20 miles and, applying the GEIS sparseness measures, ONS falls into a least sparse category, Category 4 (greater than or equal to 120 persons per square mile within 20 miles).

As estimated from 2000 Census Bureau information, 1,219,121 people lived within 50 miles of ONS. This equates to a population density of 155 persons per square mile within 50 miles. Applying the GEIS proximity measures, ONS is classified as Category 2 (no city with 100,000 or more persons and between 50 and 190 persons per square mile within 50 miles). According to the GEIS sparseness and proximity matrix, the ONS ranks of sparseness Category 4 and proximity Category 2 results in the conclusion that ONS is located in a medium population area (Reference E2.9-14).

Table E2-2 depicts historical, current, and projected population figures for Oconee, Pickens, and Anderson Counties.

Table E2-2

Population Growth in Oconee, Pickens, and Anderson Counties, South Carolina (1980-2005)

	Oconee County		Pickens County		Anderson County	
	Population	Annual Growth %	Population	Annual Growth %	Population	Annual Growth %
1980	48,611	1.8%	79,292	2.8%	133,235	2.4%
1990	57,494	1.7%	93,896	1.7%	145,177	0.9%
1998	64,059	1.4%	107,087	1.7%	160,791	1.3%
2000	66,215	1.5%	110,757	1.7%	165,740	1.4%
2005	69,577	0.9%	113,575	0.7%	175,514	1.1%

Sources: DP-1. Profile of General Demographic Characteristics, Census 2000 Summary File 1 (SF 1) 100-Percent Data, U.S. Bureau of the Census, County Population Estimates for July 1, 2005 and Population Change for July 1, 2004 to July 1, 2005, Population Estimates, Population Division, U.S. Bureau of the Census, County Population Estimates for July 1, 1998 and Population Change for July 1, 1997 to July 1, 1998, Population Estimates Program Population Division, March 12, 1999; Knight 1998 (Reference E2.9-20).

E2.4.2 MINORITY AND LOW-INCOME POPULATIONS

For ONS license renewal, Duke and NRC used a 50-mile radius as the area that could contain environmental impact sites and the state as the geographic area for comparative analysis (Reference E2.9-19). ONS believes that this analysis conservatively bounds the expected limit of minority and low-income population impacts from ONS Site-Specific ISFSI license renewal, the 4-mile radius from the center of the ISFSI (Reference E2.9-16).

Duke used ArcView® geographic information system software with the U.S. Census Bureau 2000 census data to determine the minority and low-income population characteristics on a block group level. Duke included a block group if any of its area lay within 50 miles of ONS. The 50-mile radius includes 909 block groups. Duke defined the geographic area for ONS as the states of North and South Carolina and Georgia. Duke analyzed block groups in each state separately against their state's data.

E2.4.2.1 MINORITY POPULATIONS

The NMSS environmental justice procedures defines a "minority" population as: American Indian or Alaskan Native; Asian; Native Hawaiian and other Pacific Islander; Black races; other; multi-racial; the aggregate of all minority races; or, Hispanic ethnicity (See Reference E2.9-16, Appendix C). The guidance indicates that a minority population exists if either of the following conditions exists:

- The minority population of the census block or environmental impact site exceeds 50 percent
- The minority population percentage of the environmental impact area is significantly greater (typically at least 20 percentage points) than the minority population percentage in the geographic area chosen for comparative analysis

The NRC guidance calls for use of the most recent U.S. Census Bureau decennial census data. Duke used 2000 census data from the U.S. Census Bureau website (Reference E2.9-12) and U.S. Census Bureau data provided by ESRI (Reference E2.9-4) in determining the percentage of the total population within Georgia, South Carolina and North Carolina for each minority category, and in identifying minority populations within 50 miles of ONS.

Duke divided Census Bureau population numbers for each minority population within each block group by the total population for that block group to obtain the percent of the block group's population represented by each minority. For each of the 909 block groups within 50 miles of ONS, Duke compared the percent of the population in each minority category to the corresponding geographic area's minority category threshold percentage to determine if that block group constituted a minority population. Duke defined the geographic area for ONS as the State of North Carolina when the block group was in North Carolina, and the State of South Carolina when the block group was in South Carolina, and the State of Georgia when the block group was in Georgia.

Census Bureau data (Reference E2.9-12) for North Carolina characterizes 1.24 percent of the population as American Indian or Alaskan Native, 1.41 percent as Asian, 0.05 percent as Native Hawaiian or other Pacific Islander, 21.59 as percent Black races, 2.32 percent as all other single minorities, 1.28 percent as multi-racial, 27.89 percent as aggregate of minority races, and 4.71 percent as Hispanic ethnicity.

U.S. Census Bureau data (Reference E2.9-12) for South Carolina characterizes 0.34 percent of the population as American Indian or Alaskan Native, 0.90 percent as Asian, 0.04 percent as Native Hawaiian or other Pacific Islander, 29.54 as percent Black races, 1.00 percent as All Other Single Minorities, 1.00 percent as multi-racial, 32.81 percent as aggregate of minority races, and 2.37 percent as Hispanic ethnicity.

U.S. Census Bureau data (Reference E2.9-12) for Georgia characterizes 0.27 percent of the population as American Indian or Alaskan Native, 2.12 percent as Asian, 0.05 percent as Native Hawaiian or other Pacific Islander, 28.70 as percent Black races, 2.40 percent as All Other Single Minorities, 1.39 percent as multi-racial, 34.93 percent as aggregate of minority races, and 5.32 percent as Hispanic ethnicity.

Based on the “more than 20 percent” or the “exceeds 50 percent” criteria, no Asian, Native Hawaiian or Pacific Islander, and no multi-racial minorities exist in the geographic area. Table E2-3 presents the numbers of block groups within each county in North and South Carolina that exceed the threshold for determining the presence of minority populations.

Based on the “more than 20 percent” criterion, American Indian or Alaskan Native minority populations exist in two block groups (Table E2-3). Both of these block groups are found in Jackson County, North Carolina. The American Indian or Alaskan Native minority block group locations are displayed in Figure E2-4 and are at the perimeter of the 50-mile geographic area.

Based on the “more than 20 percent” criterion, the Black races minority populations exist in 74 block groups (Table E2-3). Figure E2-5 displays the locations of these minority block groups, while Table E2-3 displays the minority block group distributions among counties in the geographic area.

Based on the “more than 20 percent” criterion, the All Other Single Minorities populations exist in a single block group (Table E2-3). Figure E2-6 displays the location of this minority block group in Habersham County, Georgia.

Based on the “exceeds 50 percent” criterion, the Aggregate of Minority Races populations exist in 64 block groups (Table E2-3). Figure E2-7 displays the locations of these block groups, while Table E2-3 displays the minority block group distributions among the counties in the geographic area.

Based on the "more than 20 percent" criterion, the Hispanic ethnicity minority populations exist in 5 block groups (Table E2-3). Figure E2-8 displays the locations of these minority block groups in Habersham County, Georgia and Greenville County, South Carolina.

NMSS guidance is that for a rural location, such as at ONS, a radius of approximately 4 miles should be used as the area of potential environmental impact. Review of the ONS 50-mile demographic data shows that 2 of the Black races minority block groups are within 10 miles of ONS (Table E2-4). The same 2 block groups also have aggregate minority populations because of the Black minority populations.

E2.4.2.2 LOW-INCOME POPULATIONS

NRC guidance defines "low-income" by using U.S. Census Bureau statistical poverty thresholds (See Reference E2.9-16, Appendix C). Duke divided U.S. Census Bureau low-income household numbers for each block group by the total households for that block group to obtain the percentage of low-income households per block group. U.S. Census Bureau data (Reference E2.9-12) characterize 10.6 percent of North Carolina households as low-income, 13.1 percent of South Carolina households as low-income, and 12.7 percent of Georgia households as low-income. A low-income population is considered to be present if:

- The low-income population of the census block or environmental impact site exceeds 50 percent, or

- The percentage of households below the poverty level in an environmental impact area is significantly greater (typically at least 20 percent) than the low income population percentage in the geographic area chosen for comparative analysis

Based on the "more than 20 percent" criterion, 34 block groups within 50 miles of ONS contain a low-income population. Figure E2-9 displays the locations of low income household block groups, and Table E2-3 displays the low-income household block group distributions among the counties in the geographic area. NMSS guidance is that for a rural location, such as at ONS, a radius of approximately 4 miles should be used as the area of potential environmental impact. Review of the ONS 50-mile demographic data identified four low income household block groups within 10 miles of the ONS Site-Specific ISFSI.

Table E2-3
Minority and Low-Income Population Block Groups

County	State	2000 Block Groups	American Indian or Alaskan Native	Asian	Native Hawaiian or Other Pacific Islander	Black Races	All Other Single Minorities	Multi-Racial Minorities	Aggregate of Minority Races	Hispanic Ethnicity	Low Income
Banks	GA	7	0	0	0	0	0	0	0	0	0
Elbert	GA	20	0	0	0	6	0	0	3	0	1
Franklin	GA	16	0	0	0	0	0	0	0	0	1
Habersham	GA	26	0	0	0	0	1	0	0	3	0
Hall	GA	2	0	0	0	0	0	0	0	0	0
Hart	GA	19	0	0	0	1	0	0	1	0	1
Jackson	GA	2	0	0	0	0	0	0	0	0	0
Madison	GA	8	0	0	0	0	0	0	0	0	0
Rabun	GA	10	0	0	0	0	0	0	0	0	0
Stephens	GA	18	0	0	0	1	0	0	1	0	3
Towns	GA	5	0	0	0	0	0	0	0	0	0
White	GA	7	0	0	0	0	0	0	0	0	0
Buncombe	NC	8	0	0	0	0	0	0	0	0	0
Clay	NC	3	0	0	0	0	0	0	0	0	0
Haywood	NC	31	0	0	0	0	0	0	0	0	1
Henderson	NC	56	0	0	0	0	0	0	0	0	1
Jackson	NC	26	2	0	0	0	0	0	1	0	1
Macon	NC	33	0	0	0	0	0	0	0	0	0
Polk	NC	9	0	0	0	0	0	0	0	0	0
Swain	NC	3	0	0	0	0	0	0	0	0	0
Abbeville	SC	15	0	0	0	0	0	0	0	0	0
Anderson	SC	121	0	0	0	17	0	0	14	0	6
Greenville	SC	244	0	0	0	42	0	0	38	2	15
Greenwood	SC	5	0	0	0	0	0	0	0	0	0
Laurens	SC	14	0	0	0	0	0	0	0	0	0
Oconee	SC	50	0	0	0	2	0	0	2	0	0
Pickens	SC	66	0	0	0	0	0	0	0	0	4
Spartanburg	SC	60	0	0	0	5	0	0	4	0	0
South Carolina			0.34%	0.90%	0.04%	29.54%	1.00%	1.00%	32.81%	2.37%	13.1%
North Carolina			1.24%	1.41%	0.05%	21.59%	2.32%	1.28%	27.89%	4.71%	10.6%
Georgia			0.27%	2.12%	0.05%	28.70%	2.40%	1.39%	34.93%	5.32%	12.7%

Table E2-4
Minority and Low-Income Block Groups
Within 10 miles of ONS Site-Specific ISFSI

Block Group Identity	Low-Income Population [a]	Black Races Population [b]	Aggregate of Minority Races Population [c]
Oconee County			
450730308002		X	
450730307021		X	
450730308004		X	
450730307013		X	
450730307011		X	X
450730304005			X
450730308004			X
Pickens County			
450770112013	X		
450770112012	X		
450770112015	X		
450770112011	X		

a. 32.0% or more of the population in the block group.
b. 31.7% or more of the population in the block group.
c. 50.0% or more of the population in the block group.

Figure E2-4 American Indian or Alaskan Native Minority Populations

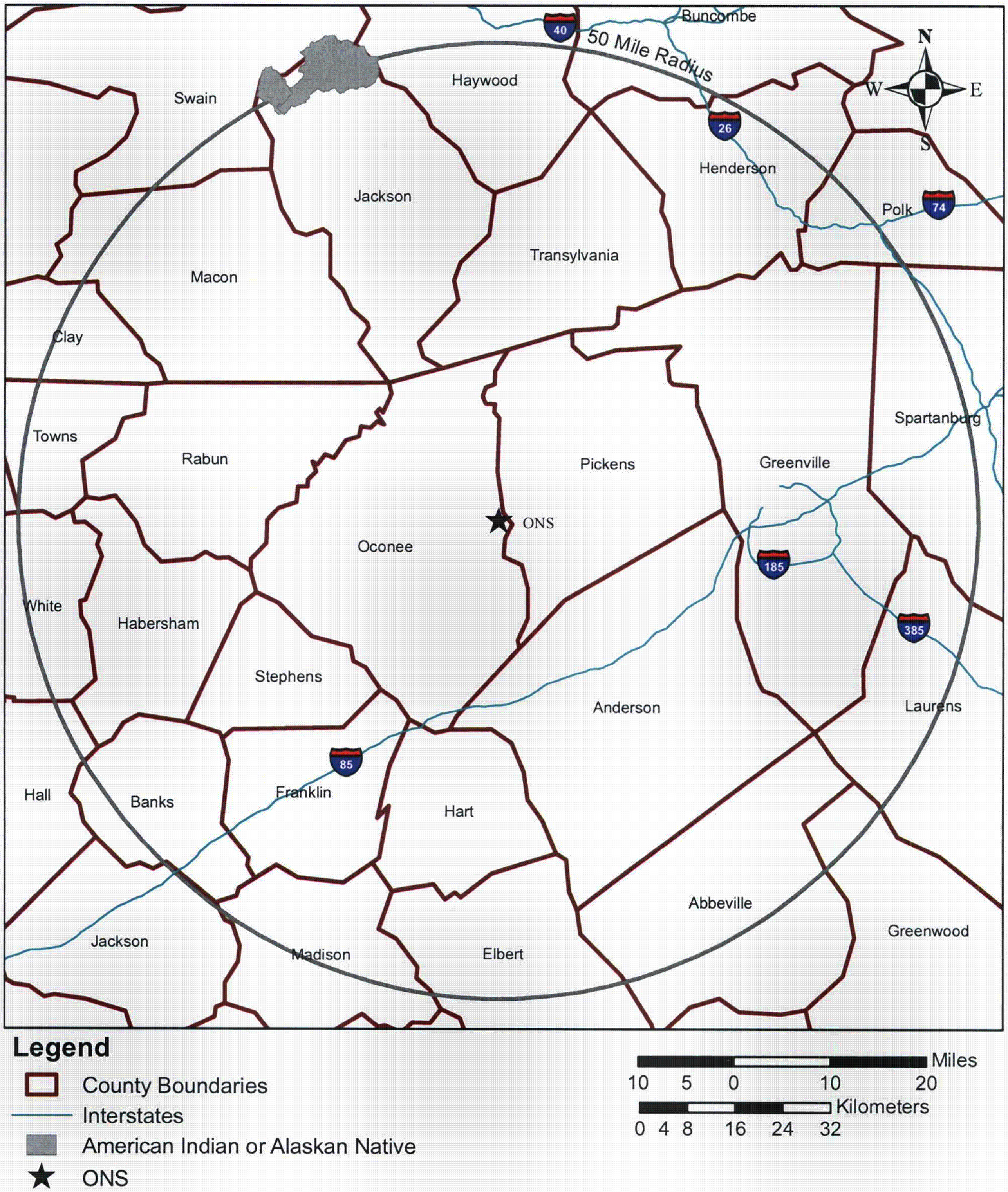


Figure E2-5 Black Races Minority Populations

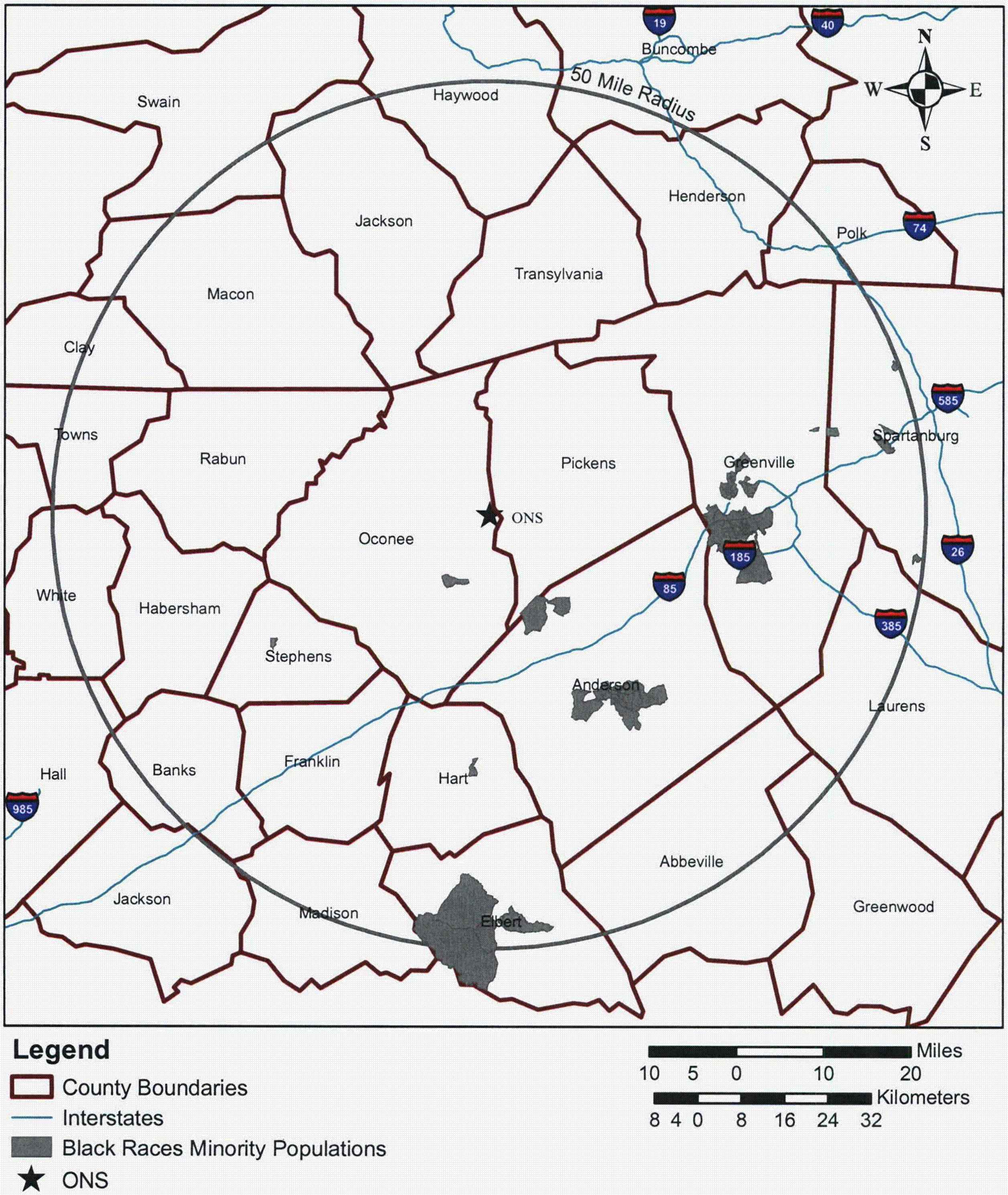


Figure E2-6 Other Minority Populations

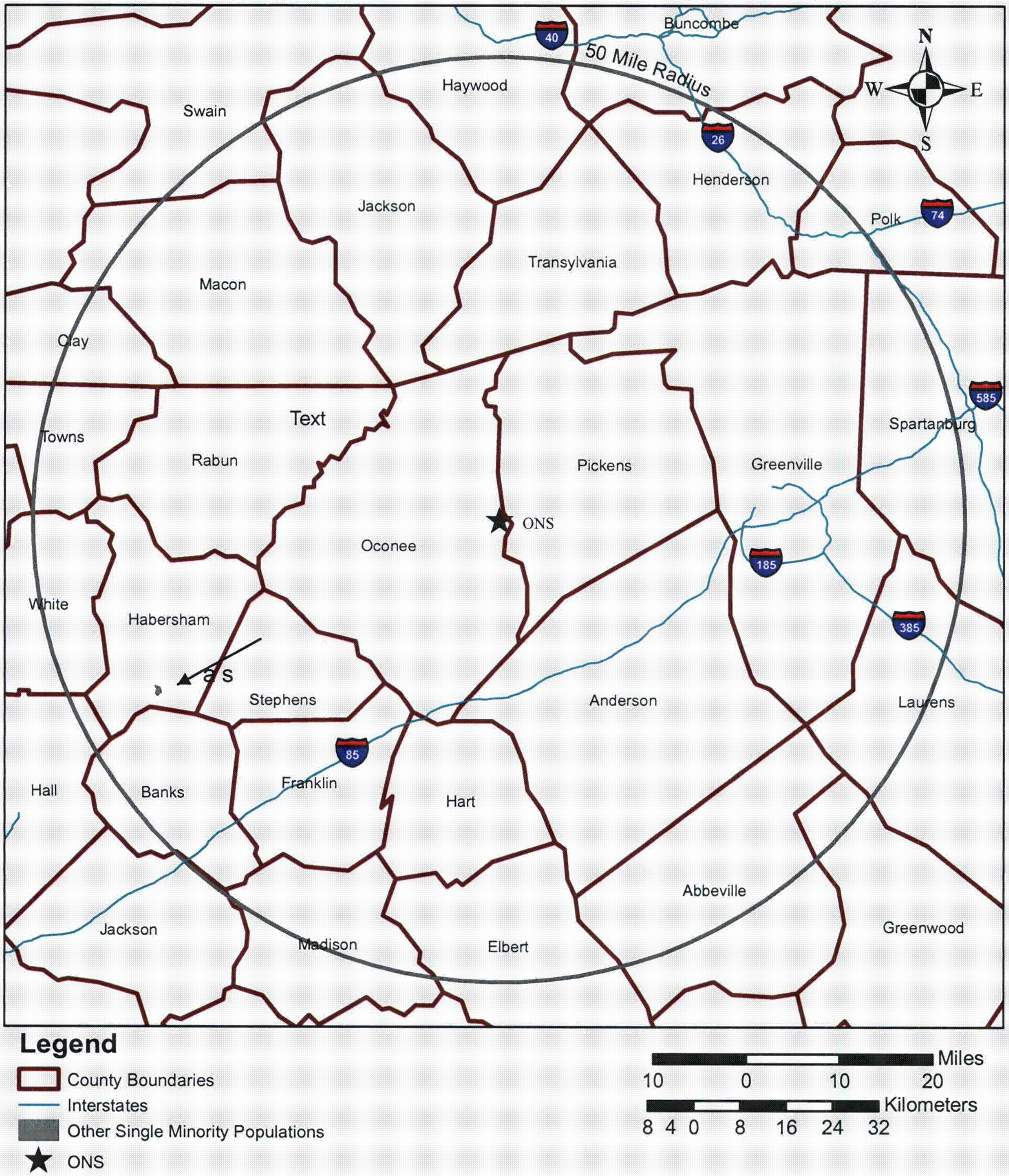


Figure E2-7 Aggregate of Minority Populations

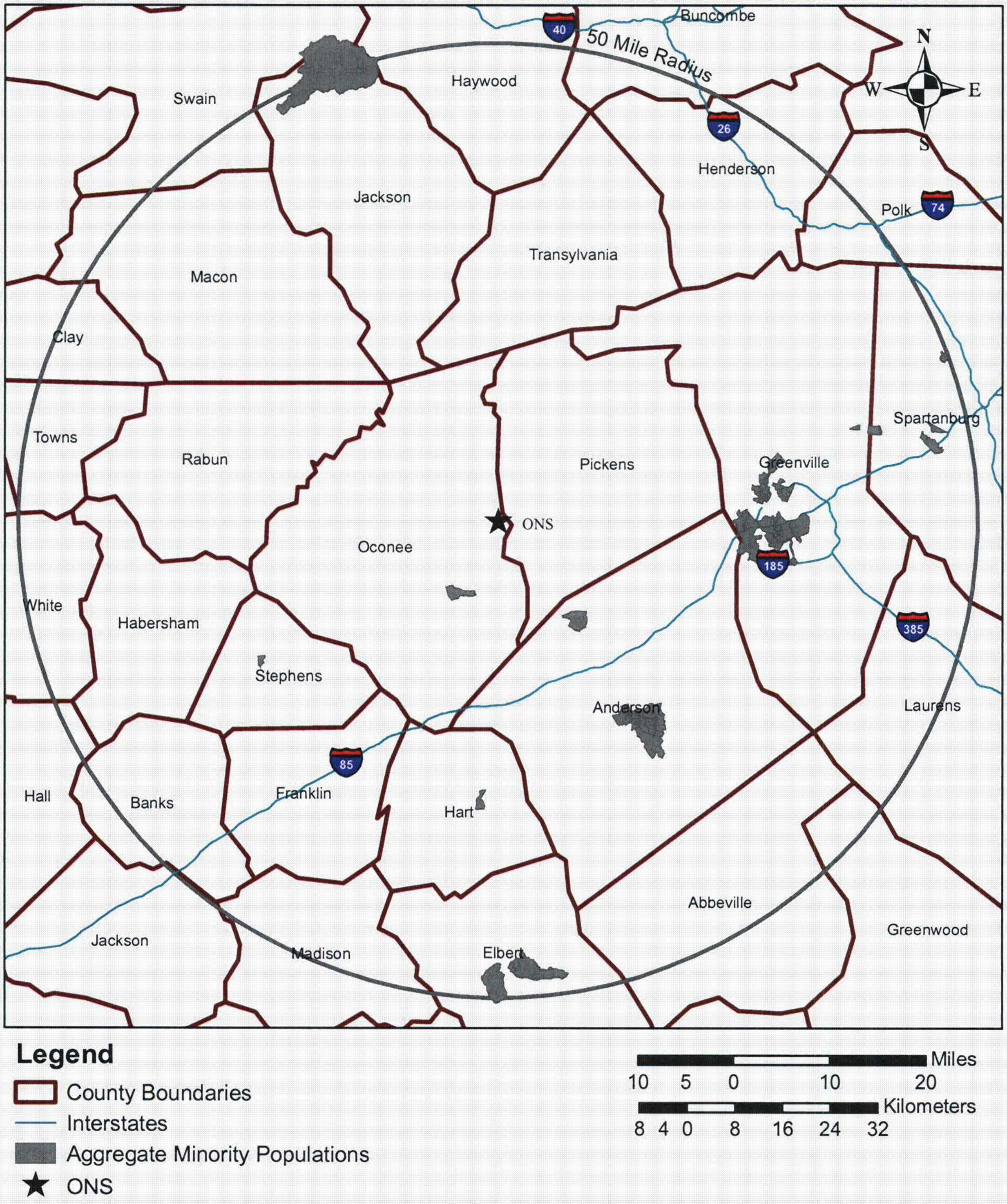


Figure E2-8 Hispanic Ethnicity Minority Populations

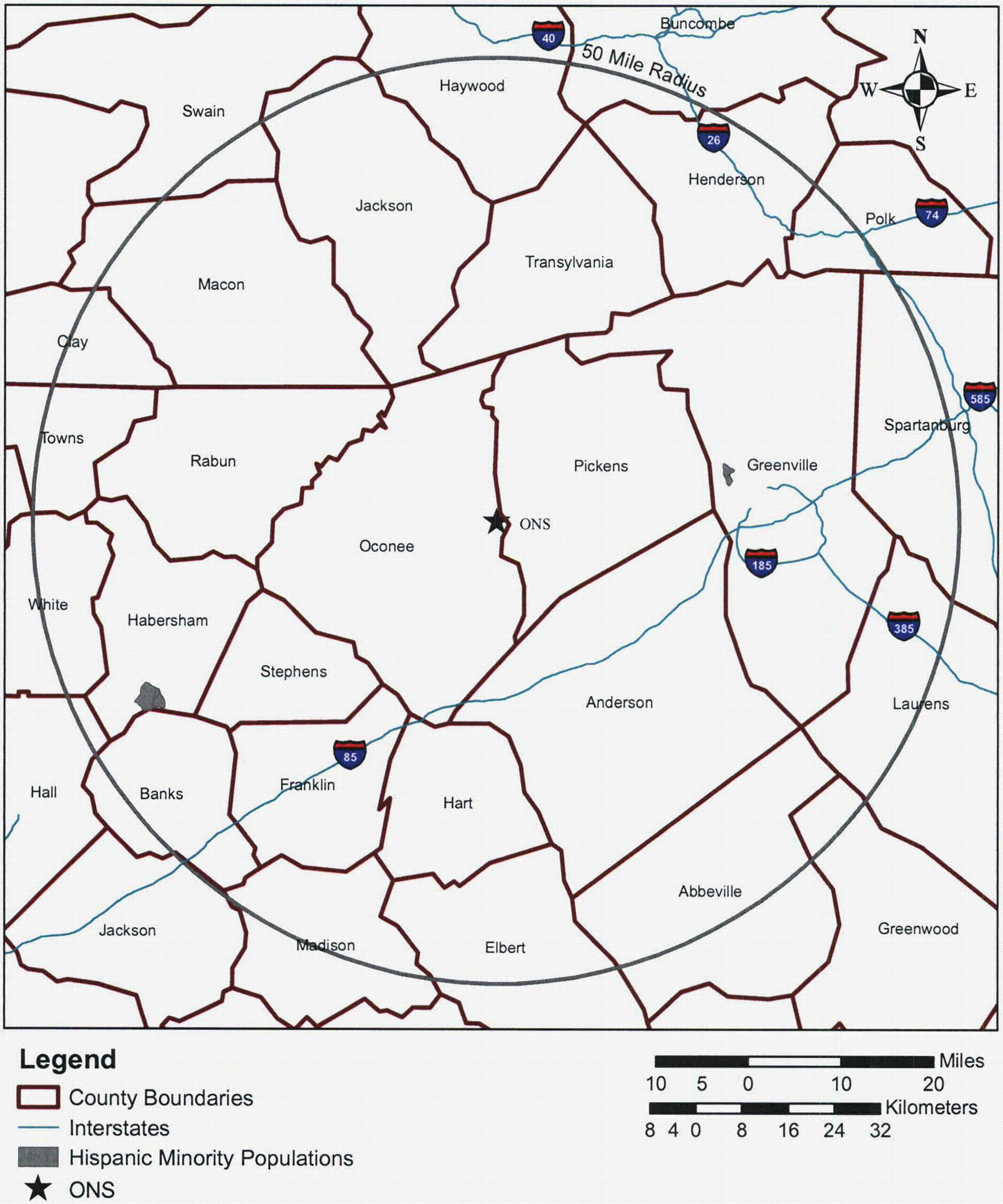
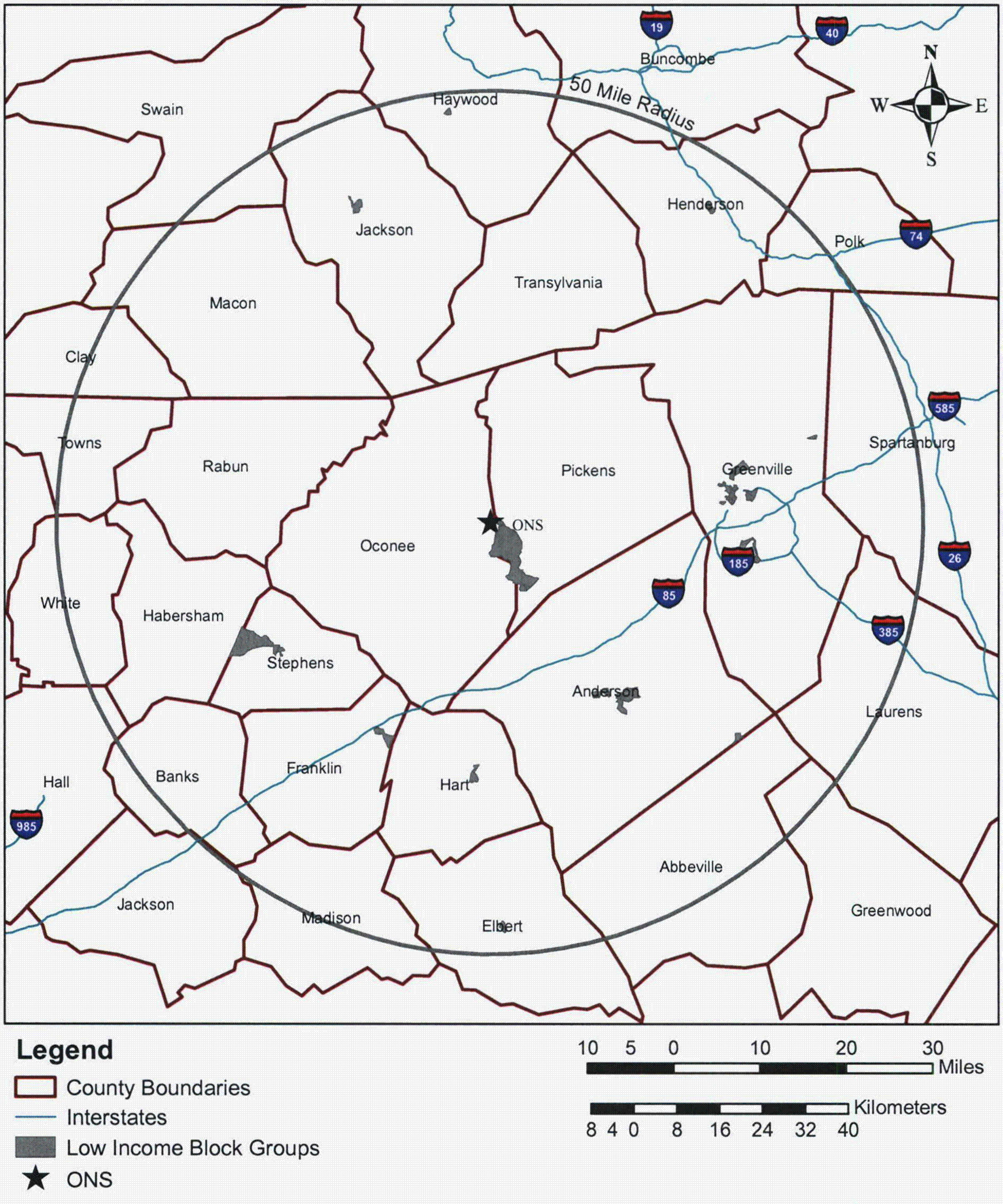


Figure E2-9 Low Income Population Locations



E2.5 TAXES

Duke pays annual property taxes for ONS to Oconee and Pickens Counties, South Carolina. For Oconee County, the payments include, but do not differentiate, the ONS Site-Specific ISFSI. For Pickens County, the payments include the Keowee Hydro Station and the Jocassee Hydroelectric Station.

Property tax revenues for both counties fund the following (list not all inclusive): county operations, the county general fund, fire districts, libraries, the emergency management system, various environmental services, the school districts, local technical colleges, road maintenance, county office maintenance, hospitals, and the county jail. (Reference E2.9-7 and Reference E2.9-9)

For the years 2000 to 2005, ONS property taxes provided an approximate average of 31 percent of the Oconee County total property tax revenues. Table E2-5 compares Duke's ONS tax payments to Oconee County tax revenues.

Duke paid $2,140,734.93 in property taxes to Pickens County in 2006. This is 4.39 percent of the $48,749,279.00 in revenues collected annually by Pickens County (Reference E2.9-1).

Table E2-5

Oconee Nuclear Station Property Taxes Paid to Oconee County Compared to Total Revenues, 2000-2006

Year	Total Oconee County Property Tax Revenues *	Property Tax Paid for ONS *	Percent of Total Property Taxes
2000	$63,599,701.87	$22,024,916.16	34.6
2001	$70,615,854.29	$22,052,670.10	31.2
2002	$72,129,188.90	$22,632,060.00	31.4
2003	$73,249,779.50	$20,140,716.89	27.5
2004	$76,934,816.11	$21,233,104.95	27.6
2005	$95,219,282.40	$34,162,264.12	35.9
2006	Not Available	$24,662,193.00	

* (Reference E2.9-6)

E2.6 LAND USE PLANNING

This discussion summarizes a more lengthy discussion of land use in the ONS Application for Renewed Operating License Environmental Report Supplement (Reference E2.9-2).

Duke employs a nuclear-related permanent workforce of approximately 1224 employees and an additional 476 site assigned contract and Duke employees at ONS. This section focuses on Oconee and Pickens Counties, because the majority (approximately 76 percent) of the permanent ONS workforce lives in these counties and ONS pays property taxes in Oconee and Pickens Counties. Both counties have experienced growth over the last several decades and their respective comprehensive land use plans reflect planning efforts and public involvement in the planning process. Both plans share the goals of encouraging responsible growth and development in areas where public facilities, such as water and sewer systems, are present or planned.

During the last 30 years, Pickens and Oconee Counties have experienced moderate growth. Pickens County's population increased by 2.8 percent during the 1970s, 1.7 percent during the 1980s, and 1.7 percent during the 1990's. Oconee County's population increased by 1.8 percent during the 1970s, 1.7 percent during the 1980s, and 1.5 percent during the 1990s.

Residential land use in Oconee County is expected to increase north of Seneca near Lake Keowee as sewer and water lines are extended beyond the city's boundaries. Although development continues to slowly spread throughout both counties, the majority of the land in the counties is rural in nature, either vacant, forested, or in agricultural production.

E2.7 SOCIAL SERVICES AND PUBLIC FACILITIES

As described in the ONS license renewal environmental report (Reference E2.9-2) the public water systems in the locations where most ONS employees reside provide sufficient water to the populations in their service areas. Some of the systems are near their capacities, but other systems have excess capacity available for their use, and the utilities are investigating increasing capacity.

As described in Section E4.10.10 of ONS Environmental Report (Reference E2.9-2), the transportation system in the vicinity of ONS is adequate to support the level of traffic it receives.

E2.8 HISTORIC AND ARCHAEOLOGICAL RESOURCES

The ONS Site-Specific ISFSI license renewal application is based on 40 additional years of operation of the Site-Specific ISFSI and does not include plans for future structural modifications or land disturbances. The Site-Specific ISFSI is located within the ONS protected area on previously disturbed land. The Duke staff concludes that there are no archeological or cultural resources at the Site-Specific ISFSI location that will be adversely impacted by continued operation of the Site-Specific ISFSI.

Significant archaeological investigations were conducted throughout the Keowee-Toxaway project area including the Keowee Dam and ONS site prior to inundation. South Carolina State Department of Archaeology personnel performed the research in which 39 archaeological sites were recorded. Previous archaeological site file searches at the South Carolina Department of Archives and History and the Institute of Archaeology and Anthropology at the University of South Carolina revealed four Native American sites within a 1.6 km (1 mile) radius of ONS. None of these sites were located in close proximity to the current location of the Site-Specific ISFSI.

The original town of Pickens was located on what is now the ONS site location (Reference E2.9-5). The only standing structure remaining from the Old Pickens townsite is a one-story brick building known as the "Old Pickens Presbyterian Church," constructed between 1849 and 1851. An old cemetery of approximately 200 marked graves surrounds the church. The Old Pickens Presbyterian Church was listed on the National Register of Historic Places in 1996 (Reference E2.9-10). There is also a small fenced cemetery near the current access road into the plant from Highway 183. This cemetery is not recorded and is not included in the listing of the Oconee County historic cemeteries (Reference E2.9-8).

In addition to the Old Pickens Presbyterian Church, there are two other sites listed on the National Register of Historic Places within 6 miles of ONS (Reference E2.9-11). The Alexander-Cannon-Hill House is located at High Falls County Park. The house was relocated from its original location at the Old Pickens townsite, the current location of ONS, in 1972 to conform to regulations of the Atomic Energy Commission. The Newry Historic District is located approximately 5 miles south of ONS on the Little River Valley off Highway 130. It is a turn of the century textile mill village consisting of numerous buildings and properties on approximately 250 acres.

E2.9 REFERENCES

E2.9-1 Total Property Tax Revenues for Pickens County, Fiscal Year 2005-2006. G. Aldrich (Duke) personal communication with D. Looper, Pickens County Treasurers Office; February 28, 2007

E2.9-2 Duke Letter dated July 6, 1998, Application for Renewed Operating Licenses, Oconee Nuclear Station, Units 1, 2, and 3, Volume IV, Exhibit D: Applicants Environmental Report Operating License Renewal Stage

E2.9-3 ONS Updated Final Safety Analysis Report

E2.9-4 2000 U.S. Census Bureau Demographic Data; ESRI (Environmental Systems Research Institute, Inc.), 2005; Redlands, California, USA; March 2005

E2.9-5 Keowee: The Story of the Keowee River Valley in Upstate South Carolina. Fourth Printing, Revised; M. Hembree and D. Jackson, 1998, (no publisher given)

E2.9-6 G. Nowell, Oconee County Treasurers Office, Oconee County Property Taxes. Oconee County, South Carolina; February 20, 2007

E2.9-7 Oconee (Oconee County) 2007. Oconee County Budget Ordinance Fiscal Year 2006-2007. Accessed February 28, 2007 at: http://www.oconeesc.com

E2.9-8 Pendleton Chapter of South Carolina Genealogical Society. 1983, 1984. Oconee County, South Carolina Cemetery Survey. 2 Vols. A Press, Greenville, South Carolina

E2.9-9 Pickens (Pickens County) 2007. Pickens County Budget Fiscal Year 2007. Accessed March 1, 2007 at: http://www.co.pickens.sc.us/budget/

E2.9-10 National Register of Historic Places Registration Form: Old Pickens Presbyterian Church. Copy of file at South Carolina Department of Archives and History, Columbia, South Carolina; Sherard, G. W. (Compiler); 1994 (updated 1996)

E2.9-11 South Carolina Department of Archives and History. 2007 National Register of Historic Places. Accessed February 20, 2007 at: http://www.nationalregister.sc.gov/nrlinks.htm

E2.9-12 U.S. Census Bureau. 2000, "Summary File 3: Census 2000" Accessed December 14, 2006 at: http://factfinder.census.gov/servlet/MetadataBrowserServlet?type=dataset&id=DEC_2000_SF3_U&_lang=en

E2.9-13 Notice of Issuance of Environmental Assessment and Finding of No Significant Impact for the Oconee Independent Spent Fuel Storage Installation at the Oconee Nuclear Station, NRC, dated October 25, 1988

E2.9-14 Generic Environmental Impact Statement for License Renewal of Nuclear Plants. Volumes 1 and 2. NUREG-1437, NRC, Washington, D.C. May 1996

E2.9-15 *Generic Environmental Impact Statement for License Renewal of Nuclear Plants, Supplement 2, Regarding the Oconee Nuclear Station*, NUREG-1437, NRC, December 1999

E2.9-16 *Environmental Review Guidance for Licensing Actions Associated with MNSS Programs* , NUREG-1748, NRC, August 2003

E2.9-17 *Endangered, Threatened, and Otherwise Noteworthy Plant and Animal Species of the Oconee Nuclear Station, Oconee and Pickens Counties, South Carolina*, Report prepared by L.L. Gaddy, Ph. D., June 1998

E2.9-18 USFWS. 72 FR 37346, published in the Federal Register July 9, 2007

E2.9-19 NRC Office Instruction (LIC-203), "Procedural Guidance for Preparing Environmental Assessments and Considering Environmental Issues," dated June 21, 2001, NRC Office of Nuclear Reactor Regulation, Washington, D.C.

E2.9-20 1998 Upstate Profile; Development of the SC Upstate, Part 1: Population, Income, and Housing; South Carolina Appalachian Council of Governments; Greenville, South Carolina; Knight, H.T. (Ed.) 1998.

E3.0 PROPOSED ACTION

The purpose of the proposed action is to renew the material license of the ONS Site-Specific ISFSI for 40 years beyond the current license period. The Site-Specific ISFSI consists of 40 HSMs, with 24 IFAs stored in each DSC and each loaded HSM containing a single DSC. The 40 Site-Specific ISFSI HSMs are fully loaded with spent fuel.

The Site-Specific ISFSI UFSAR was used as a source for much of the information presented in this Section. The information is consistent with the construction environmental report (Reference E3.7-1) and the environmental assessment (Reference E3.7-5).

E3.1 GENERAL INSTALLATION INFORMATION

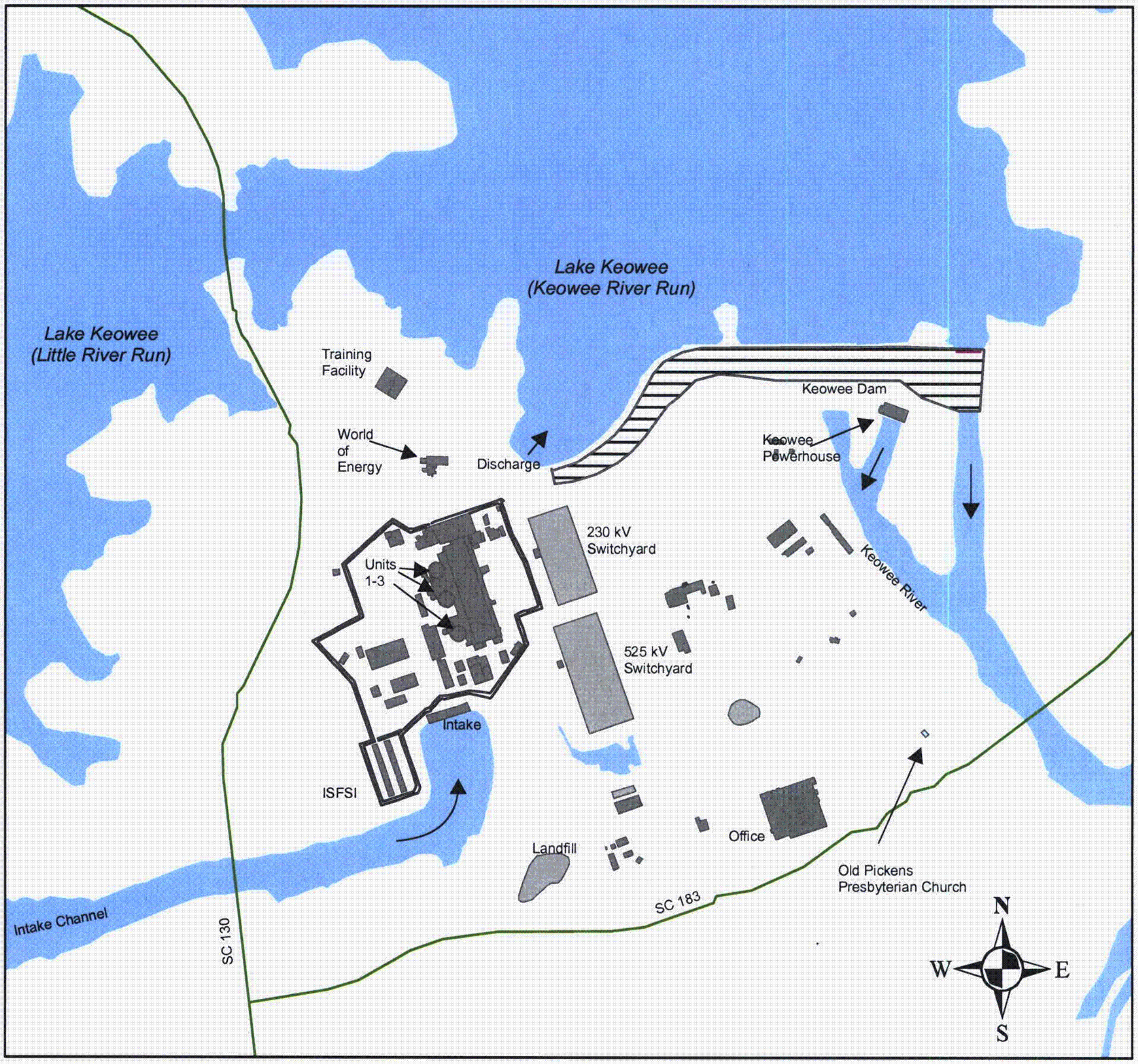
Location

The ONS Site-Specific ISFSI is located within the ONS site protected area near Seneca, South Carolina. Chapter 4 of the Site-Specific ISFSI UFSAR provides descriptive information on Site-Specific ISFSI systems, structures, and components.

Surrounding Areas and Boundaries

The ONS Site-Specific ISFSI is located approximately 1000 ft southwest of the Unit 2 reactor building (center point for the one mile exclusion zone around the ONS site) and approximately 100 ft west of the condenser cooling water intake structure (see Figure E3-1). There are no residences, industrial, commercial, institutional, or recreational structures within the one mile exclusion zone. Located within one mile of the station center but outside the protected area are a visitor center, the Keowee Hydroelectric Station, the Mosquito Control Facility, the Crescent Resources office complex (Keowee Division), and the Clemson Operations Center and other appurtenances. All of these facilities are Duke properties. Duke does not own the Old Pickens Presbyterian Church and Cemetery, a small, historic property adjoining the ONS owner controlled area (Figure E3-1).

Figure E3-1 Layout of Oconee Nuclear Station Showing Location of ISFSI



Legend

Protected Area Fence

State Highways

0 0.1 0.2 0.4 0.6 0.8 Miles

0 0.15 0.3 0.6 0.9 1.2 Kilometer

Layout

The ONS Site-Specific ISFSI utilizes the NUHOMS®-24P storage system for the horizontal, dry storage of irradiated nuclear fuel assemblies. The HSMs were constructed in two phases - 20 HSMs in Phase I which were installed in 1990 and 20 HSMs in Phase II which were installed in 1992. Twenty-four fuel assemblies are stored inside a stainless steel dry storage canister (DSC) which is placed inside the reinforced concrete HSM for long term storage. There are 960 irradiated fuel assemblies stored in the Site-Specific ISFSI. Each HSM is approximately 20 ft long by 15 ft high and 8 ft 8 in wide. Phase I of the Site-Specific ISFSI consists of 20 integrally constructed HSMs on one foundation with ten modules facing opposing sides. Phase II consists of an additional 20 HSMs which were constructed in an identical configuration on an adjacent foundation for a total of 40 Site-Specific HSMs. The foundations are 3 ft thick reinforced concrete. The outer walls and roof of the HSMs are comprised of reinforced concrete, approximately 3 ft thick. The DSC access at the front of each HSM is covered by a steel door with a neutron shield.

Auxiliary Systems

The Site-Specific ISFSI is provided with a 480/208/120 VAC power supply for operation of the transfer trailer hydraulic positioners, hydraulic ram, and lighting.

The ONS Site-Specific ISFSI design is based on the NUHOMS®-24P system for storage of irradiated fuel assemblies. Each module is a self-contained, passive system requiring no support systems during storage.

The ONS Site-Specific ISFSI is located within the plant protected area. Details of the communication and alarm system are provided in the Physical Security Plan (Reference E3.7-3).

No flammable or combustible materials are stored within the Site-Specific ISFSI or in its immediate vicinity and the Site-Specific ISFSI is constructed of noncombustible heat-resistant materials (concrete and steel). No fixed fire extinguishing equipment is required. However, portable fire suppression equipment is provided within the fenced boundary. The ONS Pre-Fire Plan contains requirements for fire protection at the Site-Specific ISFSI.

The Site-Specific ISFSI requires no maintenance other than periodic inspection of the HSM air inlets and outlets and removal of debris. Steam and water are not required at the Site-Specific ISFSI, and none are provided.

Neither sanitary sewage nor chemical treatment is required, and none are provided.

E3.2 INVENTORY

Physical Characteristics

The physical characteristics of the reference 15x15 fuel are listed in Table A-10 of the ONS Site-Specific ISFSI UFSAR (Reference E3.7-2). Additional information may be found in the (Reference E3.7-4), Chapter 4.

Reactivity Characteristics

The reactivity of the spent fuel assemblies must be limited for criticality control purposes. Reactivity is a function of both the initial enrichment and the discharge burnup. Reactivity equivalence curves which show the acceptable combinations of initial enrichment and discharge burnup are given in Figure B-48 of the ONS Site-Specific ISFSI UFSAR (Reference E3.7-2). For criticality control, the spent fuel assemblies must fall into the acceptable range above the initial enrichment/burnup curve in order to qualify for storage in the DSC (see Section 10.2.5.1 of the ONS Site-Specific ISFSI UFSAR). Despite the multiple verification steps and extensive administrative controls used to assure selection of qualified irradiated fuel assemblies, criticality control for a misloaded array of unirradiated fuel is maintained by assuring that the DSC is filled with borated water (≥ 1810 ppm boron) and submerged in a borated water spent fuel pool (≥ 1810 ppm boron) during loading and unloading operations.

In the event that unqualified IFAs or other unirradiated fuel assemblies are erroneously placed in the DSC, the double contingency principle is applied such that the negative reactivity worth of 1810 ppm soluble boron in the spent fuel pool water (from which the DSC cavity will be filled initially) is sufficient to maintain k-eff below 0.95 (0.98 under optimum moderator conditions) even for 24 fresh fuel assemblies enriched to 4.0 w/o U^{235}. Further margin is available since the ONS spent fuel pools are maintained at approximately 2000 ppm, or greater, and the DSC cavity is filled with water from the spent fuel pool prior to fuel loading.

Thermal Characteristics

The heat generation is limited to 0.66 kW per fuel assembly. This value is based on storage of 24 assemblies per DSC with a nominal burnup of 40,000 MWd/MTU, an initial enrichment of 4.0 w/o U^{235}, and a nominal decay period of ten years. Other combinations of burnup, initial enrichment and cooling times may also be acceptable upon further analysis demonstrating acceptable decay heat levels.

Radiological Characteristics

The DSC is designed for a maximum dose rate of 200 mrem/hr at the surface of the top (with temporary neutron shielding if necessary during welding operations) and bottom end shield plugs. The HSM is designed for an average dose rate of 20 mrem/hr at the surface of the module dropping down to a negligible level at the site boundary. Fuel with a maximum burnup of 40,000 MWd/MTU, an initial enrichment of 4.0 w/o U^{235} and a decay of ten years will not exceed these dose values. Other combinations of burnup, initial enrichment and cooling times may also be acceptable upon further analysis demonstrating acceptable radiation dose rate levels.

E3.3 CONSTRUCTION

No construction or refurbishment is currently planned for the ONS Site-Specific ISFSI during the license renewal term. However, due to the ONS renewed operating license and the delay in licensing of a federal repository for spent nuclear fuel, the need for long-term spent fuel storage on site is significant. Therefore, additional loading and continued storage in the Site-Specific ISFSI will be necessary.

E3.4 AGING MANAGEMENT ACTIVITIES

The ONS Site-Specific ISFSI is subject to aging management activities to ensure the integrity of the HSMs during the license renewal term. Aging management activities are summarized in Section 3 and Appendix A of this Site-Specific ISFSI license renewal application.

E3.5 EMPLOYMENT

ONS site personnel currently perform the daily activities associated with the operation of the Site-Specific ISFSI. Offsite personnel will not be required to for routine maintenance of the Site-Specific ISFSI during the license renewal term. The passive nature of the Site-Specific ISFSI requires little maintenance beyond periodic surveillance of the air inlet and outlet vents.

Routine maintenance on the transfer cask to maintain the integrity of the top lid, bottom access plates, and trunnions are performed by ONS personnel. Employment at ONS will not be affected by the continued operation of the Site-Specific ISFSI.

E3.6 DECOMMISSIONING

The following discussion of decommissioning considerations is based on information contained in Section 4.6 of the ONS Site-Specific ISFSI UFSAR.

Decommissioning of the Site-Specific ISFSI will be performed consistent with decommissioning of the ONS nuclear units. This is predicated on the ability of the federal government to accept spent fuel as mandated by the Nuclear Waste Policy Act of 1982, as amended. It is anticipated that the DSCs will be transported to a federal repository when such a facility is operational. However, should the storage facility not accept the DSCs intact, the NUHOMS®-24P system allows the DSCs to be brought back into the pool and the fuel repositioned into the racks for loading into transport casks to be provided by the DOE.

All components of the NUHOMS®-24P system are manufactured of materials similar to those found in the existing ONS nuclear units (i.e., reinforced concrete, stainless steel, lead). These components will be decommissioned by the same methods in place to handle similar materials within the plant. Any of these components that may be contaminated will be cleaned and/or disposed of consistent with the decommissioning technology available at the time of decommissioning.

E3.7 REFERENCES

E3.7-1 Oconee Nuclear Station Site-Specific ISFSI Environmental Report, Original Issue, Duke, March, 1988

E3.7-2 Oconee Nuclear Station Site-Specific ISFSI Updated Final Safety Analysis Report

E3.7-3 Oconee Physical Security Plan

E3.7-4 Oconee Nuclear Station Updated Final Safety Analysis Report

E3.7-5 "Environmental Assessment Related to the Construction and Operation of the Oconee Nuclear Station Independent Spent Fuel Storage Installation," Docket No. 72-4, October 1988, NRC NMSS, Washington, D.C.

E4.0 ENVIRONMENTAL CONSEQUENCES AND MITIGATING ACTIONS

E4.1 NRC REVIEWS

The NRC has reviewed the environmental impacts of dry storage of spent nuclear fuel many times (Section E1.2). As noted in Table E1-1, each analysis concluded that the activity would have no significant impacts on the affected environment.

E4.2 IMPACTS FROM REFURBISHMENT AND CONSTRUCTION

No refurbishment or construction of the Site-Specific ISFSI is planned during the 40 year license renewal period. Therefore, there will be no impacts from refurbishment or construction.

E4.3 IMPACTS FROM OPERATIONS

E4.3.1 OCCUPATIONAL AND PUBLIC HEALTH

Radiological protection and doses from Site-Specific ISFSI operations are discussed in Chapter 7 of the ONS Site-Specific ISFSI UFSAR. The major aspects of the Radiation Protection program are summarized in the following sections. There are no other potential health impacts other than the hazards associated with moving heavy objects and equipment during cask transfer operations.

Policy Considerations

Duke corporate and ONS Radiation Protection policies are applicable to the Site-Specific ISFSI and are described in Chapter 12 of the ONS UFSAR. Duke is committed to a program of keeping occupational radiation exposure as low as reasonably achievable (ALARA). Duke follows Regulatory Guides 1.8, 8.8, 8.10, and other publications that deal with ALARA concepts and practices, including 10 CFR 20.

Design Considerations

The design of the DSC and HSM comply with 10 CFR 72, §72.3. Specific considerations that are directed toward ensuring ALARA are:

1. Thick concrete walls on the HSM to reduce the surface dose to below an average of 20 mrem/hr. The 20 mrem/hr dose rate was the approved maximum for HSM wall dose rates in the NUHOMS®-24P Topical Report. Actual calculated HSM wall surface dose rates are below 10 millirem per hour except at the vent and door openings. The HSM shielding design was deemed ALARA considering construction costs, heat dissipation, and access requirements. Additional description of the shielding analysis is available in the ONS Site-Specific ISFSI UFSAR, Section 7.3.2.2.

2. Shield plug on the ends of the DSC to reduce the dose to workers performing drying, sealing, and loading operations.
3. Use of a shielded transfer cask for handling and transportation operations of loaded DSCs.
4. Fuel loading procedures which follow accepted practice and build on existing experience.
5. A recess in the HSM front for the transfer cask to fit into so as to reduce scattered radiation during transfer.
6. Double seal welds on each end of DSC to provide redundant radioactive material containment.
7. Placing demineralized water in DSC/transfer cask annulus and sealing it to minimize contamination of the DSC exterior during loading.
8. Placing external shielding blocks over HSM air outlets to reduce direct and streaming radiation dose.
9. Passive system design that requires minimum maintenance.
10. Insertion of internal shielding blocks around air inlets to reduce direct and streaming radiation dose.
11. Use of portable shielding during DSC drying/welding operations.
12. Use of existing shipping procedures and experience to control contamination during handling and transfer of fuel.
13. Leaving water in the DSC cavity and DSC/Transfer Cask annulus during welding operations.
14. Providing a large control area around the Site-Specific ISFSI and locating the facility well away from normally occupied areas.
15. Operation of the Site-Specific ISFSI will be performed under the Radiation Protection program of the station as described in Section E7.1.1.
16. Use of lead blanket screens during decontamination and transfer operations.

Operational Considerations

Consistent with Duke's overall commitment to keep occupational radiation exposures ALARA, specific plans and procedures are followed by station personnel to assure that ALARA goals are achieved. Operational ALARA policy statements are formulated at the corporate staff level through the issuance of the Duke Radiation Protection Policy Manual and the Duke System ALARA Manual and are implemented at each nuclear plant by means of procedures. These statements and procedures are consistent with the intent of Section C.1 of Regulatory Guides 8.8 and 8.10.

Since the Site-Specific ISFSI is a passive system, no maintenance is expected on a normal basis in the facility. Maintenance operations on the transfer cask, transfer trailer and other ancillary equipment are performed in a very low dose environment when fuel movement is not occurring.

Maintenance activities that could involve significant radiation exposure of personnel are carefully planned. They utilize any previous operating experience, and are carried out using well trained personnel and proper equipment. Radiation Work Permits (RWPs) are issued for each job, listing Radiation Protection requirements that shall be followed by all personnel working in RCA. Where applicable, specific radiation exposure reduction techniques, such as those set out in Regulatory Guide 8.8, are evaluated and used.

The station ALARA Committee carefully reviews operations and maintenance activities involving the major plant systems to further assure that occupational exposures are kept ALARA.

Sources of Radiation

Neutron and gamma sources are developed based on the reference irradiated fuel assembly described in Table A-1 of the Site-Specific ISFSI UFSAR. The reference fuel assembly is assumed to be irradiated to a burnup of 40,000 MWd/MTU and cooled to a decay heat rate of less than or equal to 0.66 kW before being stored in the DSC. The initial enrichment considered is 4.0 w/o U^{235}. The source terms include the irradiated fuel, activated portions of the fuel assemblies, and deposited activity from corrosion products in the reactor coolant. All primary sources are considered to be originating in the fuel with secondary gammas generated in the shielding considered by the shielding codes used.

The detailed calculation of gamma ray group fractions and additional details of the radiation source terms and dose conversion factors used in Site-Specific ISFSI shielding analysis are described in Reference E4.5-3.

Occupational Dose

This section establishes the expected cumulative dose delivered to site personnel during the fuel handling and transfer activities associated with one NUHOMS®-24P module. The ONS Site-Specific ISFSI UFSAR, Chapter 5 (Reference E4.5-1) describes in detail the Site-Specific ISFSI operational procedures, a number of which involve radiation exposure to personnel.

Except during periods of additional module construction, there is no adjacent work area close by, so very little dose is received from fuel in storage. Access is primarily needed to load new canisters into storage modules and dose from previously stored fuel will be received during these operations. The occupational exposure received during DSC transfer operations is included in the operational dose assessment summarized in the ONS Site-Specific ISFSI UFSAR, Table A-19. The occupational dose estimates provided in Table A-19 are calculated using reference fuel assembly characteristics (see Table A-1 of the Site-Specific ISFSI UFSAR) and other site specific parameters (Reference E4.5-1). Dose contributions from hidden module scatter effects and self shielding for an 88 loaded module array are included in the Site-Specific ISFSI UFSAR Table A-19 results for DSC transfer operations. The dose received for other operations performed within the HSM storage facility secured area is negligible.

The phased construction of modules up to the licensed capacity of 88 will be undertaken on an as-needed basis considering required lead time, station operation and construction schedules. Increments of additional module construction are flexible and may continue until the ultimate licensed capacity of 88 HSMs is reached. Construction work performed subsequent to the loading of any HSM with spent fuel will result in worker exposures from direct and sky shine radiation in the vicinity of the loaded HSMs.

While Duke is currently using its General License for additional storage, the Site-Specific ISFSI license permits the construction of additional up to 48 additional Site-Specific HSMs. If such construction is undertaken, dose to construction workers will be minimized using appropriate ALARA techniques. Actual personnel exposure will depend upon the configuration of Site-Specific and General License ISFSIs at the time of construction.

The dose estimate for additional construction is based on labor estimated for a 2 x 10 module array. It is assumed that 60 percent of the labor hours are expended in the radiation area and the prefabrication work is done in low or no dose areas. Table A-20 of the ONS Site-Specific ISFSI UFSAR summarizes expected construction doses by task.

The maximum dose received from the loading, construction, and maintenance of HSMs is 7.5 rem per year for the assumed loading rates. This is approximately 3.5% of normal station dose. The total includes fuel handling and canister loading operations, additional module construction and general maintenance of the facility. The dose estimate assumes design basis source terms for all fuel, construction of additional modules at a rate of 5 HSMs per year and general area doses from a full 88 HSM array of Site-Specific HSMs for the entire period of HSM construction. Actual personnel exposure will depend upon the configuration of both the Site-Specific ISFSI and the General License ISFSI at the time of construction.

Dose to the Public

Doses to any offsite point are only from direct and scatter gamma radiation from the storage module. The estimated dose from the modules to any dose point beyond the site boundary is well below regulatory limits even when combined with station doses for both airborne and direct gamma dose. The ONS Site-Specific ISFSI is situated approximately 1 mile from the exclusion area boundary. The estimated maximum dose rate in any direction at 5,000 ft for up to an 88 module array of HSMs as shown in Figures B-43 through B-45 of the ONS Site-Specific ISFSI UFSAR is less than 1.0×10^{-6} mrem/hr. The estimated annual dose to the public is conservatively calculated as 7 person-millirem per year. The maximum dose to the nearest potential future resident from the Site-Specific ISFSI is 7.5×10^{-2} mrem/yr.

Note that new construction of HSMs under the Site-Specific ISFSI license was suspended at HSM number 40. Subsequent modules are of the General License (GL) design. An integrated dose analysis of contributions by both dry storage systems and the plant are contained in the 10 CFR 72, §72.212 written evaluations required for use of the General License.

E4.3.2 OTHER IMPACTS

The continued operation of the ONS Site-Specific ISFSI during the 40-year license renewal term would have no impacts on the following resources:

- Geology or soils
- Hydrology
- Air quality
- Aquatic resources
- Socioeconomics
- Social services or public utilities
- Land use
- Threatened or endangered species
- Cultural or historic resources
- Aesthetics

The ONS Site-Specific ISFSI is a totally passive installation that is designed to provide shielding and safe confinement of irradiated fuel. The Site-Specific ISFSI is within the ONS plant protected area. There are no residences or agricultural activities within the one mile radial exclusion zone centered on the Unit 2 reactor building. The distance to the nearest residence from the HSM center is approximately 1.0 mile in a northwesterly direction.

There are no liquid discharges from the Site-Specific ISFSI, so no geologic, water, or aquatic resources would be affected. There are no air emissions from the Site-Specific ISFSI, so no air resources would be affected.

As described in Section E3.5, operation, maintenance, and surveillance activities at the Site-Specific ISFSI would be performed by ONS employees. No additional employees would be required to maintain or monitor the Site-Specific ISFSI. Duke concludes that there would be no affect on regional socioeconomics, social services, or public utilities due to the continued operation of the ONS Site-Specific ISFSI.

Section E2.6, Land Use Planning, describes the population growth and land use in Oconee or Pickens counties. The continued operation of the Site-Specific ISFSI would not be expected to have an impact on land use patterns in the region.

As described in Section E2.3, Threatened and Endangered Species, Duke is not aware of any activities associated with the Site-Specific ISFSI license renewal that would adversely impact threatened or endangered species. Bald eagles have been observed in the immediate area of ONS but are not known to nest or reside for long periods of time near the site. Three state listed species of concern and one new state record species are known to exist within the one-mile exclusion zone. These species are located in managed natural areas and would not be adversely affected by Site-Specific ISFSI operations.

As described in Section E2.8, Historic and Archaeological Resources, the Site-Specific ISFSI is located on land that was previously disturbed and has no potential for unknown cultural resources. No adverse effects to historic, cultural, archaeological resources, scenic, or aesthetic resources would result from renewal of the Site-Specific ISFSI material license for another 40 years.

E4.4 IMPACTS FROM POTENTIAL ACCIDENTS

Chapter 8 of Reference E4.5-1 identifies and analyzes a range of credible accident occurrences (from minor accidents to the design basis accidents) and their causes and consequences. ANSI/ANS-57.9-1984, "Design Criteria for an Independent Spent Fuel Storage Installation (Dry Storage Type)," defines four categories of design events that provide a means of establishing design requirements to satisfy operational and safety criteria. Category I events are associated with normal operation. The Category II and III events apply to the events that are expected to occur during the life of the installation. The Category IV events are concerned with severe natural phenomena or low probability events.

E4.4.1 CATEGORY I EVENT ANALYSIS

Category I events are those encountered during normal operation as discussed in Chapter 4 of the ONS Site-Specific ISFSI UFSAR. Normal operating conditions are discussed in Section 8.1 of Reference E4.5-3. None of the events encountered during normal operation result in dose consequences beyond those discussed in Section E4.3 and Section 7 of this document.

E4.4.2 CATEGORY II EVENT ANALYSIS

Category II events are off-normal events that might occur with moderate frequency on the order of once during any calendar year. The limiting off-normal event is defined as a jammed DSC during loading or unloading at the ambient temperature extremes of - 40°F and +125°F as described in Section 8.1.2 of the NUTECH Topical Report (Reference E4.5-3). This postulated event results in the limiting structural loads on the DSC and thermal loads on the DSC and HSM for all identified off-normal events. The ambient extremes for the ONS site are bounded by the assumed values.

If the transfer cask is not accurately aligned with the HSM during loading or unloading, the DSC might become bound or jammed during the transfer operation. When DSC jamming occurs, the hydraulic pressure in the ram will increase above normal insertion pressures. When this occurs, the DSC will be presumed to be jammed. The pushing and pulling forces are limited to 20,000 lbs., with override control available to the operator. The analysis of the DSC under assumed jamming and binding conditions is covered in Section 8.1.2.1 of Reference E4.5-3. In both jammed DSC scenarios considered, the stress on the DSC body is shown to be much less than the ASME code allowable stress. Therefore, plastic deformation of the DSC body will not occur and there is no potential for rupture. The ram force is limited to 80,000 lbs by Hydraulic Power Unit.

In cases of DSC jamming or binding, the required corrective action is to reverse the direction of applied force on the DSC, and return the DSC to its previous position. Since no plastic deformation has occurred, the return of the DSC to its previous position will be unimpeded. The transfer cask alignment is then rechecked and the transfer cask repositioned as necessary before reinsertion is renewed. Based on the off-normal operation analysis results, there is no additional radiological impact due to off-normal operations beyond that presented in Chapter 7 of the ONS Site-Specific ISFSI UFSAR.

E4.4.3 CATEGORY III AND IV EVENT ANALYSIS

This section addresses Category III and IV design events as defined by ANSI/ANS-57.9-1984, and other credible accidents which could impact the safe operation of the ONS Site-Specific ISFSI. The postulated events addressed are:

1. Loss of Air Outlet Shielding
2. Tornado/Tornado Missile
3. Earthquake
4. Transfer Cask Drop
5. Transfer Cask Loss of Neutron Shield
6. Lightning
7. Blockage of Air Inlets and Outlets
8. DSC Leakage
9. Accidental Pressurization of DSC
10. Load Combinations
11. Floods
12. Explosions

The postulated accidents listed above include all events identified as potentially resulting in offsite doses in excess of 25 mrem.

Loss of Air Outlet Shielding

This postulated accident involves the loss of both air outlet shielding blocks from the top of the HSM. All other components of the ONS Site-Specific ISFSI are assumed to be in their normal conditions. The air outlet shielding blocks are designed to remain in place and completely functional for all events except tornado missiles. To demonstrate the safety of the Site-Specific ISFSI design, this accident assumes that both shielding blocks are completely lost. The air outlet shield blocks are attached to the HSM by welding to an embedded plate in the HSM roof. In the highly unlikely event of a recovery situation, the damaged shield block would be removed from the HSM and temporary shielding would be placed around the outlet opening in such a way that a worker could perform the necessary recovery techniques with minimal radiation exposure. All Duke ALARA procedures, such as pre-staging construction activities in a no-dose area, would be followed throughout the entire recovery process. There are no structural or thermal consequences to the Site-Specific ISFSI facility resulting from the loss of the air outlet shielding blocks. The air flow resistance is less without the shield blocks and, hence, the air flow will increase (slightly) and provide more cooling of the DSC. Radiological consequences of this accident are described in the ONS Site-Specific ISFSI UFSAR, Section 8.2.1.3 Reference E4.5-1, which shows that the increased dose to an offsite person for 24 hours per day for seven days located 5,000 ft away would be minimal.

Tornado/Tornado Missile

The most severe tornado wind loadings specified by NUREG-0800, NRC Regulatory Guide 1.76 and the ONS UFSAR are used as the design basis for this accident condition. The applicable design parameters of the DBT are specified in Section 3.2.1 of the ONS Site-Specific ISFSI UFSAR. The DBT design parameters specified are identical to those used in the reference Topical Report in the determination of forces on structures for this accident (Reference E4.5-3). The analysis of the HSM and Transfer Cask response to DBT loadings is covered by the analysis presented in Section 8.2.2 of the ONS Site-Specific ISFSI UFSAR.

The only component of the Site-Specific ISFSI which is not capable of withstanding tornado generated missiles is the precast air outlet shielding block. The consequence of losing the shielding blocks during this accident is presented in Section 8.2.1.3 of the ONS Site-Specific ISFSI UFSAR.

Earthquake

As specified in Section 3.2.3 of the ISFSI UFSAR, the Site-Specific ISFSI MHE acceleration value is 0.15g for both vertical and horizontal ground acceleration. The analysis of earthquake loads in Reference E4.5-3 assumes a value of 0.25g and 0.17g for maximum horizontal and vertical acceleration, respectively. The seismic stress analysis used a multiplier of 1.5 is used to account for multimode excitations. The ONS Site-Specific ISFSI seismic analysis using site specific criteria is bounded by the analysis in Reference E4.5-3. Major components of the ONS Site-Specific ISFSI are designed and evaluated to withstand the forces generated by the MHE. Hence, there are no dose consequences.

Cask Drop

This section addresses the structural integrity of the DSC and its internals under a postulated transport cask accident condition. It is postulated that the transfer cask described in Section 4.3 of the Site-Specific ISFSI UFSAR with the DSC inside is dropped 80 inches onto a thick concrete slab. Due to the use of transfer cask trailer tie-downs, an actual drop event is not considered credible. Cask drop target parameters are given in Table A-23 of Reference E4.5-1.

The ONS Site-Specific ISFSI transfer cask is analyzed for an 80 inch drop accident using the method of analysis presented in Section 8.2.5 of Reference E4.5-3 as modified by subsequent analysis. The analysis presented in the Topical Report assumes an 80 inch cask drop using ONS Site-Specific ISFSI transfer cask parameters. Hence, the Topical Report analysis covers the ONS accident analysis. Therefore, the stress on the various structural components of the DSC and its internals are the same as those reported in Table 8.2-7 of Reference E4.5-3 as modified by subsequent analysis.

Since the stress analysis has shown that all components important to safety of the DSC and its internal basket will perform their intended function under this accident condition, there are no dose consequences.

Transfer Cask Loss of Neutron Shield

The neutron shield jacket is designed, fabricated, tested, and inspected as ASME Section III, Division 1, Class 2 vessels. The associated ASME quality assurance program will assure that there are no poor joints, or other substandard components in the transfer cask. The BISCO NS-3 neutron shield material is a rigid solid when cured and will not flow freely through openings in the jacket. Therefore, a loss of shield material will only occur in cases of external damage to the shield jacket and concurrent displacement of NS-3 material.

Damage to the neutron shield jacket and material would be visually obvious. Anticipated loss of hydrogen from the NS-3 material resulting from degassing at evaluated temperatures is accounted for in the shielding analysis (see Section 7.3.2 Reference E4.5-1).

For the purpose of this analysis, it is assumed that the transfer cask neutron shield will be breached as a result of postulated drop accident, and the shielding effect of the NS-3 will be lost. The effect of this will increase the cask surface contact dose from 180 mrem/hr to 837 mrem/hr. The only potential off-site dose consequences would be additional direct and air scattered radiation if the accident were to occur sufficiently close to the site boundary. It is assumed that eight hours would be required to either recover the neutron shield or to add temporary shielding while arranging recovery operations. As a result, it is estimated that on-site workers at an average distance of 15 ft would receive an additional dose rate of 80 mrem/hr. Off-site individuals at a distance of 2,000 ft would receive an additional dose of 5.7×10^{-4} mrem for the assumed eight hour exposure. This increase is well within the limits of 10 CFR 72 for an accident condition.

Lightning

The likelihood of lightning striking the Site-Specific ISFSI and causing an off-normal operating condition is not considered a credible accident given the Site-Specific ISFSI lightning protection provided. The lightning protection system for the Site-Specific ISFSI is designed in accordance with NFPA NO. 78-1979 Lightning Protection Code. This system precludes any damage to the HSM or its internals due to lightning. Since no off-normal operating condition will develop as a result of lightning striking the Site-Specific ISFSI, there are no radiological consequences.

Blockage of Air Inlets and Outlets

This accident involves the complete and total blockage of all HSM air inlets and outlets. Since the HSMs are located outdoors, the air inlets and outlets could potentially be blocked by debris from such unlikely events as tornados. Site-Specific ISFSI design features such as a perimeter fence and separation of air inlets and outlets reduce the potential for this accident.

The structural consequences due to the weight of debris blocking the air openings are bounded by the structural consequences of other accidents described in this section (i.e., tornado and earthquake analyses). The thermal consequences of this accident result from heating of the DSC and HSM due to the loss of natural convection cooling. An analysis of this condition is provided by Section 8.2.7 of Reference 4.5-3. There are no offsite dose consequences as a result of this accident.

Dry Storage Canister Leakage

The DSC is designed for no leakage and analysis of normal and accident conditions have shown that no credible conditions could breach the canister body or fail the double seal welds at each end of the DSC. However, to show the ultimate safety of the Site-Specific ISFSI system, a total and complete instantaneous leak is postulated. This postulated accident is the instantaneous release directly to the environment of 30% of all fission gasses mainly Kr^{85} and I^{129} contained in all the fuel rods in all 24 PWR fuel assemblies. This accident assumes that all fuel rods are ruptured and that concurrent DSC leakage occurs. Due to the passive nature of the ONS Site-Specific ISFSI system and the various design features, there is no credible event that could result in the rupture of all fuel rods concurrent with DSC leakage. However, to demonstrate the safety of the Site-Specific ISFSI design, this accident assumes that the fuel rods and the canister are ruptured due to an event of unspecified origin.

There are no structural or thermal consequences resulting from the DSC leakage accident. The resulting calculated doses are 7 and 200 mrem for the maximum offsite whole body and thyroid doses, respectively. These doses are well below the 10 CFR 72 acceptable limit of 5,000 mrem whole body dose equivalent.

Accidental Pressurization of the DSC

Internal pressurization of the DSC could result from fuel cladding failure which would release fuel rod fill gas and free fission gas. The maximum DSC accident pressurization is calculated assuming that the fuel rod fission gas release fraction is 30%, and that the original fuel rod fill pressure is 480 psig (ONS fuel actually has a maximum initial fill pressure of 465 psig). The resulting internal DSC pressures at ONS's maximum ambient temperature of 116°F and at the minimum ambient temperature of -30°F are below the accident pressures reported in Section 8.2.9 of Reference E4.5-3 (for temperature extremes of 125°F and -40°F). The limiting accident for DSC pressurization is the loss of transfer cask neutron shield. Under these conditions, the gas temperatures in the DSC will rise to 600°F producing a DSC internal pressure of 49.1 psig. The DSC shell stresses due to accident pressurization are enveloped by those reported in the NUTECH Topical Report (Reference E4.5-3). Since the accidental pressurization is within the design basis limits of the DSC, there are no dose consequences.

Load Combinations

The load categories associated with normal operating conditions and accident conditions have been described and analyzed in the ONS Site-Specific ISFSI UFSAR. The methodology used in combining normal operating and accident loads and their associated overload factors for various Site-Specific ISFSI components is presented in Section 8.2.10 of the Reference E4.5-3. The load combination analysis indicates that the major Site-Specific ISFSI components can withstand severe load combination without failure and the ONS Site-Specific ISFSI analysis results are bounded by the NUTECH Topical Report Reference E4.5-3. Thermal fatigue and thermal cycling have been evaluated for the renewed license period as discussed in Appendix B. Therefore, there are no dose consequences for postulated load combination events.

Flooding

The elevation of the ONS Site-Specific ISFSI is more than 11 ft higher than the maximum flood level postulated for Lake Keowee. Therefore, flooding of the ONS Site-Specific ISFSI will not occur.

Explosions

The explosion on SC Highways 130 or 183 of a tanker containing 8,500 gallons of gasoline would subject the Site-Specific ISFSI to a surface overpressure. According to the NRC Regulatory Guide 1.91, "Evaluations of Explosives Postulated on Transportation Routes Near Nuclear Power Plants," the explosion of 8,500 gallons of gasoline 1,100 ft from the Site-Specific ISFSI on S C Highway 130 or 183, would result in a peak overpressure of 1 psi about 1,900 ft from the point of explosion and therefore an overpressure of 2.3 psi at the Site-Specific ISFSI. The HSM has been designed to withstand a maximum tornado wind pressure of 2.75 psi on the HSM leading wall, and -2.48 psi on the HSM roof. Therefore, the HSM overpressure from the explosion of a gasoline tanker on either SC Highway 130 or 183 is enveloped by the wind pressure analysis and design for a DBT. Therefore, there are no dose consequences for postulated explosions.

E4.5 REFERENCES

E4.5-1 Oconee Nuclear Station Site-Specific ISFSI Updated Final Safety Analysis Report

E4.5-2 SCALE-3: A Modular Code System for Performing Standardized Computer Analysis for Licensing Evaluation, NUREG/CR-0200, ORNL, Revision 3, December 1984

E4.5-3 Topical Report for the NUTECH Horizontal Modular Storage (NUHOMS®-24P) System for Irradiated Nuclear Fuel, NUH-002, Revision 1A, July 1989

E5.0 ASSESSMENT OF NEW AND SIGNIFICANT INFORMATION

E5.1 DISCUSSION

In assessing whether there has been any significant change since the NRC evaluated ONS Site-Specific ISFSI construction and operation, Duke reviewed the following documents:

- The generic environmental impact statement (GEIS) that the NRC prepared for ONS license renewal (Reference E5.2-3).
- The description of the new and significant information identification process that Duke undertook for the ONS license renewal (Reference E5.2-1).

Each of the above-referenced documents represents a structured approach to identifying and evaluating the significance of environmental impacts. The scope of each is station license renewal, and also addresses spent fuel storage, including the ONS Independent Spent Fuel Storage Installation (ISFSI). The GEIS covers the time from construction and start of operation to publication in 1998. The ONS license renewal application evaluated whether there have been any significant environmental issues not covered in the GEIS, and includes the time from GEIS publication to the present. In combination, therefore, the documents span the time from the ONS ISFSI final environmental statement (Reference E5.2-2) to the present, and serve as a mechanism for identifying any significant environmental changes since the NRC evaluated ONS Site-Specific ISFSI construction and operation.

The following is a description of the process used during the ONS plant license renewal investigations. Duke used a qualified investigation team comprised of corporate and plant personnel. These individuals form a group knowledgeable about plant systems, the site environment, and plant environmental issues. In addition, Duke contracted with an environmental consulting firm with expertise in the NRC license renewal environmental review process, the National Environmental Policy Act (NEPA), and the scientific disciplines involved in preparing a license renewal environmental report. The team and consultants (1) interviewed Duke subject matter experts regarding specifics of plant operations, including management of discharges and emission, (2) reviewed environmental documentation, (3) consulted with state and federal agencies to determine if the agencies were concerned about plant operations, and (4) reviewed internal procedures for reporting to the NRC events that could have environmental impacts. The subject matter experts interviewed during the plant license renewal process included persons responsible for ONS spent fuel management and Site-Specific ISFSI operations. The results of those interviews identified no new significant information.

Documentation and procedures reviewed for this application covered Site-Specific ISFSI impacts, and regulatory agencies were afforded the opportunity to address operational issues. While preparing this environmental report, Duke reviewed the original environmental report for the Site-Specific ISFSI, the Site-Specific ISFSI Safety Analysis Report, and applicable station monitoring reports. ONS and Duke corporate personnel familiar with the operation of the Site-Specific ISFSI provided input to, and commented on, the information provided in this environmental report.

The assessments performed for the ONS license renewal and for the Site-Specific ISFSI were thorough and comprehensive, and would have identified any new and significant issues related to the Site-Specific ISFSI. Duke is aware of no new and significant information regarding the environmental impacts of the ONS Site-Specific ISFSI license renewal.

E5.2 REFERENCES

E5.2-1 Application for Renewed Operating Licenses, Oconee Nuclear Station, Units 1, 2, and 3, Exhibit D, Operating License Renewal Stage, dated July 6, 1998

E5.2-2 Environmental Assessment Related to the Construction and Operation of the Oconee Nuclear Station Independent Spent Fuel Storage Installation, October 1988, NRC, Washington, D.C.

E5.2-3 Generic Environmental Impact Statement for License Renewal of Nuclear Plants, Regarding the Oconee Nuclear Station. Supplement 2, NUREG-1437, NRC, 1999

E6.0 SUMMARY OF LICENSE RENEWAL IMPACTS AND MITIGATING ACTIONS

E6.1 LICENSE RENEWAL IMPACTS

This environmental report describes the proposed action, renewing the license of the ONS Site-Specific Independent Spent Fuel Storage Installation (ISFSI), and any associated impacts. All impacts would be small and not significant. Table E6-1 identifies the impacts license renewal would have on the environmental resources. Based on this evaluation, renewal of the license for the ONS Site-Specific ISFSI would involve no significant environmental impact.

Table E6-1

Environmental Impacts Related to the License Renewal of the ONS Site-Specific ISFSI

Issue	Environmental Impact
Geology or Soils	None
Hydrology	None
Air Quality	None
Aquatic Resources	None
Socioeconomics	None
Social Services or Public Utilities	None
Land Use	None
Threatened or Endangered Species	None
Historic or Cultural Resources	None
Occupational Doses from Normal Operations	Small. Workers would come from the ONS workforce. The conservative occupational collective dose rate is estimated to be no more than 6 person-rem per year. The nearest office worker would receive less than 1 mrem annually.
Occupational Doses from Construction Activities	Small. Less than 50 mrem per year when construction activities occur.
Other Occupational Health Effects	Small. Any other health effects would be the result of hazards associated with moving heavy objects and equipment during cask shipment to a permanent repository.
Doses to the Public from Normal Operations	Small. The maximum dose to the nearest potential future resident is 7.5×10^{-2} mrem per year.
Occupational Doses from Accidents	Small. 700 mrem maximum for a single individual per 8 hours for debris removal from air inlet/outlet blockage.
Doses to the Public from Accidents	Small. Postulated dose from a single ruptured DSC; 7 mrem whole body, 200 mrem thyroid.

E6.2 MITIGATION

The impacts of license renewal are small and would not require mitigation. Current operations include mitigation activities that would continue during the term of the renewed license. Duke performs routine monitoring activities and any associated mitigation to ensure the safety of workers, the public, and the environment. These monitoring activities include the radiological environmental monitoring program conducted for ONS and the ONS Site-Specific ISFSI, periodic monitoring of the HSMs and preventative maintenance as necessary, and monitoring and maintenance of the perimeter and security fences.

E6.3 UNAVOIDABLE ADVERSE IMPACTS

Renewing the ONS Site-Specific ISFSI license would incur no unavoidable adverse impacts as a result of normal operations. No credible accidents would increase the dose to the public beyond a minimal amount, and occupational doses from a credible accident would be a maximum of 700 mrem during the 8 hour period it is estimated to remove debris from a blocked inlet or outlet vent.

E6.4 IRREVERSIBLE AND IRRETRIEVABLE RESOURCE COMMITMENTS

The continued operation of the ONS Site-Specific ISFSI for the license renewal term will result in no additional irreversible or irretrievable resource commitments. If Duke elects to construct additional Site-Specific HSMs, it will not exceed the maximum of 88 already permitted under the limits of the Site-Specific license.

E6.5 SHORT TERM USE VERSUS LONG TERM PRODUCTIVITY

The Site-Specific ISFSI is a temporary storage facility. Once the spent nuclear fuel is moved to a permanent repository, the HSMs, concrete pads, and fencing, could be removed and the land used for another purpose.

E7.0 ALTERNATIVES

Preparatory to construction, Duke and the NRC evaluated the following alternatives to the ONS ISFSI (Reference 7.4-2 and 7.4-3).

- Ship spent nuclear fuel to an MRS or a permanent federal repository
- Ship spent nuclear fuel to another site
- Construct a supplemental independent spent fuel storage pool at ONS
- Expand the storage capabilities of both ONS spent fuel pools through the use of spent fuel rod consolidation.

Table 7-1 provides a tabulation of the alternatives analyzed in previous ISFSI license applications.

Table E7-1

Alternatives Analyzed in Independent Spent Fuel Storage Installation License Applications

	Alternatives											
	Ship To											
ISFSI	MRS or Permanent Federal Repository	Interim federal repository	Same utility, different reactor site	Other utility's reactor site	Reprocessing center	Increase existing spent fuel pool storage capacity	Construct new spent fuel storage pool at site	Improve fuel storage	Operate reactors at reduced power	Construct an ISFSI at a remote location	Store fuel in dry casks	No action
Surry	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		✓
Robinson[1]	✓		✓				✓				✓	✓
Oconee[2]	✓		✓			✓						
Fort St. Vrain	✓	✓		✓[3]	✓		✓[4]			✓		
Calvert Cliffs[5]	✓	✓		✓	✓	✓	✓					✓
Prairie Island[6]	✓	✓	✓	✓	✓	✓	✓	✓				✓
Rancho Seco[7]	✓			✓	✓							
Trojan	✓			✓	✓							✓
North Anna[8]			✓			✓	✓	✓				✓
TMI						✓	✓			✓		✓
Skull Valley[9]			✓	✓						✓		✓

1. Robinson also considered other dry storage technologies.
2. Oconee also considered full-scale rod consolidation.
3. Fort St. Vrain evaluated storing fuel at Idaho National Engineering and Environmental Laboratory, as well as commercial reactor sites.
4. Fort St. Vrain evaluated storing fuel in fuel storage wells, not spent fuel pools.
5. Calvert Cliffs also considered full-scale rod consolidation and other dry storage technologies.
6. Prairie Island also considered other dry storage technologies.
7. Rancho Seco also evaluated other dry storage technologies and maintaining the fuel in the existing fuel pool.
8. North Anna also considered other dry storage technologies.
9. Skull Valley also evaluated dry and wet storage technologies, and alternatives that would eliminate the need for the proposed storage facility.

E7.1 ALTERNATIVES CONSIDERED IN THE ORIGINAL SITE-SPECIFIC ISFSI ENVIRONMENTAL REPORT

E7.1.1 SHIP SPENT FUEL TO A PERMANENT FEDERAL REPOSITORY

In the original Environmental Report for the ONS Site-Specific ISFSI, it was noted that shipping spent fuel to a permanent federal repository would be Duke's preferred alternative, but that an MRS or repository would not likely be ready to receive spent fuel in time to meet the ONS spent fuel storage needs. This remains true today. There are no plans for an MRS. The U.S. Department of Energy (DOE) currently expects the Yucca Mountain repository to begin receiving spent fuel no sooner than 2017 (Reference E7.4-1), seven years after the expiration date for the current ONS Site-Specific ISFSI license. Because there are no current plans for an MRS, and a federal repository will not be available in time, shipping spent fuel to an MRS or a permanent federal repository is not a reasonable alternative to renewing the ONS Site-Specific ISFSI license.

E7.1.2 SHIP SPENT FUEL TO ANOTHER SITE

The CNS Renewed FOLs allow for storage of spent fuel assemblies from ONS. Approval of this provision by the NRC required a demonstration of full compliance with the limits set forth in Table S-4 of 10 CFR 51. This alternative, therefore, presents no adverse environmental impacts when considered as a supplement to or complete replacement of the proposed dry storage alternative.

The MNS Renewed FOLs allow for storage of spent fuel assemblies from ONS. However, MNS is not licensed to store more than the 300 ONS spent fuel assemblies that were transshipped from ONS in the 1980's. While this limit could potentially be increased, it would require an amendment to the MNS Renewed FOLs.

However, since both CNS and MNS have already implemented dry spent fuel storage, any ONS fuel assemblies would have to be accommodated at CNS or MNS by additional dry storage at those facilities. Therefore, transshipment of spent fuel to CNS and MNS would not reduce environmental impacts and is not a reasonable alternative to renewing the ONS Site-Specific ISFSI license.

E7.1.3 CONSTRUCT A NEW INDEPENDENT SPENT FUEL STORAGE POOL

Expansion of the ONS spent fuel storage pools would necessitate construction of an independent pool facility and transferring assemblies from existing ONS Site-Specific ISFSI storage modules into the pool. It would also require an amendment to the ONS Renewed FOLs. Given the increased environmental impacts from construction, increased worker dose, necessary modifications to plant systems, and increased facility maintenance requirements with no identifiable reduction in significant environmental impact, Duke concludes that constructing a new spent fuel storage pool at ONS offers no environmental advantages over renewing the ONS Site-Specific ISFSI license.

E7.1.4 EXPAND THE STORAGE CAPABILITIES OF OCONEE SPENT FUEL POOLS THROUGH THE USE OF SPENT FUEL ROD CONSOLIDATION

This discussion of spent fuel rod consolidation is a summary from the original Site-Specific ISFSI Environmental Report (see Section 9.1.1 of Reference E7.4-2). The technique of spent fuel rod consolidation consists of dismantling the fuel assembly and storing fuel rods inside a separate container in a close packed array. Spent fuel rod consolidation was studied for implementation at ONS during the six years preceding the original Environmental Report. These efforts included a full scale demonstration at ONS using four irradiated fuel assemblies. This was followed by detailed material characterization efforts and subsequent disposal of the compacted non-fuel-bearing structural materials.

While spent fuel rod consolidation is manageable, other negative considerations associated with the process render this impractical for large scale implementation. These include low consolidation rates, greater potential for radioactive releases, and higher radiation exposures for operating personnel.

Thus, Duke has determined that rod consolidation is not a reasonable alternative for ONS.

E7.2 ALTERNATIVES NOT CONSIDERED IN THE ORIGINAL SITE-SPECIFIC ISFSI LICENSING ANALYSIS

E7.2.1 INCREASE THE STORAGE CAPACITY OF THE EXISTING SPENT FUEL POOLS

Increasing the size of the existing spent fuel pools at ONS is not possible due a lack of room for such expansion, as well as the impracticality of maintaining an existing inventory of spent fuel during expansion activities. Since the ONS spent fuel storage racks have already been replaced with a high-density design, capacity increases through re-racking are not possible. Thus, capacity increases for the ONS spent fuel pools are not a reasonable alternative to renewing the ONS Site-Specific ISFSI license.

E7.2.2 SHIP SPENT FUEL TO A REPROCESSING FACILITY

No commercial reprocessing facilities exist in the United States and there are no prospects for such facilities in the foreseeable future. Therefore, reprocessing is not a reasonable alternative renewing the ONS Site-Specific ISFSI license.

E7.2.3 SHIP SPENT FUEL TO A FEDERAL INTERIM STORAGE FACILITY

The NRC has evaluated impacts of storing spent fuel at a federal interim storage facility, and some planning has been done for constructing such a facility, most recently at the Yucca Mountain repository site. However, no federal interim storage facility has been built and there appears to be no prospect for one in time to eliminate the need for ONS Site-Specific ISFSI license renewal. Therefore, shipping to a federal interim storage facility is not a reasonable alternative renewing the ONS Site-Specific ISFSI license.

E7.2.4 SHIP SPENT FUEL TO OTHER UTILITY COMPANIES' REACTORS FOR STORAGE

Duke is aware of only one NRC licensee that has recently performed inter-plant transfers and those transfers are feasible only because of a unique circumstance. The receiving plant, Shearon Harris, constructed spent fuel pool storage capacity for more units than were constructed at the site. The excess capacity is designated for spent fuel from other plants of that licensee, however, and is not available for transfer from other licensee's plants such as ONS.

Duke concludes that shipping ONS spent fuel to any other commercial nuclear plant for storage is not a reasonable alternative to renewing the ONS Site-Specific ISFSI license.

E7.2.5 CONSTRUCT A NEW ISFSI AT THE ONS SITE

ONS has already implemented a General License ISFSI to meets its current needs for additional dry storage. Thus, Duke could repackage ONS Site-Specific ISFSI spent fuel into other NRC-certified casks and store the spent fuel in the ONS General License ISFSI. This alternative would obviate the need to renew the original Site-Specific ISFSI license. The alternative would, however, add significant costs and personnel exposure associated with repackaging. Duke concludes that repackaging and moving the fuel to the ONS General License ISFSI does not offer net environmental benefits and is not a reasonable alternative to renewing the ONS Site-Specific ISFSI license.

E7.2.6 CONSTRUCT A NEW ISFSI AWAY FROM THE ONS SITE

The only ISFSI currently planned for receipt of commercial spent nuclear fuel is the Private Fuel Storage facility in Utah. NRC evaluated the environmental impacts of constructing and operating a private ISFSI at the Skull Valley Goshutes Indian Reservation and concluded that the proposed ISFSI would reduce the already small environmental effects of spent fuel storage at reactor sites (Reference 7.4-4). However, legal and regulatory issues have prevented construction of this facility and its future availability is uncertain. Therefore, this is not a reasonable alternative to renewing the ONS Site-Specific ISFSI license.

E7.3 NO ACTION

Under this alternative, NRC would not renew the ONS Site-Specific ISFSI license. Duke could not lawfully store spent fuel at the Site-Specific ISFSI after January 31, 2010, and would have to remove all spent fuel that it currently stores there. Other subsections of Section E7 address potential alternatives for storing ONS Site-Specific ISFSI spent fuel.

NRC has prepared a generic environmental impact statement on decommissioning of nuclear facilities, including ISFSIs (Reference 7.4-3). NRC evaluated ISFSI decommissioning alternatives, radiation safety, cost, waste disposal, and socioeconomic effects. NRC identified no prohibitory technical or environmental issues.

The "No Action" alternative, like the proposed action and all other alternatives, would involve eventual decommissioning of the ONS Site-Specific ISFSI. Decommissioning activities and their impacts are not discriminators between the proposed action and any other alternative, including no action. Duke will need to decommission the ONS Site-Specific ISFSI regardless of the NRC decision on license renewal - license renewal would only postpone decommissioning. Duke adopts by reference the NRC discussion of ISFSI decommissioning effects.

Duke concludes that the "No Action" alternative does not provide any environmental advantage over license renewal.

E7.4 REFERENCES

E7.4-1 DOE 2006 Yucca Mountain Repository Schedule dated July 19, 2006 accessed online September 6, 2006 at: http://www.ocrwm.doe.gov/info_library/newsroom/documents/CtrSchedule.pdf

E7.4-2 Oconee Nuclear Station Site-Specific ISFSI Environmental Report, Original Issue, Duke. March 1988

E7.4-3 NRC Final Generic Environmental Impact Statement on Decommissioning of Nuclear Facilities (NUREG-0586), August 1988

E7.4-4 NRC Final Environmental Impact Statement for the Construction and Operation of an Independent Spent Fuel Storage Installation on the Reservation of the Skull Valley Band of Goshute Indians and the Related Transportation Facility in Tooele County, Utah (NUREG-1714), December 2001

E8.0 COMPARISON OF THE IMPACTS OF LICENSE RENEWAL WITH THE ALTERNATIVES

Table E8-1 compares the environmental impacts of renewing the license of the ONS Independent Spent Fuel Storage Installation with the alternatives.

Table E8-1

Comparison of ONS Site-Specific ISFSI License Renewal with the Alternatives

	License Renewal	No Action	Ship to permanent repository	Ship to another storage facility	Construct new pool at ONS	Ship to reprocessor	Ship to interim storage facility	Construct a second ISFSI	Other technologies (e.g., rod consolidation)
Impacts	Proposed Action	No environmental advantage. Requires transfer of fuel from the Site-Specific ISFSI to another storage facility	Not a reasonable alternative, because repository will not be available until after expiration of current license	Not a reasonable alternative, because excess capacity is not available at other plants	No environmental advantage. Requires transfer of fuel from Site-Specific ISFSI	Not a reasonable alternative, because there are no domestic reprocessors	Not a reasonable alternative, because there is no federal interim storage facility	No environmental advantage. Requires transfer of fuel from the Site-Specific ISFSI to another storage facility	No environmental advantage. Requires transfer of fuel from the Site-Specific ISFSI to another storage facility
Resources									
Geology/Soils	None				Small			Small	None
Hydrology	None				Small			Small	None
Air Quality	None				Small			Small	None
Aquatic Resources	None				None			None	None
Socioeconomics	None				Small			Small	None
Land Use	None				Small			Small	None
Threatened or Endangered Species	None				None			None	None
Historic/Cultural Resources	None				None			Small	Small
Normal Operations									
Occupational Dose	Small				Small, but greater than license renewal			Small, but greater than license renewal	Small, but greater than license renewal
Dose to public	Small				Small			Small	Small
Accidents									
Occupational Dose	Small				Small			Small	Small
Dose to public	Small				Small			Small	Small

E9.0 STATUS OF COMPLIANCE

E9.1 PROPOSED ACTION

E9.1.1 GENERAL

The ONS Environmental Report (Reference E9.2-1) for license renewal provides a list of all authorizations for current ONS operations. The ONS Site-Specific ISFSI does not require any additional permits, licenses (other than SNM-2503), or approvals to operate.

Table E9-1 below lists the authorizations and consultations that are precedent to the NRC renewing the Site-Specific ISFSI License. This section discusses each of these in more detail.

Table E9-1

Environmental Authorizations for ONS Site-Specific ISFSI License Renewal[a]

Agency	Authority	Requirement	Remarks
U.S. Nuclear Regulatory Commission	Atomic Energy Act (42 USC 2011 et seq.)	Site-Specific ISFSI License Renewal	Environmental Report Supplement submitted in support of Site-Specific ISFSI license renewal application.
U. S. Fish and Wildlife Service	Endangered Species Act, Section 7 (16 USC 1531)	Consultation	Requires federal agency issuing a license to consult with USFWS.
South Carolina Department of Archives and History	National Historic Preservation Act, Section 106 (16 USC 470)	Consultation	Requires federal agency issuing a license to consider cultural impacts and consult with State Historic Preservation Officer.

a. No renewal-related requirements identified for local or other agencies.

FWS = U. S. Fish and Wildlife Service

E9.1.2 THREATENED AND ENDANGERED SPECIES CONSULTATIONS

Section 7 of the Endangered Species Act (16 USC 1531 et seq.) requires federal agencies to ensure that agency action is not likely to jeopardize any species that is listed or proposed for listing as endangered or threatened. The Act addresses consultation with the U.S. Fish and Wildlife Service (FWS) regarding effects on non-marine species. FWS and the National Marine Fisheries Service (which has jurisdiction over marine species) have issued joint procedural regulations in 50 CFR 402, Subpart B, which address consultation, and USFWS maintains the joint list of threatened and endangered species in 50 CFR 17.

As discussed in Section E2.3, threatened or endangered species are known from the vicinity of ONS. Therefore, under Section 7 of the Endangered Species Act, the NRC may consult with USFWS to ensure the proposed action will not jeopardize the continued existence of any threatened or endangered species.

Although not required of an applicant by federal law, Duke has chosen to invite comment from federal and state agencies regarding potential effects that the ONS Site-Specific ISFSI license renewal may have. Appendix E, Attachment 1 includes copies of Duke correspondence with USFWS and the South Carolina Department of Natural Resources.

E9.1.3 NATIONAL HISTORIC PRESERVATION ACT

Section 106 of the National Historic Preservation Act (16 USC 470 et seq.) requires federal agencies having the authority to license any undertaking, prior to issuing the license, to take into account the effect of the undertaking on historic properties, and to afford the Advisory Committee on Historic Preservation the opportunity to comment on the undertaking. Council regulations provide for establishing an agreement with any State Historic Preservation Officer (SHPO) to substitute State review for Council review (35 CFR 800, §800.7). Therefore, the NRC may request comments from the South Carolina SHPO prior to renewing the Site-Specific ISFSI license.

Although not required of an applicant by federal law, Duke has chosen to invite comment from the SHPO regarding potential effects that the ONS Site-Specific ISFSI license renewal may have. Appendix E, Attachment 2 includes copies of Duke correspondence with the South Carolina SHPO.

E9.1.4 AIR REGULATED FACILITIES

Industrial facilities that may impact the degradation rates of the Site-Specific ISFSI through air emissions are minimal. Appendix E, Attachment 3 lists all facilities that are regulated for air emissions by the South Carolina Department of Health and Environmental Control (DHEC) and the U.S. Environmental Protection Agency (EPA) located within 10 miles of ONS (Reference E9.2-2). Duke identified no facilities whose air emissions may impact the ONS Site-Specific ISFSI.

E9.2 REFERENCES

E9.2-1 Duke Application for Renewed Operating Licenses, ONS, Units 1, 2, and 3. Applicants Environmental Report, Operating License Renewal Stage, Rev. 0, June 1998

E9.2-2 DHEC (South Carolina Department of Health and Environmental Control) 2002. Air Regulated Facilities, September 2002. Accessed at: http://www.scdhec.net/eqc/gis/

APPENDIX E, ATTACHMENT 1, ENDANGERED SPECIES CORRESPONDENCE

TABLE OF CONTENTS

Letter	Page
Letter Aldrich (Duke) to Zimmerman (USFWS), August 30, 2006	E-78
Letter Aldrich (Duke) to Shipes (SCDNR), August 30, 2006	E-79
Letter Hall (USFWS) to Aldrich (Duke), September 27, 2006	E-80
Report by L. L. Gaddy, June 1998	E-82

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Environmental, Health and Safety

Oconee Nuclear Site
ON03EHS/7800 Rochester Hwy.
Seneca, SC 29678

864 885-3000

864 885-3809 fax

August 30, 2006

Lori Zimmerman
U. S. Fish and Wildlife Service
176 Croghan Spur Rd.
Suite 200
Charleston, SC 29407

Dear Ms. Zimmerman:

Subject: Biological Assessment for Oconee Nuclear Station NRC License Renewal of the Independent Spent Fuel Storage Installation

Duke Power Company, LLC dba Duke Energy Carolinas, LLC (Duke) is in the process of preparing a license renewal package for the Independent Spent Fuel Storage Installation (ISFSI) at the Oconee Nuclear Station. As part of the renewal process the Nuclear Regulatory Commission (NRC) requires that applicants identify rare, threatened, and endangered species that may be impacted by the continued operation of the facility.

Currently, the ISFSI is licensed to operate until January 31, 2010. The license renewal will allow Oconee to operate the ISFSI until 2050.

In 1998 as part of the license renewal package for the continued operation of Oconee Nuclear Station, Duke hired Dr. L. L. Gaddy to survey a one mile radius around the plant for rare, threatened, and endangered species. The survey, entitled "*Endangered, Threatened, and Otherwise Noteworthy Plant and Animal Species of the Oconee Nuclear Station, Oconee and Pickens Counties, South Carolina*" found 4 state listed species within the one-mile radius of the plant. These areas are remote from the plant and the operation of the Oconee ISFSI will have no impact on these areas. Please note that this license renewal is for the continued operation of the ISFSI and not for construction of new dry cask storage units.

I have enclosed information about the relicensing scope as well as a copy of Dr. Gaddy's survey report. We ask that you review the project scope and Dr. Gaddy's survey and give concurrence that there will be no adverse impacts to rare, threatened, and endangered species because of the license renewal of Oconee's ISFSI. Please provide comments on our determination of no adverse impact due to the relicensing of Oconee's Independent Spent Fuel Storage Installation.

Please contact me at 864/885-4504 if you have any questions.

Sincerely,

Gregory K. Aldrich

Gregory K. Aldrich
Associate Scientist

Enclosures

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Oconee Nuclear Site
ON03EHS/7800 Rochester Hwy.
Seneca, SC 29678

864 885-3000

864 885-3809 fax

August 30, 2006

Derrel Shipes
South Carolina Department of Natural Resources
P.O. Box 167
Columbia, SC 29202

Dear Mr. Shipes:

Subject: Biological Assessment for Oconee Nuclear Station NRC License Renewal of the Independent Spent Fuel Storage Installation

Duke Power Company, LLC dba Duke Energy Carolinas, LLC (Duke) is in the process of preparing a license renewal package for the Independent Spent Fuel Storage Installation (ISFSI) at the Oconee Nuclear Station. As part of the renewal process the Nuclear Regulatory Commission (NRC) requires that applicants identify rare, threatened, and endangered species that may be impacted by the continued operation of the facility.

Currently, the ISFSI is licensed to operate until January 31, 2010. The license renewal will allow Oconee to operate the ISFSI until 2050.

In 1998 as part of the license renewal package for the continued operation of Oconee Nuclear Station, Duke hired Dr. L. L. Gaddy to survey a one mile radius around the plant for rare, threatened, and endangered species. The survey, entitled *"Endangered, Threatened, and Otherwise Noteworthy Plant and Animal Species of the Oconee Nuclear Station, Oconee and Pickens Counties, South Carolina"* found 4 state listed species within the one-mile radius of the plant. These areas are remote from the plant and the operation of the Oconee ISFSI will have no impact on these areas. Please note that this license renewal is for the continued operation of the ISFSI and not for construction of new dry cask storage units.

I have enclosed information about the relicensing scope as well as a copy of Dr. Gaddy's survey report. We ask that your office review the project scope and the applicability of Dr. Gaddy's survey. We also request any new information on the presence of rare, threatened and endangered species in the immediate vicinity of the Oconee Nuclear Station. Please provide comments on Duke's determination of no adverse impact due to the relicensing of Oconee's Independent Spent Fuel Storage Installation on rare, threatened and endangered species in the vicinity of the Oconee Nuclear Station.

Please contact me at 864/885-4504 if you have any questions.

Sincerely,

Gregory K. Aldrich

Gregory K. Aldrich
Associate Scientist

Enclosures

www.duke-energy.com

United States Department of the Interior

FISH AND WILDLIFE SERVICE
176 Croghan Spur Road, Suite 200
Charleston, South Carolina 29407

RECEIVED
OCT 9 2006
ONS EHS, DUKE POWER CO.

September 27, 2006

Mr. Gregory Aldrich
Duke Energy
7800 Rochester Hwy.
Seneca, SC 29678

Re: Oconee Nuclear Station License Renewal
Oconee, South Carolina
FWS Log No: 2006-I-872

Dear Mr. Aldrich:

The U.S. Fish and Wildlife Service (Service) has reviewed your letter requesting concurrence that the above-referenced project will have no adverse impacts on listed species. The proposed license renewal will extend operations of the Independent Spent Fuel Storage Installation (ISFSI) until 2050. The license renewal is for the continued operation of the existing ISFSI and does not include authorization for construction of new dry cask storage units. The following comments are provided in accordance with section 7 of the Endangered Species Act (Act), as amended (16 U.S.C. 1531-1543).

In 1998 Dr. L. L. Gaddy conducted a survey of the Nuclear Station, including a 1-mile radius centered on the Number Two Reactor. Within these bounds, Dr.Gaddy surveyed appropriate habitat for rare species known to occur in the area. Results of these surveys indicate that no federally-listed species occur on the property. The surveys did find four state-listed plants on the property that are contained within protected natural areas. These areas will not be disturbed by activities related to issuance of the requested license renewal.

Based on information provided, we concur with your determination that the proposed action is not likely to have reasonably foreseeable adverse effects on resources under the jurisdiction of the Service that are currently protected by the Act. In view of this, the Service believes that the requirements of Section 7 of the Act have been fulfilled relative to the proposed action, and no further consultation is necessary at this time. However, obligations under Section 7 of the Act must be reconsidered if: (1) new information reveals that the proposed project may affect listed species in a manner or to an extent not previously considered, (2) the proposed project is subsequently modified to include activities which were not considered during this consultation; or (3) new species are listed or critical habitat designated that might be affected by the proposed project.

Your interest in ensuring the protection of endangered species is appreciated. If you have further questions or require additional information, please contact Lora Zimmerman of this office at (843)727-4707 ext. 226. In future correspondence concerning this project, please reference FWS Log No. 2006-I-0872.

Sincerely,

Timothy N. Hall

Timothy N. Hall
Field Supervisor

TNH/LLZ

ENDANGERED, THREATENED, AND OTHERWISE NOTEWORTHY PLANT AND ANIMAL SPECIES OF THE OCONEE NUCLEAR STATION, OCONEE AND PICKENS COUNTIES, SOUTH CAROLINA

prepared by

L. L. Gaddy, Ph. D.
245 The Wild Wood Way
Walhalla, South Carolina 29691

for

Duke Energy Corporation
Charlotte, North Carolina

June 1998

INTRODUCTION

This report presents the results of an inventory of endangered, threatened, and otherwise noteworthy plant and animal species of Duke Energy's Oconee Nuclear Station. The study area for this investigation was a one mile-radius circle centered on the Number Two Reactor inside the Oconee Nuclear Station. The study area included all lands at Oconee Nuclear Station and additional lands along the Keowee River and along Lake Keowee (see Map 1).

Field work was conducted in May and June of 1998. A habitat analysis of the study area was conducted using false color infrared photography, black and white photography, and topographic maps of the site. Habitats that appeared to be potential areas of occurrences for the species listed in Table 1 were completely surveyed on foot in the field. More cursory inventories were done of successional forests and highly-disturbed areas.

RESULTS

Three state-listed plants species and one species not previously known in South Carolina were found in the course of the inventory (Table 1). Additionally, four significant natural areas which harbored state-listed plants, old-growth trees, or other noteworthy natural features were located (Map 1).

Table 1. Endangered, threatened, and otherwise noteworthy plant and animal species occurring or historically-occurring in the vicinity of the Oconee Nuclear Station.

SCIENTIFIC NAME	COMMON NAME	STATUS[1]	OCCURRENCE[2]
PLANTS			
Carex laxiflora	loose-flowered sedge	SR	PRESENT
Carex prasina	drooping sedge	SL	PRESENT
Echinacea laevigata	smooth coneflower	FE	HISTORICAL
Nestronia umbellula	Indian olive	SL	PRESENT
Orobanche uniflora	one-flowered broomrape	SL	HISTORICAL
Pachysandra procumbens	Allegheny spurge	SL	HISTORICAL
Viola tripartita	three-parted violet	SL	PRESENT
ANIMALS			
Sigmora robusta	a millipede	SL	HISTORICAL

[1] SR-new state record for species found during this inventory; SL-listed as "rare, threatened, or endangered" by the State of South Carolina (see Appendix); FE-federally-listed as endangered by the Fish and Wildlife Service.

[2] PRESENT indicates that species was found on Oconee Nuclear Station property or within a one-mile radius of Oconee Nuclear Station during the course of this inventory or has recently been reported from the area by biologists; HISTORICAL indicates that species has been reported from the general area in the past but was not located within a one-mile radius of Oconee Nuclear Station during this inventory.

Populations of the state-listed three-parted violet (Viola tripartita) were found in three different areas in rich deciduous woods. This yellow violet is uncommon in the Blue Ridge and upper Piedmont of South Carolina. The populations located within the study area ranged from five to 25 plants (Map 1).

A population of Indian olive (Nestronia umbellula), also state-listed in South Carolina, was found along the nature trail in Natural Area 1 (see Map 1 and discussion of Natural Area 1 below). About 50 plants of Indian olive were found in a blueberry (Vaccinium spp.) thicket at this site. (Robert Siler, a Duke Engineering & Services biologist, brought this population to my attention).

Drooping sedge (Carex prasina), uncommon in the Blue Ridge and Piedmont of South Carolina, is also listed and monitored by the South Carolina Department of Natural Resources. One population of about 10 plants was found in small seepage bogs east of SC 183 in Natural Area 3 (see Map 1 and discussion of natural areas below).

Finally, the first substantiated South Carolina record for loose-flowered sedge (Carex laxiflora) was found in the southern portion of the study area in Natural Area 4 (see Map 1 and discussion of natural areas below). About 25 plants of Carex laxiflora were located during this inventory on a rich, north-facing slope. Carex laxiflora is reported from South Carolina in Radford et al., 1968, the authoritative guide to the flora of Carolinas; however, over the last decade, field research has revealed that several other species of sedges were probably incor-

3

rectly identified as this species, which heretofore was unknown from South Carolina (see Gaddy, 1995). Only two records of the sedge were known from the southern Blue Ridge, both in North Carolina (the closest record to South Carolina for the species was Windy Falls on the Horsepasture River--a site also within the Keowee-Toxaway River drainage). Because this is the first record for the species in South Carolina, a specimen was collected for deposit in the Clemson University Herbarium.

Four significant natural areas were also encountered during the survey of the study area. They have been included on Map 1 to facilitate their location. Natural Area 1 is the nature trail area north of the World of Energy. Here, relatively undisturbed deciduous woods dominated by white oak (Quercus alba), red oak (Quercus rubra), southern red oak (Quercus falcata), and hickories (Carya spp.). Dogwood (Cornus florida), mountain laurel (Kalmia latifolia), and the uncommon buckthorn (Rhamnus caroliniana) are found in the understory. This site harbors a rich herbaceous flora which includes good populations of uncommon wildflower species such as Indian pink (Spigelia marilandica), American liverleaf (Hepatica americana), Indian olive (Nestronia umbellula) (see above), and three-parted violet (Viola tripartita). Smaller populations of many other showy spring herbs are also found here.

Natural Area 2 is an area of old-growth Piedmont mixed hardwoods on a north-facing slope and ridge east of SC 183 (Map 1). Here, a forest of mixed oak and tulip poplar appears not to have been disturbed in recent history. Black oak (Quercus velutina) up to 40 inches in diameter at breast height (4.5 feet) (dbh), southern red oak (Quercus falcata) to 36 inches in dbh, white oak (Quercus alba) up to 30 inches in dbh, and tulip poplar (Liriodendron tulipifera) over 24 inches in dbh all were seen here. The area of old-growth is not extensive but is significant considering the fact that old-growth Piedmont forests are rare. Buckthorn (Rhamnus carolinana) and three-parted violet (Viola tripartita) were also found in the natural area.

Natural Area 3 is a small, north-facing ravine in the southwestern portion of the study area. A stand of 100-year old white oak (Quercus alba), some of which have recently been cut, is found here on slopes overlooking several interesting bogs. Good populations of cinnamon fern (Osmunda cinnamomea), southern lady fern (Athyrium asplenoides), and New York fern (Thelypteris noveboracensis) surround several small bogs which harbor a small population of the rare drooping sedge (Carex prasina). The northern end of this ravine harbors a small beaver pond/marsh complex with bur-reed (Sparganium americanum), sedges (Carex spp.), tag alders (Alnus serrulata), and black willows (Salix nigra) (see Map 1).

Finally, Natural Area 4 is an extensive north-facing bluff with mature white oak (Quercus alba), red oak (Quercus rubra), beech (Fagus grandifolia), and tulip poplar (Liriodendron tulipifera) (largest trees over 30 inches in dbh). Found in the southern portion of the study area south of SC 183, this site also harbors mountain laurel (Kalmia latifolia), dogwood (Cornus

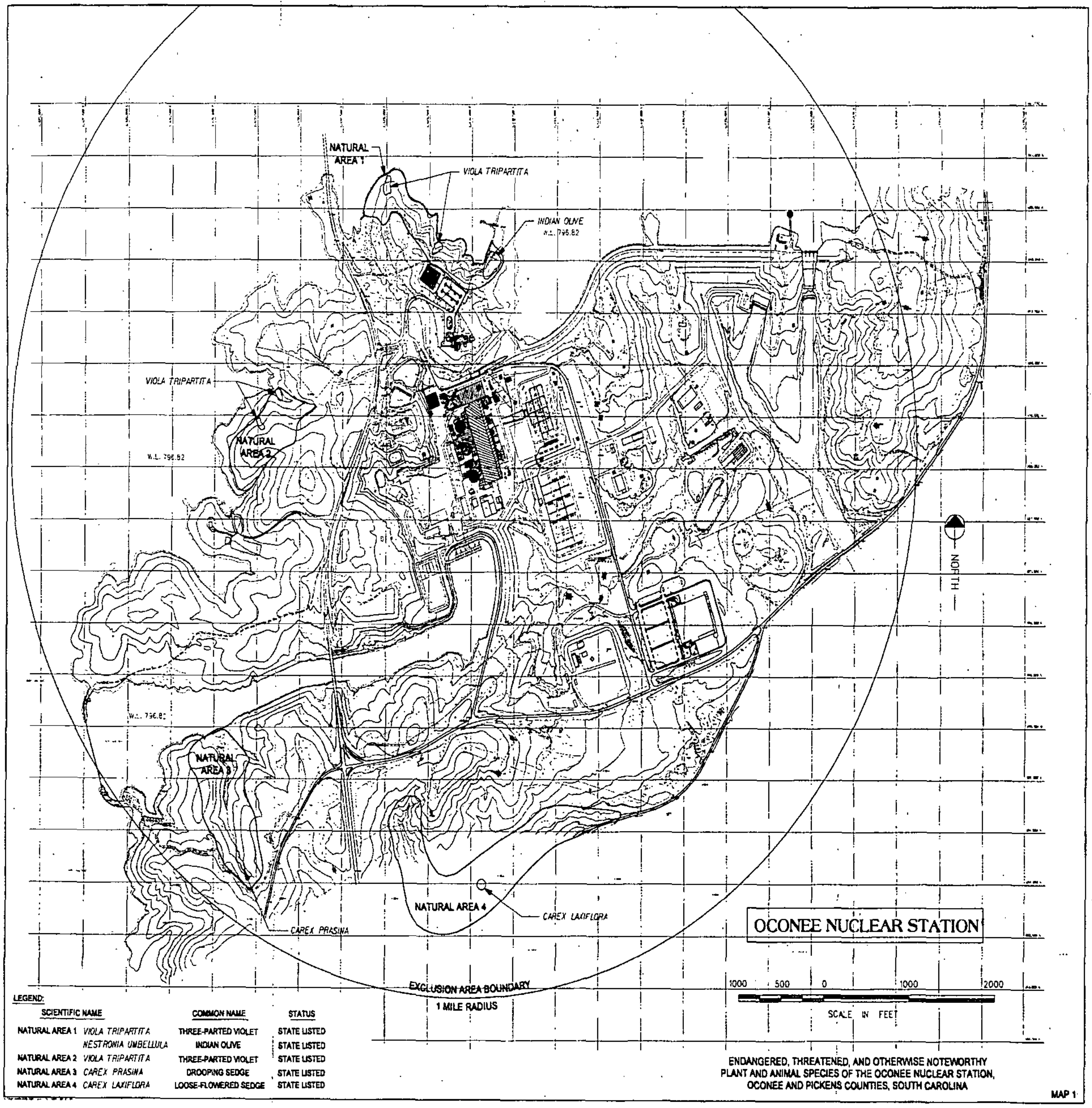
5

<u>florida</u>), redbud (<u>Cercis</u> <u>candadensis</u>) (one tree eight inches in dbh), and chalk maple (<u>Acer</u> <u>leucoderme</u>) in the understory. The herbaceous flora is rich with three-parted violet (<u>Viola</u> <u>tripartita</u>), loose-flowered sedge (<u>Carex</u> <u>laxiflora</u>) (discussed above), black cohosh (<u>Cimicifuga</u> <u>racemosa</u>), maidenhair fern (<u>Adiantum</u> <u>pedatum</u>), and American liverleaf (<u>Hepatica</u> <u>americana</u>).

LITERATURE CITED

Gaddy, L. L. 1995. Carex radfordii (Sect. Laxiflorae: Cyperaceae), a new species from the southern Appalachians. Novon 5:259-261.

Radford, A. E., H. E. Ahles, and C. R. Bell. 1968. Manual of the vascular flora of the Carolinas. University of North Carolina Press. Chapel Hill. 1183 p.


NATURAL AREA 1
VIOLA TRIPARTITA
INDIAN OLIVE
W.L. 796.82
VIOLA TRIPARTITA
NATURAL AREA 2
W.L. 796.82
NORTH
W.L. 796.82
NATURAL AREA 3
NATURAL AREA 4
CAREX LAXIFLORA
CAREX PRASINA
OCONEE NUCLEAR STATION
EXCLUSION AREA BOUNDARY
1 MILE RADIUS
1000 500 0 1000 2000
SCALE IN FEET
LEGEND:
SCIENTIFIC NAME
COMMON NAME
STATUS
NATURAL AREA 1 VIOLA TRIPARTITA THREE-PARTED VIOLET STATE LISTED
NESTRONIA UMBELLULA INDIAN OLIVE STATE LISTED
NATURAL AREA 2 VIOLA TRIPARTITA THREE-PARTED VIOLET STATE LISTED
NATURAL AREA 3 CAREX PRASINA DROOPING SEDGE STATE LISTED
NATURAL AREA 4 CAREX LAXIFLORA LOOSE-FLOWERED SEDGE STATE LISTED
ENDANGERED, THREATENED, AND OTHERWISE NOTEWORTHY
PLANT AND ANIMAL SPECIES OF THE OCONEE NUCLEAR STATION,
OCONEE AND PICKENS COUNTIES, SOUTH CAROLINA
MAP 1

ATTACHMENT 2 CULTURAL RESOURCES CORRESPONDENCE

TABLE OF CONTENTS

Letter	Page
Letter Aldrich (Duke) to Dobrosko (SCDHA), August 30, 2006	E-92
Letter Dobrosko (SCDHA) to Aldrich (Duke), September 21, 2006	E-93

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Oconee Nuclear Site
ON03EHS/7800 Rochester Hwy.
Seneca, SC 29678

864 885-3000

864 885-3809 fax

August 30, 2006

Rebekah Dobrosko
South Carolina Department of Archives and History
8301 Parklane Road
Columbia, SC 29223

Dear Ms. Dobrosko:

Subject: Cultural and Historical Assessment for Oconee Nuclear Station NRC License Renewal of the Independent Spent Fuel Storage Installation

Duke Power Company, LLC dba Duke Energy Carolinas, LLC (Duke) is in the process of preparing a license renewal package for the Independent Spent Fuel Storage Installation (ISFSI) at the Oconee Nuclear Station. As part of the renewal process the Nuclear Regulatory Commission (NRC) requires that applicants identify cultural and historical resources that may be impacted by the continued operation of the facility.

Currently, the ISFSI is licensed to operate until January 31, 2010. The license renewal will allow Oconee to operate the ISFSI until 2050.

I have enclosed information about the license renewal process from Oconee's Environmental Report. We have concluded that there are no adverse impacts to cultural and historical resources as a result of the continued operation of Oconee's ISFSI. After reviewing the enclosed information we ask for your concurrence that impacts to cultural resources will be minimal.

Please contact me at 864/885-4504 if you have any questions.

Sincerely,

Gregory K. Aldrich

Gregory K. Aldrich
Associate Scientist

Enclosures

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RECEIV

SEP 2 5 :

ONS EHS; DUKE P

The South Carolina Archives & History Center
History & Heritage For All Generations

September 21, 2006

Mr. Gregory Aldrich
Associate Scientist
Duke Energy
Oconee Nuclear Site
ON03EHS/7800 Rochester Hwy.
Seneca, SC 29678

Re: Oconee Nuclear Station
License Renewal of the Independent Spent Fuel Storage Installation
Oconee County, South Carolina

Dear Mr. Aldrich:

Thank you for your letter of August 28, which we received on August 31, regarding the Nuclear Regulatory Commission license renewal package for the above-referenced site. We appreciate the information you provided for our review.

We understand that the proposed license renewal is to provide for the continued storage of spent fuel at the existing Independent Spent Fuel Storage Installation (ISFSI). No structural modifications or ground disturbance will result from this license renewal. Therefore, we concur with your assessment that the continued operation of the ISFSI should cause **no effect** to any properties listed in or eligible for listing in the National Register of Historic Places. Our comments are advisory only. The federal agency is responsible for determining if historic properties will be affected by this undertaking.

These comments are provided to assist you with your responsibilities pursuant to Section 106 of the National Historic Preservation Act, as amended. If you have questions, please contact me at (803) 896-6169 or dobrasko@scdah.state.sc.us.

Sincerely,
Rebekah Dobrasko
Rebekah Dobrasko
Review and Compliance Coordinator
State Historic Preservation Office

S.C. Department of Archives & History • 8301 Parklane Road • Columbia • South Carolina • 29223-4905 • 803-896-6100 • www.state.sc

APPENDIX E, ATTACHMENT 3

Air Regulated Facilities

Permit No.	Facility Name	ADDRESS	CITY	STATE
0560-0317	Coastal Research & Education Center	C/O SC AGRICULTURAL EXPERIMENT STATION	CLEMSON	SC
1820-0031	Bad Creek Constructors	HWY 130	SALEM	SC
1820-0036	Duke Bad Creek Entrance	HWY 130 AT WHITE WATER FALLS	SALEM	SC
1820-0054	Keowee Elementary School	7051 KEOWEE SCHOOL RD	SENECA	SC
1820-0056	Oconee County School District Of	101 E N BROAD ST	WALHALLA	SC
1820-0060	Valenite Inc Plant #2	604 W BEAR SWAMP RD	WALHALLA	SC
1820-0061	Wood Dynamics Inc	202 A W DIEDRICH ST	WALHALLA	SC
1820-0062	Twin Lakes Auto Body Corporation	645 TWIN LAKES RD	SENECA	SC
1820-0063	Milliken & Co Defore Plant	HWY 123 BY PASS	CLEMSON	SC
1820-0065	Oconee County Seneca Landfill	STRAWBERRY FARM RD	SENECA	SC
1820-0067	Johnson Controls W Union	1204 OLD WALHALLA HWY	WEST UNION	SC
1820-0071	Seneca Light And Water	251 E NORTH SECOND ST	SENECA	SC
1820-0072	Seneca Light And Water Plt #2	219 GODDARD ST	SENECA	SC
1880-0066	Greenville Water System	173 GAP HILL RD	SIX MILE	SC
1880-0071	Clemson University Starkey Swine Farm	208 N PALMETTO BLVD	CLEMSON	SC
9900-0340	Thomas Concrete Of South Carolina Inc Se	375 KEOWEE SCHOOL RD	SENECA	SC
9900-0342	Morgan Concrete Company	159 RICHLAND RD	WESTMINSTER	SC
9900-0402	MST Concrete Products Inc	1588 EIGHTEEN MILE CREEK RD	CENTRAL	SC
1820-0001	Kendall Healthcare Products Company - Se	1448 BLUE RIDGE BLVD	SENECA	SC
1820-0004	Torrington Company – Walhalla	TORRINGTON RD	WALHALLA	SC
1820-0006	Westpoint Stevens - Seneca Plant	1300 E S 6TH ST	SENECA	SC
1820-0017	Jantzen Inc	101 MOUNTAIN VIEW DR	SENECA	SC
1820-0018	Schlumberger Sema	313-B N HWY 11	WEST UNION	SC
1820-0020	Kennametal Industrial Products Group	150 GREENFIELD LN	SENECA	SC
1820-0022	Oconee Memorial Hospital	298 MEMORIAL DR	SENECA	SC
1820-0030	Amoco Fabrics & Fibers Co - Seneca Plant	320 SHILOH RD	SENECA	SC
1820-0035	Jacobs Chuck Mfg Co	1 JACOBS RD	CLEMSON	SC
1820-0037	Metromont Materials Corp Seneca	640 A OLD CLEMSON HWY	SENECA	SC
1820-0041	Duke Oconee Nuclear Station	7812 ROCHESTER HWY	SENECA	SC
1820-0044	Menzner Lumber & Supply	102 SW JEFFERSON RD	WEST UNION	SC
1820-0046	Cryovac Sealed Air Corp	1851 SANDIFER BLVD	SENECA	SC
1820-0049	Hi-Tec Plating Inc	219 HI TEC RD	SENECA	SC
1820-0052	Aec Seneca	2313 BLUE RIDGE BLVD	SENECA	SC
1820-0055	Parkway Products Inc	1642 BLUE RIDGE BLVD	SENECA	SC
1880-0058	Tri County Regional Landfill Facility	EIGHTEEN MILE CREEK RD	CENTRAL	SC
1880-0017	Central Textiles Inc Central	237 MILL AVE	CENTRAL	SC
1880-0007	Basf Corp Fibers Clemson	HWY 93	CENTRAL	SC
1880-0035	Ohio Gear-Richmond Gear SC Oper-Regal	1208 OLD NORRIS RD	LIBERTY	SC
1880-0037	Champion Aerospace Inc	1230 OLD NORRIS RD	LIBERTY	SC
1880-0010	Clemson University FM & O Utilities	KLUGH AVE	CLEMSON	SC

Appendix F

Additional Information

APPENDIX F: ADDITIONAL INFORMATION

F1.0 ADDITIONAL INFORMATION

F1.1 TRAINING AND QUALIFICATIONS (10 CFR 72, §72.28)

F1.1.1 TECHNICAL QUALIFICATIONS

Duke has been involved in the nuclear energy field since the 1960's. Duke's first commercial nuclear power plant, ONS, started operation in 1973. Duke additionally operates McGuire Nuclear Station (MNS), Units 1 and 2, and Catawba Nuclear Station (CNS) Units 1 and 2. Reactor operations have provided extensive experience in the receipt, handling, storage, and shipping of nuclear fuel. Operations activities of the ONS Site-Specific Independent Spent Fuel Storage Installation (ISFSI) are conducted by the operating staff of ONS. Additional experience in fuel storage has been obtained by operation of the ONS ISFSI since initial fuel loading in 1990.

A discussion of technical qualifications was submitted with the initial license application for the ONS Site-Specific ISFSI in Section 2. Additionally, discussion of personnel qualifications is available in the Section 9.1.3 of the Site-Specific ISFSI Updated Final Safety Analysis Report (UFSAR) and in Section 13.1.3 of the ONS UFSAR. Both of these documents are updated in accordance with regulatory requirements.

A commitment to staff the project (i.e., the Site-Specific ISFSI) with an adequate cadre of personnel possessing the required skills throughout all phases of the project was contained in Section 2 of the initial license application for the ONS Site-Specific ISFSI. The commitment remains throughout the renewed license period to provide continued assurance of the safety of the public and operating personnel.

F1.1.2 PERSONNEL TRAINING

A discussion of operator training was submitted with the initial license application for the ONS Site-Specific ISFSI in Section 2. Additionally, discussion of the training programs is provided in Section 9.3 of the Site-Specific ISFSI Safety Analysis Report and in Section 13.2 of the ONS UFSAR. Both of these documents are updated in accordance with regulatory requirements.

F1.1.3 OPERATING ORGANIZATION

Operation of the ONS Site-Specific ISFSI is integrated with the operation of ONS. A description of the operating organization of ONS is contained in the ONS UFSAR, Sections 13.1.1 and 13.1.2. This document is updated periodically in accordance with regulatory requirements.

F1.2 FINANCIAL ASSURANCE FOR DECOMMISSIONING (10 CFR 72, §72.30)

A decommissioning funding plan for the ISFSI was submitted to the NRC on July 24, 1990 and a clarification was submitted on December 4, 1990. Included with the letter dated July 24, 1990 were a photocopy of Duke's Master Decommissioning Trust Agreement, a site-specific study summary of decommissioning costs for the ISFSI and a schedule of planned contribution rates to the external sinking fund for ISFSI decommissioning. The basic elements of the plan, i.e., shipping of the fuel to an off-site repository and removal and disposal of the horizontal storage modules remain unchanged. The actual activities at the time of decommissioning will be dependent upon the regulations and practices in effect at that time. Discussion of decommissioning of the Site-Specific ISFSI is contained in Section 4.6 of the Site-Specific ISFSI Updated Final Safety Analysis Report, which is periodically updated in accordance with regulatory requirements in 10 CFR 72, §72.70(c)(6).

Decommissioning costs for the ISFSI were estimated to be a small fraction of the decommissioning costs of the operating nuclear units. A recent estimate of this cost is $7.4 million (in 2003 dollars) for decontamination and removal of the ISFSI. The decommissioning funding status for the existing operating plants, including the ISFSI, are reported to the NRC every two years; the most recent reporting was April 2, 2007.

F1.3 EMERGENCY PLANNING (10 CFR 72, §72.32)

A description of emergency planning was submitted with the initial license application for the ONS Site-Specific ISFSI in Section 11.

Emergency planning for the Site-Specific ISFSI is integrated into the emergency plan for ONS. As such, the emergency plan and implementing procedures are updated in accordance with 10 CFR 50, Appendix E; 10 CFR 50, §50.54(q); and, 10 CFR 72, §72.44(f). Emergency plan changes made pursuant to 10 CFR 72, §72.44(f) are submitted to the NRC in accordance with 10 CFR 72, §72.44(f).

The emergency plan is discussed in Section 9.5 of the Site-Specific ISFSI UFSAR, which is periodically updated in accordance with regulatory requirements.

ENCLOSURE 4

OCONEE NUCLEAR STATION SITE-SPECIFIC INDEPENDENT SPENT FUEL STORAGE INSTALLATION LIST OF REGULATORY COMMITMENTS FOR LICENSE RENEWAL

The following table identifies those actions committed to by Duke in this ONS Site-Specific ISFSI License Renewal Application. Any other statements contained in this submittal were provided for informational purposes and are not considered to be regulatory commitments. Please direct questions regarding these commitments to Reene' Gambrell at (864) 885-3364.

	REGULATORY COMMITMENTS	Due Date/Event
1	Any revisions to aging management activities resulting from this project will be incorporated into future revisions of the Site-Specific ISFSI UFSAR in accordance with the requirements of 10 CFR 72, §72.70 (See Appendix C, Section C3)	Prior to Implementation of the renewed license period

ENCLOSURE 5

OCONEE NUCLEAR STATION SITE-SPECIFIC INDEPENDENT SPENT FUEL STORAGE INSTALLATION UPDATED FINAL SAFETY ANALYSIS REPORT

Duke Energy Company
Independent Spent Fuel Storage Facility
Oconee Nuclear Site
UPDATED FINAL SAFETY ANALYSIS REPORT

Revised to Include: 2007 Update
Effective Date of Contents: December 31, 2007

Revision	Effective Date	Issue Date
1	12/31/91	6/30/92
2	12/31/92	6/30/93
3	12/31/93	6/30/94
4	12/31/94	6/30/95
5	12/31/95	6/30/96
6	12/31/96	6/30/97
7	12/31/97	6/30/98
8	12/31/98	6/30/99
9	12/31/99	06/30/00
10	12/31/00	06/30/01
11	12/31/01	06/30/02
12	12/31/02	06/30/03
13	12/31/03	06/30/04
14	12/31/04	06/30/05
15	12/31/05	06/30/06
16	12/31/06	06/30/07
17	12/31/07	01/31/08

Table of Contents

ISFSI Title Page
List of Abbreviations

1.0 Introduction and General Description of Storage System
1.1 Introduction
1.2 General Description of Installation
1.2.1 General Description
1.2.2 Principal Site Characteristics
1.2.3 Principal Design Criteria
1.2.3.1 Structural Features
1.2.3.2 Decay Heat Dissipation
1.2.4 Operating and Fuel Handling Systems
1.2.5 Safety Features
1.2.6 Radioactive Waste and Auxiliary Systems
1.3 General Systems Descriptions
1.3.1 Systems Descriptions
1.3.1.1 DSC Design
1.3.1.2 Horizontal Storage Module
1.3.1.3 Transfer Cask
1.3.1.4 Transfer Trailer
1.3.1.5 Transfer Cask Skid
1.3.1.6 Horizontal Hydraulic Ram
1.3.1.7 System Operation
1.4 Identification of Agents and Contractors
1.5 Material Incorporated by Reference
1.6 References

2.0 Site Characteristics
2.1 Geography and Demography
2.1.1 Site Location
2.1.2 Site Description
2.1.2.1 Legal Responsibilities for Site
2.1.2.2 Other Activities Within the Site Boundary
2.1.2.3 Arrangements for Traffic Control
2.1.3 Population Distribution and Trends
2.1.3.1 Transient Population
2.1.4 Uses of Nearby Land and Waters
2.2 NEARBY INDUSTRIAL, TRANSPORTATION, AND MILITARY FACILITIES
2.2.1 Industrial and Military Facilities
2.2.2 Transportation Routes
2.2.2.1 Description of Products and Materials
2.3 Meteorology
2.3.1 Regional Climatology
2.3.2 Local Meteorology
2.3.2.1 Data Sources
2.3.2.2 Topography
2.3.3 Onsite Meteorological Measurement Program
2.3.4 Diffusion EstimatesO
2.3.4.1 Basis
2.3.4.2 Calculations
2.4 Hydrologic Engineering
2.4.1 Hydrologic Description

2.4.1.1 Site and Facilities
2.4.1.2 Hydrosphere
2.4.2 Floods
2.4.2.1 Flood History
2.4.2.2 Flood Design Consideration
2.4.3 Probable Maximum Flood on Streams and Rivers
2.4.3.1 Probable Maximum Precipitation
2.4.3.2 Runoff and Stream Course Models
2.4.3.3 Probable Maximum Flood Flow
2.4.3.4 Coincident Wind Wave Activity
2.4.4 Potential Dam Failures, Seismically Induced
2.4.5 Flooding Protection Requirements
2.4.5.1 Flood Protection Measures for Oconee Station Seismic Class 1 Structures
2.4.5.2 Flood Protection Measures for ISFSI Site
2.4.6 Environmental Acceptance of Effulents
2.4.7 Subsurface Hydrology
2.4.7.1 Groundwater Usage
2.4.7.2 Regional Groundwater Conditions
2.4.7.3 Groundwater Quality
2.4.7.4 Program of Investigation
2.4.7.5 Groundwater Conditions Due to Keowee Reservoir
2.5 Geology and Seismology
2.5.1 Basic Geologic and Seismic Information
2.5.1.1 Regional Geology
2.5.1.2 Site Geology
2.5.1.2.1 Geologic, History, Physiography, and Lithography
2.5.1.2.2 Rock Weathering
2.5.1.2.3 Jointing
2.5.1.2.4 Ground Water
2.5.2 Vibratory Ground Motion
2.5.2.1 Earthquake History
2.5.2.2 Geologic Structures and Tectonic Activity
2.5.2.3 Correlation of Earthquake Activity with Geologic Structures or Tectonic Provinces
2.5.2.4 Maximum Earthquake Potential
2.5.2.5 Seismic Wave Transmission Characteristics of the Site
2.5.2.6 Maximum Hypothetical Earthquake (MHE)
2.5.2.7 Design Base Earthquake
2.5.2.8 Design Response Spectra
2.5.3 Surface Faulting
2.5.4 Subsurface Materials
2.5.4.1 Exploration
2.5.4.2 Groundwater Conditions
2.5.5 ISFSI Foundation
2.5.6 Liquefaction
2.5.7 Slope Stability
2.6 References

3.0 Principal Design Criteria
3.1 Purpose of the Oconee ISFSI
3.1.1 Material to be Stored
3.1.1.1 Physical Characteristics
3.1.1.2 Reactivity Characteristics
3.1.1.3 Thermal Characteristics
3.1.1.4 Radiological Characteristics
3.1.2 General Operating Functions
3.1.2.1 Overall Functions of the Facility

3.1.2.2	Handling and Transfer Equipment
3.2	Design Criteria for Environmental Conditions and Natural Phenomena
3.2.1	Tornado and Wind Loadings
3.2.1.1	Applicable Design Parameters
3.2.1.2	Determination of Forces on Structures
3.2.1.3	Tornado Generated Missiles
3.2.1.4	Ability of Structures to Perform
3.2.2	Water Level (Flood) Design
3.2.3	Seismic Design
3.2.3.1	Input Criteria
3.2.3.2	Seismic System Analysis
3.2.4	Snow and Ice Loads
3.2.5	Combined Load Criteria
3.3	Safety Protection System
3.3.1	General
3.3.2	Protection By Multiple Confinement Barriers and Systems
3.3.2.1	Confinement Barriers and Systems
3.3.2.2	Ventilation - Offgas
3.3.3	Protection By Equipment and Instrumentation Selection
3.3.3.1	Equipment
3.3.3.2	Instrumentation
3.3.4	Nuclear Criticality Safety
3.3.4.1	Control Methods for Prevention of Criticality
3.3.4.2	Error Contingency Criteria
3.3.4.3	Verification Analysis
3.3.4.3.1	Single Region Storage
3.3.4.3.2	Mixed Region Storage
3.3.5	Radiological Protection
3.3.6	Fire and Explosion Protection
3.3.7	Materials Handling and Storage
3.4	Summary of Storage System Design Criteria
3.5	References
4.0	Storage System
4.1	Location and Layout
4.2	Storage Site
4.2.1	Structures
4.2.2	Storage Site Layout
4.2.3	HSM Description
4.2.4	Instrumentation System Description
4.3	Transfer System
4.3.1	Function
4.3.2	Components
4.3.2.1	Transfer Cask
4.3.2.2	Dry Storage Canister (DSC)
4.3.2.3	Transfer Cask Skid
4.3.2.4	Transfer Trailer
4.3.2.5	Skid Positioning System
4.3.2.6	Hydraulic Ram System (HRS) Description
4.3.3	Design Bases and Safety Assurance
4.3.3.1	Transfer Cask
4.3.3.2	Transfer Cask Skid
4.3.3.3	Transfer Trailer
4.3.3.4	Skid Positioning System (SPS)
4.3.3.5	Hydraulic Ram
4.3.3.6	Other Equipment

4.3.3.7 Qualification of Components
4.3.3.8 Maintenance of HRS and SPS
4.4 Operating Systems
4.4.1 Loading and Unloading System
4.4.1.1 Preparation for Fuel Loading
4.4.1.2 Spent Fuel Selection
4.4.1.3 Spent Fuel Loading
4.4.1.4 DSC Drying, Backfilling, and Sealing
4.4.1.5 DSC Unloading
4.4.2 Decontamination System
4.4.3 DSC Repair and Maintenance
4.4.4 Transfer Cask Repair and Maintenance
4.4.5 Utility Supplies and Systems
4.4.6 Other Systems
4.4.6.1 Communications and Alarm System
4.4.6.2 Fire Protection System
4.4.6.3 Maintenance System
4.5 Classification of Structures, Systems, and Components
4.5.1 Transfer Cask
4.5.2 Dry Storage Canister
4.5.3 Horizontal Storage Module
4.5.4 Foundation
4.5.5 Transfer Components
4.5.6 Instrumentation
4.6 Decommissioning Plan
4.7 References

5.0 Storage System Operations
5.1 Operation Description
5.1.1 Narrative Description
5.1.1.1 Loading of the DSC into the HSM
5.1.1.2 Monitoring Operations
5.1.1.3 Fuel Identification and Accountability
5.1.1.4 Unloading the DSC from the HSM
5.1.2 Flow Sheet
5.1.3 Identification of Subjects for Safety Analysis
5.1.3.1 Criticality Prevention
5.1.3.2 Instrumentation
5.1.3.3 Maintenance Techniques
5.1.3.4 Administrative Controls to Limit DBT Effects
5.2 Control Room and Control Areas
5.3 References

6.0 Waste Management

7.0 Radiation Protection
7.1 Ensuring That Occupational Radiation Exposures Are ALARA
7.1.1 Policy & Organizational Considerations
7.1.2 Design Considerations
7.1.3 ALARA Operational Considerations
7.2 Radiation Sources
7.2.1 Characterization of Sources
7.2.2 Airborne Radioactive Material Sources
7.3 Radiation Protection Design Features
7.3.1 Installation Design Features
7.3.2 Shielding

7.3.2.1 Radiation Shielding Design Features
7.3.2.2 Shielding Analysis
7.4 Estimated On-Site Collective Dose Assessment
7.4.1 Operational Dose Assessment
7.4.2 Storage Term Dose Assessment
7.5 Radiation Protection Program
7.6 Environmental Monitoring Program
7.7 Estimated Off-Site Collective Doses
7.8 References

8.0 Accident Analyses
8.1 Off-Normal Operations
8.1.1 Jammed DSC During Loading or Unloading
8.1.1.1 Postulated Cause of Jammed DSC
8.1.1.2 Detection of Jammed DSC
8.1.1.3 Analysis of Effects and Consequences
8.1.1.4 Corrective Actions
8.1.2 Radiological Impact of Off-Normal Operations
8.2 Accidents
8.2.1 Loss of Air Outlet Shielding
8.2.1.1 Cause of Accident
8.2.1.2 Accident Analysis
8.2.1.3 Accident Dose Consequences
8.2.2 Tornado/Tornado Missile
8.2.2.1 Cause of Accident
8.2.2.2 Accident Analysis
8.2.2.3 Accident Dose Consequences
8.2.3 Earthquake
8.2.3.1 Cause of Accident
8.2.3.2 Accident Analysis
8.2.3.3 Accident Dose Consequences
8.2.4 Cask Drop
8.2.4.1 Cause of Accident
8.2.4.2 Accident Analysis
8.2.4.3 Accident Dose Consequences
8.2.5 Transfer Cask Loss of Neutron Shield
8.2.5.1 Postulated Cause of Solid Shield Loss
8.2.5.2 Detection of Shield Material Loss
8.2.5.3 Analysis of Effects and Consequences
8.2.6 Lightning
8.2.6.1 Cause of Accident
8.2.6.2 Accident Analysis
8.2.6.2.1 HSM
8.2.6.2.2 Power Supplies
8.2.6.2.3 Welding of DSC to Support Structure
8.2.6.3 Accident Dose Consequences
8.2.7 Blockage of Air Inlets and Outlets
8.2.7.1 Cause of Accident
8.2.7.2 Accident Analysis
8.2.7.3 Accident Dose Consequences
8.2.8 Dry Storage Canister Leakage
8.2.8.1 Cause of Accident
8.2.8.2 Accident Analysis
8.2.8.3 Accident Dose Consequences
8.2.9 Accidental Pressurization of DSC
8.2.9.1 Cause of Accident

8.2.9.2 Accident Analysis
8.2.9.3 Accident Dose Calculations
8.2.10 Load Combinations
8.2.10.1 Cause of Accident
8.2.10.2 Accident Analysis
8.2.10.3 Accident Dose Consequences
8.2.11 Flooding
8.2.12 Explosions
8.2.12.1 Cause of Accident
8.2.12.2 Accident Analysis
8.2.12.3 Accident Dose Consequences
8.3 Site Characteristics Affecting Safety Analysis
8.4 References

9.0 Conduct of Operations
9.1 Organizational Structure
9.1.1 Corporate Organization
9.1.1.1 Corporate Functions, Responsibilities and Authorities
9.1.1.2 Applicant's In-House Organization
9.1.1.3 Interrelationship with Contractors and Suppliers
9.1.1.4 Applicant's Technical Staff
9.1.2 Operating Organization, Management, and Administrative Control System
9.1.2.1 Onsite Organization
9.1.2.2 Personnel Functions, Responsibilities and Authorities
9.1.3 Personnel Qualification Requirements
9.1.3.1 Minimum Qualification Requirements
9.1.3.2 Qualifications of Personnel
9.1.4 Liaison with Other Organizations
9.2 Preoperational Testing and Operation
9.2.1 Administrative Procedures for Conducting Test Program
9.2.2 Test Program Description
9.2.2.1 Operations
9.2.2.1.1 DSC and Associated Equipment
9.2.2.1.2 Transfer Cask and Handling Equipment
9.2.2.1.3 Off-Normal Testing of the DSC and Transfer Cask
9.2.2.1.4 Transfer Trailer and HSM
9.2.2.1.5 Off-Normal Testing of the Transfer Trailer and HSM
9.2.3 Test Discussion
9.3 Training Program
9.3.1 Training for Operations Personnel
9.3.2 Training for Maintenance Personnel
9.3.3 Training for Radiation Protection Personnel
9.3.4 Training for Security Personnel
9.4 Normal Operations
9.4.1 Procedures
9.4.2 Records
9.5 Emergency Planning
9.6 Physical Security Plan
9.7 References

10.0 Operating Controls and Limits
10.1 Operating Controls and Limits
10.2 Development of Operating Controls and Limits
10.2.1 Functional and Operating Limits, Monitoring Instruments and Limiting Control Settings
10.2.2 Limiting Conditions for Operation
10.2.2.1 Equipment

10.2.2.2	Technical Conditions And Characteristics
10.2.3	Surveillance Requirements
10.2.4	Design Features
10.2.5	Administrative Controls
10.2.5.1	Qualification of Spent Fuel
10.2.5.2	Spent Fuel Identification
10.3	Operational Control and Limit Specification
10.4	References
11.0	Quality Assurance

List of Tables

Table A-1. Design Parameters for the Oconee ISFSI
Table A-2. Summary of ISFSI Fuel Handling Operations
Table A-3. Primary Design Parameters for the ISFSI Transport Systems
Table A-4. Major Systems, Subsystems and Components of the Oconee ISFSI
Table A-5. Population Growth in Oconee, Pickens, and Anderson Counties, South Carolina (1980-2005)
Table A-6. Population Projections for Oconee, Pickens, and Anderson Counties, South Carolina (2010-2050)*
Table A-7. Joint Frequencies of Wind Direction and Speed by Stability Class
Table A-8. Soil Permeability Test Results
Table A-9. Significant Earthquakes in the Southeast United States (Intensity V or Greater)
Table A-10. Physical Characteristics of PWR Fuel Assemblies Based on Nominal Design
Table A-11. Transfer Cask Stress Analysis for Tornado Effects
Table A-12. Oconee ISFSI Major Components and Functions
Table A-13. Oconee ISFSI Radioactive Material Confinement Barriers
Table A-14. Oconee ISFSI Major Components and Design Requirements
Table A-15. ONS ISFSI Project Transfer Trailer Design Parameters
Table A-16. Oconee ISFSI Major Components and Classification
Table A-17. Gamma Energy Spectrum
Table A-18. Shielding Analysis Results
Table A--19. Summary of Estimated On-Site Doses Resulting from ISFSI1 Operations. (Per DSC Transfer to HSM)
Table A-20. Dose Estimate for Construction of Additional Horizontal Storage Modules Based on Labor Estimates for 2 X 10 Array
Table A-21. Neutron and Gamma Energy Spectra
Table A-22. Comparison of Total Dose Rates for HSM With and Without Air Outlet Shielding Blocks
Table A-23. Cask Drop Target Parameters

List of Figures

Figure B-1. Location of ISFSI
Figure B-2. General Location
Figure B-3. Site Plan
Figure B-4. ISFSI Layout
Figure B-5. Topography Within 5 Miles
Figure B-6. Relative Positions of Meteorological Instruments
Figure B-7. Relative Elevations of Meteorological Instruments
Figure B-8. Areal Groundwater Survey
Figure B-9. Groundwater Survey at Station Site
Figure B-10. Well Permeameter Test Apparatus
Figure B-11. Formulae For Determining Permeability
Figure B-12. General Site Area
Figure B-13. Site Boring Plan
Figure B-14. Core Boring Record
Figure B-15. Core Boring Record
Figure B-16. Core Boring Record
Figure B-17. Core Boring Record
Figure B-18. Core Boring Record
Figure B-19. Core Boring Record
Figure B-20. Core Boring Record
Figure B-21. Core Boring Record
Figure B-22. Core Boring Record
Figure B-23. Core Boring Record
Figure B-24. Core Boring Record
Figure B-25. Core Boring Record
Figure B-26. Core Boring Record
Figure B-27. Core Boring Record
Figure B-28. ISFSI Foundation Profile
Figure B-29. Site Layout and Route
Figure B-30. Site Plan
Figure B-31. Transfer Cask Lifting Yoke
Figure B-32. Transfer Cask Lift Extension
Figure B-33. Spent Fuel Pool Area
Figure B-34. Spent Fuel Pool Area
Figure B-35. Spent Fuel Pool Area
Figure B-36. NUHOMS® System Loading Operations Flowchart.
Figure B-37. NUHOMS® System Loading Operations Flowchart.
Figure B-38. NUHOMS® System Loading Operations Flowchart.
Figure B-39. NUHOMS® System Loading Operations Flowchart.
Figure B-40. NUHOMS® System Loading Operations Flowchart
Figure B-41. NUHOMS® System Loading Operations Flowchart
Figure B-42. Location of Dose Rates. Reported in Table A-18
Figure B-43. Dose Rate Versus Distance From Surface of HSM
Figure B-44. Dose From Filled HSM Array
Figure B-45. Dose From Filled HSM Array
Figure B-46. Radiation Zone Map of Modules Surface Dose Rates
Figure B-47. Deleted per 1991 Update
Figure B-48. Fuel Assembly Burnup Requirements

List of Abbreviations

ACI	AMERICAN CONCRETE INSTITUTE
APM	ADMINISTRATIVE POLICY MANUAL
AFR	AWAY-FROM-REACTOR
AISC	AMERICAN INSTITUTE OF STEEL CONSTRUCTION
ALARA	AS LOW AS REASONABLY ACHIEVABLE
ANSI	AMERICAN NATIONAL STANDARDS INSTITUTE
AWS	AMERICAN WELDING STANDARDS
CFR	CODE OF FEDERAL REGULATIONS
DBT	DESIGN BASIS TORNADO
DOE	DEPARTMENT OF ENERGY
DPC	DUKE POWER COMPANY
DSC[1]	DRY STORAGE CANISTER
EPRI	ELECTRIC POWER RESEARCH INSTITUTE
EPZ	EMERGENCY PLANNING ZONE
ESF	ENGINEERED SAFETY FEATURE
ETQS	EMPLOYEE TRAINING AND QUALIFICATION SYSTEM
FEMA	FEDERAL EMERGENCY MANAGEMENT ADMINISTRATION
HSM	HORIZONTAL STORAGE MODULE
HRS	HYDRAULIC RAM SYSTEM
IFA	IRRADIATED FUEL ASSEMBLY
ISFSI	INDEPENDENT SPENT FUEL STORAGE INSTALLATION
LWM	LIQUID WASTE MANAGEMENT
MHE	MAXIMUM HYPOTHETICAL EARTHQUAKE
MRS	MONITORED RETRIEVABLE STORAGE
NDE	NONDESTRUCTIVE EXAMINATION
NEPA	NATIONAL ENVIRONMENTAL POLICY ACT
NRC	NUCLEAR REGULATORY COMMISSION
NUHOMS®-24P	NUTECH ENGINEERS, INC. HORIZONTAL MODULAR STORAGE
NUREG	NUCLEAR REGULATORY GUIDE
POR	PRUDENT OPERATING RESERVE
PWR	PRESSURIZED WATER REACTOR
ONS	OCONEE NUCLEAR STATION
SPS	SKID POSITIONING SYSTEM
UFSAR	UPDATED FINAL SAFETY ANALYSIS REPORT
VA	VENTILATION AIR SYSTEM
VR	STATION VOLUME REDUCTION SYSTEM
NWPA	WASTE POLICY ACT OF 1982, AS AMENDED

Note:

1. The term Dry Storage Canister (DSC) in this report refers to the same item termed dry shielded canister in the Nutech Topical Report referenced in this UFSAR.

1.0 Introduction and General Description of Storage System

1.1 Introduction

Duke Energy Carolinas LLC (Duke) began commercial operation of the Oconee Nuclear Station, Units 1, 2, and 3 on July 15, 1973, September 9, 1974 and December 16, 1974 respectively. When the original application was submitted for the Oconee Site-Specific Independent Spent Fuel Storage Installation (ISFSI), these three 2568 MWt units had generated millions of KWH in a safe and reliable manner. In so doing, these units had discharged a total of approximately 2300 spent fuel assemblies. These spent fuel assemblies were being stored in two onsite pools and in the McGuire Nuclear Station spent fuel pools. The need to provide additional onsite storage facilities to permit continued operation was discussed in Sections 9, 10, and 11 of the Environmental Report (Reference 1) which was submitted as part of the Oconee Site-Specific ISFSI license application.

To provide storage until the Department of Energy (DOE) begins to accept title to spent fuel under the requirements of the Nuclear Waste Policy Act of 1982, as amended in 1987, Duke received a license to build and operate an ISFSI in compliance with 10 CFR 72. Duke chose the NUHOMS®-24P dry storage system designed by Transnuclear (formerly VECTRA Technologies, formerly Pacific Nuclear Inc., formerly NUTECH Engineers, Inc.) to be used for the Oconee Site-Specific ISFSI. The NUHOMS®-24P system is more fully described in Revision 1A of the Topical Report for the NUHOMS®-24P system submitted in July 1988 and accepted by the NRC on April 21, 1989. The location of the Site-Specific ISFSI on the Oconee site is shown on Figure B-1.

The NUHOMS®-24P system provides long-term interim storage for irradiated fuel assemblies. The fuel assemblies are confined in a helium atmosphere by a stainless steel canister. The canister is protected and shielded by a massive concrete module. Decay heat is removed by thermal radiation, conduction and convection from the canister to an air plenum inside the concrete module. Air flows through this internal plenum by natural draft convection.

The canister containing twenty-four irradiated fuel assemblies is transferred from the spent fuel pool to the concrete module in a transfer cask. The cask is precisely aligned and the canister is inserted into the module by means of a hydraulic ram.

The NUHOMS®-24P system is a totally passive installation that is designed to provide shielding and safe confinement of irradiated fuel. The dry storage canister and horizontal storage module have been designed to withstand certain accidents as described in Chapter 8 of this UFSAR.

The license (SNM-2503) authorizes a total of eighty-eight modules (2112 assemblies) to be built incrementally, as needed, to match the requirements for additional storage. The initial construction of 20 horizontal storage modules (HSMs) in a 2 x 10 array was designated as Phase I. The construction of the next 20 HSMs was designated as Phase II.

In 1997 Oconee installed a new and separate General License (GL) ISFSI, in addition to maintaining the existing Site-Specific ISFSI. The GL ISFSI uses the Standardized NUHOMS®-24P storage system which was approved by the U.S. Nuclear Regulatory Commission (NRC) for use under a GL. The two compatible systems simply utilize the same fuel handling/transport equipment and general site location. The GL system has a separate set of licensing documents including a separate UFSAR and Certificate of Compliance (CoC), and is not covered in this UFSAR. Any changes, tests, or experiments involving dry storage activities should be reviewed against all applicable licensing documents.

Operation of the Oconee Site-Specific ISFSI will continue past the first year for up to 20 years under the initial license and continue under license renewal as necessary until the fuel can be shipped to a permanent repository. During this service life, while any given HSM could be unloaded and later reloaded with a new DSC, reloading a given DSC following removal of the original fuel assemblies is not anticipated due to the potential destructive nature of the top end shield plug removal process. However, enhanced techniques may be developed which prevent DSC damage during plug removal. Eventual reuse of the HSMs will depend upon the schedule and restrictions for spent fuel deliveries to DOE under the NWPA.

1.2 General Description of Installation

1.2.1 General Description

The Oconee Site-Specific ISFSI provides for the horizontal, dry storage of irradiated fuel assemblies (IFAs) in a concrete module. The principal components are a concrete horizontal storage module (HSM) and a stainless steel dry storage canister (DSC) with an internal basket which holds the IFAs. Each HSM contains one DSC and each DSC contains twenty-four fuel assemblies.

Deleted paragraph(s) per 2007 update

The initial phase of construction including twenty HSMs was completed in May 1990. A second phase of twenty HSMs was completed in January 1992. In addition to these primary components, the Oconee Site-Specific ISFSI also requires transfer equipment to move the DSCs from the spent fuel pool (where they are loaded with the IFAs) to the HSMs where they are stored. This transfer system includes a transfer cask, a hydraulic ram, a trailer and a cask skid. This transfer system interfaces with the existing Oconee spent fuel pool, the cask crane, the site layout (i.e., roads and topography) and other procedural requirements.

1.2.2 Principal Site Characteristics

The Oconee Site-Specific ISFSI is located on the Oconee Nuclear Station site near Seneca, South Carolina. Duke owns and operates three 2568 MWt nuclear generating units on the Oconee site. The ISFSI is located inside the protected area approximately 100 ft. west of the Station's condenser cooling water intake structure (Figure B-1).

1.2.3 Principal Design Criteria

The principal design criteria and parameters for the Oconee Site-Specific ISFSI are shown in (Table A-1). The radiation sources are for the reference fuel assembly. For the majority of the fuel to be stored, the radiation sources will be less than or equal to the sources described in the NUHOMS®-24P Topical Report (Reference 2). For radiation sources larger than the sources described in Reference 2 restrictive measures will be used to ensure surface dose rates that are ALARA and below design basis limits.

1.2.3.1 Structural Features

The HSM is a low profile reinforced concrete structure designed to withstand normal operating loads, the abnormal loads created by seismic activity, tornados and other natural events and the postulated accidental loads which may occur during operation.

The structural features of the DSC are defined, to a large extent, by the cask drop accident. The DSC body, the double seal welds on each end, and the DSC internals are designed to provide for fuel retrieval after a postulated maximum credible drop.

1.2.3.2 Decay Heat Dissipation

The decay heat of the IFAs is removed from the DSC by natural draft convection. Air enters the lower part of the HSM, rises around the DSC and exits through the top shielding slab. The flow cross-sectional area is designed to provide adequate air flow from the draft height of the HSM and the inlet and outlet air temperature differences for the hottest day conditions (i.e., 46.7°C or 116°F).

1.2.4 Operating and Fuel Handling Systems

The major operating systems of the Oconee Site-Specific ISFSI are those required for fuel handling and transport of the fuel from the spent fuel pool to the ISFSI. General operations are outlined in Table A-2 and the primary design parameters of the required systems are listed in Table A-3. The majority of the fuel handling operations involving the transfer cask (i.e., fuel loading, drying, trailer loading, etc.) utilize standard techniques at Oconee for spent fuel shipment. The remaining operations (seal welding, transfer cask-HSM alignment, and DSC transfer) are unique to the Oconee Site-Specific ISFSI.

1.2.5 Safety Features

The principal safety features of the Oconee Site-Specific ISFSI are the containment provided by the DSC and the concrete shielding of the HSM. In addition to its structural and missile protection functions, this shielding reduces the gamma and neutron flux emanating from the IFAs inside a DSC so that the average outside surface dose rate on the HSM is less than 20 mr/hr. Additional Oconee Site-Specific ISFSI features include:

1. Filling the annulus between the DSC and transfer cask with demineralized water and sealing it prior to lowering them into the spent fuel pool - Prevents contamination of the DSC exterior by pool water.
2. Internal shield blocks inside the HSM which comprise the shielded ventilation plenum - Reduces scatter dose out of the air inlet.
3. External shield blocks on the HSM roof - Reduces scatter dose out of the air outlet.
4. Shield plugs on the DSC - Reduces dose during DSC drying, helium filling and seal welding.
5. Double seal welds on each end of the DSC - Prevents leakage of radioactive gases or particulates if the fuel rods should fail.

1.2.6 Radioactive Waste and Auxiliary Systems

Because of the passive nature of the Oconee Site-Specific ISFSI, there are no radioactive waste or auxiliary systems required during normal storage operations. There are, however, some waste and auxiliary systems required during DSC loading, drying and transfer into the module. The Oconee waste systems handle the fuel pool water and air which are vented from the DSC during drying. Auxiliary handling systems (such as hydraulic pressure control, alignment, crane, etc.) are also required during the loading and transfer operation.

1.3 General Systems Descriptions

The major systems, subsystems, and components of the Oconee Site-Specific ISFSI are listed in Table A-4. The following subsections briefly describe the principal systems and components and their operation.

1.3.1 Systems Descriptions

1.3.1.1 DSC Design

The NUHOMS®-24P DSC is shown in Figure 1.3-1 of the Topical Report for the NUHOMS®-24P System (Reference 2). The DSC is sized to hold twenty-four irradiated pressurized water reactor (PWR) fuel assemblies. The main component of construction is a stainless steel cylinder with a nominal 67 inch outside diameter. The nominal overall length is 187 inches, excluding grapple ring.

The components of the internal basket of the DSC are described in Table A-4 and are also shown on Figure 1.3-1 of Reference 2. The basket is comprised of twenty-four square cells. The structural component of the cells is type 304 stainless steel.

Structural support is provided by circular stainless-steel spacer disks. Longitudinal support is provided by the four support rods which run the length of the DSC.

The DSC is equipped with two shielded end plugs so that when the DSC is inside the transfer cask or the HSM, the radiation dose at the ends is limited. The end shield plugs are constructed of lead surrounded by a steel body.

The DSC has redundant seal welds at the top and bottom. The bottom cover plates are welded to the DSC body during fabrication and the top cover plates after fuel loading. Also, all connections (drain and vent ports) are redundantly sealed. This assures that no single failure of the DSC end plates will breach the DSC. Furthermore, there are no credible accidents which would breach the main body of the DSC.

Criticality safety during wet loading operations is assured by 1) the design of the basket structure which maintains a minimum separation between fuel assemblies, 2) technical specifications which require a minimum boron concentration in excess of 1810 ppm to be maintained within the DSC storage cavity during wet loading and unloading operations, and 3) procedures which limit the reactivity of fuel assemblies loaded into the DSC to an established maximum through verification of initial enrichment and exposure history.

Design changes and enhancements were made to the DSCs beginning with dry storage transfer number 22 at Oconee. For this load and subsequent transfers, the DSCs utilized will be of two different types designated "long cavity" or "short cavity" canisters. The long cavity DSC design is used to accommodate spent fuel assemblies with control components. The short cavity DSC is utilized to store spent fuel without control components. The following list describes major changes from the original DSC design that are common to both the new long and short cavity DSCs.

1. The spacer discs material has been changed to carbon steel with aluminum flame spray coating versus 304 stainless steel. There is also an option to use carbon steel support rods.

2. The DSC shell has been modified such that the bottom shield plug assembly fits inside the continuous cylindrical shell rather than attaching to it.

3. The grapple ring support is now attached to the outer bottom cover plate and doesn't penetrate the bottom shield plug.

4. The new top shield plug design utilizes a separate stainless steel inner top cover plate to provide for better weld joint detail. The shield plug is no longer a pressure boundary.

The basket, shell, and final assembly design for the new short and long cavity DSCs are essentially the same, except for the shield plugs and support rods. The short cavity DSC design utilizes thicker top and bottom shield plugs made of solid carbon steel instead of encased lead and the support rods, which provide longitudinal support, are shorter to accommodate the reduced cavity length.

The above changes to the DSC reflect an improved design that will ease fabrication, reduce costs, and improve the welding/closure process. These changes were evaluated in References 3 and 4.

1.3.1.2 Horizontal Storage Module

An isometric view of a unit of four HSMs is shown in Figure 1.3-1A of Reference 2. The HSMs are typically built in units of 20 in a 2 x 10 array. The first construction of 20 HSMs at Oconee is designated as Phase I, with the second grouping of 20 designated as Phase II. Subsequent constructions are permitted, with up to a maximum of 88 HSMs possible under the existing license. The HSM is fabricated from reinforced concrete and structural steel which is constructed in place at the storage location. The thick concrete top, front, and sides of the HSM provide adequate neutron and gamma shielding to achieve an average 20 mr/hr surface dose. Nominal closure door surface doses are less than 100 mr/hr. The transfer cask surface has an average dose rate of less than 200 mr/hr for the locations where workers must perform loading and unloading operations.

Thick shield walls (3.0 ft. thick) are provided on the outside walls of the modules at the end of the unit to provide shielding on the sides. Sufficient (2.0 ft. thick) shielding between modules (to prevent scatter in adjacent modules during loading and retrieval) is provided by the interior module walls.

The HSM provides fuel cooling by a combination of radiation, conduction and convection. The air enters at the bottom of the HSM and passes around the DSC and exits through the flow channels in the top shield slab. Heat is conducted out of the DSC into the natural convection air flow. Heat is also radiated from the DSC to the HSM walls where the natural convection air flow removes the heat. Figure 1.3-2 of Reference 2 shows the flow path and typical conditions. The passive cooling system of the HSM was designed to assure that peak cladding temperatures are less than 340°C (644°F) during long term storage for average normal ambient temperatures of 70°F. The fuel can withstand short term temperatures of up to 570°C (1,058°F) during operational and accidental transients with no anticipated adverse effects. However, calculations show that temperatures remain well below 570°C at any time during normal operation or any postulated accident.

The HSMs are independent, passive systems for the dry storage of irradiated fuel assemblies. Therefore, the HSMs are designed to ensure that normal operation and credible site hazards do not impair their function. To this end, the HSMs are designed to the following loads:

1. Winds and Tornado (includes missile) - Oconee UFSAR, Chapter 3.
2. Seismic - Oconee UFSAR, Chapter 3.
3. Flood - Oconee UFSAR, Chapter 2.
4. Snow and Ice - ANSI A58.1-1982.
5. Combined Load (dead weight, live loads, temperature) - ACI 349-85.

The HSMs are placed in service on a load bearing foundation. Earth work is required to prepare the storage site for a level foundation and access area.

1.3.1.3 Transfer Cask

The transfer cask used with the Oconee Site-Specific ISFSI provides radiological shielding during the DSC drying operation and during the transfer to the HSM. Both neutron (Bisco NS-3, a cementatious material) and gamma (lead) shielding are incorporated into the cask design. For the Oconee Site-Specific ISFSI, the transfer cask has a nominal 188 inch long internal cavity with a nominal 68 inch internal diameter. Figure 1.3-2A of Reference 2 shows the major components of the transfer cask.

1.3.1.4 Transfer Trailer

The transfer trailer has a capacity of 120 tons. The transfer trailer carries the transfer cask skid and the loaded transfer cask. The transfer trailer is designed to ride as low to the ground as possible to minimize the HSM height. Four hydraulic jacks are incorporated into the transfer trailer design to provide vertical movement for alignment of the cask and HSM. The transfer trailer is pulled by a conventional tractor. Figure 1.3-3 of Reference 2 shows a typical transfer trailer arrangement. Also, as discussed in Section 8.2.5 of Reference 2, the design basis drop height for the NUHOMS®-24P Transfer cask is 80 inches. This analysis bounds the Oconee transport conditions.

The original transfer trailer was replaced by a newer design in 2006 which is similar to the original except that it has an integral 3-stage hydraulic ram mounted to the transfer cask skid.

1.3.1.5 Transfer Cask Skid

The transfer cask skid is similar in design and operation to existing transport skids. The major differences are:

1. No equipment interferes with access to the top of the transfer cask when in the horizontal position.
2. The skid is mounted on a smooth bearing surface and hydraulic positioners provide horizontal alignment with the HSM. A restraining bolt system is provided to prevent movement during trailer towing.
3. The entire skid is mounted on a trailer.

The above features are shown on Figure 1.3-4 of Reference 2.

1.3.1.6 Horizontal Hydraulic Ram

The horizontal hydraulic ram is a 3-Stage design with a capacity of 80,000 lb. and a reach of 6.55m (21.5 ft.). The hydraulic ram is an integral portion of the transfer cask skid.

1.3.1.7 System Operation

The primary operations (in sequence of occurrence) for the Oconee system are shown schematically in Figure 1.3-6 of Reference 2 and are described below:

1. Transfer Cask Preparation - Cask preparation includes taking smears of the cask interior to ensure that the DSC exterior will remain radiologically clean. These operations are done in the decontamination area inside the spent fuel pool area. Detailed procedures for these operations are described in Chapter 5.
2. DSC Preparation - The internals and externals of the DSC are verified to be clean. This ensures that the newly fabricated DSC will meet existing Oconee specific criteria for placement in the spent fuel pool.
3. Placement of DSC in Transfer Cask - The empty DSC is inserted into the transfer cask. Proper alignment is assured through the use of alignment marks on the cask and each DSC.
4. Transfer Cask Lifting and Placement in the Spent Fuel Pool - The DSC/transfer cask annulus is filled with clean demineralized water. The DSC cavity is also filled with borated water from either the spent fuel pool or an equivalent source of borated water. This prevents an inrush of pool water when they are placed in the spent fuel pool. This will also prevent contamination of the DSC outer surface by the pool water. The DSC/transfer cask annular region is then sealed with an inflatable seal at the top to prevent mixing. The water-filled transfer cask with the DSC inside is then placed into the spent fuel pool.

   Polished stainless steel reflectors attached to the cask pit support stand are used as a visual guide to ensure proper seating of the transfer cask in the SFP depression.

5. DSC Loading - Twenty-four spent fuel assemblies are placed into the DSC basket. These spent fuel assemblies will be preselected to control reactivity and decay heat using the administrative controls on burnup, initial enrichment, and decay time detailed in Section 10.2.5.

6. DSC Top End Shield Plug Placement - The DSC top end shield plug is placed inside the DSC using the overhead crane with transfer cask lifting yoke attached. The top end shield plug is suspended from the transfer cask lifting yoke by cables and is emplaced as the transfer cask lifting yoke is re-engaged to the transfer cask trunnions.

7. Transfer Cask Lifting out of the Pool - The loaded transfer cask is lifted out of the spent fuel pool and placed in the decontamination pit.

8. DSC Sealing - The water level in the DSC/transfer cask annulus is then lowered approximately 5-10 inches. Swipes are taken over the DSC exterior at the DSC upper surface and around the circumference. The water level in the DSC is lowered away from the inside surface of the top end shield plug. Then a seal weld is applied to the outer surface of the top end shield plug. This provides the primary seal for the DSC.

   The new design DSCs (beginning with dry storage load 22) have a top shield plug design that utilizes a separate 0.75" thick stainless steel inner top cover plate (ITCP) to provide for better weld joint detail. Since there is a separate ITCP, the shield plug itself is no longer a pressure boundary. The seal weld is applied to the top of the ITCP and DSC shell, not directly to the shield plug. The use of a separate ITCP reduces the welding heat input, consequent deformation of the DSC lip during seal welding, and eliminates the potential for lead intrusion into the seal weld observed in some of the earlier DSCs. This arrangement also precludes the need to decontaminate the top of shield plug before welding can begin, as the seal weld is applied to the ITCP which does not have to be placed in the spent fuel pool water.

9. DSC Drying - A pressure line is connected to the DSC and the water inside the DSC is forced out by helium pressure. The water, which is removed from the transfer cask and the DSC, is returned to the spent fuel pool or routed to the Oconee radioactive waste processing equipment. The pressure line is then used to draw a vacuum to facilitate drying until the water content meets the design criteria.

10. Helium Filling - In order to ensure that no fuel and/or cladding oxidation occurs during storage, the DSC is filled with helium (He). To accomplish this, a portable helium gas bottle is connected.

    The DSC is then filled with He gas. After the DSC is filled with the inert gas, the filling line is removed and the DSC ports are plugged and welded closed.

    A strong-back device supplied by the vendor is used with the new DSC designs to prevent overstressing the ITCP during helium pressurization.

11. Final DSC Sealing - The outer top cover plate is positioned and seal welded. This provides a redundant seal at the upper end of the DSC. The lower end also has redundant seal welds, which are placed and tested during fabrication. This operation provides the double seal integrity of the DSC.

12. Transfer Trailer Loading - After helium filling and seal welding, the transfer cask lid is positioned and bolted in place. The transfer cask is then lifted onto the transfer cask skid mounted on the transfer trailer and secured.

13. Transfer - Once loaded and secured, the transfer trailer is towed to the HSM. This movement takes place completely within the Oconee plant protected area.

14. Transfer Cask/HSM Preparation - At the Oconee Site-Specific ISFSI the transfer trailer is backed into position and the HSM front access cover is raised and removed. Next, the transfer cask lid is removed. An optical alignment system and the hydraulic skid positioners are used for the final alignment of the transfer cask and HSM.

15. Cask Docking - After alignment, the cask is docked to the HSM and secured in place.

16. HSM Loading - After final alignment the DSC is then pushed into the HSM by the hydraulic ram.

17. Storage - After the DSC is positioned inside the HSM, the hydraulic ram is released from the DSC and retracted. The transfer trailer is pulled away and the HSM front access door is closed and tack welded. The DSC is now in storage within the HSM.

18. Retrieval - For retrieval, the HSM access door is raised and removed and the transfer cask is positioned as previously described and the hydraulic ram is used to pull the DSC into the transfer cask. All coupling, attachment, alignment, and closure operations are done in the same manner as previously described, but in reverse order. Once back in the transfer cask, the DSC and its cargo of irradiated fuel assemblies are ready for shipment to a permanent repository or other storage location. Provisions will be made to return the DSC to the Oconee spent fuel pool if necessary.

1.4 Identification of Agents and Contractors

The prime contractor for design and analysis of the Oconee Site-Specific ISFSI was Pacific Nuclear Fuel Systems, Inc. of San Jose, California (now Transnuclear, Inc. of Columbia, Maryland). HSM construction was the responsibility of Duke. Fabrication of transfer equipment and DSCs furnished to date was also the responsibility of Pacific Nuclear Fuel Systems, Inc. (now Transnuclear, Inc. of Columbia, Maryland).

1.5 Material Incorporated by Reference

The Topical Report for the Nutech Horizontal Modular Storage (NUHOMS®-24P) System for Irradiated Nuclear Fuel, originally submitted to the Nuclear Regulatory Commission by Nutech Engineers, Inc. (now Transnuclear, Inc.) on February 26, 1988 and approved on April 21, 1989 is hereby incorporated into this UFSAR by reference.

1.6 References

1. Duke Power Company, Oconee Nuclear Station, Independent Spent Fuel Storage Installation, Environmental Report.

2. Topical Report for the Nutech Horizontal Modular Storage (NUHOMS®-24P) System for Irradiated Nuclear Fuel, NUH-002, Revision 1A, July 1989.

3. DPC Engineering Calculation OSC-3485, "10 CFR 72.48 Evaluations for Revisions to the Oconee ISFSI", Rev. 9, dated 2-15-93.

4. DPC Engineering Calculation OSC-3485, "10 CFR 72.48 Evaluations for Revisions to the Oconee ISFSI", Rev. 10, dated 9-13-93.

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2.0 Site Characteristics

2.1 Geography and Demography

2.1.1 Site Location

The Oconee Site-Specific Independent Spent Fuel Storage Installation (ISFSI) is located on the Oconee Nuclear Station plant site. The site is located in Oconee County, South Carolina, approximately 8 miles northeast of Seneca, South Carolina at latitude 34°-47'-38.2" N and longitude 82°-53'-55.4" W. Lake Keowee is located to the north and west of the site. The Corps of Engineers' Hartwell Reservoir is south of the site and Duke's Lake Jocassee lies approximately 11 miles to the north. Figure B-2 (based on Figure 2-1 of Oconee UFSAR) shows the site location with respect to neighboring states and counties within 50 miles.

2.1.2 Site Description

Figure B-3 (based on Figure 2-4 of Oconee UFSAR) shows the site, property line, exclusion area, site structures and general features of the area. Figure B-4 is a detailed site layout showing the Oconee Site-Specific ISFSI location in relation to major site features. There are no industrial, commercial, institutional or recreational structures within the site boundary. Located within 1 mile of the station center are a visitors center, the Keowee Hydroelectric Station, the Mosquito Control Facility, the Clemson Operations Center, and the Crescent Resources (Keowee Division) office complex and appurtenances. All of these facilities are Duke properties. Duke does not own the vacated Old Pickens Church and Cemetery, a small, historic property located east of the station which is not currently being used.

The topography immediately surrounding the ISFSI (Figure B-4) consists of relatively flat terrain which has been grassed or graveled over and is routinely maintained by the station. Routine maintenance of the immediate site vicinity assures that erosion will be minimal and that fire hazards due to burning vegetation are also minimized.

2.1.2.1 Legal Responsibilities for Site

All the property within the 1 mile radius exclusion area including mineral rights is owned by Duke except for the small vacant rural church plot belonging to Old Pickens Church, rights-of-way for existing highways and approximately 9.8 acres of U. S. Government property involved with Hartwell Reservoir.

The Hartwell property is either a portion of the Hartwell Reservoir or subject to flooding and not suitable for other uses. Duke has obtained from the owners of the church plot and from the United States the right to restrict activities on these properties and to evacuate them of all persons at any time without prior notice if, in its opinion, such evacuation is necessary or desirable in the interest of public health and safety.

The property which is within the exclusion area and which is not owned by Duke is shown on Figure B-3.

2.1.2.2 Other Activities Within the Site Boundary

Duke owns and operates the Oconee Nuclear Station and the Keowee Hydroelectric Station. The Oconee Site-Specific ISFSI is located within the owner controlled area of the nuclear plant. ISFSI operations have been considered for impacts upon the Oconee station's facility operating licenses. Pursuant to 10CFR Part 50, the licenses for the three Oconee Units were amended to permit Duke to operate the Site-Specific ISFSI. The amendment concluded that with certain minor modifications all aspects of Site-Specific ISFSI operation which are conducted within the existing Oconee station can be conducted safely while meeting the criteria for a "no significant hazards" finding.

All ISFSI operations are performed by the existing Oconee workforce. Only the transfer equipment used for the storage system is dedicated exclusively to ISFSI operations. No individual or group is dedicated exclusively to the ISFSI. Operational control of the ISFSI includes procedures for the spent fuel pool loading steps and the subsequent transfer into the ISFSI.

ISFSI operations required the following fuel building modifications:

1. Enlarging the opening of the cask decontamination pit covers.
2. Shortening the projection from the spent fuel pool wall of the cooling system intake pipe. This is needed to provide clearance for the transfer cask in the spent fuel pool cask pit.
3. The addition of a microdrive to the fuel crane positioning system to aid in the precision placement of the transfer cask.

The following auxiliary equipment is used exclusively for DSC/transfer cask operations within the fuel building:

1. Transfer cask lift yoke and extension member.
2. Vacuum drying equipment.
3. Automatic welding equipment.
4. Slings for the transfer cask lid.
5. Cask pit depression platform.

Additional description of the ISFSI and Fuel Building systems and facility is included in Section 4.4.

Other non-plant related activities are limited to the highways through the Exclusion Area, Duke's Visitors Center, recreation on the lakes, the Mosquito Control Facility, and the Old Pickens Church and Cemetery which are historical landmarks and will not be used for regular services.

2.1.2.3 Arrangements for Traffic Control

Arrangements have been made with the South Carolina State Highway Department to control and limit traffic on public highways in the Exclusion Area should it become necessary in the interest of public health and safety.

2.1.3 Population Distribution and Trends

The population distribution is based on the 2000 census (Reference 10). Table A-5 gives the population distribution within the three county area surrounding Oconee. The majority of citizens live in the cities of Walhala, Seneca, Clemson, Central, and Anderson, S.C. The area is largely rural and sparsely populated.

As derived from 2000 Census Bureau information, 187,679 people lived within 20 miles of ONS. This is a population density of 149 persons per square mile within 20 miles and, applying the GEIS sparseness measures, ONS falls into a least sparse category, Category 4 (greater than or equal to 120 persons per square mile within 20 miles).

As estimated from 2000 Census Bureau information, 1,219,121 people lived within 50 miles of ONS. This equates to a population density of 155 persons per square mile within 50 miles. Applying the GEIS proximity measures, ONS is classified as Category 2 (no city with 100,000 or more persons and between 50 and 190 persons per square mile within 50 miles). According to the GEIS sparseness and proximity matrix, the ONS ranks of sparseness Category 4 and proximity Category 2 results in the conclusion that ONS is located in a medium population area (Reference 11).

The population projections for the three county area around Oconee are given for 2010 through 2050 in Table A-6. These projections are based on the 1980-2000 census. The population within the three county area surrounding Oconee is projected to increase by approximately 55% by the year 2050.

2.1.3.1 Transient Population

It was expected in the late 1980s that Lake Keowee's 300 mile shoreline would be fully developed by the early 1990's at which time the estimated transient population would be 36,000. This estimate was based on development of lakeside lots, public access areas, and expanded commercial activities to take advantage of expanded recreational opportunities. As of 2007, the shoreline of Lake Keowee is not yet fully developed. There will not be any cottages within the Exclusion Area.

The visitors center, located on Duke Property just north of the plant and within the Exclusion Area, hosts approximately 20,000 visitors per year.

There are no large industries within 5 miles of the ISFSI. Duke identified no facilities whose air emissions or other activities may have negative impacts on the ONS ISFSI.

2.1.4 Uses of Nearby Land and Waters

Residential development of Lake Keowee's shoreline is expected to be the major use of the nearby land. Commercial development is anticipated to increase in response to the residential development. The waters of Lake Keowee are used for fishing, boating and swimming by the public through various public and private recreational areas.

The following description of land use and localized populations in Pickens and Oconee Counties in the 10-mile EPZ of the Oconee Nuclear Station is based on the Oconee Nuclear Station Emergency Plan as of August 1, 1988.

Pickens County lies within the 10-mile EPZ of the Oconee Nuclear Station. Involved are approximately 157.08 square miles of county territory and approximately 30,000 people. Also included are approximately 300 dairy cattle, 10 milk-producing goats, 243 head of swine, 2,938 head of beef cattle and 15 head of meat-producing goats.

Also, involved in the 10-mile EPZ are approximately 256 acres of vegetables, 47 acres of apples, and a large number of residential vegetable gardens.

This area has approximately 1,297 acres of hay crops and 4,670 acres of pasture grass.

A large portion of Oconee County lies within the 10-mile EPZ of the Oconee Nuclear Station. Included in this zone are approximately 165.498 square miles of land and approximately 26,000 people, with the largest concentration in Seneca. Oconee County's 654 square miles are divided into 22,665 acres of cropland, 285,605 acres of woodlands, and approximately 127,333 acres that fall into a general category of "all other". There are a total of 13 dairies in the 10-mile EPZ.

The largest portion of land is devoted to crops such as soybeans, cotton, hay, wheat, small grain, and corn, apples, forestry, poultry, beef or dairying.

Production of meat, agricultural crops and milk for the 5-mile radius of Oconee Nuclear Station for 1980 was as follows:

1. meat = 118 tons
2. crops = 310 tons

3. milk = 86,300 gallons

This data has not significantly changed since it became available in 1980.

There are two schools located within the 5-mile radius: Six Mile Elementary School - 522 students, and Keowee Elementary School - 299 students. Two special care institutions are located within the 5-mile radius: Harvey's Love and CareHome and Six Mile Retirement Center nursing homes have a total of 80 patients.

2.2 NEARBY INDUSTRIAL, TRANSPORTATION, AND MILITARY FACILITIES

2.2.1 Industrial and Military Facilities

There are no large industrial or military facilities or activities within 5 miles of Oconee. No other nuclear facilities including university research reactors are presently located within a 50-mile radius of Oconee Nuclear Station.

2.2.2 Transportation Routes

Figure B-3 shows the major transportation routes within 1 mile of Oconee. There are no oil or gas pipelines within 5 miles of the site. The nearest railroad line or spur is located at Newry, SC which is outside the 5-mile radius from the plant.

The nearest airport is the Clemson-Oconee Airport located approximately 9 miles to the south of the plant. The runway is oriented ENE-WSW. Pickens County Airport is located approximately 10 miles to the east of Oconee Nuclear Station. The runway is oriented in a NE-SW direction. Anderson County Airport is located approximately 23 miles SSE of the plant. It has two runways oriented as follows: NE-SW and NNW-SSE. The orientation of the NNW-SSE runway is not in a straight line toward Oconee Nuclear Station. The above information is based on the "Atlanta Sectional Aeronautical Chart Scale 1:500,000" 37th Edition, September 25, 1986, published by the U.S. Department of Commerce. No structures which could cause damage as described in Reg. Guide 3.48, para. 2.2 are located near the plant.

2.2.2.1 Description of Products and Materials

The highways passing through the 1 mile radius exclusion area are SC Routes 130 and 183 which carry local traffic only with infrequent trucking of hazardous chemicals and explosives since the general area is nonindustrial.

Only small amounts of chlorine are stored on-site since chlorine is not used for condenser cleaning at Oconee. No individual container contains more than 150 lbs. of chlorine. The chlorine is used for disinfection of raw water, with one 150 lb. container typically being in service. The maximum total number of containers on hand at any time is four.

2.3 Meteorology

2.3.1 Regional Climatology

Western South Carolina is far south of major storm tracks but experiences higher precipitation amounts than the east coast due to its location in the lee of the Appalachian Mountains. A semi-permanent belt of high pressure usually influences the regional climate. During the fall season, the area has a high probability of experiencing atmospheric stagnation during which the dilution rate for effluents is low due to low wind speeds.

The Oconee plant site is situated on Lake Keowee which was established to provide cooling for the three existing Oconee Nuclear units and future steam generating units as well as storage for Jocassee (pumped storage) and Keowee (conventional) hydroelectric stations. The topography in the vicinity of the site is moderately rolling and the local air flow is influenced to some extent by the contour of the lake. The prevailing winds are divided between the southwest and northeast quadrants due to the lake orientation and large scale pressure effects.

A complete description of regional and local wind data, including normal and extreme parameters can be found in Section 2.3 of the UFSAR.

2.3.2 Local Meteorology

2.3.2.1 Data Sources

The accident analysis meteorological data base, discussed in the Oconee SER Section 3.2.4, Units 2 and 3, is for the period March 15, 1970 - March 14, 1972. Joint frequency tables of wind direction, wind speed and atmospheric stability are shown in Table A-7.

2.3.2.2 Topography

Figure B-5 shows the detailed topography within 5 miles of the storage site.

2.3.3 Onsite Meteorological Measurement Program

Meteorological measurements include wind direction and speed, horizontal wind direction fluctuation, temperature, vertical temperature gradient, and rainfall. The relative position of instruments with respect to station yard is noted in Figure B-6. Relative elevations of both surface levels and instrument levels are depicted in Figure B-7.

Wind measurements are made with the Packard Bell Model W/S 1O1B series wind direction-speed system with starting thresholds of 0.7 and 0.6 miles per hour for direction and speed, respectively. Wind direction and speed are recorded in the control room on Esterline Angus Model A 601 C strip chart recorders with a system accuracy of ± 5.4 degrees for direction and ± 0.45 miles per hour for speed. Temperature and delta temperature measurements are made with the Leeds and Northrup 8100 Series 100 ohm resistance temperature device with Packard Bell Model 327 thermal radiation shields. Temperature and delta temperature are recorded on the Leeds and Northrup Speedomax W recorder with a system accuracy of ± 1°F for temperature (at 10 m level) and ± 0.5°F for delta temperature (46 m level referenced to the 10 m level). For data prior to February 24, 1977, delta temperature was measured at the 46 m level and the 1.5 m level. Rainfall is measured near the meteorological tower with the Belfort Weighing Rain Gauge Model 5-780 with an accuracy of ± 0.03 in. and ± 0.06 in. for zero to five and five to ten inch totals respectively.

Operational measurements consist of near real-time digital outputs in addition to the previously described analog system. An entirely new set of instrumentation has been installed including the measurement of dew point (at 10 m level); a supplemental low-level wind system (at 10 m level) provides input for emergency dose assessment (see Figure B-6 and Figure B-7). The rain gauge has been relocated near the supplemental wind system.

Instrument specifications for operational measurements are:

1. Wind Direction

a. Manufacturer Teledyne Geotech
b. Time - averaged digital accuracy ± 3° of azimuth
c. Time - averaged analog accuracy ± 6° of azimuth
d. Starting threshold 0.3 m/sec at 10° initial deflection
e. Damping ratio 0.4 at 10° initial deflection
f. Distance constant 1.1 m

2. Wind Speed
   a. Manufacturer Teledyne Geotech
   b. Time - averaged digital accuracy ± 0.27 m/sec for speeds less than 27 m/sec
   c. Time - averaged analog accuracy ± 0.40 m/sec for speeds less than 27 m/sec
   d. Starting threshold 0.45 m/sec
   e. Distance constant 1.5 m
3. Temperature
   a. Manufacturer Teledyne Geotech
   b. Time - averaged digital accuracy ± 0.3°C
   c. Time - averaged analog accuracy ± 0.5°C
4. Delta Temperature
   a. Manufacturer Teledyne Geotech
   b. Time - averaged digital accuracy ± 0.10°C
   c. Time - averaged analog accuracy + 0.15°C
5. Precipitation
   a. Manufacturer Teledyne Geotech
   b. Digital accuracy ± 6% of total accumulation at 15 cm/hr
   c. Analog accuracy ± 9% of total accumulation at 15 cm/hr
   d. Resolution 0.25 mm

Near real-time digital outputs of meteorological measurements are summarized for end-to-end 15 min. periods for use in a near real-time puff-advention model to calculate offsite dose during potential radiological emergencies. The Operator Aid Computer (OAC) system computes the 15 min. quantities from a sampling integral of 60 sec. It calculates 15 min. average values for high and supplemental low level wind direction and speed; 15 min. averages are also calculated for delta temperature, ambient temperature and dew point temperature. Total water equivalence is computed for precipitation. All 15 min. values are stored with a 24 hr. recall. Permanent archiving of data from the digital system is made by combining the 15 min. quantities into one hour values.

2.3.4 Diffusion Estimates

2.3.4.1 Basis

The design two-hour X/Q at the Exclusion Area Boundary (EAB) for accidental releases is 4.5E-4 (sec/m^3).

2.3.4.2 Calculations

The calculation of a two-hour X/Q value to estimate radiological doses from potential accidental releases from the storage site (See Figure B-1) is based on a plant design condition of Pasquill Type F stability with a wind speed of 1m/sec as proposed in the Oconee Safety Evaluation Report, Section 3.2.4, Units 2 and 3. The equivalent design condition [95 percentile hourly average X/Q] for the ISFSI is a Pasquill Type F stability with a wind speed of 0.65 m/sec. The calculation assumes a gaussian material distribution from a ground level release with essentially a point source geometry.

$$X/Q = \left[\bar{u}\,\pi\,\sigma_y\sigma_z\right]^{-1} = 4.5E-4(\mathrm{sec}/\mathrm{m}^3)$$ [1]

Where

$\bar{u}$ = mean wind speed at 10 m = 0.65(m/sec)

σ_y(1.0 mi.) = crosswind concentration distribution standard deviation = 57 m

σ_z(1.0 mi.) = vertical concentration distribution standard deviation = 19 m

2.4 Hydrologic Engineering

2.4.1 Hydrologic Description

2.4.1.1 Site and Facilities

The location and description of Oconee presented in Chapters 1 and 2 include reference to figures showing the general arrangement, layout and relevant elevations of the station. Station yard grade is 796 ft. mean sea level (msl). The mezzanine floor elevation in the Turbine, Auxiliary, and Service Buildings is 796.5 ft. (msl). Exterior accesses to these buildings are at elevation 796.5 ft. (msl).

All of the man-made dikes and dams forming the Keowee Reservoir rise to an elevation of 815 ft. msl including the intake channel dike. The crest of the submerged weir in the intake canal is at elevation 770 ft. msl.

Flooding at the ISFSI will not occur. Figure B-3 shows the location of the ISFSI at the Oconee site, and Figure B-12 shows the relative location and topography of the ISFSI yard at Elevation 825.0 and the surrounding terrain features, including the Keowee dam and dikes. The Probable Maximum Flood level for Lake Keowee, as defined in Section 2.4.2.2, is Elevation 808.0, which is seventeen feet below the ISFSI site yard level of Elevation 825.0. Also, the peak flood level due to a postulated failure of the

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[1] Slade, D. H. (ed.) 1968: Meteorology and Atomic Energy 1968, TID-24190, National Technical Information Service, Springfield, Va.

upstream Jocassee Dam is Elevation 813.12, as discussed in Section 2.4.5.1, Thus, since all of the man-made dams and dikes forming Lake Keowee are constructed to an elevation of 815.0 and since the ISFSI site elevation of 825.0 is above the maximum lake level which can be maintained, there is no potential for the reservoir level reaching the ISFSI site by overtopping. Therefore, flooding of the ISFSI will not occur.

The ISFSI yard is surrounded by drainage intercept ditches sized to prevent local overland flow from reaching the ISFSI site. In addition, stormwater drainage is provided in the paved areas of the ISFSI site.

Therefore, flooding of the ISFSI site cannot occur either due to reservoir overflow or local intense precipitation.

2.4.1.2 Hydrosphere

The main hydrologic features influencing the Oconee plant site are the Jocassee and Keowee Reservoirs. Lake Jocassee was created in 1973 with the construction of the Jocassee Dam on the Keowee River. The lake provides pump storage capacity to the reversible turbine-generators of the Jocassee Hydroelectric Station, located approximately 11 miles north of the plant. At full pond, elevation 1110 ft. msl, Lake Jocassee has a surface area of 7565 Ac, a shoreline of approximately 75 mi, a volume of 1,160,298 Ac-ft., and a total drainage area of about 148 sq mi.

Lake Keowee was created in 1971 with the construction of the Keowee Dam on the Keowee River and the Little River Dam on the Little River. Its primary purpose is to provide cooling water for the plant and water to turn the turbines of the Keowee Hydroelectric Station. At full pond, elevation 800 ft. msl, Lake Keowee has a surface area of 18,372 Ac, a shoreline of approximately 300 mi, a volume of 955,586 Ac-ft., and a total drainage area of about 439 sq mi. The Jocassee and Keowee Reservoirs and the hydroelectric stations located at these reservoirs are owned and operated by Duke.

The area presently provides for a few raw water users. The City of Greenville and the Town of Seneca take their raw water supplies from Lake Keowee. The Town of Anderson, the Town of Clemson, the Town of Pendleton, Clemson University, and several industrial plants take their raw water supplies from Hartwell Reservoir, downstream of Lake Keowee.

Greenville's raw water intake is located approximately 2 miles north of the plant on Lake Keowee. Seneca's raw water intake is located approximately 7 miles south of the plant on the Little River Arm of Lake Keowee. Anderson raw water intake is located approximately 40 river miles downstream of the Keowee tailrace.

The existing raw water intakes for Greenville, Seneca, and Anderson are shown and located relative to the site on Figure 2.4.1 in the Oconee Site-Specific ISFSI Environmental Report.

2.4.2 Floods

2.4.2.1 Flood History

Since Oconee is located near the ridgeline between the Keowee and Little River valleys, or more than 100 ft. above the maximum known flood in either valley, the records of past floods are not directly applicable to siting considerations.

2.4.2.2 Flood Design Consideration

In accordance with sound engineering practice, records of past floods as well as meteorological records and statistical procedures have been applied in studies of floods routed through the Keowee and Jocassee Reservoirs as a basis for spillway and freeboard design.

The spillway capacities for Lake Keowee and Jocassee were selected in accordance with the empirical expression for design discharge:

$$Q = C\sqrt{DA}$$

Where

Q = peak discharge in cfs

DA = drainage area in square miles

C = 5000, a runoff constant judged to be characteristic of the drainage area

The following tabulation gives pertinent data on this design flood flow:

Lake Keowee[1]	Lake Jocassee	
439	148	Drainage area at damsite, sq mi
25,200	21,000	Maximum recorded flow at nearby USGS gages efs DA
(Newry Gage, DA 455 sq mi)	(Jocassee Gage, DA 148 sq mi	
8-13-40	10-4-64	Date of maximum flow
1939-1961	1950-1965	Period of record
105,000	61,000	Spillway design discharge, cfs
800	1,110	Full Pond elevation
815	1,125	Crest of dam elevaton
0	0	Surcharge on full pond for design discharge
4	2	Number of spillway gates
38 ft. x 35 ft.	40 ft. x 32 ft.	Size of spillway gates Discharge capacity, cfs
107,200	45,700	Spillway
-	16,500	(2 units Dependable flood flow of 4) through units
107,200	62,200	Total discharge capacity, cfs

Note:

1. Little River and Keowee River Arms

The above discharge capacities assume no surcharge above normal full pond level. Statistical analyses have shown design reservoir inflows for both Lake Keowee and Lake Jocassee equal to respective design discharge capacities outlined above to have recurrence intervals less frequent than once in 10,000 years.

The maximum wave height and wave run-up have been calculated for Lake Keowee and Lake Jocassee by the Sverdrup-Munk formulae. The results of these calculations are as follows:

Wave Height	Wave Run-Up	Maximum Fetch	Lake
3.70 ft.	7.85 ft	8 miles	Keowee (Keowee River Arm)
3.02 ft.	6.42 ft.	4 miles	Jocassee
3.02 ft.	6.42 ft.	4 miles	Keowee (Little River Arm)

The wave height and wave run-up figures are vertical measurements above full pond elevations as tabulated above.

Studies were also made to evaluate effects on reservoirs and spillways of maximum hypothetical precipitation occurring over the entire respective drainage areas. This rainfall was estimated to be 26.6 inches within a 48 hour period. Unit hydrographs were prepared based on a distribution in time of the storms of October 4-6, 1964, for Jocassee and August 13-15, 1940, for Keowee. Results are summarized as follows:

Keowee	Jocassee	
147,800	70,500	Maximum spillway discharge, cfs
808.0	1114.6	Maximum reservoir elevation
7.0 ft.	10.4 ft.	Free board below toe of dam

While spillway capacities at Keowee and Jocassee have been designed to pass the design flood with no surcharge on full pond, the dams and other hydraulic structures have been designed with adequate freeboard and structural safety factors to safely accommodate the effects of maximum hypothetical precipitation. Because of the time-lag characteristics of the runoff hydrograph after a storm, it is not considered credible that the maximum reservoir elevation due to maximum hypothetical precipitation would occur simultaneously with winds causing maximum wave heights and run-ups.

The maximum Keowee tailwater level during hydro operation has been calculated to be elevation 672.0 ft. (msl), which is 124 ft. below the nuclear station yard elevation 796.0 ft. (msl) and 153 ft. below the ISFSI yard elevation of 825 ft. (msl)

The maximum discharge calculated, due to hydro operating, is expected to be 19,800 cfs. The minimum discharge calculated with no units operating, is expected to be 30 cfs.

In summary, the above results of flood studies show that Lakes Keowee and Jocassee are designed with adequate margins to contain and control floods which pose no risk to the ISFSI site.

2.4.3 Probable Maximum Flood on Streams and Rivers

2.4.3.1 Probable Maximum Precipitation

See Section 2.4.2.2.

2.4.3.2 Runoff and Stream Course Models

See Section 2.4.2.2.

2.4.3.3 Probable Maximum Flood Flow

See Section 2.4.2.2.

2.4.3.4 Coincident Wind Wave Activity

See Section 2.4.2.2.

2.4.4 Potential Dam Failures, Seismically Induced

Duke has designed the Keowee Dam, Little River Dam, Jocassee Dam, Oconee Intake Canal Dike, and the Intake Canal Submerged Weir based on sound Civil Engineering methods and criteria. These designs have been reviewed by a board of consultants and reviewed and approved by the Federal Energy Regulatory Commission in accordance with the license issued by that agency. The Keowee Dam, Little River Dam, Jocassee Dam, Intake Canal Dike, and the Intake Canal Submerged Weir have also been designed to have an adequate factor of safety under the same conditions of seismic loading as used for design of Oconee.

The construction, maintenance, and inspection of the dams are consistent with their functions as major hydro projects. The safety of such structures is the major objective of Duke's designers and builders, with or without the presence of the nuclear station or ISFSI.

2.4.5 Flooding Protection Requirements

2.4.5.1 Flood Protection Measures for Oconee Station Seismic Class 1 Structures

The Oconee Station plant yard elevation is 796.0 ft. msl and the Oconee Site-Specific ISFSI yard elevation is 825 ft. (msl). All of the man-made dikes and dams forming the Keowee Reservoir are constructed to an elevation of 815.0 ft. msl with a full pond elevation of 800.0 ft. msl. However, Class 1 structures and components at the station are not subject to flooding since the Probable Maximum Flood (PMF) would be contained by the Keowee Reservoir. The minimum external access elevation for the Auxiliary, Turbine, and Service Buildings is 796.5 ft. msl which provides a 6 in. water sill. Also, the plant site is provided with a surface water drainage system that protects the plants facilities from local precipitation.

In the Oconee PRA study, a postulated failure of the upstream Jocassee Dam resulted in a peak flood elevation at Keowee Dam of Elev. 813.12, which gives 1.9 feet available freeboard. Although the connecting canal between the two arms of Lake Keowee would lengthen the travel time of the flood wave, it is conservatively assumed that the water level resulting at Oconee Intake Dike would be the same as for Keowee Dam.

2.4.5.2 Flood Protection Measures for ISFSI Site

The site for the Oconee Site-Specific ISFSI is elevated well above the nominal plant yard grade at El. 825.0. Flooding of the ISFSI is not a credible event; therefore, no flood protection prevention measures are necessary.

2.4.6 Environmental Acceptance of Effulents

The only liquid used for the Oconee Site-Specific ISFSI is during preparation of the DSC and transfer cask within the confines of the plant Auxiliary Building. No liquids are used during the actual operation of the ISFSI.

2.4.7 Subsurface Hydrology

The Oconee Site-Specific ISFSI provides for the storage of spent nuclear fuel in a dry condition. Therefore, there will be no consumption of groundwater or impact to the groundwater system as a result of installing the ISFSI at the Oconee Station.

2.4.7.1 Groundwater Usage

The completed field survey of approximately 30 wells performed in the late 1960's determined that groundwater usage is almost entirely from the permeable zones within the saprolite with only minor amounts obtained from the underlying fractured bedrock. Yields from these shallow wells are low, generally less than 5 gpm, and are used to supply domestic water for homes and irrigation of lawns, gardens, and limited amounts for livestock. With only a few exceptions, the wells are hand dug, equipped with bucket lift and/or jet pump, and 40 to 60 ft. deep. At present, there is no industrial demand for groundwater within the area. The only appreciable groundwater draft observed is being supplied by eight wells for Keowee Elementary School, located four miles west of the site.

2.4.7.2 Regional Groundwater Conditions

The Oconee Station lies within the drainage area of the Little and Keowee Rivers which flow southerly into the Seneca River and subsequently discharge into the main drainage course of the Savannah River. The average annual rainfall at the site area is approximately 53 in.

The deposits of the Little and Keowee drainage basin are generally of low permeability which result in nearly total runoff to the two rivers and their numerous tributary creeks. Runoff occurs soon after precipitation, particularly during the spring and summer months when the soil percolation rates are exceeded by the short term but higher yielding rainfall periods. The area is characterized by youthful narrow streams and creeks which discharge into the mature Little and Keowee Rivers.

Throughout the area, groundwater occurs at shallow depths within the saprolite (residual soil which is a weathering product of the underlying parent rock) soil mantle overlying the metamorphic and igneous rock complex (Reference 1). Refer to Section 2.5. This saprolite soil, which ranges in thickness from a few feet to over 100 ft., is the aquifer for most of the groundwater supply. Wells are shallow and few exceed a total depth of 100 ft. Depths to water commonly range from 5 to 40 ft. below the land surface. Seasonal fluctuation is wholly dependent of the rainfall and the magnitude of change may vary considerably from well to well due to the limited areas of available recharge. Average fluctuation is about 3 to 5 ft. Both surface water and groundwater in this area are of low mineral content and generally of good quality for all uses.

To determine the general groundwater environment surrounding the plant area, groundwater levels were established in numerous domestic wells and exploratory drill holes during the original program in the late 1960's within a four-mile radius. Additional data was obtained from interviews with local residents regarding specific wells and discussions with State and Federal personnel. The results of the groundwater level survey are shown on Figure B-8. The results demonstrate that local subsurface drainage generally travels down the topographic slopes within the more permeable saprolite soil zones toward the nearby surface creek or stream. Gross drainage is southward to the Little and Keowee Rivers which act as a base for the gradient.

Because the topography and thickness of the residual soil, overlying bedrock control the hydraulic gradient throughout the area, and further, the relief is highly variable within short distances, it is not possible to assign a meaningful average gradient for the 15 square mile area surveyed. In all small areas studied within the four-mile radius, the groundwater hydraulic gradient is steep and conforms to the topographic slope. Water released on the surface will percolate downward and move toward the main drainage channels at an estimated rate of 150 to 250 ft. per year.

The gradient throughout the area represents the upper surface of unconfined groundwater and therefore is subject to atmospheric conditions. Confined groundwater occurs only locally as evidenced by the existence of isolated springs and a few exploratory drill holes which encountered artesian conditions. These examples do not reflect general conditions covering large areas but merely represent isolated local strata within the saprolite soil which contain water under a semi-perched condition and/or permeable strata overlain by impermeable clay lenses which have been breached by erosion at its exit and recharged short distances upslope by vertical percolation.

The plant area is on a moderately sloping, northwest trending topographic ridge which forms a drainage divide between the Little and Keowee Rivers located approximately 0.5 mile to the west and east, respectively. Groundwater levels at the plant site, measured during the 1966 drilling program and subsequently in four piezometer holes drilled for pre-construction monitoring purposes, ranged from elevation 792 ft. (msl) to 696 ft. (msl). The slope of this apparently free water surface is predominantly southeasterly toward the Keowee River and its tributary drainage channels. An average hydraulic gradient to the southeast of approximately 8.0 percent was plotted along a line of measured wells. This closely conforms to the existing topography as expected. Refer to Figure B-9 for measured water levels and typical water table profile.

2.4.7.3 Groundwater Quality

The surface water and groundwater of the area is generally of good quality (Reference 2). Of the wells surveyed, none were noted where water treatment is being conducted. Temperature of well water measured ranged from a low of 46 to a high of 59 degrees. The majority of readings were from 50 to 53 degrees Fahrenheit.

Water contains different kinds and amounts of mineral constituents. Temperature, pressure and length of time water is in contact with various rock types and soils determine the type and amount of mineral constituents present. Because ground waters are in intimate contact with the host rocks for longer periods of time, they have a more uniform and concentrated mineral content than surface waters. The mineral content of natural surface waters in the Piedmont Province is low due to the relative insolubility of the granitic, gneissic, and schistose host rocks and the reduced contact time caused by rapid runoff in the mountainous areas.

Tabulated below are the surface water constituents reported in parts per million from the Keowee River near Jocassee, South Carolina. The water sample was taken and analyzed by the U.S. Geological Survey, Water Resources Division in June 1965.

Silica (SiO_2)	7.8	Carbonate (CO_3)	0.0
Iron (Fe)	0.01	Bicarbonate (HCO_3)	7.0
Calcium (Ca)	1.0	Sulfate (SO_4)	1.0
Magnesium (Mg)	0.1	Chloride (Cl)	0.6
Sodium (Na)	1.2	Fluoride (F)	0.1
Potassium (K)	0.4	Nitrate (NO_3)	0.1
Dissolved Solids	150	Phosphate (PO_4)	0.0
Hardness as $CaCO_3$	3.0	PH	6.6
Specific Conductance	13.0		

Soil surveys conducted by the U.S. Department of Agriculture in cooperation with the South Carolina Agricultural Experiment Station assign pH values of between 5.0 and 6.0 for the Hayesville and Cecil soil series which are present at the site area (Reference 3). Surface water samples taken from the Keowee River within one mile of the site have a pH of 6.5 to 7.0. It is expected groundwater at the site has a pH ranging between 5.5 and 6.0.

The cation exchange potential can be evaluated by knowing the SAR (Sodium Absorption Ratio), saturation extract values, and the pH of the soil. Two samples of saprolite soil were obtained from drill holes used in determining field permeability values and tested for Sodium Absorption Ratio (SAR). The results are tabulated as follows:

		Saturation Extract Values Milligram – equivalent per 100 grains of soil				
Sample No.	**pH**	**Cond. (mhos)**	**Calcium**	**Magnesium**	**Sodium**	**SAR**
1	5.8	5	0.015	0.000	0.0108	0.122
2	5.7	7	0.010	0.000	0.0166	0.235

Considering the amount of soil that is available is so great, it is evident that many times the amount of strontium and/or cesium contained in the waste could be absorbed. Further, the distribution coefficient for ion exchange of radionuclides with the sediments is dependent on the pH of the water in the formation (Reference 4). The distribution coefficient is a ratio of the reaction of these radionuclides that are absorbed on the soil and the fraction remaining in solution. It is expected that the soils surrounding Oconee have a ratio in the range of 80 to 150, and consequently a substantially lower average velocity for any radionuclide to that of natural water will result.

The estimated maximum rate of movement of water through the soils is about 0.75 feet per day. Using this rate in relation with the above distribution coefficient, bulk density and porosity of the soil, and ratio of the weight of soil to volume of groundwater it indicates the radionuclide velocity will be about .0015 that of groundwater. Using a safety factor of five for variance in flow and competition for exchangeable sodium ions, it would require more than 1000 years for strontium or cesium ions to migrate a distance of one-half mile. In summary, the movement would be so extremely slow that the saprolite soil is an effective natural barrier to the migration of radionuclides.

2.4.7.4 Program of Investigation

Permeability tests were performed in borings in the late 60's as part of the original site investigation program to determine permeabilities of the soil underlying the site. The tests were run according to the Bureau of Reclamations Field Permeability Tests, Designation E-19. Figure B-10 shows the arrangement of the field test equipment along with a brief description of the procedure used in determining the soil permeability test results. Test results are from 5 borings as presented in Table A-8. The formulae used in the calculations of the k values are shown in Figure B-11. Field permeability tests conducted within the saprolite soil yielded values ranging from 100 to 250 ft./yr. The permeability tests were performed in holes of varying depths to determine if the zoned typed weathering of the saprolite soil affects vertical permeability. Based on the test results, inspection of nearby road cuts, and a study of the exploratory drill logs, it is concluded that the surficial saprolite possesses lower permeability values than that found in the deeper strata. This correlates with the general profile of the saprolite in that the later stages of weathering produce a soil having a higher clay content than the more coarse-grained silty sand sediments below. This natural process of weathering results in the formation of a partial barrier to downward movement of the surface water.

2.4.7.5 Groundwater Conditions Due to Keowee Reservoir

As previously discussed, the groundwater levels at the plant range from elevation 792 ft. (msl) to below elevation 696 ft. (msl). The Keowee Reservoir operates with a maximum pool elevation of 800 ft. (msl). This results in raising the surface water elevation to that datum on the northern and western portions of land adjoining Oconee. It also raises the existing groundwater table for those local areas bordering the reservoir where formerly the groundwater surface was below elevation 800.0 ft (msl). The reservoir materially contributes in establishing a potentially larger recharge area and where it effects the groundwater results in a more stable hydraulic gradient with less seasonal fluctuation than formerly existed.

Preliminary studies indicate that Keowee Reservoir has created the following groundwater conditions at Oconee.

1. Groundwater continues to migrate downslope through the saprolite soil on a slightly steeper gradient in a southeasterly direction toward the Keowee River base datum.
2. There are two topographic divides which separate the nuclear station from the nearby reservoir: (1) a one-half mile wide north-south stretch of terrain west of the site, and (2) a narrow 500 ft. wide ridge north of the site. Original groundwater measurements in drill hole K-12, located atop the northern ridge, show water table conditions exist at about elevation 810 ft. (msl).
3. There should be no reversal of groundwater movement at the site, and all water percolates downward and away from the plant area.
4. The construction of Keowee Dam and Reservoir has not created adverse groundwater conditions at the plant site.
5. Infiltration of domestic wells, located beyond the plant one-mile exclusion radius, by surface water from the site is not possible under the groundwater conditions imposed by Keowee Reservoir.

2.5 Geology and Seismology

Specific soil testing has been performed at the designated location for the Oconee Site-Specific ISFSI. The data obtained from this testing is utilized in the foundation design of the ISFSI (See Section 2.5.5). It should be noted that foundation conditions at the ISFSI site are typical of those encountered in the general station area. The following sections discuss the Oconee site geology and seismology.

2.5.1 Basic Geologic and Seismic Information

Geologic and seismic investigative studies for Oconee Nuclear Station include the following:

1. a review of the available geological and seismological literature pertaining to the region;
2. a geological reconnaissance of the site, performed primarily for the purpose of evaluating the possibility of active faulting in the area;
3. geophysical explorations and laboratory tests to provide parameters for evaluating the response of foundation materials to earthquake ground motion;
4. an evaluation of the seismic history to aid in the selection of the design earthquake that the station might experience; and
5. the development and recommendation of seismic design parameters for the proposed structures.

The geologic field work at the site was performed concurrently with the drilling for the original plant site. The site reconnaissance is a continuation of the geologic field work done for the Keowee Dam. Local outcrops, though scarce, are examined and the rock types, joint and foliation orientation noted.

The original plant structures are founded on normal Piedmont granite gneisses. The construction characteristics of the residual soils overlying the rock that form the foundation for the ISFSI are known and present no problems in design or construction. The rock underlying the site, below surface weathering, is hard and structurally sound and contains no defects which would influence the design of heavy structures.

The southeastern Piedmont rocks are highly stable seismologically, and the Oconee Nuclear Site should be one of the nation's most inactive areas with respect to earthquake activity.

2.5.1.1 Regional Geology

The regional structure is typical of the southern Piedmont and Blue Ridge. The region was subjected to compression in the northwest-southeast direction which produced a complex assortment of more or less parallel folds whose axes lie in a northeast-southwest direction. The Blue Ridge uplift was the climax of the folding, and it was accompanied by major faulting, along a line stretching northeast through Atlanta and Gainesville, Georgia and across South Carolina, 11 miles northwest of the site. This has been termed the Brevard Fault.

The age of these uplifts has not been agreed on by geologists. The consensus of geologic opinion seems to require a period of severe deformation followed by at least one additional period of less severity. Probably all occurred during the Paleozoic Era, but it has been suggested that the last major uplift was as late as the Triassic (180 million years ago) when the Coastal Plain to the east was downwarped. A number of investigators have maintained that the major deformative movements occurred at least 225 million years ago. However, all the resulting stresses have not yet been fully dissipated.

There is no evidence of any displacement along these faults during either historic times or during the Geologic Recent Era as indicated in displacements in the residual soils that blanket the region. While the well known Brevard Fault passes 11 miles northwest of the site, there is no indication of a major fault in the immediate vicinity of the site. Furthermore, the major faults of the region are ancient and dormant, except for minor adjustments at considerable depth. Therefore, there is no indication of any structural hazard to foundations.

The site is underlain by crystalline rocks which are a part of the southeastern Piedmont physiographic province. This northeastward - trending belt of ancient metamorphic rocks extends northward from Alabama east of the Appalachians, and in South Carolina crosses the state from the Fall Line on the east to the Blue Ridge and Appalachian Mountains on the west. These rocks are generally recognized as being divided into four northeast-southwest trending belts in the Carolinas. From southeast to northwest they are the Carolina slate belt, Charlotte belt, Kings Mountain belt, and Inner Piedmont belt. The Oconee Nuclear Site is in the western, or Inner Piedmont Belt.

The Piedmont metamorphic rocks of the site were formed under many different combinations of pressure and temperature, and represent a complex succession of geologic events. The formerly accepted concept that the Piedmont consists only of the deep, worn-down roots of ancient mountains now seems untenable. The older theory that the rocks were exclusively of igneous origin is being replaced by the proposition that they represent highly metamorphosed sediments which have been folded, faulted, and injected to result in one of the most complex geologic environments in the world. It can be said with certainty, however, that these rocks represent some of the oldest on the continent. The new techniques of dating by radioactive decay have placed the age of the metamorphic episodes that produced these rocks as occurring from 1,100 my (million years) to 260 my ago. The successive northeastward trending bands of rocks vary greatly in lithology from granitic types to highly basic classifications, with gneisses and schists being the predominant classifications petrographically. In summary, the regional geology of the Oconee Nuclear Site can be accepted as typical of the southeastern Piedmont - narrow belts of metamorphic rocks trending northeast, with the foliation dipping generally to the southeast.

2.5.1.2 Site Geology

2.5.1.2.1 Geologic, History, Physiography, and Lithography

The rock present at this site is metamorphic. It is believed to be Precambrian in age; thus, it was formed over 600 million years ago. The complete history of this region is quite complex and has not been fully unravelled. However, it is the consensus of the geologic opinion that the formation consisted of thick strata of sedimentary rocks which were later downwarped and altered by heat and pressure. This first rock formed is termed the country rock.

More than one episode of regional metamorphism transformed the rock into metasediments with accompanying injection and mobilization by plastic flow.

Since the formation of the country rock, most of the mass has been altered or replaced by injection of granite gneiss, biotite hornblende gneiss, and one or possibly more pegmatite dikes.

It is not definite which is the younger: the granite gneiss injection or the biotite hornblende gneiss injection. The limited evidence points to the granite gneiss as the younger of the two.

The pegmatite dikes are the youngest rock known at this site. One such dike is exposed in the road cut on the east side of the state highway passing through the site. It clearly shows the pegmatite cutting through the older rocks, and thus, demonstrates that it is the youngest.

Regional metamorphism, folding, and some minor faulting occurred concurrently much of this early time.

This site is located within the Inner Piedmont Belt, at this locality the westernmost component of the Piedmont Physiographic Province. The topography of the area is undulating to rolling; the surface elevations ranging from about 700 ft. to 900 ft. The region is moderately well dissected with rounded hilltops, representing a mature regional development. The area is well drained by several intermittent streams flowing away from the center of the site in a radial pattern.

The local geology of the Oconee Nuclear Site is typical of the southeastern Inner Piedmont Belt. The foundation rock is biotite and hornblende gneiss striking generally northeast, with the foliation dipping southeast. The rock is overlain by residual soils, which vary from silty clays at the surface, where the rock decomposition has completed its cycle, to partially weathered rock, and finally to sound rock.

The strike of the foliation planes or bands of mineral segregation is north 6 degrees to 15 degrees east with an average dip of 22 degrees to 28 degrees to the southeast. However, due to the local folding or warping at this site, minor variations in the strike and dip of the foliation will occur within the site.

There have been periods of erosion and perhaps even continuous erosion since the close of the Paleozoic Era. The rock now encountered at this site represents the deeper portions of the original metamorphic complex.

The rock encountered at this site is of three main types; light to medium gray granite gneiss, light gray to black biotite hornblende gneiss and white quartz pegmatite with local concentrations of mica, both muscovite and biotite varieties.

The dominate rock type at this site is the light to medium gray granite gneiss. This rock type is generally moderately hard and hard below the initial soft layers encountered in the rock surface. Joints in this rock are brown iron stained in the upper softer layers, but in the deeper harder rock, the joints are not stained. This helps illustrate that the jointing at this site does not control the weathering or decomposition of the rock.

The second most abundant rock type is the biotite hornblende gneiss. The rock is generally weathered or softer to a greater depth than the granite gneiss. This is probably due to the higher percentage of biotite mica. Biotite mica is a potassium magnesium-iron aluminum silicate. The iron content of the biotite mica causes the rate of decomposition to accelerate. However, generally at the deeper portions of the original plant borings, the biotite hornblende gneiss hardness increases to moderately hard or harder. Only a few thin soft layers were noted in this rock in the deeper portion of the original plant borings but not in the ISFSI site boring logs which are presented and discussed in Section 2.5.4.

A few layers of hard quartz pegmatite with local concentrations of mica were recorded. The thickness of the pegmatite layers are generally less than three feet. These pegmatite layers are dikes. A dike is a sheetlike body of igneous rock that fills a fissure in the older rock which is encountered while in a molten condition. There is an exposure of mica-quartz pegmatite dike on the east side of the state road cut passing through this project. This dike exposure is about 3.5 ft. wide, but due to the lack of knowledge of orientation of the dike, the exact width cannot be computed. The quartz pegmatite encountered in the original station borings probably represent other smaller dikes of the same material. These dikes are of hard, sound and durable material and should cause no concern to construction or foundation requirements.

2.5.1.2.2 Rock Weathering

Rock weathering at the Oconee Nuclear Site is about normal for Piedmont biotite gneisses. The range of depth before sound rock is reached is 0 to 35 ft. for the ISFSI foundation. Yard grade is nominally at elevation 825.0 msl. with the bottom of the foundation at elevation 822.0 msl. The resulting residual materials - clays, silts, and weathered rock - are structurally strong, and are used in situ for the foundation of this structure.

2.5.1.2.3 Jointing

The rock at the Oconee site is moderately jointed. All of the visible rock outcrops were studied in attempting to determine the correct orientation of the joint patterns.

Some moderately good rock outcrops were found and several joint pattern orientations measured. While studying and logging the original site rock cores, all of the joint dips were recorded. The dips of the joint patterns recorded in the rock cores were associated with the dips measured in the rock outcrops.

The rock has apparently not been subjected to stresses causing high concentrations of joints. The core borings indicate that jointing is widely spaced, and has not influenced the weathering pattern. Joints are about equally divided between strike and dip joints, with occasional oblique joints.

2.5.1.2.4 Ground Water

Subsurface water is typical of Piedmont area. The top of the zone of saturation, or water table, follows the topography, but is deeper in the uplands and more shallow in valley bottoms. It migrates through the pores of the weathered rock, where the feldspars have disintegrated and left interstitial spaces between the quartz grains. Additional water is contained in the deeper fractures and joints below the sound rock line. The water table is not stationary, but fluctuates continually as a reflection seasonal precipitation. Additional information on ground water is included in Section 2.4.7. Groundwater elevations encountered during the ISFSI site borings are noted on the boring logs, Section 2.4.4.

2.5.2 Vibratory Ground Motion

A seismological study for the Oconee Nuclear Site has been performed to determine the design and hypothetical earthquakes for the site and the ground motion associated with them. Details are discussed in Section 2.5.2 of the Oconee UFSAR.

2.5.2.1 Earthquake History

The largest earthquakes close to the site occurred near Charleston in August, 1886, some 200 miles from the site. Two shocks occurring closely in time, had an intensity estimated to be about Modified Mercalli IX at the epicenter and were perceptible over an area of greater than two million square miles.

Aftershocks of the main earthquake had intensities ranging up to Modified Mercalli VII. These shocks may be associated with a downfaulted Triassic basin under the coastal plain.

There have been two moderate earthquakes in the immediate vicinity of the plant since construction began.

In 1971, an earthquake occurred near Seneca, South Carolina. The descriptions of this event which occurred at 07:42 (EST) on July 13, 1971 have been examined from various sources. A MM intensity VI was assigned to the event by USGS based primarily on the report of a cracked chimney near Newry, about 10 km south of the present epicentral area. A detailed examination of the buildings and chimneys by Sowers and Fogle (1978) convinced them that the chimney in question had been broken and in a state of disrepair before the shock. They assigned an intensity IV (MM) to the shaking at Newry.

The July 13, 1971 event at 07:42 AM EDT was preceded by a felt shock at about 4:15 AM EDT and followed by at least one felt aftershock at 7:45 AM (Sowers and Fogle, 1978).

On August 25, 1979 (9:31 PM EDST, Aug. 26) a magnitude 3.7 earthquake occurred in the vicinity of Lake Jocassee, South Carolina. This MM intensity VI event was felt in an area of about 15,000 sq. km and was recorded locally on the three station Lake Jocassee seismographic network, and regionally on seismic stations in South Carolina, North Carolina, Georgia, Tennessee, and Virginia. During the period (August 26, 1979 September 15, 1979) 26 aftershocks were recorded and they ranged in magnitude from -60 to 2.0.

A list of earthquakes in the region is provided in Table A-9.

2.5.2.2 Geologic Structures and Tectonic Activity

The region (defined as North Carolina and South Carolina, and parts of Georgia, Alabama, Tennessee, and Virginia) is comprised of three large northeast-southwest trending tectonic zones: The coastal plain, the crystalline-metamorphic zone and the overthrust zone.

The site is located nearly in the center of the crystalline-metamorphic zone, which consists of six generally recognized metamorphic belts. From southeast to northwest these are: The Carolina slate belt, Charlotte belt, Kings Mountain belt, Inner Piedmont belt, Brevard belt, and Blue Ridge belt. The site location is within the Inner Piedmont belt. The rocks in the belts consist of metamorphosed sediments and volcanics that have been folded, faulted, and intruded with igneous rocks. These belts are delineated by differing degrees of metamorphism. Generally, the degree of metamorphism becomes progressively less from the northwest to the southeast.

The oldest metamorphic rocks are located in the Blue Ridge belt. The more easterly belts of younger rocks have undergone progressively less metamorphism.

To the north and west are found a series of fault systems. Since these faults are both numerous and extensive, they can be grouped together and referred to as the overthrust zone. These faults no doubt resulted from the formation of the Appalachians.

The great system of thrust faults in the overthrust zone and most of the known faulting within the crystalline-metamorphic zone apparently occurred during the last period of metamorphism (260 million years ago).

During the Triassic Period (180 to 225 million years ago), sediments were deposited over parts of the exposed metamorphic belts. These deposits and the older metamorphics were intruded by a system of northwest-trending diabase dikes and were faulted by northeast-trending normal faults in the late Triassic Time (200 million years ago). Some of the older faults within the crystalline-metamorphic zone may have been active at this time.

From the late Triassic time until the present, the coastal plain has accumulated a sedimentary cover over its crystalline-metamorphic bedrock. These sediments overlap the bedrock and thicken toward the southeast, effectively masking any ancient faulting.

It is considered possible that igneous activity has occurred in the region after the Triassic because volcanic bentonitic clays of Eocene (approximately 50 million years ago) and possible Miocene age (12 million years ago) have been mapped in the sediments of the coastal plain in South Carolina. The source of this volcanic activity is presently unknown.

Faulting: The names, distances and directions from the proposed site, and the probable age of the known faulting in the region are as follows:

Name	Distance-Direction Form Site	Probable Age Millions of Years
Brevard Fault	11 Miles NW	260
Dahlonega Fault	40 Miles W	260
Whitestone Fault	47 Miles NW	260
Towaliga Fault	90 Miles S	260
Carterville Fault	104 Miles W	260
Gold Hill Gault	115 Miles E	260
Goat Rock Fault	140 Miles SW	260
Triassic, Deep River Basin, N.C. and S.C.	140 Miles E	200
Triassic, Danville Basin, N.C.	145 Miles NE	200
Crisp and Dooly Counties, GA.	190 Miles SW	12 to 70
Probable Triassic Basin Charleston, S.C.	200 Miles SE	200

The first seven faults are all associated with the last metamorphic period. The Brevard, Whitestone, Dahlonega, and Cartersville faults apparently form an interrelated system. This system separates the eastern metamorphic belts from the Blue Ridge metamorphic belt and the overthrust zone on the west.

The Towaliga, Goat Rock, and Gold Hill Faults, and the Kings Mountain belt apparently form another interrelated alignment within the eastern metamorphic belts. The Kings Mountain belt is not considered a fault. Its association and alignment in relation to the three known faults mentioned and the location of earthquake epicenters within the area bounded by these features, lead to the conclusion that these features form an interrelated alignment.

There is no surface indication that any of these three faults have been active since the Triassic Period (200 million years).

Two fault locations in the region have been thoroughly investigated by borings. These are the Cartersville fault near the Allatoona Dam, and the Oconee-Conasauga fault in Georgia. These faults were found to be completely healed and not to have moved in many millions of years.

The Triassic basins of the Carolinas and further north may be due to the release of the compressional forces which formed the Appalachians. These basins are down-faulted grabens which are filled with

Triassic sediments. Two earthquakes in the vicinity of McBee, South Carolina, may be related to an extension of a Triassic basin which has been inferred in the Chesterfield-Durham area.

Some faulting within the tertiary sediments in Dooly, Crisp, and Clay Counties, Georgia, has been mapped. The true aerial extent of this faulting is unknown. This faulting apparently ranges from Cretaceous to possibly Miocene in age (70 to 12 million years).

The earthquake activity near Charleston, South Carolina, may indicate an active fault in that region. However, no evidence of surface faulting has been found.

2.5.2.3 Correlation of Earthquake Activity with Geologic Structures or Tectonic Provinces

The region surrounding the Oconee Station site can be divided into three major areas on the basis of the regional tectonics and the seismic history. These major seismic areas are:

1. the overthrust zone and Blue Ridge metamorphic belt;
2. the crystalline-metamorphic zone, exclusive of the Blue Ridge belt; and
3. the coastal plain.

The greatest number of recorded shocks have occurred within the overthrust zone and the Blue Ridge metamorphic belt northwest of the Brevard, Whitestone, Dahlonega, and Cartersville fault system. The epicenters in this area are generally widely scattered.

There have been a small number of earthquakes within the crystalline-metamorphic zone, exclusive of the Blue Ridge metamorphic belt. These earthquakes, extending from central Georgia to North Carolina, may be associated with the Towaliga, Goat Rock, Gold Hill, Kings Mountain alignment.

The coastal plain has experienced few earthquakes outside of the Charleston area. Four shocks, at Wilmington, North Carolina and Savannah, Georgia, have occurred but are unrelated to any known faulting, although the Wilmington shocks were adjacent to the Cape Fear Arch.

The only earthquake which does not closely fit this system of seismic areas is the 1924 shock in Pickens County, South Carolina (MM V Intensity). However, it is likely that this earthquake is associated with the overthrust-Blue Ridge seismic area.

2.5.2.4 Maximum Earthquake Potential

The assignment of probable future earthquake activity can only be based upon the previous record and the known geology of the area. Although the seismic history of the region is fairly short, a reasonable picture of the seismicity of the area becomes apparent from a study of the epicenter locations and the regional tectonics.

There are three significant zones of seismic activity in the general vicinity of the site; the Brevard and related faults zone, the overthrust zone, and the Towaliga, Goat Rock, Gold Hill, Kings Mountain alignment.

An evaluation of the earthquake activity and the regional geology can result in the selection of a series of maximum-sized shocks which are likely to occur in these various areas. Conservatively, it can be assumed that the previous maximum-sized shock on a particular fault zone can occur during the economic life of the power station and Oconee Site-Specific ISFSI at perhaps the nearest approach of the particular fault system to the site.

Zone	Location	(MM) Intensity at Epicenter	Estimated Magnitude (Richter)
Brevard Fault Zone	11 Miles NW	VI	Less than 4 ½ to 5
Overthrust	75 Miles NW	VIII	Less than 5 ½ to 6
Towaliga, Goat Rock Gold Hill, Kings Mountain Alignment	30 Miles SE	VII – VIII	Less than 5 ½ to 6

2.5.2.5 Seismic Wave Transmission Characteristics of the Site

Static and dynamic engineering properties of the soil and rock materials that underlie the general plant site area are discussed in Section 2.5.4 of the Oconee UFSAR. Design response spectra that include considerations of the thickness and distribution of these materials are discussed in Section 2.5.2.8 of the Oconee UFSAR.

2.5.2.6 Maximum Hypothetical Earthquake (MHE)

The MHE acceleration value is 0.15 g for structures founded on overburden. The design response spectra are covered in Section 2.5.2.8.

2.5.2.7 Design Base Earthquake

It is considered likely that the shocks listed in Section 2.5.2.4 could occur no closer than the indicated distances from the site during the life of the planned facilities. Since the magnitudes of these shocks are fairly small, the distance from the epicenter becomes extremely important. Ground accelerations would diminish rapidly with the distance from the epicenter. Although larger earthquakes occur within other fault zones, the highest ground accelerations at the site would be experienced from an earthquake along the Brevard fault zone. The assumption of a shock of less than Richter Magnitude five occurring along the Brevard fault zone at its closest location to the site (11 miles), would give ground motions on the order of five percent of gravity at the site. Vertical ground accelerations, as contrasted to the horizontal accelerations, would be only slightly less than five percent of the gravity in the competent rock at the site.

2.5.2.8 Design Response Spectra

The Oconee UFSAR provides that the maximum ground acceleration for structures founded on over burden (MHE) is .15g (Section 2.5.2 and Figure 2-51 of the Oconee UFSAR). The accelerations considered and used for the design of the NUHOMS®-24P system envelope the MHE acceleration (Reference 6).

2.5.3 Surface Faulting

This information is discussed in Sections 2.5.1 and 2.5.2.

2.5.4 Subsurface Materials

2.5.4.1 Exploration

A grid pattern of borings was established to provide the maximum amount of information for determining the foundation and soil conditions and permit flexibility in final Oconee Site-Specific ISFSI layout, alignment, and elevation.

The general site area is shown on Figure B-12 and the site and boring layout is shown on the Boring Plan, Figure B-13.

The drilling, sampling, and rock coring were performed in accordance with methods specified by the American Society for Testing and Materials:

1. "Penetration Testing and Split Barrel Sampling of Soils" - D-1586-64T
2. "Diamond Core Drilling for Site Investigation" - D-2311-62T
3. "Thin Walled Tube Sampling of Soils" - D-1587-63T

Boring logs are given in Figure B-14 through Figure B-27.

2.5.4.2 Groundwater Conditions

Section 2.4.7 provides a discussion of the existing groundwater conditions at the Oconee site.

It is believed that the removal of the overburden due to construction of the Oconee Site-Specific ISFSI has had little, if any, effect on the water table. If the water table elevation did change, it is believed that it would be a slight drop. The elevation of the water table at the ISFSI site when constructed varied from elevation 797 feet at the south end to elevation 822 feet at the north end.

Hydrostatic uplift will not occur during the life of the ISFSI because the foundation of the HSMs and associated pavement is at or above the water table. There may be some seepage through the cut into the hillside; however, adequate drainage is provided around the ISFSI site to carry away seepage.

At the south end of the ISFSI site, the elevation of the water table is far below the foundation of the HSMs. At the north end, the foundation of the HSMs will be near the water table elevation. However, the HSM structure at the north end of the ISFSI site is partially founded on rock. Therefore, there will be no reduction of shear resistance due to potential seepage along the bedding.

2.5.5 ISFSI Foundation

A specific soil testing (results and locations presented in Section 2.5.4) and foundation evaluation has been performed at the Oconee Site-Specific ISFSI site to assist in the development of the insitu static soil bearing pressure. Fourteen (14) soil borings were taken in and around the ISFSI site. The location of these borings is shown in Figure B-13. A line of boring was taken along the length of the future foundation of the HSMs. From these borings several undisturbed samples were taken. Several tests, including the triaxial shear test, were performed on selected undisturbed samples. The results from the triaxial shear test provided essential information used to determine the ultimate and allowable bearing capacity. (The triaxial shear tests were performed in accordance with the Corps of Engineers Manual EM10-2-1906, Appendix 10).

After inspection of the boring logs, soil samples, and tests, the worst case soil data were selected and used in the Meyerhoff bearing capacity equation to determine the ultimate soil bearing capacity, which is approximately 12.0 kips/square foot. To obtain the allowable static soil bearing capacity, a factor of safety of 3.0 was applied to the ultimate capacity, which yields the allowable bearing pressure of 4.0 kips/square foot (Reference 9).

The largest applied static bearing pressure was calculated by first determining the dead weight of the HSM with a fully loaded DSC and then dividing by the area of the foundation. This maximum applied static bearing pressure was computed to be 3.3 kips/square foot, which is less than the allowable soil bearing pressure of 4.0 kips/square foot.

As shown by the boring logs, the HSM foundation will to a large degree rest entirely on either firm soil or partially weathered rock with penetration blow counts ranging from n = 12 to refusal. A conservative analysis was performed to determine the worst-case settlement of an HSM array. Both a 2x3 array and a 2x10 HSM array were considered. This analysis indicates that the worst-case differential settlement will cause the 2x10 HSM array to experience a differential settlement of about 3.0 inches along the North-South axis. Differential settlement in the East-West direction will be negligible.

These settlements are accounted for in the foundation design. The foundation was analyzed as a finite module using the computer code McAuto STRUDL (Reference 7).

This computer code models settlements by the use of calculated soil springs which provide consideration for the settlements. Considering the small magnitude of this settlement, the integrity and radiological shielding of the HSM will not be adversely impacted. The foundation structure consists of a 3 ft. reinforced concrete mat. Typical HSM reinforcement is shown in Figure 8.1-9 of Reference 6.

The limiting calculated maximum stresses and allowable stresses for loadings as defined by Reference 6 envelope the site foundation stresses for the Oconee ISFSI site. These forces are for the accident condition assuming blocked vents and bound all other loading combinations.

2.5.6 Liquefaction

Potential liquefaction of soils under the Oconee Site-Specific ISFSI foundation area is not a concern because all of the foundation materials are non-liquefiable. The three foot thick concrete mat bears entirely on either firm soil or partially weathered rock having Standard Penetration Test blowcounts ranging from N = 12 to refusal. Figure B-28 shows the longitudinal profile of the ISFSI foundation level in relation to both the original ground and to partially weathered rock, based on site borings.

2.5.7 Slope Stability

The Oconee Site-Specific ISFSI site includes cut slopes along both sides of the ISFSI site access road, and along the west, north, and northeastern sides of the ISFSI site as shown in Figure B-12. Fill slopes are located along the southeastern and south sides of the ISFSI site. The maximum vertical cut is approximately fifty feet and the maximum vertical fill is approximately ten feet. The maximum ISFSI slope is two horizontally to one vertically.

The stability of slopes associated with the ISFSI site was modeled by a program that utilizes the circular arc analysis method of slices. The program postulates a failure arc through the soil embankment or foundation, computes the soil mass driving moment and the soil mass resisting moments associated with the postulated failure arc, and then determines the resulting safety factor by dividing the total resisting moment by the total driving moment. The computer program allows the computation of a large number of safety factors associated with many postulated failure arcs (Reference 8).

The slope stability analyses were performed using the maximum ISFSI site slope of two horizontal to one vertical. Actual site soil engineering parameters, based on laboratory testing of soil samples, were determined. (Reference the site boring records presented in Figure B-14 through Figure B-27). The Seismic Design Input Criteria specified in Section 3.2.3.1 were used as input in determining the seismic behavior of the ISFSI site slopes.

The minimum safety factors calculated for any postulated failure arc of the vertical cut and fill slopes of the ISFSI site are as follows:

Slope Loading Condition	Minimum Calculated Safety Factor
55 feet vertical cut slope, static	1.62
55 feet vertical cut slope dynamic	1.22
10 feet vertical fill slope static	2.06
10 feet vertical fill slope dynamic	2.03

Therefore, the stability of the ISFSI site slopes is ensured since the minimum safety factor is greater than 1.0 for all slopes for all analyzed conditions.

2.6 References

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3.0 Principal Design Criteria

3.1 Purpose of the Oconee ISFSI

The purpose of the Oconee Site-Specific ISFSI is to insure the uninterrupted operation of the three unit Oconee Nuclear Station by providing additional long-term spent fuel storage capacity. Prior to the storage of spent fuel in the ISFSI, the existing storage system consisted of two separate wet spent fuel pools that were rapidly approaching a maximum operating inventory. The Oconee Site-Specific ISFSI utilizes the NUHOMS®-24P System. NUHOMS®-24P is comprised of a series of reinforced concrete HSMs which will each house a stainless steel, helium filled DSC containing 24 qualified spent fuel assemblies. The DSC top inner and outer top cover plates are both independently seal welded to provide total confinement of the irradiated fuel. A shielded transfer cask is used to transfer the DSC to the HSM from the spent fuel pool. During storage, the HSM provides radiation shielding and passive decay heat removal from the DSC.

3.1.1 Material to be Stored

Each DSC is capable of storing 24 PWR assemblies. The following subsections will address the physical, reactivity, thermal and radiological characteristics of spent fuel to be stored in the DSC.

3.1.1.1 Physical Characteristics

The physical characteristics of the reference 15 x 15 fuel are listed in Table A-10. Additional information may be found in the Oconee UFSAR, Chapter 4.

3.1.1.2 Reactivity Characteristics

The reactivity of the spent fuel assemblies must be limited for criticality control purposes. Reactivity is a function of both the initial enrichment and the discharge burnup. Reactivity equivalence curves which show the acceptable combinations of initial enrichment and discharge burnup are given in Figure B-48. For criticality control, the spent fuel assemblies must fall into the acceptable range above the initial enrichment/burnup curve in order to qualify for storage in the DSC (see Section 10.2.5.1). Despite the multiple verification steps and extensive administrative controls used to assure selection of qualified irradiated fuel assemblies, criticality control for a misloaded array of unirradiated fuel is maintained by assuring that the DSC is filled with borated water (≥ 1810 ppm boron) and submerged in a borated water spent fuel pool (≥ 1810 ppm boron) during loading and unloading operations.

In the event that unqualified IFAs or other unirradiated fuel assemblies are erroneously placed in the DSC, the double contingency principle is applied such that the negative reactivity worth of 1810 ppm soluble boron in the spent fuel pool water (from which the DSC cavity will be filled initially) is sufficient to maintain k-eff below 0.95 (0.98 under optimum moderator conditions) even for 24 fresh fuel assemblies enriched to 4.0% wt. U-235. Further margin is available since the Oconee spent fuel pools are maintained at approximately 2000 ppm, or greater, and the DSC cavity is filled with water from the spent fuel pool prior to fuel loading.

3.1.1.3 Thermal Characteristics

The heat generation is limited to 0.66 kw per fuel assembly. This value is based on storage of 24 assemblies per DSC with a nominal burnup of 40,000 MWD/MTU, an initial enrichment of 4.0 wt % U-235 and a nominal decay period of ten years. Other combinations of burnup, initial enrichment and cooling times may also be acceptable upon further analysis demonstrating acceptable decay heat levels.

3.1.1.4 Radiological Characteristics

The DSC is designed for a maximum dose rate of 200 mr/hr at the surface of the top (with temporary neutron shielding if necessary during welding operations) and bottom end shield plugs. The HSM is designed for an average dose rate of 20 mr/hr at the surface of the module dropping down to a negligible level at the site boundary. Fuel with a maximum burnup of 40,000 MWD/MTU, an initial enrichment of 4.0 w/o U-235 and a decay of ten years will not exceed these dose values. Other combinations of burnup, initial enrichment and cooling times may also be acceptable upon further analysis demonstrating acceptable radiation dose rate levels.

3.1.2 General Operating Functions

3.1.2.1 Overall Functions of the Facility

The Oconee Site-Specific ISFSI is designed to maximize the use of existing site features and equipment and minimize the need to add or modify equipment. The storage facility is located within a fenced area inside the ONS plant protected area. The only services required from the station during the ongoing storage mode is through security surveillance equipment tied in with the plant security center. The storage facility is included in a routine daily surveillance. Power supply to the storage facility is retail. Support services from the plant are necessary only during loading (and unloading) operations.

Following periodic delivery of the individual DSCs and construction of the HSMs, the DSC is loaded into the transfer cask and the two are lowered into the spent fuel pool. The DSC/transfer cask is loaded with 24 spent fuel assemblies previously selected per criteria given in Section 10.3. Once fuel loading is complete, the DSC is fitted with its top end shield plug and pulled out of the pool. The water level in the DSC is then lowered slightly and the top end shield plug is welded into place. This is followed by further draining and eventual vacuum drying of the DSC cavity. The cavity is then back-filled with helium followed by further seal welding of both penetrations. An additional cover plate is welded over the top end shield plug, the cask lid bolted in place, and the transfer cask is then lowered to the transfer trailer and rotated to the horizontal position. Transfer from the spent fuel pool receiving area to the ISFSI is done with the use of a separate towing vehicle. The transfer trailer is then carefully aligned with the opening in the HSM, and the cask is docked to the HSM and secured in place. The hydraulic ram system then is used to push the DSC out of the transfer cask and into the HSM. This method utilizes a small penetration at the bottom of the transfer cask to allow access to the DSC through the transfer cask bottom. A large access door is then lowered and tack welded in place to close off the HSM access.

The HSMs are constructed on a level, reinforced concrete slab designed for normal transfer and storage conditions and postulated accidents.

Once loaded and secured, the passive design of the HSM provides for sufficient radiation shielding, tornado missile protection, and decay heat removal capabilities for the stored spent fuel. The double seal welded DSC closure system together with multi-pass welding procedures provide a multiple barrier against releases of radioactive material.

A more detailed description of each NUHOMS®-24P system component is provided in the following subsections.

3.1.2.2 Handling and Transfer Equipment

All components of the NUHOMS®-24P system are designed to interface where necessary with all existing Oconee fuel handling/storage equipment and facilities. This includes fuel pool receiving areas, radwaste systems, overhead cranes, yoke and yoke extension, fuel handling bridge and mast, auxiliary hoists, water, power and gas supplies, and clearance restrictions.

The additional equipment required to support the operation of the NUHOMS®-24P system includes the DSC, the transfer cask, the transfer trailer with hydraulic alignment mechanisms, the hydraulic ram assembly, the HSM and various miscellaneous tools, lids, gauges, hoses. Other equipment necessary to operate the system includes a towing vehicle to be used for moving the transfer trailer to and from the ISFSI, and a mobile yard crane for raising and lowering the HSM front access door. This equipment is further described as follows:

1. DSC - The DSC serves as the confinement vessel for the 24 fuel assemblies during both the storage mode and transfer operations. Seal welds on the inner and outer top cover plates provide redundant containment of all radioactive products within or on the surface of the spent fuel assemblies. The top and bottom shield plugs also provide for biological shielding during DSC welding, drying, and backfilling, operations, transport of the fuel assemblies, and during all operations performed at the front end of the HSM.

2. Transfer Cask - The transfer cask provides for dry transfer of the DSC from the Oconee fuel storage pool to the storage facility. The transfer cask utilizes a lead gamma shield and a solid neutron shield to maintain acceptable surface dose levels during transfer operations. A removable access plate at the bottom of the cask provides access to the DSC by the hydraulic ram during transfer of the DSC into or out of the HSM. The cask has a bolt on closure lid to keep the DSC in place during cask movement. Lift trunnions are provided at the top end of the transfer cask to interface with a lift yoke which will in turn interface with the spent fuel pool overhead crane. These top lift trunnions together with bottom trunnions provide cask support on the trailer during transfer operations.

3. Transfer Trailer - The transfer trailer allows for movement of the entire DSC/transfer cask assembly to the ISFSI. It is designed with a positioning mechanism that moves the cask in the horizontal and vertical directions to ensure alignment with the HSM. Final alignment accuracy is verified by an optical alignment system.

4. Hydraulic Ram - The hydraulic ram assembly is mounted on the transfer trailer. The ram is aligned with the bottom access portal of the horizontally positioned cask and engaged to slowly push the DSC from the cask into the HSM. A grappling ring on the bottom of the DSC and grappling arms on the hydraulic ram allow for eventual retrieval of the DSC using the same operations in reverse.

5. Horizontal Storage Module (HSM) - The HSM provides protection for the DSC during the storage mode and provides sufficient biological shielding from the stored spent fuel. Passive decay heat removal results from air entering shielded air ducts near the bottom of the structure, passing up and around the DSC and picking up heat before being exhausted through shielded vents at the top of the HSM. The HSM design includes a front access fitted with a carbon steel door and the coupling system for mating with the transfer cask. The HSM is fitted with a set of rails which serve as a bearing surface for movement of the DSC into and out of the module and as the primary support structure for the DSC during storage.

A more detailed description of these primary NUHOMS® components, including design criteria, is provided in Chapter 4.

3.2 Design Criteria for Environmental Conditions and Natural Phenomena

The Oconee Site-Specific ISFSI is designed to perform its intended safety function under normal and extreme environmental conditions. In general, the structural and mechanical safety criteria of the ISFSI are the same as or enveloped by the criteria specified in the NUHOMS®-24P Topical Report.

Details of the HSM lightning protection are contained in Section 8.2. Oconee foundation conditions are described in Section 2.5

3.2.1 Tornado and Wind Loadings

3.2.1.1 Applicable Design Parameters

The Oconee Site-Specific ISFSI was constructed within the existing boundaries of the Oconee Nuclear Station. As stated in Section 3.2.1 of Reference 1 the most severe tornado and wind loadings specified by NRC Regulatory Guide 1.76 and NUREG-0800, Section 3.5.1.4, were selected for design consideration. Therefore, both the HSM and the transfer cask are designed in accordance with NRC Regulatory Guide 1.76 and NUREG-0800, Section 3.5.1.4.

As stated in Section 3.2.1.1 of Reference 1, "... the maximum wind speed is 360 miles per hour, the rotational speed is 290 miles per hour, the maximum translational speed is 70 miles per hour, the radius of the maximum rotational speed is 150 feet, the pressure drop across the tornado is 3.0 psi, and the rate of pressure drop is 2.0 psi per second."

3.2.1.2 Determination of Forces on Structures

The tornado loading combination used for design of the HSM is:

$y = 1/\varnothing\ (1.0D + 1.0L + 1.0T_o + 1.0W_t + 1.0P_j)$

Where

Y	= required yield strength of the structure
$\varnothing$	= concrete capacity reduction factor
$\varnothing$	= 0.90 for concrete flexure
$\varnothing$	= 0.85 for shear in concrete
$\varnothing$	= 0.90 for axial tension in concrete
$\varnothing$	= 0.70 for tied compression members
$\varnothing$	= 0.90 for fabricated structural steel
T_o	= normal operating temperature
L	= live loads on structure
D	= dead loads of structures and equipment
W_t	= stress induced by design tornado wind velocity (drag, lift, and torsion)
P_I	= stress due to differential pressure

Shape factors will be applied in accordance with ANSI A 58.1 - 1982.

3.2.1.3 Tornado Generated Missiles

As described in Section 3.2.1.2 of Reference 1, the determination of impact forces created by Design Basis Tornado (DBT) generated missiles for the HSM was based on the criteria provided by NUREG-0800, Section 3.5.1.4, III.4. Accordingly, three types of missiles were postulated. The velocity of the missiles was conservatively assumed to be 35 percent of the combined translational and rotational velocity for the DBT or (0.35)(360), which is 126 miles per hour. For the massive high kinetic energy deformable missile specified in NUREG-0800, a 3,967 pound automobile with a 20 square foot frontal area impacting at normal incidence was assumed. For the rigid penetration-resistant missile specified, a 276 pound, eight-inch diameter blunt-nosed armor piercing artillery shell, impacting at normal incidence was assumed. For the protective barrier impingement missile specified, a one-inch diameter solid steel sphere was assumed.

The possibility of a tornado damaging a transfer cask/DSC in transit to the HSM is a low probability event. The probability of a tornado occurring at the Oconee site and generating a missile that impacts the cask is less than 1×10^{-7} per transfer trip. This is based on site-specific tornado frequencies derived from 35 years of National Severe Storm Forecasting Center data and assumes a conservative exposure time to DBT effects of 24 hours. However, the transfer cask has been evaluated for the tornado wind speed and missiles specified for the HSM. The maximum DBT tornado wind speed of 360 mph produces a design pressure of 304 psf. The 3,967 pound automobile and 276 pound eight inch diameter shell missiles are also considered. The one inch diameter spherical missile effects are enveloped by the eight inch shell missile.

3.2.1.4 Ability of Structures to Perform

The Oconee Site-Specific ISFSI is designed to withstand the design basis tornado wind loads. All components of the ISFSI with the exception of the air outlet shielding blocks of the HSM are designed to withstand the tornado generated missile forces as described in Section 8.2.2 of Reference 1. The loss of the air outlet shielding blocks is discussed in Section 8 of the NUHOMS®-24P Topical Report. The HSM is anchored to the foundation slab to mitigate overturning and sliding effects using dowel rods of a size and spacing consistent with the HSM wall vertical reinforcement.

The possibility of total air inlet and outlet blockage by foreign objects or burial under debris during a tornado event is considered. The effect of facility burial under debris is presented in Section 8.2 of Reference 1.

The transfer cask analysis for tornado wind speed and missile effects was performed for the cask secured in the horizontal position on the support skid and transfer trailer. The following criteria were used to evaluate the adequacy of the transfer cask for the loads described in Section 3.2.1.3.

1. Stability
2. Penetration Resistance
3. Stresses

The main components of the transfer cask considered in this analysis were the structural shell, and the top and bottom cover plates. Since the primary purpose of the solid neutron shield is biological shielding and since it is located on the cask exterior, it was conservatively assumed that the neutron shield will be ruptured by a DBT missile strike and therefore was not considered in the structural analysis. A brief description of the analysis follows.

1. Stability Analysis

   A stability analysis for the transfer cask mounted on the skid/trailer assembly was performed for the wind pressure loads and the massive missile impact.

   For the wind pressure loads, the overturning moment was compared to the stabilizing moment to determine the factor of safety against overturning. A factor of safety of 3.1 was calculated.

   For the massive missile impact, it was conservatively assumed that the missile impacts the uppermost part of the cask. The angle of rotation (θ) of the cask/skid/trailer arrangement at impact was calculated as 3.0 degrees assuming a rigid pavement. This calculation was based on the conservation of angular momentum, and also compared to the angle (θ_{tip}) necessary for the cask/skid/trailer to tip over. Tip-over occurs when the center of gravity of the cask is directly above the point of rotation. This was calculated as 32.7 degrees. Since $\theta < \theta_{tip}$, tip-over does not occur and the stability of the cask/skid trailer arrangement is maintained.

2. Penetration Analysis

Penetration due to the 276 pound rigid missile was calculated using two formulas obtained from the literature. The added energy absorbing affect of the neutron shield material was omitted from this calculation to give a more conservative result. The first approach, suggested by Nelms (Reference 4) is for a lead-backed shell:

$$T = \left[\frac{KE}{2.4\,S_u D^{1.6}}\right]^{0.71} = 0.50 \text{ inches}$$

Where:

T	= Minimum required steel plate or shell thickness to resist penetration
KE	= Kinetic energy = 1/2 mV^2
M	= Mass of missile = 276/g
	= 0.714 lb. sec^2/in.
V	= Velocity of missile
	= 2,218 in./sec.
S^u	= Ultimate strength of cask structural shell = 70,000 psi
D	= Diameter of missile = 8.0 inches

The second formula used was developed by the Ballistic Research Laboratory (Reference 5):

$$T = \frac{KE^{2/3}}{672D} = 0.52\text{inches}$$

Where:

KE	= Kinetic energy = 1/2 mV^2
M	= Mass of missile
	= 8.57 lb. sec.^{2}/ft.
V	= Velocity of missile
	= 184.8 ft./sec.
D	= Diameter of missile = 8.0 inches

Both methods produce a consistent result which shows a predicted penetration of 0.5 inches compared to the minimum structural shell thickness of 1.5 inches. Therefore the DBT missile will not penetrate the cask and the DSC will remain intact.

3. Stress Analysis

Conservative hand calculations were performed to determine the peak stresses in the cask shell, and the top and bottom cover plates due to DBT loads. A summary of the stress results is provided in the attached Table A-11. The analytical method for each of the load cases shown in this table is briefly described below.

a. Wind Pressure Loads: A uniform line load of 2.18 Kips/ft. was applied to the full length of the cask. The correlation of Roark and Young (Reference 6) Table 31, Case 9c was conservatively used to calculate membrane and bending stresses. The analyses of the three inch top and two inch bottom cover plates were performed using Case 10, Table 24 of Roark and Young. The top cover plate was assumed pinned at the edges while fixed edge supports were assumed for the bottom cover plate.

b. Massive Missile Impact: Based on the conservation of angular momentum, the total force on impact was calculated to be 257 kips. This force was applied as a line load to the cask shell and as a pressure load to the top and bottom cover plates. The analysis method followed that described above for the wind pressure loads.

c. Penetration Resistance Missile: The impact force due to the eight inch diameter, 276 pound missile was calculated from the conservation of momentum as 63.4 kips. Case 9a, Table 31 of Reference 6 was used to calculate the membrane and bending stress for the cask shell while Cases 16 and 17, Table 24 of Reference 6 were used to calculate the stresses in the top and bottom cover plates respectively.

3.2.2 Water Level (Flood) Design

The grade level of the Oconee Site-Specific ISFSI is El 825.0. This elevation is 11.9 ft. higher than the calculated maximum flood water elevation at Oconee due to a postulated breach of the upstream Jocassee Dam (See Section 2.4.5.1).

3.2.3 Seismic Design

3.2.3.1 Input Criteria

The maximum horizontal and vertical ground acceleration (Maximum Hypothetical Earthquake - MHE) specified for the Oconee site is .15g (Section 2.5.2.8 of the Oconee UFSAR). The Oconee site accelerations are less than the analyzed values of .17g vertical and .25g horizontal used for NUHOMS® components (Reference 1) and thus are enveloped by the generic NUHOMS® analysis.

The Oconee HSMs were designed using the seismic criteria from Reference 1. As stated in Section 3.2.3 of Reference 1, "The maximum horizontal ground acceleration component selected for design of the NUHOMS®-24P was 0.25g. The maximum vertical acceleration component selected was two-thirds of the horizontal component which is 0.17g. In order to establish the amplification factor associated with the generic design basis response spectra, various frequency analyses were performed for the different NUHOMS®-24P components and structures. The results of these analyses indicated that the dominant lateral frequency for the reinforced concrete HSM was 25 Hertz. The corresponding horizontal seismic acceleration used for design of the HSM was 0.32g. Conservatively assuming that the dominant HSM vertical frequency is also 25 Hz. produces a vertical seismic design acceleration of 0.22g."

The effects of a seismic event occurring during the transport of a loaded DSC resting inside the NUHOMS®-24P transfer cask and secured to the transport skid/trailer was postulated. This load case is conservatively enveloped by the postulated normal transport load accelerations of ±0.5g acting in the vertical, axial, and transverse directions, applied simultaneously at the center of gravity of the transfer cask, as specified in Section 8 of Reference 1. These accelerations envelope those which would result from a seismic event in the highly unlikely event that a design basis earthquake would occur during transport of the loaded DSC to or from the HSM.

3.2.3.2 Seismic System Analysis

The stresses in the Oconee Site-Specific HSMs and the DSCs due to the .15g horizontal and vertical motion for the MHE are enveloped by the results of the generic seismic analysis reported in the NUHOMS®-24P Topical Report (Reference 1). The maximum HSM reinforced concrete bending moments and shear forces in Table 8.2-3 of Reference 1 envelope the seismic loads at Oconee.

The foundation of the HSM is also designed to withstand the forces generated by the MHE (See Section 2.5.5).

3.2.4 Snow and Ice Loads

The NUHOMS®-24P Topical Report specified a postulated live load of 200 pounds/ft^2 which conservatively envelopes the maximum snow and ice loads for the Oconee site.

3.2.5 Combined Load Criteria

Load combination criteria established in the NUHOMS®-24P Topical Report for the HSM, DSC and DSC support assembly meet or envelop the load combinations required by the Oconee UFSAR Section 3.8.

The HSM analyses summarized in Reference 1 considered combinations of HSMs ranging from a single stand-alone module up to the maximum array size of 2x10. The finite element models used in the analyses are applicable to both side-by-side or back-to-back arrangements. Different DSC loading patterns were analyzed for each size of array to establish the worst case design loadings.

The analyses showed that the single HSM provides the governing case for load combinations containing tornado wind and missile loads, seismic loads and flooding conditions. The postulated failure mode for each of these cases is sliding or overturning of the HSM unit. The analyses also showed that the thermal loads for a 2x10 array control the reinforcement requirements for the walls, roof and foundation members for all intermediate array sizes.

Therefore, Reference 1 presents a design configuration which envelopes the loads from a single HSM to a 2x10 array.

3.3 Safety Protection System

3.3.1 General

The Oconee Site-Specific ISFSI is designed for safe and secure, long-term containment and storage of IFAs. The major components which assure that the safety objectives are met are listed in Table A-12. The major procedures which require special design consideration are:

1. Double Closure Seal Welds on DSC Ends
2. Radiation Exposure During DSC Closure and Drying Operations
3. Minimization of Contamination of DSC Exterior by Pool Water
4. Minimization of Radiation Exposure During Transfer of the DSC from the Transfer Cask to the HSM

These items are addressed in the following subsections.

3.3.2 Protection By Multiple Confinement Barriers and Systems

3.3.2.1 Confinement Barriers and Systems

The Oconee Site-Specific ISFSI design incorporates multiple confinement barriers to ensure there will be no release of airborne radioactive effluent to the environment. The radioactivity which must be confined is from the IFAs themselves and DSC exterior contamination from IFA loading operations in the spent fuel storage pool. ISFSI multiple radioactivity confinement barriers are listed in Table A-13.

DSC exterior contamination is minimized by preventing spent fuel storage pool water from contacting the DSC exterior. DSC loading procedures (See Section 4.4.1) require that the annulus between the transfer cask and DSC be filled with demineralized water and sealed prior to immersion in the spent fuel pool. Annulus sealing is accomplished by an inflatable seal between the transfer cask and DSC. The combination of the above operations provides assurance that the DSC exterior surface has less residual contamination than required for shipping cask externals (i.e., 10CFR 71.87(i)(1)). A surface swipe of the DSC exterior is taken while it is in the cask decontamination pit to assure this level of contamination is not exceeded.

The annulus seal is an inflatable fabric reinforced elastomeric tube. An automotive-type valve stem permits inflation to approximately 25 psig. This design can accommodate the maximum variation in the annulus width (.5 to 1.5" at the cask flange). The seal is placed in the annulus and inflated prior to immersion in the fuel pool. It remains in place at least through the completion of top end shield plug decontamination. The seal may remain in place until just prior to DSC seal welding. The seal is then stored for future use, or discarded if it has become damaged.

The function of the annulus seal is to minimize the potential for DSC and cask contamination during fuel loading. It is not intended to be a "safety protection system" for the NUHOMS® system. The seal provides an added assurance that minimizes the potential spread of contamination and therefore reduces personnel radiation exposures. The NUHOMS® system will safely function with or without the seal, and as such, its correct placement and operation are not critical to the safety of the system. In the event that the seal should fail, the water filled annulus will minimize the spread of contamination below the top of the DSC. Should the DSC surface become contaminated, clean demineralized water will be flushed through the DSC/transfer cask annulus until surface smears show that the contamination levels meet Technical Specification limits.

Transfer cask external contamination will also be controlled to minimize personnel radiation exposure and potential off-site radiological releases during cask handling operations outside the spent fuel pool. 49CFR 173.443(d), which governs contamination levels for off-site shipment in a closed, exclusive use vehicle, will be used as a guideline for establishing cask release limits.

Containment of radioactive material associated with IFAs is provided by fuel cladding, the stainless steel DSC body, and double seal welded primary and secondary closures. These multiple confinement barriers assure that any accidental radioactive releases from stored IFAs to the environment will be ALARA.

3.3.2.2 Ventilation - Offgas

The design of the Oconee Site-Specific ISFSI limits the temperature history of stored fuel rods, such that no fuel damage will occur under design basis conditions. Decay heat dissipation is discussed in Section 1.2.3.2 of this UFSAR. ISFSI response to abnormal cooling conditions (i.e. convective air flow blockage conditions) is provided in Chapter 8, of this UFSAR. There are no radioactive effluent releases during normal operations. Additionally, there are no credible accidents which cause releases of radioactive effluent from the DSC. Therefore, there is no offgas system or radiological effluent release monitoring requirement for the ISFSI.

The only offgas concern results from the DSC purge and drying operations. During this operation, the gases purged from the DSC internals are directed to the spent fuel pool HVAC system upstream of the Engineered Safety Feature (ESF) HEPA, and carbon filter units. The purged air and helium are ultimately released from the station unit vent. Potential radiological effluent releases are monitored by both spent fuel storage facility HVAC and unit vent monitors prior to release. This is the same method and system currently utilized for spent fuel shipping cask operations.

3.3.3 Protection By Equipment and Instrumentation Selection

3.3.3.1 Equipment

The transfer cask and DSC are the only equipment considered safety related during normal and off-normal operations. The HSM is not safety related. However, the functions of the HSM are considered important to the safe operation of the Oconee Site-Specific ISFSI. Based on the function, design, and construction, the HSM is classified as a QA Condition 4 structure. The design criteria for all equipment comprising the ISFSI that is classified to be important to safety are summarized in Section 3.4 of this UFSAR. Design code standards for ISFSI components are summarized in Table A-14.

The design criteria for the NUHOMS® reinforced concrete HSM including its foundation and DSC support structure, the DSC and its internal basket assembly, and the transfer cask are provided in Section 3.2 and summarized in Tables 3.2-1 through 3.2-9 of Reference 1.

The Oconee transfer cask lifting yoke and lift extension used for movement of the transfer cask within the fuel building are designed and procured as components important to safety. The lifting yoke and lift extension used in that part of the operation are controlled by 10CFR Part 50 and NUREG-0612 and are designed to ANSI 14.6-1986 criteria for nonredundant yokes.

The vacuum drying system described in Section 4.7.3 of Reference 1 is not safety related. Failure of any part of this system can only result in a delay of operations, and not in a hazardous situation to the public or operating personnel. The welding materials required to make the closure welds on the DSC top end shield plug and top cover plate are purchased to the same ASME Code criteria as the DSC (Section NB Class 2). The actual equipment used for making the closure welds is purchased in accordance with standard industry codes such as ANSI, AWS and AISC.

As noted in Section 4.5.5 of this UFSAR, all other components of the NUHOMS® system, including the transfer cask skid, skid positioning system, and hydraulic ram system are required to perform their function to successfully transfer a DSC to and from the HSM. These systems are described in Reference 1 with the design requirements further delineated in Chapter 4, of this UFSAR. However, the failure of any of this equipment may cause additional operational effort but will not endanger the health and safety of the public or plant personnel. Therefore, these transfer components are not considered to be important to safety and are therefore designed, constructed, and tested in accordance with accepted industry standards.

In addition, the transfer cask, HSM, and DSC have been designed to meet very conservative design criteria including postulated conditions which envelop those which may result from the mechanistic failure of the transfer system equipment. Design conditions such as cask drop accident and jammed DSC have been included even though there is no plausible way for these worst case events to occur. Conservative bounding analyses for these conditions have been performed using minimum material yield strengths, strength reduction factors, and factors of safety in accordance with the stringent requirements of the ASME and ACI Codes. Even when applying these conservative criteria, considerable design margin for these components and structures remains as evidenced by the analysis results comparisons with acceptance criteria contained in Reference 1. Further, these components and structures are fabricated and constructed to the rigorous standards and methods of the ASME and ACI Codes under a 10CFR 50 Appendix B Quality Assurance Program. These include material qualification, welding and nondestructive examination, and strict surveillance and quality control inspection. The resulting high integrity of the Transfer Cask, DSC, and HSM provide more than adequate assurance that the health and safety of the public and plant personnel are protected.

3.3.3.2 Instrumentation

The Oconee Site-Specific ISFSI is designed to maintain a safe and secure, long-term containment and storage environment for IFAs using only totally passive components. Therefore, no safety related instrumentation is required for operation of the facility.

3.3.4 Nuclear Criticality Safety

3.3.4.1 Control Methods for Prevention of Criticality

A combination of DSC fuel basket design and station administrative procedures assure subcritical conditions exist at all times. DSC fuel basket material properties and geometry are established to assure subcriticality assuming a full loading of IFAs with a specified minimum burnup that encompasses the majority of the available spent fuel inventory at Oconee. Oconee administrative procedures assure that only qualified IFAs are loaded for storage in a DSC and that a minimum soluble boron concentration of 1810 ppm is maintained within the DSC basket cavity during underwater loading/unloading operations. IFA qualification for storage in a DSC is determined based on initial enrichment, burnup history and post-irradiation cooling time as governed by Oconee Site-Specific ISFSI Technical Specifications.

IFA qualification requirements are provided in Section 10.2.5 on Administrative Controls. Using special nuclear materials control and accountability (SNMCA) records and the burnup results from the Oconee Operator Aided Computer, the specific data needed to characterize any given spent fuel assembly can be gathered. This includes the initial enrichment, discharge burnup, known cladding defects (if any), current storage location, and cumulative cooling time since reactor discharge. After verifying that all the spent fuel specifications of Reference 2 are met, documentation of individual fuel qualifications will be transmitted to fuel handling personnel. Oconee administrative procedures will require receipt of this qualification documentation, and independent verification of fuel assembly identification numbers prior to loading a given assembly into the DSC. In addition, all assembly serial numbers will be checked following the complete loading of 24 assemblies into the DSC.

The Oconee Site-Specific ISFSI Technical Specifications which govern IFA qualification for storage are given in Reference 2. The administrative procedures outlined above will be used to ensure that the requirements for fuel qualification are met.

IFA qualfication criteria do not include a specification on axial burnup distribution. The axial burnup profile used in analyzing the nonuniform axial burnup reactivity effects on fully loaded DSC spent fuel storage arrays is considered worst-case based on a comprehensive review of axial burnup profiles generated by the EPRI-NODE computer program (reference Section 3.3.4.3 of Reference 1). Although some individual IFAs may not be enveloped by the worst-case axial burnup profile considered, the conservative treatment of nonuniform axial burnup in the Reference 1 analysis and the averaging effects of loading up to 24 qualified IFAs per DSC provide adequate assurance that the K_{eff} of any loaded DSC configuration will not exceed the worst-case value presented in Reference 1.

To satisfy the requirements of 10CFR72.124, ANSI N16.1, and ANSI/ANS-57.9 (that at least two independent and unlikely changes in conditions must occur before criticality could be possible) the DSC is designed to remain subcritical for each of two independent and unlikely events-accidental deboration of the pool water during loading, and accidental loading of unqualified fuel assemblies. In the case of accidental deboration of the pool water, the qualifying burnup of the IFAs assures subcriticality. In the case of accidental loading of unqualified fuel assemblies, the dissolved boron concentration of 1810 ppm assures subcriticality even with 24 fresh fuel assemblies with enrichment of 4.0 weight percent U-235 combined with the effect of water at the optimum density for reactivity.

3.3.4.2 Error Contingency Criteria

The design basis for preventing criticality in Oconee Site-Specific ISFSI spent fuel storage operations is taken from American National Standard Design Requirements for Light Water Reactor Spent Fuel Storage Facilities at Nuclear Power Plants, ANSI/ANS-57.2-1983. ANSI/ANS-57.2-1983 requires a demonstrated margin of subcriticality of ≥0.05 ΔK under all credible conditions except under certain extreme off-normal conditions where a ≥0.02 ΔK subcritical margin may be justified. Additionally, ANSI/ANS-57.2-1983 requires all uncertainties be included in the final calculated K_{eff} value at 95/95 tolerance limits. See Section 3.3.4 of Reference 1 for details on how these criteria are applied in demonstrating ISFSI criticality safety.

3.3.4.3 Verification Analysis

Two criticality analysis methods are used for the two types of storage. The SCALE-3 system of codes is the basis for Single Region Storage while the CASMO-3/SIMULATE-3 package is used for Mixed Region Storage.

3.3.4.3.1 Single Region Storage

The analysis method which ensures criticality safety for the Oconee Site-Specific ISFSI uses the Criticality Analysis Sequence No. 2 (CSAS2) and the 123GROUPGMTH master cross-section library included in the SCALE-3 system of codes (Reference 2). CSAS2 consists of two cross-section processing codes (NITAWL and BONAMI), a 1-D transport code for cell-weighting cross-section data (XSDRNPM), and a 3-D monte-carlo code (KENO-IV) for calculating the effective multiplication factor for a system.

In CSAS2 calculations involving the zero burnup intercept point, cross section processing and cell weighting of cross sections was performed assuming fresh fuel. For CSAS2 calculations involving irradiated fuel, cross section processing and cell weighting of cross sections was performed assuming irradiated fuel actinide and fission product isotopics.

Irradiated fuel fissile nuclide number density data was obtained from CASMO-2 (Reference 4) calculations and input to the CSAS2 criticality code sequence (reference Section 3.3.4.2 of Reference 1). The CASMO-2 lattice physics code has been used extensively in reactor physics calculations. Its ability to accurately predict fissile nuclide depletion and generation as well as neutron multiplication is well established in benchmark calculations (References 5 and 6) and through its successful application in numerous licensed reactor physics and core reload design calculations.

The Shielding Analysis Sequence No. 2 (SAS2) included in the SCALE-3 package of codes was used to develop irradiated fuel fission product number density data for input to CSAS2. SAS2 is an industry recognized code which employs ORIGEN-S to perform fuel burnup, depletion and decay calculations.

A set of 40 critical experiments have been analyzed using the CSAS2/123GROUPGMTH reactivity calculation method to demonstrate its applicability to criticality analysis and to establish method bias and variability. The experiments analyzed represent a diverse group of water moderated, heterogeneous oxide fuel arrays separated by various materials (stainless steel, Boral, water, etc.) that are representative of LWR shipping and storage conditions. The method bias and uncertainty applied in the calculation of the final K_{eff} result is based on CSAS2/123GROUPMTH calculated results for the set of 40 critical experiments summarized in Table 3.3-6 of Reference 1. All 40 critical experiments included in the method benchmark are similar to zero burnup/nominal case flooded DSC conditions in that all are water moderated, low enrichment heterogeneous U02 systems. Additional benchmark calculations were performed to demonstrate that the irradiated fuel criticality/equivalence method used is conservative when compared to the method bias basis U02 benchmark results (i.e., Reference 1 Table 3.3-6 results). CSAS2/123GROUPGMTH benchmark results for systems containing Pu02-U02 mixed oxide fuel pins are provided in Table 3.3-7 of Reference 1. Benchmark data representative of irradiated fuel assemblies was obtained from the results of CASMO-2 infinite lattice criticality calculations; the results of benchmark comparisons between CASMO-2 and CSAS2/CASMO2/SAS2 calculated K_{inf} values are provided in Table 3.3-8 of Reference 1. Inspection of the benchmark results provided in Reference 1 Table 3.3-7 and 3.3-8 demonstrates that the criticality/equivalence method used conservatively overpredicts K_{eff} for systems containing plutonium or irradiated fuel of the type proposed for Oconee ISFSI storage.

Further details on the analysis method and the ISFSI verification analysis are provided in Section 3.3.4 of Reference 1.

3.3.4.3.2 Mixed Region Storage

The criticality analysis performed for the mixed region canister uses the CASMO-3/TABLES-3/SIMULATE-3 code system. CASMO-3 is a multigroup two-dimensional transport theory code for burnup calculations on LWR fuel. The 70-group CASMO-3 cross section library is used for the mixed region criticality analysis. TABLES-3 is a linking code which formats data from CASMO-3 for use in SIMULATE-3. SIMULATE-3 is an advanced two-group nodal code utilizing the QPANDA neutronics model.

Fuel assemblies are first depleted using CASMO-3 modeling normal reactor operating conditions. Restarts are then performed using CASMO-3 to determine the reactivity of the depleted assemblies in the dry storage canister geometry. Since CASMO-3 is a lattice code, its calculations are for single assemblies in an infinite array, which is not representative of the canister geometry. Therefore, CASMO-3 cases are also run to model the exterior of the canister as a reflector region. TABLES-3 is used to manipulate the CASMO-3 assembly and reflector data into a library to allow the nodal code to analyze a wide range of assembly types in the canister. SIMULATE-3 is then executed to calculate k_{eff} of the canister with a variety of different fuel configurations within the canister.

The criticality analysis performed for the mixed region canister uses the reactivity equivalencing technique to ensure sufficient criticality margin. The reactivity of a fully loaded single region canister at the minimum burnup requirements is calculated using SIMULATE-3. This represents a safe and acceptable reactivity level for the canister. Hence, any arrangement of fuel assemblies in the canister whose reactivity is less than or equal to that of the single region canister is also acceptable. The reactivity of the mixed region canister is adjusted by independently varying the burnup and enrichment of both regions until the reactivity of the mixed region canister is equivalent to the single region canister. Several sets of restricted and filler fuel burnup and enrichment requirements are defined by this process. A single set of burnup and enrichment curves for the restricted and filler fuel is selected based on the inventory of fuel in the Oconee spent fuel pools.

3.3.5 Radiological Protection

The Oconee Site-Specific ISFSI is designed to maintain onsite and offsite doses ALARA during loading operations and long-term storage conditions. ISFSI loading procedures, shielding design, and access controls provide the necessary radiological protection to assure radiological exposures to station personnel and the public is maintained ALARA. Further details on collective onsite and offsite doses resulting from ISFSI operations and the ISFSI ALARA evaluation are provided in Chapter 7, of this UFSAR.

Access to the spent fuel assemblies stored in the ISFSI is restricted by a radiological controlled area fence inside the Oconee protected area, and the thick walls and heavy door of the Horizontal Storage Module. Since there are no active systems in the storage module, there is no need for continuous monitoring of conditions. Appropriate monitoring is performed prior to loading or unloading Dry Storage Canisters inside the ISFSI fence. Appropriate monitors are in place inside the station to provide warning of radiation hazards while DSC loading and cask handling operations are performed in the fuel building and loading area. During transport, the transfer cask will be monitored to assure no danger to the health of the public or station personnel.

3.3.6 Fire and Explosion Protection

The Oconee Site-Specific ISFSI HSMs and DSCs contain no flammable material and the concrete and steel used for their fabrication can withstand any credible fire hazard. There is no fixed fire suppression system within the boundaries of the ISFSI; however, portable suppression equipment is provided within the fenced boundary. Also, the facility is located such that the station fire brigade can respond to any fire emergency using portable fire suppression equipment or the site's Fire Protection System, as described in Section 9.5.1 of the Oconee UFSAR.

ISFSI initiated explosions are not considered credible since no explosive materials are present in the fission product or cover gases. Externally initiated explosions are considered to be bounded by the design basis tornado generated missile load analysis presented in Section 3.2 of this UFSAR and Reference 1.

3.3.7 Materials Handling and Storage

Materials handling and storage at the Oconee Site-Specific ISFSI includes irradiated fuel and radioactive waste handling and storage. No hazardous chemicals or chemical reactions are involved in the normal ISFSI loading and storage processes.

All irradiated fuel handling outside the fuel storage pool is performed with the fuel assemblies enclosed in a DSC. DSC handling equipment and handling procedures are described in detail in Chapter 4 and Chapter 5 of this UFSAR, respectively.

Radioactive waste generation, treatment and disposal are addressed in Chapter 6 of this UFSAR.

The design criteria for handling spent fuel outside the pool area is to keep the fuel enclosed in the DSC and the Transfer Cask or HSM at all times. There is no waste generation outside the fuel building for normal DSC transfer operations. Waste generated in loading and decontaminating the cask is handled by existing Oconee waste systems in the pool and decontamination areas.

The DSC/transfer cask design is such that fuel handling in the pool area is consistent with routine fuel handling processes. Specific criteria for selecting fuel assemblies for storage are detailed in Reference 2. IFAs are selected to meet design criticality, cooling and radiation protection parameters. Once the assemblies are loaded into the DSC, there is no individual assembly handling. Thus, the only fuel handling procedures are those already in existence for the pool and the administrative criteria for selecting assemblies for storage. Damaged fuel assemblies are not normally considered for storage and would be handled according to existing pool procedures in the event damage occurred during DSC loading or unloading in the pool. (Fuel damage in the context of this discussion represents gross clad or structural failure and does not include pin-hole clad leaks.) Fuel handling operations will be monitored with existing pool area monitors.

All radioactive waste generation is from cask decontamination and consists of liquid waste which is input into the cask decontamination pit drain and thus into the existing plant liquid radwaste system and solid waste which is collected for disposal via the existing plant radwaste facility.

3.4 Summary of Storage System Design Criteria

1. REFERENCE SPENT FUEL CHARACTERISTICS -
   a. 15x15 PWR Assemblies (24 Per Module/DSC)
   b. Decay Heat = .66 KW Per Assembly
   c. Nominal Burnup = 40,000 GWD/MTU
   d. Initial Enrichment = 4.0 weight % U-235
   e. Equivalent Zero Burnup Enrichment ≤1.45 weight % U-235 (criticality)
2. COMPONENT FUNCTIONS
   a. DSC Provides Fuel Support, End Shielding, Heat Transfer, Criticality Control, and Confinement of cover gas and Radioactive Material.
   b. Transfer Cask Provides Shielding, DSC Loading, Handling and Transfer Mechanism, HSM Docking Functions, and Tornado Wind and Missile Protection.
   c. HSM Provides Shielding, Passive Decay Heat Removal, Structural/Seismic DSC Support and Environmental Protection, including Tornado Wind and Missile Protection.
   d. Hydraulic Ram System Provides Mechanism for DSC Transfer From Transfer Cask to HSM and eventual removal of DSC from HSM.
3. ENVIRONMENTAL CONDITIONS
   a. Maximum Tornado:
      1) wind speed = 360 miles per hour
      2) rotational speed = 290 miles per hour
      3) translational speed = 70 miles per hour
      4) pressure drop across the tornado = 3.0 psi
      5) rate of pressure drop = 2.0 psi per second
   b. Tornado Missiles @ 35% of the Combined translational and rotational DBT velocity = 126 miles per hour.
      1) 3967 pound automobile with a 20 square foot frontal area
      2) 276 pound, eight inch diameter blunt-nosed armor piercing artillery shell
      3) one-inch diameter solid steel sphere
   c. Flood Design: Not Applicable
   d. Seismic Forces = .17g Vertical, .25g Horizontal (NUHOMS® components)
      = .15g Vertical, .15g Horizontal (Oconee site conditions)
   e. Snow Ice Loads = 200 Pounds Per Square Foot
4. SAFETY PROTECTION
   a. Normal Operating Clad Temperature ≤ 340°C
   b. Material Confinement - Multiple Barrier Concept

c. Purged-gasses - Passed Through Spent Fuel Pool Vertilation System During Fuel - Loading Otherwise Not Applicable.

d. Criticality Control Through Burnup Credit and 1810 ppm Soluble Boron Credit - $K_{eff} < 0.95$, $K_{eff} < 0.98$ (off-normal)

3.5 References

1. Topical Report for the Nutech Horizontal Modular Storage System for Irradiated Nuclear Fuel (NUHOMS®-24P), Rev. 1A, dated July, 1989, NUH-002.
2. "SCALE-3: A Modular Code System for Performing Standardized Computer Analysis for Licensing Evaluation," NUREG/CR-0200, ORNL, Revision 3, December 1984.
3. Oconee Nuclear Station Updated Final Safety Analysis Report (UFSAR).
4. "Structural Analysis of Shipping Cask, Effects of Jacket Physical Properties and Curvature and Puncture Resistance", H. A. Nelms, Vol. 3, ORNL TRM-1312, Oak Ridge National Laboratory, Oak Ridge Tennessee, June, 1968.
5. "Design of Structures for Missile Impact," R. B. Linderman, J. V. Rotz, and G. C. K. Yeh, Topical Report BC-TOF-9-A, Bechtel Power Corporation, Revision 2, September 1974.
6. "Formulas for Stress and Strain," R. J. Roark and W. C. Young, Fifth Edition, McGraw-Hill, New York, New York, 1975.
7. "CASMO-2 A Fuel Assembly Burnup Program," Malte Edenius, et. al., STUDSVIK/NR-81/3, March 1981.
8. "CASMO Benchmark Report," M. Edenius, et. al., RF-78/6293, STUDSVIK, March 1978.
9. "CASMO Benchmarking Against Experiments in Rack Geometries," M. Edenius, et. al., NR-81/61 STUDSVIK, November 1981.

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4.0 Storage System

The Oconee Site-Specific ISFSI is located within the Protected Area on the Oconee Nuclear Station site. The storage area is located west of the existing intake structure. Figure B-29 depicts the site layout in relation to other plant features and defines the onsite route that the transfer cask and trailer will travel in moving loaded storage canisters from the Fuel Buildings to the ISFSI.

The Oconee ISFSI utilizes the NUHOMS®-24P storage system which provides for the horizontal, dry storage of irradiated nuclear fuel assemblies. The fuel assemblies are contained in a DSC made of stainless steel which is placed inside a reinforced concrete HSM for long term storage.

In addition to the DSC and HSM, the NUHOMS®-24P system utilizes handling and transfer equipment to load the DSC with fuel, to seal the DSC, to move the loaded DSC inside a heavily shielded transfer cask from the Fuel Building to the HSM and to insert the DSC into the HSM. The DSC is designed to hold 24 PWR fuel assemblies. The margins of safety in the structural design of the HSM, DSC, and transfer cask are more fully described in Section 8, Tables 8.1 and 8.2 of Reference 1. Additional information for the handling and transfer equipment is presented in Section 4.5.5.

The fuel assemblies to be stored are described in Section 3.1.1. The dose to the general public from the operation of the ISFSI is far below the allowable dose limits as set by regulation. Estimates of the annual dose rates are provided in Section 7.7.

It should be noted that the Oconee ISFSI is licensed for the storage of as many as 2112 assemblies; this storage capacity will be added incrementally as needed to support the actual refueling schedules. HSMs and foundation have been designed to be built in any array size no smaller than 2x3 (three modules side by side and back to back with three additional modules) and no larger than 2x10 (Ten modules side by side and back to back with ten additional modules).

The ISFSI system is designed to interface with existing plant equipment and systems. Roadways, buried pipes, trenches, and positioning aprons were verified to be acceptable for the wheel loadings of the transfer equipment. Oconee Nuclear Station asphalt roadways were verified as meeting the design minimum thickness requirements of the American Association of State Highway and Transportation Officials as specified for loading comparable to the ISFSI transfer equipment. Approximately 64 buried pipes and over 26 drain lines were analyzed and verified acceptable according to the applicable codes for each piping material. All interfacing trench systems were analyzed for transfer vehicle loadings. These include the 115 KV, Interim Radwaste, and the Standby Shutdown Facility trenches.

The size and weight of the transfer cask, DSC, and transfer cask lifting yoke/lift extension are acceptable within the current design limits of the crane, cask handling area, and transfer cask positioning aprons of the spent fuel pools. Design features employed to withstand environmental and accident forces are detailed in Chapter 3 and Chapter 8 of this UFSAR. The DSC and transfer cask are important to safety and are designed, constructed, and tested per Duke's QA 1 program that is more fully described in Chapter 11. The HSM is designed, constructed and inspected in accordance with Duke's QA Condition 2 program. Based on the function, design, and construction, the HSM is classified as a QA Condition 4 structure.

The HSM is designed in accordance with the requirements of ACI 349-85 as discussed in Section 3.2.5.1 of Reference 1. The HSM is constructed following the guidelines of ACI 318-83 as discussed in Section 4.2.1 of Reference 1. The DSC and transfer cask are designed and built in accordance with the ASME Code, 1983 edition through Winter 1985 addenda. In addition this equipment complies with the following: ANSI N 14.6-1978, American National Standard for Special Lifting Device for Shipping Containers Weighting 10,000 lbs. or More for Nuclear Materials; ANSI/ANS 57.9-1984, Design Criteria for An Independent Spent Fuel Storage Installation (Dry Storage Type); ASTM E499-73, Standard Methods of Testing for Leaks Using the Mass Spectrometer Leak Detector in the Detector Probe Mode.

4.1 Location and Layout

The location and layout of the Oconee Site-Specific ISFSI with respect to other site structures is shown in Figure B-29. This figure also denotes the transportation route for movement of the DSCs from the spent fuel pool to the HSMs.

If, during the transfer of a DSC from the fuel building to a HSM, an event requiring return to the fuel handling building occured, until the point where it reaches the ramp leading up to the ISFSI, the tow vehicle and trailer has sufficient space to turn around as needed and can return using the approved path.

Once it is on the access ramp leading to the ISFSI, the tow vehicle and trailer would have to continue to the ISFSI site in order to turn around.

The transport route has been reviewed and found to be within the design basis of the cask drop analysis discussed in Section 8.2 of Reference 1. The potential causes for cask and DSC drop accidents are described in Section 8.2.5.1 of Reference 1. The enveloping postulated drop events assumed for design are:

1. A horizontal side drop or slap down from a height of 80 inches.
2. A vertical end drop from a height of 80 inches onto the top or bottom of the transfer cask.
3. A corner drop from a height of 80 inches at an angle of 30° to the horizontal, onto the top or bottom corner of the transfer cask.

These drop scenarios were used to define an equivalent static deceleration load of 75g for cases (a) and (b) and 25g for the corner drop (case (c)). As described in Reference 1, these deceleration values were developed for assumed surface conditions which will envelop all Oconee site conditions which may be encountered. Specifically, these decelerations are based on the work contained in EPRI report NP-4830 and are applicable to impacted surfaces with target hardness numbers up to 400,000. The maximum target hardness along the Oconee transfer route is 2750 for an edge drop scenario.

The transfer cask route from the fuel buildings to the HSM was evaluated to ensure that the maximum transfer cask drop height of 80 inches is not exceeded. Therefore, since the Oconee target hardness and maximum potential cask drop height are less than the values presented in Reference 1, the deceleration values presented in Reference 1 envelop all Oconee site conditions.

The site area will be sloped appropriately to permit surface drainage to collection ditches for channeling the water away from the site. As noted in Section 2.4, the site is 11.9 feet above the probable maximum flood elevation. Local intense rainfall is not a problem since the inlet air opening is 24 in. above yard grade. There is a small drainage pipe passing through the HSM front wall into the plenum area. The base slab of the plenum area is sloped towards this drainage pipe. Additionally, the concrete approach apron is sloped away from the HSM front wall. During a local intense rain, it is remotely possible that some rainwater may backup into the HSM plenum area temporarily, but this water will drain out of the HSM soon after the intense rain subsides. Therefore, due to surface drainage, rain water will not collect to a depth of any concern.

4.2 Storage Site

The design bases covering the analysis and design procedures for the appropriate loadings are specified in Chapter 3 of this report and in Reference 1 for the HSM, DSC, transfer cask and transfer trailer. The foundation design includes allowances for seismic loads. The ground accelerations are from the site ground motions specified in Chapter 2. Liquefaction potential for the ISFSI site is discussed in Section 2.5. Based on the soil investigations and using an equivalent static methodology to account for dynamic effects, spring stiffeners are determined representing the force-deflection relationship of the underlying soil. This information is utilized as input to the structural model described in Reference 1 to determine settlement effects. See Section 2.5.4 for details of the foundation analysis. Temporary loadings from the extreme environmental cases (Chapter 3) and accident conditions (Chapter 8) have been reviewed and are acceptable.

4.2.1 Structures

The HSM design bases, materials of construction, codes and standards, etc. are fully described in Reference 1. The HSM foundation requirements are discussed in Section 2.5.5. The concrete approach aprons will not be attached to the HSM but will be separated by an expansion joint. Differential settlement between the slab and the HSM is not anticipated to be a problem.

The approach aprons are sized for bearing pressures using the same allowable and ultimate pressures as used for the HSM as discussed in Section 2.5.5. Settlement of the approach aprons will be minimal since they are normally unloaded. In addition, the transfer trailer has jacks used in vertically positioning the cask for DSC insertion into the HSM. The trailer leveling procedure will compensate for any differential settlement that may occur between the HSM and the concrete approach aprons. Outlying areas are concrete or asphalt to provide the space required for transfer trailer maneuvers.

4.2.2 Storage Site Layout

Figure B-30 depicts the Oconee Site-Specific layout and its functional features.

4.2.3 HSM Description

The HSM is constructed of reinforced concrete and structural steel. The HSMs are placed in service on a load bearing foundation which is within a fenced, controlled access area.

The HSM provides the structural support for the DSC as well as protection against tornado missiles plus neutron and gamma shielding. The exterior walls form an array of modules and the front and roof of the modules are sufficiently thick to provide average surface doses that are below 20 mr/hr.

The HSM provides fuel cooling by a combination of radiation, conduction and convection. Natural circulation air flow enters at the bottom of the HSM and passes around the DSC and exits through the flow channels in the top shield slab.

The design of the HSM system includes consideration of both normal and off-normal operating conditions including a range of credible and hypothetical accidents. The HSM design and analysis were performed in accordance with Chapter 3 and Chapter 8 of this UFSAR and Reference 1.

The design criteria for the operational and accident conditions fall into three main categories; structural, nuclear and thermal-hydraulic. Reference 1 describes in detail the analysis of these accidents. The bounding structural loading combinations include thermal, earthquake, tornado and cask drop accidents. For the nuclear analyses, shielding of the DSC end shield plugs, the HSM walls and penetrations, and the criticality analyses were primary considerations. The thermal-hydraulic criteria assures adequate air flow inside the module, acceptable air and concrete temperatures as well as DSC and fuel clad temperatures.

4.2.4 Instrumentation System Description

The Oconee Site-Specific ISFSI is designed to maintain a safe and secure, long-term containment and storage environment for IFAs using only totally passive components. Therefore, no safety related instrumentation is required for operation of the facility.

Instrumentation is necessary to perform the DSC/transfer cask draining purging, and drying operations. This instrumentation consists of commercial grade pressure gauges. The functions served by pressure instrumentation in the DSC loading procedure are discussed in Chapter 5 of this UFSAR.

Radiation monitoring is provided by existing station area, and process effluent monitors. Oconee Site-Specific ISFSI radiation monitoring is provided by environmental TLDs.

4.3 Transfer System

4.3.1 Function

The function of the transfer system is to transfer the DSC containing irradiated fuel assemblies to and from the HSM.

4.3.2 Components

The transport system consists of the transfer cask, DSC, transfer cask skid, transfer trailer, skid positioning system and hydraulic ram.

4.3.2.1 Transfer Cask

The transfer cask is used to transfer the loaded DSC to and from the HSM. The cask provides shielding along the axial length of the fuel during transfer, loading and retrieval operations. A description of the transfer cask is provided in Reference 1. For Oconee, two (2) hard surfaced rails were added to the enhance cask sliding characteristics and the liquid neutron shield described in Reference 1, has been replaced by a solid neutron shield comprised of Bisco NS-3 which is a cementatious material cast in place in the neutron shield jacket. The drain and fill ports, as well as the expansion tank, which are needed for the liquid neutron shield have been deleted. To ensure that off-gassing or vapor expansion will not result in over-pressurization of the bottom neutron shield and the exterior neutron shielding jacket, pressure relief valves set at 20 and 50 psig respectively have been added. This change results in a more passive neutron shield in that operational and maintenance considerations are reduced. Also, the possibility of a complete loss of neutron shielding as a result of an accident is eliminated, although it is still assumed that substantial degradation may occur in some localized area.

This substitution satisfies the requirements of 10CFR 72 because:

1. The surface dose rates still satisfy the requirements established in Reference 1.
2. The temperature of the fuel cladding does not exceed the criteria established in Reference 1.
3. The material characteristics are suitable for the service environment.
4. The consequences of postulated accidents are enveloped by the criteria established in Reference 1.
5. The structural integrity of the transfer cask and DSC is not compromised.

4.3.2.2 Dry Storage Canister (DSC)

The DSC provides the primary confinement for up to 24 irradiated fuel assemblies. The DSC provides shielding at the ends and also maintains the fuel array subcritical under the worst case conditions. The DSC fits inside the transfer cask for safe movement from the spent fuel pool to the ISFSI site.

4.3.2.3 Transfer Cask Skid

The purpose of the transfer cask skid is to provide a support base for rotating the transfer cask to a horizontal position and to maintain the transfer cask in the properly aligned position during transport, loading and retrieval operations.

The basic dimensions and layout for the transfer cask skid are presented in Section 1.3.1.5 and Figure 1.3-4 of Reference 1.

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The skid is bolted to the transfer cask trailer during transfer operations.

The transfer cask skid is a non-safety related item which is designed in accordance with the requirements of the AISC code, eighth edition using linear elastic analytical methods and normal allowables for the bounding design basis loading. The design loads for the transfer skid and attachments are the same as the transfer cask trunnion loads presented in Section C.1-4 and Figure C.1-2 of Appendix C of Reference 1.

The design basis loads for the transfer cask skid were conservatively established to envelope all applied loads including downending of the cask, rotational loads, and transport loads during transfer to the ISFSI site. The transfer skid design loads envelope the postulated off-normal and accident loads discussed in Section 8.2 of Reference 1 such as earthquake and tornado wind loads. Along with the basic Code allowable stresses used in the design analysis, this conservative design basis assures that the skid will adequately support the NUHOMS®-24P transfer cask for all postulated events.

4.3.2.4 Transfer Trailer

The transfer trailer has a capacity of 120 tons. The transfer trailer is designed to ride as low to the ground as possible to minimize the HSM height. Four hydraulic jacks are incorporated into the trailer design to provide vertical movement for alignment of the transfer cask with the HSM. The trailer is pulled to the ISFSI by an appropriate tow vehicle.

The trailer is configured as a 4x2 mechanically or hydraulically steered dolly. Eight hydraulic suspensions carry four pneumatic tires each and are located two wide, in four axle lines. There are a total of 32 tires.

The steering mechanism connects the individual axles such that they have a common turning radius, thus minimizing tire scuffing and the resulting damage to pavement and tires. The suspensions allow other advantages such as adjustable deck height, lockout or repair of failed suspensions or tires, and compensation for road surface irregularities.

The trailer is pulled by an appropriate tow vehicle via a drawbar unit. The drawbar unit also provides motive force for steering of the trailer.

Additional features and accessories for the trailer include: diesel power pack and hydraulic control valves, hand held remote control unit, all-wheel braking, and provisions for mounting four bearing pads, hydraulic alignment system hardware, and four hydraulic lifting jacks to the trailer frame.

The trailer is a commercial grade item of the type commonly used to move heavy loads, such as the space shuttle. The design parameters for a typical trailer are provided in Table A-15. It is constructed in accordance with the manufacturer's standard QA program.

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4.3.2.5 Skid Positioning System

The Skid Positioning System (SPS) includes the following items which either actively or passively position the skid during storage, transport, and alignment operations: low friction bearing plates, skid tie down bolting, hydraulic lifting jacks, hydraulic x-y-theta positioning cylinders, and all associated instrumentation and controls. Controls for the SPS are located on the front of the trailer and on a remote control pendant.

The loaded cask is supported by a steel skid structure. The skid's weight is supported by a set of four low friction bearing plates. The bearing material offers a coefficient of friction of 5% or less with negligible breakaway friction. The skid is restrained from lateral motion during transport and storage by a set of tie down bolts attached to the trailer frame.

Four support plates for hydraulic lifting jacks are located on the trailer frame. Although the trailer's hydraulic suspensions could be used to perform trailer deck height adjustments, the jacks will more firmly support the load than pneumatic tires. The jacks provide elevation adjustment, plus adjustment of pitch and roll of the trailer frame relative to the concrete HSM pad. The jacks are also used in the fuel building during cask loading. There, the front pair of jacks carries most of the load during the cask setdown and downending.

A system of hydraulic actuators are oriented in the transverse and longitudinal directions on the trailer deck. These cylinders are used to align the cask correctly relative to the HSM after the deck is leveled at the appropriate height.

4.3.2.6 Hydraulic Ram System (HRS) Description

Reference 1 includes a system description of the hydraulic ram in Section 1.3.1.6, a system operation description of loading and retrieval of the DSC in Section 1.3.1.7 and a functional description in Section 5.2.1.1. Figure 1.3-5 shows a typical design for the hydraulic ram system. Figure 1.3-6 shows the primary operations for the NUHOMS® system.

The operations system for loading and unloading of the DSC into and out of the HSM is discussed in Sections 5.1.1.6 and 5.1.1.8 of Reference 1. Figure 5.1-4 of the same reference shows the NUHOMS® System retrieval operations flow chart. Safety features of the ram system are presented in Section 5.2.1.2 of Reference 1.

The HRS consists of the following main components: a double-acting hydraulic cylinder (ram); a ram support frame assembly for support and alignment of the ram hydraulic cylinder (integral to the cask skid); one grapple assembly; one hydraulic power unit with controls: and hydraulic tubing, hoses, hose reel and accessories as required for system operation.

4.3.3 Design Bases and Safety Assurance

4.3.3.1 Transfer Cask

The design bases of the transfer cask are given in Section 1.2.2 of Reference 1. These are based primarily on radiological and structural considerations.

As discussed in Section 4.3.2.1, the solid neutron shield will be permanently filled with Bisco NS-3 - a neutron absorbing cementatious material cast in place in the neutron shield jacket. Pressure relief valves are designed to relieve pressure in the event that any off-gassing were to create excessive internal pressure.

4.3.3.2 Transfer Cask Skid

The transfer cask skid supports the transfer cask in a horizontal position on the trailer deck during the on site road transportation to the ISFSI site. The transfer cask skid is designed to support a transfer cask weighing 110 tons and to allow rotation of the transfer cask between the horizontal and vertical positions. The transfer cask skid is secured to the transfer trailer during movement and is restrained by a securing system to resist the peak loads anticipated under normal conditions of transport between the fuel buildings and the ISFSI.

4.3.3.3 Transfer Trailer

The design parameters for the transfer trailer are presented in Table A-15. Also, as shown in Section 8.2.5 of Reference 1 the design basis drop height for the NUHOMS®-24P transfer cask is 80 inches. This analysis bounds the Oconee transport conditions.

4.3.3.4 Skid Positioning System (SPS)

The SPS is designed to compensate for the following variance in true alignment between the cask and HSM, in any combination.

Pure Vertical Translation	3"
Pure Sideways Translation	3"
Pitch	1/4" / ft
Yaw	3 degrees

In addition to the above corrections, the SPS must move the cask and skid from the transport position, in which the payload's center of gravity lies directly over the centroid of the trailer, to a position where the cask slightly overhangs the rear of the trailer. The required actuator strokes to achieve the design basis compensations are (in terms of pure directional motion) approximately:

Vertical Travel	6"
Transverse Travel	10"
Longitudinal Travel	39"

The SPS components which restrain the cask and skid during cask setdown and transport are designed to withstand the loads described for the cask trunnions in Appendix C.1 of Reference 1. The design basis weights for use in sizing SPS actuators and hardware are, in U.S. tons:

Empty Cask	56 tons
Loaded DSC	38 tons
Skid	6 tons
Trailer	20 tons

The SPS is non-QA and is designed and built to the standard industrial requirements.

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The SPS is designed with several safety features to avoid unnecessary delays in the transfer process. The trailer lifting jacks have mechanical locking collars which preclude settling of the trailer deck, due to loss of hydraulic pressure to the jack cylinders. Operation of the trailer jacks, transverse, and longitudinal cylinders are mutually exclusive; it is impossible to operate more than one sub-system at a time. During alignment and fuel transfer, the skid tie down brackets are unbolted, and the x-y travel of the skid is limited by both the hydraulic cylinder travel and by mechanical restraints on the low friction bearing travel. A tie down between the HSM and cask provides additional restraint during fuel transfer.

4.3.3.5 Hydraulic Ram

HYDRAULIC RAM SYSTEM (HRS) PERFORMANCE REQUIREMENTS:

1. Ram Force - 20,000 lb., Push and pull (Nominal)

80,000 lb., Push and Pull (Maximum)

2. Ram Piston Speed - 36 in/min (max)
3. Stroke - Approximately 21 feet

<u>CODES AND STANDARDS</u>:

The HRS components are not safety related and are designed to conform to standard industrial requirements.

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<u>DESIGN LOAD CONDITIONS</u>:

All system load bearing components of the HRS are designed to withstand the stresses associated with a maximum column load of 80,000 pounds at full extension centered 4.5 inches above the longitudinal axis of the ram cylinder. The system load bearing components include the ram hydraulic cylinder, grapple assembly and ram support frame assembly.

The trailer-mounted tripod support for the ram hydraulic cylinder is designed per American Institute of Steel Construction (AISC) 8th Ed. Manual of Steel Construction Standards.

<u>ENVIRONMENTAL CONDITIONS</u>:

The HRS is designed to withstand the following environmental conditions:

1. Ambient Storage Temperature Range: -30°F to 116°F
2. Ambient Humidity Range: 10 to 100% (coincident with outdoor temperature range)
3. Radiation Dose Rate (Section 10.3.4.1 of Reference <u>1</u>): 250 mrem/hr
4. Ram force is limited to 20,000 pounds during the extension and retraction strokes for normal operation.
5. Ram force is limited to no more than 80,000 pounds under all conditions.
6. Ram extension and retraction speeds are variable from 0 to 36 inches per minutes.

<u>INSTRUMENTATION AND CONTROLS</u>:

The HRS is designed to allow the operator to extend and retract the ram hydraulic cylinder using hand-operated devices. The control system includes safety features to prevent the inadvertent operation of the HRS and to regulate speeds and forces of the ram to within the design criteria limitations.

<u>COMPONENT DESCRIPTIONS</u>:

<u>Ram Hydraulic Cylinder</u> - The ram hydraulic cylinder is a three stage, double-acting, horizontal design. The maximum extension or retraction force is 80,000 pounds at the maximum extension and retraction fluid pressures. The maximum piston speed for extension or retraction is 36 inches per minute (ipm). The cylinder is mounted to the transfer trailer.

<u>Ram Hydraulic Pump</u> - The hydraulic pump is a positive displacement type pump.

<u>Grapple Cylinder and Pump</u> - The grapple is operated with a small, double acting hydraulic cylinder. The cylinder is operated from the Hydraulic Power Unit (HPU).

<u>Reservoir</u> - The HRS includes a 150 gallon reservoir sized to meet the system capacity requirements.

<u>Instrumentation and Controls</u> - The control system is designed to allow the operator to extend or retract the ram hydraulic cylinder using manually actuated pressure and flow control devices.

Grapple Assembly - The grapple assembly is depicted by Revision 1 of the NUHOMS®-24P Topical Report Figure 1.3-5.

The power for the hydraulic system is provided from a retail 24 KV Oconee support line through a 75 KVA, 3 phase transformer.

Although this system does not have a backup power source, the retail power provided is considered very reliable. However, in the event of a power failure - whether momentary or extended - all efforts to transfer the DSC into the HSM will be halted until power is restored. In the interim period, the hydraulic system will be secured in the "off" position and all personnel will leave the immediate area of the cask. At any point in the transfer process, the HSM, the transfer cask, or a combination of both will provide sufficient shielding to maintain dose rates at acceptable levels during such a loss of power.

4.3.3.6 Other Equipment

All equipment other than the HSM, DSC, and transfer cask used in the transfer operations is classified as non-safety related. The failure of any non-safety related piece of transfer equipment described in Section 1.3 of Reference 1 will not increase human radiation exposures by any significant amount. As described, the transfer trailer has 32 wheels. The route from the fuel building to the ISFSI site is approximately 1/2 mile. The trailer is carefully inspected prior to use, and the probability of a breakdown is small. In the event of a component failure, the trailer can be configured to overcome failure of a wheel or suspension unit and off-loading can be completed prior to repairs. A failure in the system hydraulics could be repaired or the trailer pulled to the HSM site and the DSC off-loaded. Because of this design simplicity, failure of the hydraulic ram will be limited to the hydraulic control system.

4.3.3.7 Qualification of Components

Qualification of the hydraulic ram system (HRS) and skid positioning system (SPS) was done per standard administrative procedures and check out testing for operation of non-safety related equipment. The qualification tests consisted of pre-operational system checkout tests. All phases of the HRS and SPS operation were tested to verify the operability of the system. Normal operation and off-normal events and the respective recovery procedures were confirmed. All system performance criteria were verified to be met.

The HRS and SPS have simple, reliable designs which require minimal maintenance on active components and negligible maintenance on passive components. Primary maintenance requirements consist of periodic inspections of the hydraulic power units, ram hydraulic cylinder, grapple assembly, SPS actuator assemblies, and manual controls. In addition, the hydraulic fluid requires periodic testing to ensure that no water, dirt or other deleterious materials have contaminated the system.

4.3.3.8 Maintenance of HRS and SPS

Maintenance requirements for the HRS and SPS are minimized by corrosion protection provided by component design. All components are manufactured from corrosion resistant materials, or coated with corrosion resistant paints, and/or stored and operated with a grease or oil surface protectant. All controls and instrumentation which are subject to corrosion are housed in a weatherproof enclosure. The ram hydraulic cylinder is stored in its retracted position, filled with hydraulic fluid.

Operating procedures, maintenance procedures and storage procedures will ensure that all HRS and SPS components are kept in operable condition throughout the system design life.

4.4 Operating Systems

4.4.1 Loading and Unloading System

Loading and unloading of IFAs from the DSC and transfer cask requires use of the following equipment:

1. 100 ton spent fuel cask handling crane
2. spent fuel pool manipulator crane auxiliary hoist
3. spent fuel handling tool
4. transfer cask lifting yoke
5. DSC lifting rig
6. transfer cask lift extension
7. SFP cask platform
8. cask pit support stand

4.4.1.1 Preparation for Fuel Loading

Following receipt inspection and acceptance, a DSC is placed in the transfer cask. The orientation of the DSC in the cask is controlled by permanent alignment marks on each DSC and the transfer cask. The DSC is filled with borated water with a minimum concentration of 1810 ppm boron. The transfer cask is then positioned in the decontamination pit. The DSC/transfer cask annulus is filled with demineralized water and sealed with an inflatable seal. The transfer cask is then placed on the SFP cask platform in the spent fuel pool.

The following components are used for this operation:

1. 100 Ton Crane - the 100 ton spent fuel cask handling crane is used to place the DSC into the transfer cask and to move the DSC/transfer cask to the spent fuel pool. The 100 ton crane is described in Section 9.1.4.2.2 of the Oconee UFSAR.
2. DSC Lift Rig - The DSC lift rig is bolted to two of the four lifting lugs attached to the support ring for the top shield plug inside the top of the DSC. It is used for upending the DSC prior to loading into the transfer cask.
3. Transfer Cask Lifting Yoke - The transfer cask lifting yoke adapts the transfer cask to the 100 ton crane hook. It is used during upending and transport of the transfer cask within the fuel building. The transfer cask lifting yoke is designed, built, and maintained in accordance with the criteria of ANSI N14.6. The lifting yoke is a passive, open hook design with two parallel lifting beams. It is fabricated from high strength carbon steel plate and is protected by a decomtaminable coating. Figure B-31 depicts the transfer cask lifting yoke.
4. Transfer Cask Lift Extension - After the DSC/transfer cask is placed on the cask pit platform, the transfer cask lift extension is attached between the 100 ton crane hook and the transfer/cask lifting yoke. The transfer cask lift extension is designed to prevent wetting the 100 ton crane hook and block when the DSC/transfer cask is lowered from the SFP cask platform into the cask pit. The transfer cask lift extension is designed, built, and maintained in accordance with the criteria of ANSI N14.6. Like the lifting yoke, it is fabricated from high strength carbon steel plate and is protected by a decontaminable coating. The lift extension has an elongated pin hole (48 inches) and a screw actuator at the lifting yoke end. For lifting the transfer cask, the lift extension is in the elongated configuration with the lifting yoke pin supported by the bottom of the pin hole. When disengaged from the cask, the lift extension may be placed in the retracted configuration by means of the screw actuator, which

provides support for the lifting yoke while in this configuration. The retracted configuration is required for the combined lift extension and lifting yoke to clear the spent fuel pool operating deck. Figure B-32 depicts the transfer cask lift extension.

5. Cask Pit Support Stand - A removable platform approximately 18 inches in height is placed in the spent fuel pool cask pit. Its functions are to allow release of the transfer cask at an elevation that prevents the 100 ton crane block from contacting spent fuel pool water and to position the cask so that spent fuel can be loaded into the DSC.

   Four polished stainless steel reflectors (targets) are affixed to the corners of the cask pit support stand to serve as a visual guide that the transfer cask is properly centered when lowering into the SFP.

4.4.1.2 Spent Fuel Selection

A description of the administrative procedures which are followed in spent fuel identification is presented in Section 10.2.5. Using special nuclear material control and accountability records, the initial enrichment and burnup for each candidate spent fuel assembly are compared against the acceptable region in Figure B-48. Fuel assemblies falling in the acceptable regions will have qualifying reactivity and decay heat characteristics for safe storage in the NUHOMS®-24P System. If all requirements for spent fuel qualification are met, then documentation of this fact for a given assembly is transmitted to fuel handling personnel prior to assembly retrieval and placement in the DSC. Based upon station maps and special nuclear materials accountability records which indicate the current location of these assemblies, fuel handling personnel visually verify the assembly identification numbers and transfer these assemblies into the DSC. An independent visual verification (using binoculars or CCTV) of the assembly serial number by two different persons is performed prior to assembly retrieval from the spent fuel pool. After all assemblies have been loaded into the DSC, the assembly identification numbers are again checked. In the event that these assemblies must subsequently be retrieved in the future from the HSM/DSC and inserted back into the spent fuel pool, similar accountability/verification procedures will be used.

No fuel is stored in the Site-Specific ISFSI which is known to have any gross structural damage. Duke's damaged fuel assembly and component database contains a record of confirmed and suspect fuel assembly cladding and other structural failures. Assemblies which are suspected of having cladding failure are further examined visually (using cameras) to determine the extent of the damage. Of these assemblies, only those showing gross cladding or structural damage are excluded. This inspection is performed after verification of the assembly identification number. Fuel assemblies which have no record of cladding damage are not inspected in detail; they are observed during the routine fuel handling transfer operation to ensure that the structural integrity of the assembly is maintained.

No fuel assembly cleaning or crud removal operations are planned on initial loadings or retrieval. These operations are not necessary for storage in the NUHOMS®-24P system and would likely increase personnel exposures during fuel loading. The DSC will provide full containment of all radioactive crud materials which are dislodged during the handling and/or storage operations.

4.4.1.3 Spent Fuel Loading

The layout of the spent fuel pool area is shown in Figure B-33 through Figure B-35. After the DSC/transfer cask is lowered from the cask pit platform onto the cask loading pit insert, IFAs which have been qualified are loaded into the DSC. The components and equipment used for this operation are described below:

1. Spent Fuel Pool Manipulator Crane - The spent fuel pool manipulator crane mast or its auxiliary hoist is used to extract IFAs from their pool storage cells and to lower them into the DSC. The spent fuel pool manipulator crane is described in Section 9.1.4.2.2 of the Oconee UFSAR. If the auxiliary hoist is utilized, it is in conjunction with a manual spent fuel handling tool.

2. Spent Fuel Handling Tool - The spent fuel handling tool consists of a pneumatically actuated gripper and suspension cables. Its purpose is to provide remote underwater engagement and disengagement of IFAs. This tool has been used at Oconee for loading IFAs into spent fuel shipping casks, and it required no alteration for use with the DSC.

4.4.1.4 DSC Drying, Backfilling, and Sealing

After the IFAs are loaded into the DSC, the top end shield plug is replaced on the DSC. The DSC top end shield plug is suspended by cables from the transfer cask lifting yoke. The 100 ton spent fuel cask handling crane allows fine adjustment of bridge and trolley positions, hook height, as well as rotation of the crane hook. The bottom of the top shield plug is chamfered to allow a degree of self-centering by the plug. Two separate paths exist for displacement of DSC cavity water as the shield plug is lowered. A gap exists between the shield plug and the DSC shell, and the DSC vent port is open during installation of the top shield plug, both of which provide for displacement of some of the fluid from the DSC. Placement of the shield plug is recognized as a critical step requiring close attention and gradual movements to assure no misalignment or damage to components. The DSC/transfer cask is raised to the SFP cask platform by use of the 100 ton crane with the transfer cask lifting yoke and lift extension. As the DSC approaches the surface of the spent fuel pool, the correct placement of the top lead shield plug is verified visually and through dose rate monitoring. On the SFP cask platform the transfer cask lift extension is removed and the crane hook is attached directly to the lifting yoke in order to provide sufficient lift height during transport of the DSC/transfer cask over the pool deck and into the decontamination pit.

In the decontamination pit the inner top cover plate is seal welded, and the water is purged from the DSC. The DSC is then vacuum dried and backfilled with helium. Helium leak tests are performed on the top shield plug seal weld and the vent and siphon port seal welds. Finally, the outer top cover plate is seal welded into place. These operations are described in detail in Chapter 5 of Reference 1

During the above operations, the IFAs are confined within the DSC with the top end shield plug in place, and the DSC remains seated in the transfer cask. Following these operations, the transfer cask lid is placed, the annular water is drained, and the transfer cask is placed on the transfer trailer for transport to the ISFSI.

The design basis and safety assurance features of the DSC are described in Sections 3.2 and 3.3 of Reference 1. The design basis and safety assurance features of the transfer cask are described in Section 1.3.1.3 of Reference 1. The DSC drying and sealing equipment and operations make use of industry-standard equipment and procedures commonly used for such operations.

4.4.1.5 DSC Unloading

The equipment discussed in Sections 4.4.1.1 and 4.4.1.2 is used for DSC unloading operations. Appropriate DSC cutting equipment and procedures as discussed in Section 5.1.1.9 of Reference 1 will be used to open the DSC which is contained within the transfer cask.

4.4.2 Decontamination System

No decontamination facilities are needed at the ISFSI.

Decontamination of the transfer cask is performed in the decontamination pit. The transfer cask exterior is decontaminated manually before removal from the fuel building by use of detergents and wiping cloths.

It is not anticipated that either the exterior of the DSC or the inside of the transfer cask will become contaminated. The DSC/transfer cask annulus is filled with demineralized water and sealed with an inflatable seal. However, in the event that such contamination occurs, the DSC/transfer cask annulus will be flushed with demineralized water until an acceptable level is achieved.

4.4.3 DSC Repair and Maintenance

No maintenance is required for the DSC for its design life.

4.4.4 Transfer Cask Repair and Maintenance

The function of the transfer cask is to ensure integrity of the DSC during applicable design basis accidents and to provide radiological shielding for the operators during handling and transfer operation. Confinement of radioactive materials is provided by the DSC. Accordingly, a periodic maintenance program has been established to ensure the proper operation of the cask valves, bolts, washers, o-rings and neutron shield pressure relief valves. The lifting surfaces of the cask trunnions are periodically inspected for surface deterioration.

4.4.5 Utility Supplies and Systems

The design of the Oconee Site-Specific ISFSI is based on the NUHOMS®-24P system for storage of irradiated fuel. Each module is a self-contained, passive system requiring no support systems during storage.

However, the ISFSI is provided with a 480/208/120 VAC power supply for operation of the transfer trailer hydraulic positioners, hydraulic ram site security equipment and lighting. Some security equipment at the ISFSI is powered from Oconee plant SSF sources.

Other electrical connections required for ISFSI physical security are described in the Duke Power Company Physical Security Plan (Reference 3).

4.4.6 Other Systems

4.4.6.1 Communications and Alarm System

Details of the communication and alarm system are provided in the Physical Security Plan (Reference 3).

4.4.6.2 Fire Protection System

No flammable or combustible materials are stored within ISFSI or in its immediate vicinity and the ISFSI is constructed of noncombustible heat-resistant materials (concrete and steel). Therefore, no fixed fire extinguishing system is required; however, portable suppression equipment will be provided within the fenced boundary. In the unlikely event of a fire at the ISFSI, the fire brigade will be dispatched from the Oconee Station. The ONS Pre-Fire Plan (Reference 4) contains fire protection requirements for the ISFSI.

4.4.6.3 Maintenance System

The Oconee Site-Specific ISFSI requires no maintenance other than periodic inspection of the HSM air inlets and outlets and removal of debris, if needed.

4.5 Classification of Structures, Systems, and Components

Table A-16 provides a list of major Oconee Site-Specific ISFSI components and their classification. Classification of major components as "Safety Related" or "Radwaste Related" is based on the specific need for component performance under accident conditions. However, designation of specific components as "Safety Related" or "Radwaste Related" is not the only basis for establishing whether any part is important to the safe operation of the ISFSI facilities.

As listed in Revision 1 of the NUHOMS®-24P Topical Report, Section 3.2, Reference 1, the NUHOMS® reinforced concrete HSM including its foundation and DSC support structure, the DSC and its internal basket assembly, and the transfer cask are components considered important to safety. The design criteria for these components are provided in Section 3.2 and summarized in Tables 3.2-1 through 3.2-9 of Reference 1.

The Oconee fuel building overhead crane is non safety-related. The lifting yoke and lift extension used for movement of the transfer cask within the fuel building are designed and procured as components important to safety. The lifting beams used in that part of the operation are controlled by 10CFR Part 50 and NUREG-0612 and are designed to ANSI 14.6-1986 criteria for non-redundant yokes.

As noted in Section 4.5.5, all other components of the NUHOMS® system, including the transfer trailer and cask support skid, skid positioning system, and hydraulic ram system are required to perform their function to successfully transfer a DSC to and from the HSM. These systems are described in Reference 1 with design requirements further delineated in Section 4.5.5 of this UFSAR.

In addition, the transfer cask, HSM, and DSC have been designed to meet very conservative design criteria including postulated conditions which envelop those which may result from the mechanistic failure of the transfer system equipment. Design conditions such as cask drop accident and jammed DSC have been included even though there is no plausible way for these worst case events to occur. Conservative bounding analysis for these conditions have been performed using minimum material yield strengths, strength reduction factors, and factors of safety in accordance with the stringent requirements of the ASME and ACI Codes. Even when applying this conservative criteria considerable design margin for these components and structures remains as evidenced by the analysis results comparisons with acceptance criteria contained in Reference 1. Further, these components and structures are fabricated and constructed to the rigorous standards and methods of the ASME and ACI Codes under a 10CFR 50 Appendix B Quality Assurance Program. These include material qualification, welding and nondestructive examination, and strict surveillance and quality control inspection. The resulting high integrity of the Transfer Cask, DSC, and HSM provide more than adequate assurance that the health and safety of the public and plant personnel are protected.

4.5.1 Transfer Cask

The transfer cask is considered Nuclear Safety Related (QA Condition 1) since it performs primary DSC protection functions under certain transport accident conditions. The transfer cask proposed for use in DSC transfer operations is described in Section 1.3.1.3 of Reference 1, with the exception that the inner cavity length has been modified to 187.43 inches per ONOE-14622.

4.5.2 Dry Storage Canister

The DSC is considered Nuclear Safety Related (QA Condition 1) since it performs criticality control and primary IFA support functions as well as serving as the primary storage containment for the IFAs. It is designed to remain intact under all accident conditions identified in Chapter 8 of this UFSAR with no loss of function. DSC components are designed, constructed, and tested in accordance with Nuclear Safety Related requirements as defined by 10CFR 50, Appendix B and the DPC QA-1 Quality Assurance Program.

4.5.3 Horizontal Storage Module

The HSM functions include shielding, heat removal, DSC support, and DSC tornado missile protection. The HSM is not considered Nuclear Safety Related since it performs no primary IFA containment or criticality control functions. However, HSM functions are considered important to the safe operation of the ISFSI and appropriate levels of documentation and control are applied. The concrete HSM is designed in accordance with ACI 349-85 and the level of testing, inspection and documentation provided during construction is in accordance with the DPC QA-2 Quality Assurance Program. Based on a review of the function, design, and construction, the HSM and foundation have been appropriately reclassified to the QA-4 designation.

As shown by Table 8.1-12 of Reference 1, the maximum HSM concrete temperature for the long term 70°F ambient storage temperature case in 144°F. This is less than the maximum permissible concrete temperature of 150°F specified by ACI 349-85. The effect of extreme ambient temperatures will be to increase the maximum concrete temperature. However, the methods used to calculate these temperatures assumed that the extreme ambient temperatures would remain constant until steady state conditions can be established within the HSM. In reality, the extreme ambient temperatures will occur infrequently and will last for a short duration insufficient to cause steady state conditions. Therefore, the long term maximum temperatures for the HSM concrete easily meet the ACI 349 temperature limitations.

Coupled with the conservative reductions in concrete material strength used in the HSM design calculations, the design criteria utilized in Reference 1 are adequate to ensure that the HSM will perform its intended safety function for all design conditions.

Typical reinforcing steel design for the HSM basemat, walls, and roof is shown in Figure 8.1-9 of Reference 1. The HSM reinforcing designs are in accordance with the ACI 349-85 Code and are comparable to those previously reviewed and approved by the NRC for the NUHOMS®-07P design.

4.5.4 Foundation

The Oconee Site-Specific ISFSI foundation is designed, constructed and tested to the same design criteria and quality assurance requirements as the HSM.

4.5.5 Transfer Components

The remaining DSC transfer components (i.e. transfer cask trailer and skid, skid positioning system, hydraulic ram system) are necessary for the successful loading of the DSC into the HSM. As discussed in Section 4.3, failure of these components would not endanger the health and safety of the public or plant personnel. Therefore, transfer components are not considered Nuclear Safety Related and are designed, constructed and tested in accordance with good industry practices.

4.5.6 Instrumentation

The Oconee Site-Specific ISFSI is designed to maintain a safe and secure, long-term containment and storage environment for IFAs using only totally passive components. Therefore, no Nuclear Safety Related instrumentation is required for operation of the facility. Instrumentation necessary to perform DSC/transfer cask draining, purging and drying operations consists of industrial grade pressure gauges.

4.6 Decommissioning Plan

Decommissioning of the Oconee Site-Specific ISFSI will be performed consistent with decommissioning of the Oconee Nuclear Station. This is predicated on the ability of the federal government to accept spent fuel at the rates and dates specified in the Nuclear Waste Policy Act of 1982, as amended. It is anticipated that the DSCs will be transported to a federal repository when such a facility is operational. However, should the storage facility not accept the DSCs intact, the NUHOMS®-24P system allows the DSCs to be brought back into the spent fuel pool and the fuel repositioned into the racks for loading into transport casks to be provided by the Department of Energy.

All components of the NUHOMS®-24P system are manufactured of similar materials found in the existing Oconee Station (i.e., reinforced concrete, stainless steel, lead). These components will be decommissioned by the same methods in place to handle similar materials within the plant. Any of these components that may be contaminated will be cleaned and/or disposed of consistent with the decommissioning technology available at the time of decommissioning.

Although operation of the ISFSI will likely need to continue well beyond decommissioning of the Oconee Nuclear Station, the costs of decommissioning the ISFSI are expected to represent a small and negligible fraction of the cost of the decommissioning the Oconee Nuclear Station. Reference 5 submitted a schedule and justification for a decommission plan which will encompass decommissioning of both Oconee Nuclear Station and the Oconee ISFSI in accordance with 10CFR 50.75 and 10CFR 72.30. The financial options for this plan were submitted on July 24, 1990 for the NRC review and approval, Reference 6 and a clarification was submitted on December 4, 1990, Reference 7.

The radiological impacts due to postulated accidents or operation of the ISFSI are bounding for the conditions when the ISFSI is fully operational. The collective dose to residents within one to two miles of the ISFSI is based on capacity loading of 2112 spent fuel assemblies in 88 storage modules. The occupational dose to site workers assumes radiation from an array of 2 x 10 modules loaded with dry shielded casks each containing 24 spent fuel assemblies. The consequences from accidents are based on failure of 24 spent fuel assemblies contained in a dry shielded cask. The expected radiological impact due to operation of the ISFSI is much less than the regulatory limits specified in 10CFR 72.104 and 10CFR 106(b) and the EPA Protection Action Guides.

4.7 References

1. Topical Report for the Nutech Horizontal Modular Storage System, for Irradiated Nuclear Fuel NUH-002, Rev. 1A, dated July 1989
2. Oconee Nuclear Station Final Safety Analysis Report
3. Duke Power Company Physical Security Plan
4. Oconee Nuclear Station Pre-Fire Plan
5. Letter from H. B. Tucker to U.S. NRC, Document Control Desk dated May 9, 1989
6. Letter from D. L. Hauser to U.S. NRC, Document Control Desk dated July 24, 1990
7. Letter from D. L. Hauser to U.S. NRC, Document Control Desk dated December 4, 1990

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5.0 Storage System Operations

5.1 Operation Description

As a supplement to Sections 4.3 and 4.4 of this report and Section 5.1 of Reference 1 which describe the transport and fuel loading systems and their operation, this chapter describes the actual operations which occur at the ISFSI site after transfer of the DSC from the fuel building.

5.1.1 Narrative Description

The following steps describe the operating procedures which occur after the DSC has been loaded with irradiated fuel assemblies and transferred to the ISFSI site. A more detailed description of HSM loading steps is provided in Section 5.1.1.6 of Reference 1.

5.1.1.1 Loading of the DSC into the HSM

1. Inspect all air inlets and outlets on the HSM to ensure that they are clear of debris. Inspect all screens on the air inlets and outlets for damage. Replace screens if necessary. Using an available yard crane, completely remove the front access door of the HSM. Inspect the interior of the HSM and the DSC support rail surfaces for obstructions or debris.
2. Using an appropriate towing vehicle, position the transfer cask/trailer assembly inside the gross alignment marks on the HSM pad and move it slowly, toward the HSM until the docking collar is at the minimum distance from the HSM opening to allow for cask lid removal.
3. Using the optical alignment system, the targets on the transfer cask and HSM, and the skid positioning system, adjust the position of the cask until the cask is properly aligned with the HSM.
4. Unbolt and remove the cask lid and the cask bottom access plate.
5. Move the cask against the HSM so that the docking collar is completely seated in the HSM recess.
6. Secure the cask to the HSM using the cask restraint system and the anchors on the front wall of the HSM.
7. Align hydraulic ram with transfer cask. Recheck alignment of the HSM, transfer cask, and ram.
8. Extend the hydraulic ram toward the cask and activate the grapple to engage the DSC.
9. Continue extension of the hydraulic ram to move the DSC into the HSM. If the ram fails to extend when the load on the hydraulic system is increased beyond 20,000 lbs., or, if a sudden, large increase in hydraulic pressure is observed, the DSC may be jammed or bound. If jamming or binding is suspected, corrective actions as described in Section 8.1.1.4 will be applied.
10. When the DSC is in the HSM, release the grapple from the DSC and retract the hydraulic ram arm from the transfer cask.
11. Deleted per 2007 update.
12. Lower the HSM front access door back into the door frame to within a few feet of the closed position.
13. Install seismic restraint.
14. Lower to the closed position and tack weld the steel HSM front access door.
15. Measure the change in temperature between the HSM inlet and outlet air vents.
16. Return all equipment to storage locations pending delivery/loading of next DSC.

5.1.1.2 Monitoring Operations

On a 24 hour frequency site personnel will visually inspect all air inlets and outlets of each loaded HSM for both obstructions and screen damage. Obstructions and/or damage will be removed/repaired immediately.

5.1.1.3 Fuel Identification and Accountability

In compliance with NRC regulations, accountability records for all fuel assemblies transferred to, stored in or removed from the ISFSI will be maintained.

The asymmetrical design features of the DSC allow for easy identification of specific assembly storage locations within the DSC. No visible physical labels are necessary for the individual storage locations. Unique storage location symbols will be administratively assigned to each of the 24 DSC storage cells. This is similar to the method which is currently used to track assembly locations within the spent fuel pools. Unique identifications will be assigned to the HSMs, and will be labeled on the HSM exterior. This visible physical identification in combination with the administrative assignment of cell storage locations within the DSC, and a unique serial number stamped on each DSC, will allow for the positive identification of the locations of all ISFSI spent fuel assemblies.

Once a DSC has been inserted into a HSM, the door will be lowered and tack welded into place. These tack welds will sufficiently indicate any attempts at tampering as required in ANSI 57.9-84.

Unique identification of the transfer cask will not be required since only one transfer cask is to be used. This eliminates the possible mixup of transfer casks which might occur with multiple casks being used for concurrent transport operations. Accountability and control of special nuclear materials will be maintained at all times during the loading, transport, and storage of spent fuel assemblies.

5.1.1.4 Unloading the DSC from the HSM

1. Inspect the front access components of the HSM and cut tack welds on HSM access door. Remove cask lid.
2. Position the cask/trailer assembly so that the docking collar is at the minimum distance from the HSM to allow for opening of the HSM front access door.
3. Using the optical alignment system, the targets on the transfer cask and HSM, and the skid positioning system, adjust the position of the transfer cask until the transfer cask is properly positioned with respect to the HSM.
4. Using an available yard crane, raise the front access door of the HSM just high enough to access the seismic restraint.
5. Remove seismic restraint.
6. Remove the HSM access door from the support rails.
7. Move the transfer cask against the HSM so that the docking collar is completely seated in the HSM recess.
8. Secure the transfer cask to the HSM, using the cask restraint system and the anchors on the front wall of the HSM.
9. Align hydraulic ram assembly with transfer cask/trailer and secure in place. Recheck alignment of HSM, cask and ram assembly.
10. Recheck the cask and ram alignment to ensure it is properly positioned with respect to the HSM.

11. Extend the hydraulic ram through the transfer cask into the HSM and activate the grapple to engage the DSC.
12. Retract the hydraulic ram to move the DSC out of the HSM and into the transfer cask. If the ram fails to retract when the load on the hydraulic system is increased beyond 20,000 lbs., or if a sudden large increase in hydraulic pressure is observed, the DSC may be jammed or bound. If jamming or binding is suspected, corrective actions as described in Section 8.1.1.4 will be applied.
13. When the DSC is in the transfer cask, release the grapple from the DSC and retract the hydraulic ram arm from the transfer cask.
14. Replace the top lid and bottom access plate on the transfer cask to allow for transfer cask trailer movement to appropriate location for DSC removal or offsite shipment.

5.1.2 Flow Sheet

Loading and unloading operations are illustrated in Figure B-36.

5.1.3 Identification of Subjects for Safety Analysis

5.1.3.1 Criticality Prevention

Criticality in the NUHOMS®-24P DSC is prevented through a combination of geometrical separation of the fuel cells, neutron absorption in the cell walls and administrative controls on fuel pool soluble boron concentration and the selection of fuel to be stored in the DSC. The DSC basket makes use of two material thicknesses in the cell walls as well as some over-sleeves at the top and bottom of interior cells to accommodate sufficient neutron absorption with qualified fuel assemblies. While the DSC design features will be essentially fixed, the selection of fuel for storage will be a variable. Administrative control of fuel selection will be incorporated into plant procedures. Further discussion of these controls and procedures are provided in Sections 4.4 and 10.2. The criticality analysis for the NUHOMS®-24P System can be found in Section 3.3.4 of Reference 1.

5.1.3.2 Instrumentation

The proposed ISFSI is a system requiring no instrumentation for radiation, temperature or criticality considerations.

5.1.3.3 Maintenance Techniques

Due to the passive nature of the proposed ISFSI, the only maintenance on the HSM will be periodic surveillance of the air inlet and outlet vents to insure continued air flow. Routine maintenance on the transfer cask will also be performed to maintain integrity of top lid, bottom access plate and trunnions.

5.1.3.4 Administrative Controls to Limit DBT Effects

Administrative controls for limiting transfer operations due to potential tornado weather conditions will not be required. The transfer cask in transit has been evaluated for tornado wind speeds and DBT effects in accordance with 10CFR Part 72 and was found to be enveloped by the evaluation for a design basis cask drop accident.

5.2 Control Room and Control Areas

This is a passive system and there is no need for annunicators or other systems to indicate off-normal conditions.

Surveillance for such conditions will utilize visual inspection techniques. Security surveillance will be tied into the main central alarm station and/or secondary alarm station at the Oconee Nuclear Station.

5.3 References

1. Topical Report for the Nutech Horizontal Modular Storage System for Irradiated Nuclear Fuel, NUH-002, Revision 1A, dated July 1989.

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6.0 Waste Management

No radioactive wastes are generated during the storage life of DSCs. Radioactive wastes generated during loading operations are treated using existing station facilities and procedures.

Contaminated pool water removed from loaded DSCs is normally drained back into the spent fuel pool with no additional processing. A small amount (<15 CF/DSC) of liquid waste results from transfer cask decontamination. The decontamination procedure results in a small amount of a detergent/demineralized water mixture being collected in the Cask Decontamination Pit. Liquid wastes collected in the Cask Decontamination Pit are directed to the Station Liquid Waste Management System (LWM) for processing.

Potentially contaminated air and helium purged from the DSC following DSC loading and seal welding operations are directed to the Auxiliary Building Ventilation Air System (VA) at a point upstream of the Fuel Building HVAC filter units and radioactive effluent monitor. Purged gases processed with the Fuel Building HVAC filter units are released from the unit vent and will meet station release requirements. This is the same procedure currently utilized for shipping cask operations.

A small quantity (<5 CF/DSC) of low level solid waste is generated as a result of DSC loading operations and transfer cask decontamination. The solid waste generated is processed by compaction using the Volume Reduction (VR) System or incineration using appropriate facilities. This low level waste consists of disposable Anti-C garments, tape, blotter paper, rags, etc.

Descriptions of the LWM, VA and VR Systems are provided in Chapter 11 of the Oconee UFSAR.

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7.0 Radiation Protection

7.1 Ensuring That Occupational Radiation Exposures Are ALARA

7.1.1 Policy & Organizational Considerations

Duke Radiation Protection and ALARA policies are described in Chapter 12 of the Oconee UFSAR. These policies will be applied to the Independent Spent Fuel Storage Facility since it is located on the Oconee Nuclear Station site within the Owner Controlled Area and radiologically supported and controlled by the station Radiation Protection Group.

7.1.2 Design Considerations

The design of the DSC and HSM comply with 10CFR 72 concerning ALARA considerations. Specific considerations that are directed toward ensuring ALARA are:

1. Thick concrete walls on the HSM to reduce the surface dose to below an average of 20 mr/hr. The 20 millirem per hour dose rate was the approved maximum for HSM wall dose rates in the NUHOMS®-07P Topical Report. Actual calculated HSM wall surface dose rates are below 10 millirem per hour except at vent and door openings. The HSM shielding design was deemed ALARA considering construction costs, heat dissipation, and access requirements. Also, refer to Section 7.1.2 of Reference 2 for the basis of the average 20 millirem per hour HSM contact dose rate. Additional shielding analysis is included in Section 7.3.2.2 and Table 7.3-2 of Reference 2.
2. Lead/carbon steel shield plug on the ends of the DSC to reduce the dose to workers performing drying, sealing, and loading operations.
3. Use of a shielded transfer cask for handling and transportation operations of loaded DSCs.
4. Fuel loading procedures which follow accepted practice and build on existing experience.
5. Recess in the HSM front for the transfer cask to fit into so as to reduce scattered radiation during transfer.
6. Double seal welds on each end of DSC to provide redundant radioactive material containment.
7. Placing clean water in the transfer cask and DSC and sealing the DSC/transfer cask annulus to prevent contamination of DSC exterior during loading.
8. Placing external shielding blocks over HSM air outlets to reduce direct and streaming doses.
9. Passive system design that requires minimum maintenance.
10. Insertion of internal shielding blocks around air inlets to reduce direct and streaming doses.
11. Use of portable shielding during DSC drying/welding operations to limit streaming from top end shield plug/DSC annulus. The portable shield used during DSC closure operation to limit streaming from top end shield plug/DSC annulus consists of 2.0 inches of Bisco NS-3, or equivalent, as shown in Figure A.2, Appendix A of Reference 2. The portable shield will be put in place to minimize doses during direct-access operations such as top shield plug automatic welding setup, draining and drying operations, and setup of automatic welding equipment for the top cover plate. The portable shield will incorporate provisions to facilitate access to the drain and fill ports but may not be necessary during automated welding operations.
12. To minimize scatter at the HSM door during DSC loading, the top of the transfer cask docks into a recess in the HSM access door opening.

13. Use of approved procedures to control contamination during handling and transfer of fuel.
14. Leaving water in the DSC cavity and DSC/transfer cask annulus during welding operations as long as possible to reduce streaming through the gap. The water level in the DSC/transfer cask annulus is lowered to approximately 5 to 10 inches below the top of the DSC shell. The water level in the DSC cavity is lowered to approximately 4 inches below the bottom surface of the top end shield plug. These levels are maintained during shield plug welding operations. The remaining water in the annulus is not drained until after the cask cover plate is bolted into place.
15. Providing a large control area around the ISFSI and locating the facility well away from normally occupied areas.
16. Operation of the ISFSI will be performed under the Radiation Protection program of the station as described in Section 7.1.1.
17. Lead blanket screens may be employed to further reduce dose during decontamination and transfer operations. These and other ALARA measures precautions may be employed as needed based on experience gained from preoperational testing and early fuel loading efforts.

7.1.3 ALARA Operational Considerations

Consistent with Duke's overall commitment to keep occupational radiation exposures as low as reasonably achievable, (ALARA), specific plans and procedures are followed by station personnel to assure that ALARA goals are achieved. Operational ALARA policy statements are formulated at the corporate staff level through the issuance of the System Radiation Protection Manual and the ALARA Manual and are implemented at each nuclear plant by means of procedures. These statements and procedures are consistent with the intent of Section C.1 of Regulatory Guides 8.8 and 8.10.

Since the ISFSI is a passive system, no maintenance is expected on a normal basis in the facility. Maintenance operations on the transfer cask, transfer trailer and other ancillary equipment is performed in a very low dose environment when fuel movement is not occurring.

Maintenance activities that could involve significant radiation exposure of personnel are carefully planned. They utilize any previous operating experience, and are carried out using well trained personnel and proper equipment. Radiation Work Permits (RWPs) for non-routine operations, or Standing Radiation Work Permits (SRWPs) for routine operations are issued for each job, listing Radiation Protection requirements that shall be followed by all personnel working in the Radiation Control Area (RCA). Where applicable, specific radiation exposure reduction techniques, such as those set out in Regulatory Guide 8.8, are evaluated and used.

The station ALARA Committee carefully reviews operations and maintenance activities involving the major plant systems to further assure that occupational exposures are kept ALARA.

7.2 Radiation Sources

7.2.1 Characterization of Sources

This section describes the design basis radiation sources and source geometries used for the ISFSI shielding calculations.

Neutron and gamma sources are developed based on the reference irradiated fuel assembly described in Table A-1. The reference fuel assembly is assumed to be irradiated to a burnup of 40,000 mwd/mtu and cooled to a decay heat rate of less than or equal to 0.66Kw before being stored in the DSC. The initial enrichment considered is 4.0 weight percent U-235. The source terms include the irradiated fuel, activated portions of the fuel assemblies and deposited activity from corrosion products in the reactor coolant. All primary sources are considered to be originating in the fuel with secondary gammas generated in the shielding considered by the shielding codes used.

The detailed calculation of gamma ray group fractions provided in Table 7.2-2 of Reference 2 is summarized in Table A-17.

The fuel region is modeled as a homogeneous cylinder for shielding calculations as shown in the model geometry descriptions. The homogenous source over the active fuel region includes fission product, actinide and light element activation product sources. The burnup distribution is assumed flat along the axial and radial extent of source. This modeling technique is used in all shielding calculations except supplementary calculations performed subsequent to ISFSI operation. The supplementary calculations use a heterogeneous source distribution to demonstrate the effect IFA end fitting and plenum region light element activation and reduced self-shielding have on localized TC surface dose rates.

Additional details of the radiation source terms and dose conversion factors used in ISFSI shielding analysis are provided in Section 7.2.1 of Reference 2.

7.2.2 Airborne Radioactive Material Sources

The DSC is double seal welded to prevent any gaseous release of material during storage. The possibility of release during fuel handling in the spent fuel pool is covered in the accident analysis. The other possible source of airborne radioactive material is the outside surface of the DSC. This surface is protected from contamination while the DSC is in the fuel pool by filling the annulus between the DSC and the transfer cask with demineralized water and sealing the annulus to prevent pool water from coming in contact with the outside surface of the DSC. This prevents any significant accumulation of potential airborne sources on the canister. The outside surface of the transfer cask is considered to be contaminated upon removal from the fuel pool and will be cleaned and contamination measurements made to ensure no unacceptable contamination remains before leaving the fuel building.

Cask venting releases are directed to the fuel pool HVAC units upstream of the HEPA and carbon filter units. The filtered gas is ultimately released through the unit vent after it is monitored by both the spent fuel pool storage area HVAC monitor and unit vent monitor.

7.3 Radiation Protection Design Features

7.3.1 Installation Design Features

The design considerations listed in Section 7.1.2 ensure that occupational exposures to radiation are ALARA and that a high degree of integrity is obtained for the confinement of radioactive materials. The ISFSI will be hand monitored as needed for construction, loading and unloading operations. Since the storage facility contains no active systems, no continuous monitoring systems other than fence-mounted dosimetry are needed. Applicable portions of the guidance given in Regulatory Position 2 of Regulatory Guide 8.8 have been followed: 1) Access control of radiation areas is addressed in Sections 7.1.3 and 10.2.5. 2) Radiation shields substantially reduce exposure of personnel during operations and storage; radiation streaming has been reduced by providing labyrinth-type shield penetrations. 3) NUHOMS®-24P is a passive storage system; no process instrumentation or controls are necessary during storage. 4) Airborne contaminants and gaseous radiation sources are controlled by the integrity of the double seal welded DSC assembly. 5) No crud is produced by the NUHOMS®-24P system. 6) The necessity for decontamination is reduced by maintaining the cleanliness of the DSC during operations (see Section 5.1); the DSC surfaces are smooth, nonporous, and free of crevices, cracks, and sharp corners. 7) No radiation monitoring system is required during storage. 8) No resin or sludge is produced by the NUHOMS®-24P system.

Radiation sources are contained within DSCs which are stored in concrete HSMs. The radioactive sources are described in detail in Section 7.2.1 of Reference 2.

7.3.2 Shielding

7.3.2.1 Radiation Shielding Design Features

Radiation shielding is an integral part of both the DSC and HSM designs. The features described in this section assure that doses to personnel and the public are "as low as is reasonably achievable" (ALARA).

The DSC body is a rolled stainless steel plate. Details of the DSC and HSM and relevant dimensions can be found in the drawings in the proprietary supplement of Reference 2. The lead/carbon steel shield plugs provide gamma shielding at both ends of the DSC. During handling operations, shielding in the radial direction is provided by the NUHOMS®-24P transfer cask.

Two penetrations in the top shielded end plug allow water draining, vacuum drying and helium backfilling of the DSC. The penetrations are located away from fuel assemblies and contain sharp, non-coplanar bends to reduce radiation streaming. Figure B-42 shows the physical arrangements of the DSC end-shields and location of doses reported in Table A-18. These dose rates assume the water levels in the DSC cavity and DSC/Cask annulus are lowered to the levels specified in Section 1.3.1.7.

The transfer cask provides radiological shielding during the DSC drying operation and during the transfer to the HSM. Both neutron (solid Bisco NS-3) and gamma (lead) shielding are incorporated into the cask design. The NS-3 neutron shield is 3" thick (nominal) and has a density of 1.76 gm/cc. A 10% hydrogen content loss is assumed in the shielding analysis due to anticipated degassing of the NS-3 induced by elevated temperatures. The as-built transfer cask lead gamma shield thickness is verified through radiographic examination to be 3.38" thick (nominal), but varies in thickness from approximately 3.15" to 3.5". Areas where the lead thickness falls below 3.38" are covered by an additional 1/4" thickness of stainless steel neutron shield jacket to compensate for the reduced gamma shielding effectiveness of the lead.

The HSM provides shielding in both the radial and axial directions during the storage phase. Thirty six inch thick, portland cement, concrete walls and roofs provide neutron and gamma shielding. The module's front end opening is covered by a steel door with a neutron shield.

Openings to the HSM interior are placed above the end shield regions and not directly over the active fuel region. Sharp duct bends and concrete shielding caps over the exhaust exits assure that radiation streaming is reduced to a minimum. Figure B-42 shows details of the module penetrations and locations of doses reported in Table A-18.

Portable shielding during handling operations may be applied during specific handling operations. However, Section 7.4 provides an assessment of design basis on-site doses without the use of portable shielding.

7.3.2.2 Shielding Analysis

This section describes the radiation shielding analytical methods used in calculating relevant NUHOMS®-24P system dose rates during the handling and storage phases. The dose rates were calculated at the locations listed in Table A-18. Figure B-42 shows these locations on the HSM, DSC and transfer cask. The three computer codes used for analysis are described below.

Computer Codes ANISN (Reference 3), a one-dimensional discrete ordinates transport computer code, was used to obtain neutron and gamma dose rates at the outer HSM wall, centerline of DSC end plug, and outside the loaded transfer cask. The CASK (Reference 6) cross section library, which contains 22 neutron energy groups and 18 gamma energy groups, was applied in an $S_8 P_3$ or $S_{16} P_3$ approximation.

Calculated radiation fluxes were multiplied by flux-to-dose conversion factors to obtain final dose rates. The ANISN calculations used coupled neutron and gamma libraries. Therefore, both primary and secondary gammas are calculated in each run.

QAD-CG (Reference 4), a three-dimensional point-kernel code, was used for direct gamma shielding analysis of the HSM door, the DSC and transfer cask end sections, the DSC/transfer cask annulus, and the HSM air vent penetrations. Mass and buildup were all obtained from QAD-CG's internal library for eight energy groups. The gamma energy spectrum was determined in the same manner as the

Shielding analysis results are summarized in Table A-18. Additional details regarding methods, models ANISN analysis.and assumptions used in ISFSI shielding analyses are provided in Section 7.3 of Reference 2.

A similar version, QAD-CGGP, is used in supplementary calculations performed to determine the level of localized gamma dose rate peaking which may occur over areas of the TC surface corresponding to IFA end fitting and fuel pin plenum axial elevations. Gamma sources and spectra for the various IFA source regions modeled (i.e., active fuel, upper and lower end fittings, and upper and lower fuel pin plenums) are determined in the same manner as in ISFSI shielding calculations described in Section 7.3 of Reference 2. Supplementary ANISN shielding calculations were performed to verify the adequacy of the Phase I and II HSMs assuming a minimum concrete density of 140 lb/ft^3.

7.4 Estimated On-Site Collective Dose Assessment

7.4.1 Operational Dose Assessment

This section establishes the expected cumulative dose delivered to site personnel during the fuel handling and transfer activities associated with one NUHOMS®-24P module. Chapter 5 describes in detail the ISFSI operational procedures, a number of which involve radiation exposure to personnel.

The ISFSI is a radiologically controlled area. Access to the storage modules is restricted such that for normal operation; no access closer than 50 feet is allowed except for security and surveillance purposes. Except during periods of additional module construction, there is no adjacent work area close by, so very little dose is received from fuel in storage. Access is primarily needed to load new canisters into storage modules and dose from previously stored fuel will be received during these operations. The occupational exposure received during DSC transfer operations is included in the operational dose assessment summarized in Table A-19. The occupational dose estimates provided in Table A-19 were calculated using reference fuel assembly characteristics (see Table A-1) and other site-specific parameters. Dose contributions from hidden module scatter effects and self shielding for an 88 loaded module array are included in the Table A-19 results for DSC transfer operations. The dose received for other operations performed within the HSM storage facility secured area is negligible.

The phased construction of modules up to the licensed capacity of 88 will be undertaken on an as-needed basis considering required lead time, station operation and construction schedules. Increments of additional module construction are flexible and can continue until the ultimate licensed capacity of 88 HSMs is reached. Construction work performed subsequent to the loading of any HSM with spent fuel will result in worker exposures from direct and sky shine radiation in the vicinity of the loaded HSMs. In the event that additional Site-Specific HSMs are constructed, construction materials will be staged away from the adjacent loaded HSMs. The construction area will be surveyed prior to beginning work to ascertain actual dose rates and temporary shielding may be provided if needed to lower any unacceptable dose rates. The most significant dose rate contributors to the construction area are the inlet and exhaust vent openings. These dose rates may be reduced using temporary shielding screens around the vents near the construction area. After the concrete is placed for the additional modules, the additional shielding will further reduce dose rates.

The dose estimate for additional construction was based on labor cost estimates for a 2 x 10 module array. It was assumed that 60 percent of the labor hours are expended in the radiation area and the prefabrication work would be done in low or no dose areas. Table A-20 summarizes expected construction doses by task.

The maximum dose received from the loading, construction, and maintenance of Horizontal Storage Modules is 7.5 Rem per year for the expected loading rates. This is approximately 3.5% of normal station dose. The total includes fuel handling and canister loading operations, additional module construction and general maintenance of the facility. These dose estimates are based on operational history from RWP records.

7.4.2 Storage Term Dose Assessment

No firm construction schedule for module addition has been developed at this time and thus the array sizes mentioned in Section 7.4.1 are representative of possible additional increments. Additional increments of HSMs will be constructed as required to balance the off-loading of Oconee's fuel from the storage pools and transhipment to the federal repository.

Figure B-43 is a graph of the dose rate (mr/hr) versus distance from the face of a 2 x 3 array of NUHOMS®-24P HSMs. Figure B-44 and Figure B-45 show the dose rate versus distance from the front or side of the array for various other HSM array sizes. These curves were constructed from the shielding analysis described in the previous sections and are for the dose rate in the worst case direction from the modules (perpendicular to the doors). The bounding conditions may be obtained by simply scaling the results from these curves. Direct neutron and gamma flux, as well as the air-scattered radiation from the module surfaces are considered. The surface radiation sources used for the direct and air scattered dose calculations are shown in Figure B-46. Neutron and gamma flux spectra for the surface of the HSM are provided in Table A-21. The HSM surface spectra are obtained from normalized ANISN model flux data. The ANISN HSM model as well as the CASK cross section library are described in Section 7.3 of Reference 2. The CASK cross section library is made up of 40 energy groups (groups 1-22 are neutron and groups 23-40 are gamma). Air-scattered dose rates are determined with the computer code SKYSHINE-II (Reference 5); direct dose rates are calculated using the computer code MICROSHIELD (Reference 7). The direct flux from the "hidden" row of modules is considered completely shielded by the front row. All HSMs are assumed loaded with sufficiently cooled (≤0.66Kw per assembly) spent fuel.

7.5 Radiation Protection Program

The ISFSI is located adjacent to the Oconee Nuclear Station within the plant protected area. The Oconee Nuclear Station Radiation Protection Manager has responsibility for Radiation Protection activities at the ISFSI.

The Radiation Protection and ALARA programs are discussed in the Oconee Nuclear Station UFSAR, Chapter 12. Detailed discussions of Radiation Protection and ALARA are contained in Duke's Radiation Protection and ALARA program manuals.

Radiation protection requirements for all radiological work at the Oconee Nuclear Station and ISFSI is governed by approved procedures and directives. These procedures and directives include, but are not limited to, the following:

1. Procedure for personnel dosimetry issue.
2. Issuance, revision, and termination of radiation work permits and standing radiation work permits.
3. Procedure for roping off, barricading, and posting of radiation control zones.
4. Decontamination procedure for equipment and areas.

5. Smear swab sampling, counting, and calculation.
6. Procedure for quantifying airborne radioactivity.
7. Radiation Protection ALARA preplanning work.

In addition, the Radiation Work Permits for the maintenance and fuel handling tasks associated with DSC operations incorporate radiological hold points and precautions, where necessary, to ensure these activities are performed in a radiologically safe manner and are ALARA.

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7.6 Environmental Monitoring Program

The current radiological environmental monitoring program for Oconee Nuclear Station will also serve as the operational program for the ISFSI.

No liquid or airborne effluents are anticipated from the HSM. Therefore, the dose to any offsite point will only be from direct and scattered gamma radiation. Several environmental sampling locations are presently located at the Oconee site boundary surrounding the ISFSI. The closest of these is less than 0.3 miles from the ISFSI, well within the 1-mile exclusion area boundary. In addition, the dose rates at the ISFSI will be monitored periodically with fence-mounted dosimetry as part of the Oconee routine radiological monitoring program. This will be used in part to control occupational exposures and will also augment the environmental program.

As a result, no changes to the environmental program are anticipated.

7.7 Estimated Off-Site Collective Doses

Doses to any offsite point are only from direct and scatter gamma radiation from the storage module. The estimated dose from the modules to any dose point beyond the site boundary is well below regulatory limits even when combined with station doses for both airborne and direct gamma dose.

The ISFSI is situated approximately 1 mile from the exclusion area boundary. The estimated maximum dose rate in any direction at 5000 feet for up to an 88 module array of HSM's as provided by Figure B-43 through Figure B-45 is less than 1.0 x 10^{-6} mr/hr. The estimated annual dose to the public is conservatively calculated as 7 person-millirem per year. The maximum dose to the nearest potential future resident from the ISFSI is 7.5E-2 millirem per year.

Note that construction of the site specific HSMs was suspended at module number 40. Subsequent modules have been of the General License (GL) design. An integrated dose analysis of the combined contributions by both the Site-Specific and General License storage systems are contained in the written evaluations prepared for the GL system pursuant to 10 CFR 72.212(b)(2)(i).

7.8 References

1. Oconee Nuclear Station Final Safety Analysis Report
2. Topical Report for the Nutech Horizontal Modular Storage (NUHOMS®-24P) System for Irradiated Nuclear Fuel, NUH-002, Revision 1A, July 1989
3. Oak Ridge National Laboratory, "ANISN - Multigroup One-Dimensional Discrete Ordinates Transport Code with Anisotropic Scattering" CCC-254, Oak Ridge National Laboratory (1977)
4. Oak Ridge National Laboratory, "QAD-CGGP, Point-Kernal Gamma Ray Shielding Code," CCC-396, Oak Ridge National Laboratory (1979)

5. C. M. Lampley, "The SKYSHINE-II Procedure: Calculation of the Effects of Structure Design on Neutron, Primary Gamma-Ray and Secondary Gamma-Ray Dose Rates in Air" NUREG/CR-0781, RRA-T7901, USNRC (1979)
6. Radiation Shielding Information Center, "CASK: 40 Group Neutron and Gamma Ray Cross Section Data," DLC-23, September 1978
7. Grove Engineering, Inc., "Microshield User's Manual, A Program for Analyzing Gamma Radiation Shielding," Version 2.0, 1985
8. Pacific Nuclear Calculation DUK003.0320, "Shielding Evaluation of 140 lb/ft^3 Density Concrete HSM", dated 7-2-92
9. Pacific Nuclear Calculation DUK003.0321, "Shielding Evaluation for Oconee Phase II HSMs", dated 6-26-92

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8.0 Accident Analyses

In previous chapters, features important to safety have been identified and discussed. The purpose of this chapter is to identify and analyze a range of credible accident occurrences (from minor accidents to the design basis accidents) and their causes and consequences. For each situation, reference is made to the appropriate chapter and section describing the considerations to prevent or mitigate the accident.

ANSI/ANS-57.9-1984, "Design Criteria for an Independent Spent Fuel Storage Installation (Dry Storage Type)," defines four categories or design events that provide a means of establishing design requirements to satisfy operational and safety criteria. The first design event is associated with normal operation. The second and third design events apply to events that are expected to occur during the life of the installation. The fourth design event is concerned with severe natural phenomena or low probability events. The second design event is addressed in Section 8.1 and the third and fourth design events are discussed in Section 8.2. The first design event is addressed in Chapter 4 and need not be addressed here.)

8.1 Off-Normal Operations

In this section, design events of the second type as defined by ANSI/ANS-57.9-1984 are addressed. Design events of the second type consist of events that might occur with moderate frequency on the order of once during any calendar year of operation.

The limiting off-normal event is defined as a jammed DSC during loading or unloading at the ambient temperature extremes of -40°F and +125°F as described in Reference 1 (Section 8.1). This postulated event results in the limiting structural loads on the DSC and thermal loads on the DSC and HSM for all identified off-normal events. The ambient extremes for the Oconee site are bounded by the assumed values.

8.1.1 Jammed DSC During Loading or Unloading

8.1.1.1 Postulated Cause of Jammed DSC

If the transfer cask is not accurately aligned with the HSM, the DSC might become bound or jammed during the transfer operation. The maximum tolerable misalignment for the Oconee Site-Specific ISFSI transfer operation is discussed in Section 5.1 of Reference 1.

8.1.1.2 Detection of Jammed DSC

When DSC jamming occurs, the hydraulic pressure in the ram will increase above normal insertion pressures. When this occurs, the DSC will be presumed to be jammed. The pushing and pulling forces are limited to 20,000 lbs., with override control available to the operator.

8.1.1.3 Analysis of Effects and Consequences

The analysis of the DSC under assumed jamming and binding conditions is covered in Section 8.1.2.1 of Reference 1. In both jammed DSC scenarios considered, the stress on the DSC body is shown to be much less than the ASME code allowable stress. Therefore, plastic deformation of the DSC body will not occur and there is no potential for rupture. The analysis presented in Reference 1 is applicable to Oconee Site-Specific ISFSI operation.

The ram extension and retraction force is limited to 80,000 pounds by the Hydraulic Power Unit (HPU) PLC.

8.1.1.4 Corrective Actions

In cases of DSC jamming or binding, the required corrective action is to reverse the direction of applied force on the DSC, and return the DSC to its previous position. Since no plastic deformation has occurred, the return of the DSC to its previous position will be unimpeded. The transfer cask alignment is then rechecked and the transfer cask repositioned as necessary before reinsertion is renewed.

8.1.2 Radiological Impact of Off-Normal Operations

Based on the off-normal operation analysis results presented, there is no additional radiological impact due to off-normal operations beyond what is presented in Chapter 7 of this UFSAR.

8.2 Accidents

This section addresses design events of the third and fourth types as defined by ANSI/ANS-57.9-1984, and other credible accidents which could impact the safe operation of the Oconee Site-Specific ISFSI. The postulated events addressed are:

1. Loss of Air Outlet Shielding
2. Tornado/Tornado Missile
3. Earthquake
4. Transfer Cask Drop
5. Transfer Cask Loss of Neutron Shield
6. Lightning
7. Blockage of Air Inlets and Outlets
8. DSC Leakage
9. Accidental Pressurization of DSC
10. Load Combinations
11. Floods
12. Explosions

The postulated accidents listed above include all events identified as potentially resulting in offsite doses in excess of 25 mrem.

8.2.1 Loss of Air Outlet Shielding

This postulated accident involves the loss of both air outlet shielding blocks from the top of the HSM. All other components of the Oconee Site-Specific ISFSI are assumed to be in their normal conditions.

8.2.1.1 Cause of Accident

The air outlet shielding blocks are designed to remain in place and completely functional for all events except tornado missiles. To demonstrate the safety of the Oconee Site-Specific ISFSI design, this accident assumes that both shielding blocks are completely lost.

The air outlet shield blocks are attached to the HSM by welding to an embedded plate in the HSM roof. In the highly unlikely event of a recovery situation, the damaged shield block would be removed from the HSM and temporary shielding would be placed around the outlet opening in such a way that a worker could perform the necessary recovery techniques with a minimal radiation exposure. All Duke ALARA procedures, such as pre-staging construction activities in a no-dose area, would be followed throughout the entire recovery process.

8.2.1.2 Accident Analysis

There are no structural or thermal consequences to the Oconee Site-Specific ISFSI resulting from the loss of the air outlet shielding blocks. The air flow resistance is less without the shield blocks and, hence, the air flow will increase (slightly) and provide more cooling of the DSC. Radiological consequences of this accident are described in the next section.

8.2.1.3 Accident Dose Consequences

Offsite radiological consequences result from an increase in air scattered (skyshine) dose due to the loss of the shield blocks. Onsite radiological consequences result from an increase in direct (during recovery operations on the HSM roof) and skyshine radiation. The calculation of these doses during normal conditions is described in Section 7.4. Removal of the shield blocks results in local surface dose increase of 3551 mr/hr at the vent opening. This increased surface dose was used in the models described in Section 7.4 to calculate the direct and scattered doses as a function of distance from the HSM. Table A-22 shows comparisons of the increased dose rate as a function of distance due to loss of the shielding blocks. The dose increase to a person located 100 (meters) away from the Oconee Site-Specific ISFSI installation for eight hours a day for seven days (recovery time) would be 30 mr. Subsequent shielding calculations for the Phase II modules predict removal of the shield blocks will yield a local surface doserate of 3827 mr/hr. As a result, the projected 30 mr/hr dose received by a person 100 meters from the ISFSI during the seven day recovery period will increase slightly less than 10%. This increase is considered insignificant based on the 10CFR72.106 limit of 5 rem and the short duration of the accident. The increased dose to an offsite person for 24 hours a day for seven days located 5000 feet away would be minimal.

To recover from the loss of shielding blocks, a new block is transferred to the HSM. After the shield block is transferred to the HSM, a yard crane is used to lift the block into position. The block is then bolted in place. The entire remounting operation should take less than 30 minutes, of which a mechanic will be on the HSM roof for approximately 15 minutes. During this time, the mechanic will receive less than 50 mr. An additional dose to the mechanic and to the crane operator on the ground while putting the shield block in place will be 10 mr each (assuming an average distance of 10 ft. from the center of the HSM front wall).

8.2.2 Tornado/Tornado Missile

8.2.2.1 Cause of Accident

The most severe tornado wind loadings specified by NUREG-0800, NRC Regulatory Guide 1.76 and the Oconee UFSAR are used as the design basis for this accident condition.

8.2.2.2 Accident Analysis

The applicable design parameters of the design basis tornado (DBT) are specified in Section 3.2.1 of this UFSAR. The DBT design parameters specified in Section 3.2.1 are identical to those used in the reference Topical Report in the determination of forces on structures for this accident. The analysis of the HSM and Transfer Cask response to DBT loadings is covered by the analysis presented in Section 8.2.2 of Reference 1.

8.2.2.3 Accident Dose Consequences

The only component of the Oconee Site-Specific ISFSI which is not capable of withstanding tornado generated missiles are the precast air outlet shielding blocks. The consequences of losing the shielding blocks during this accident is presented in Section 8.2.1.3 of this UFSAR.

8.2.3 Earthquake

8.2.3.1 Cause of Accident

As specified in Section 3.2.3, the Oconee Site-Specific ISFSI MHE acceleration value is 0.15g for both vertical and horizontal ground acceleration.

8.2.3.2 Accident Analysis

The reference Topical Report analysis of earthquake loads assumes a value of 0.25g and 0.17g for maximum horizontal and vertical acceleration, respectively. Reference 1 seismic stress analysis also used a multiplier of 1.5.

Since the value of the seismic accelerations for the Oconee Site-Specific ISFSI site are lower than that assumed in Reference 1, the stress analysis envelopes the site specific criteria.

In summary, the Oconee ISFSI seismic analysis using site specific criteria is enveloped by the analysis in Reference 1.

8.2.3.3 Accident Dose Consequences

Major components of the Oconee Site-Specific ISFSI are designed and evaluated to withstand the forces generated by the MHE. Hence, there are no dose consequences.

8.2.4 Cask Drop

8.2.4.1 Cause of Accident

This section addresses the structural integrity of the DSC and its internals under a postulated transport cask accident condition. It is postulated that the transfer cask described in Section 4.3 with the DSC inside is dropped 80 inches onto a thick concrete slab. Due to the design of the transfer trailer and cask skid, an actual drop event is not considered credible. Cask drop target parameters are given in Table A-23.

8.2.4.2 Accident Analysis

The Oconee Site-Specific ISFSI transfer cask is analyzed for an 80 inch drop accident using the method of analysis presented in Section 8.2.5. of Reference 1, as modified by Reference 6.

The analysis presented in Reference 1 assumes an 80 inch cask drop using Oconee ISFSI transfer cask parameters. Hence, the Reference 1 analysis covers the Oconee accident analysis. Therefore, the stress on the various structural components of the DSC and its internals are the same as those reported in Table 8.2-7 of Reference 1, as modified by Reference 6.

8.2.4.3 Accident Dose Consequences

Since the stress analysis has shown that all components important to safety of the DSC and its internal basket will perform their intended function under this accident condition, there are no dose consequences.

8.2.5 Transfer Cask Loss of Neutron Shield

8.2.5.1 Postulated Cause of Solid Shield Loss

The neutron shield jacket is designed, fabricated, tested, and inspected as ASME Section III, Division 1 Class 2 vessels. The associated ASME quality assurance program will assure that there are no poor joints, or other substandard components in the transfer cask. The Bisco NS-3 neutron shield material is a rigid solid when cured and will not flow freely through openings in the jacket. Therefore, a loss of shield material will only occur in cases of external damage to the shield jacket and concurrent displacement of NS-3 material.

8.2.5.2 Detection of Shield Material Loss

Damage to the neutron shield jacket and material would be visually obvious. Anticipated loss of hydrogen from the NS-3 material resulting from degassing at evaluated temperatures is accounted for in the shielding analysis (see Section 7.3.2).

8.2.5.3 Analysis of Effects and Consequences

For the purpose of this analysis, it is assumed that the transfer cask neutron shield will be breached as a result of postulated drop accident, and the shielding effect of the NS-3 will be lost. The effect of this will increase the cask surface contact dose from 180 mrem/hour to 837 mrem/hour. The only potential off-site dose consequences would be additional direct and air scattered radiation if the accident were to occur sufficiently close to the site boundary. It is assumed that eight hours would be required to either recover the neutron shield or to add temporary shielding while arranging recovery operations. As result, it is estimated that on-site workers at an average distance of fifteen feet would receive an additional dose rate of 80 mrem/hr.

Off-site individuals at a distance of 2000 feet would receive an additional dose of 5.7E-4 mrem for the assumed eight hour exposure. This increase is well within the limits of 10CFR 72 for an accident condition. Also, this does not preclude handling operations for recovery of the cask and its contents. Water bags or other neutron absorbing material could be wrapped around the cask to reduce the surface dose to an acceptable limit for recovery operations thus minimizing exposure of personnel in the vicinity. The actual local and off-site dose rates, recovery time and operations needed to retrieve the cask, and the required actions to be performed following the event will depend upon the severity of the event and the resultant cask and trailer/skid damage.

8.2.6 Lightning

8.2.6.1 Cause of Accident

The likelihood of lightning striking the Oconee Site-Specific ISFSI and causing an off-normal operating condition is not considered a credible accident given the ISFSI lightning protection provided. The lightning protection system for the ISFSI is designed in accordance with NFPA NO. 78-1979 Lightning Protection Code. This system precludes any damage to the HSM or its internals due to lightning.

8.2.6.2 Accident Analysis

8.2.6.2.1 HSM

Should lightning strike the Oconee Site-Specific ISFSI, the normal operation of the HSM will not be affected. The current discharged by the lightning will follow the low impedance path offered by the lightning protection system. Therefore, the HSM is not damaged by the heat or mechanical forces generated by current passing through the higher impedance concrete. Since the HSM requires no equipment for its continued operation, the resulting current surge from the lightning will not affect the normal operation of the HSM.

8.2.6.2.2 Power Supplies

The hydraulic power supplies for the transfer trailer hydraulic positioners and the hydraulic ram are independent systems. Each of these systems have manually operated pumps which could be used in case of a power failure. Electrical power supplies to the Oconee Site-Specific ISFSI site serve no safety related functions, since their loss would not adversely affect the NUHOMS®-24P safety related components or the health and safety of plant personnel or the public. Some security equipment at the ISFSI is powered from Oconee plant SSF sources. These sources also do not serve a safety function.

The electrical power distribution system and associated equipment are electrically bonded to the lightning protection and grounding system for the ISFSI. The retail power transformer is installed with lightning protection features in accordance with National Electric Safety code requirements which were current at the time of construction.

The lightning protection design meets the requirements of NEPA-78, Lightning Protection Code: 1986 Edition and IEEE Standard 665.

8.2.6.2.3 Welding of DSC to Support Structure

Movement of the DSC from the transfer cask to the fully inserted position in the HSM takes less than 20 minutes. Transfer operations will not be attempted during a major thunderstorm when there is potential danger to plant personnel or costly damage to equipment. Therefore, the possibility of the DSC becoming welded to the support structure by a lightning strike is extremely unlikely. In addition, there is contact between the transfer cask and HSM mating collar, such that the anchorage of the transfer cask to the HSM shown in Topical Report Figure 4.2-6 provides a grounding path to the HSM. To complete this path, the attachment plates are grounded to the HSM reinforcing which will provide additional assurance that this event will not occur. Lightning would likely strike the highest nearby structure, which is a light pole.

The HSM rails are bonded to the HSM grounding system by means of exothermically welding a bare copper conductor to the embedded steel support plates and the HSM grounding system. Additionally, the trailer mounted ram assembly tripod is bonded to the HSM grounding system during cask positioning operations.

8.2.6.3 Accident Dose Consequences

Since no off-normal operating condition will develop as a result of lightning striking the ISFSI, there are no radiological consequences.

8.2.7 Blockage of Air Inlets and Outlets

This accident involves the complete and total blockage of all HSM air inlets and outlets.

8.2.7.1 Cause of Accident

Since the HSMs are located outdoors, the air inlets and outlets could potentially be blocked by debris from such unlikely events as tornados. Oconee Site-Specific ISFSI design features such as a perimeter fence and separation of air inlets and outlets reduce the potential for this accident.

8.2.7.2 Accident Analysis

The structural consequences due to the weight of debris blocking the air openings are bounded by the structural consequences of other accidents described in this section (i.e., tornado and earthquake analyses). The thermal consequences of this accident result from heating of the DSC and HSM due to the loss of natural convection cooling. An analysis of this condition is provided by Section 8.2.7 of Reference 1.

8.2.7.3 Accident Dose Consequences

There are no offsite dose consequences as a result of this accident. The only dose increase is related to the recovery operation where the onsite worker will receive an additional 700 mr during an estimated 8 hour debris removal period.

8.2.8 Dry Storage Canister Leakage

The DSC is designed for no leakage and analysis of normal and accident conditions have shown that no credible conditions could breach the canister body or fail the double seal welds at each end of the DSC. However, to show the ultimate safety of the Oconee Site-Specific ISFSI system, a total and complete instantaneous leak is postulated.

This postulated accident is the instantaneous release directly to the environment of 30% of all fission gasses mainly Kr_{85} and I_{129} contained in all the fuel rods in all 24 PWR fuel assemblies. This accident assumes that all fuel rods are ruptured and that concurrent DSC leakage occurs. All other components of the ISFSI system remain intact.

8.2.8.1 Cause of Accident

Due to the passive nature of the Oconee Site-Specific ISFSI system and the various design features, there is no credible event that could result in the rupture of all fuel rods concurrent with DSC leakage. However, to demonstrate the safety of the ISFSI design, this accident assumes that the fuel rods and the canister are ruptured due to an event of unspecified origin.

8.2.8.2 Accident Analysis

In the postulated Dry Storage Canister Leakage Accident, it is assumed that one DSC is breeched and fuel fails simultaneously releasing 30% of all fission gasses contained in 24 fuel assemblies. Following long-term wet storage (>7.5 years) the gaseous fission products which can be released are Kr_{85} and I_{129}. The total DSC inventories assumed for Kr_{85} and I_{129} are 2.75E+03 and 1.87E-02 Curies, respectively; these inventories are based on ORIGEN-S computer code (Reference 2) analysis for 24 B&W 15x15 fuel assemblies irradiated for 40,000 MWD/MTU and decayed for 7.5 years.

Whole body and maximum organ doses are calculated for a hypothetical maximum individual assumed to be present at the nearest site boundary location (a distance of approximately 1 mile) for the duration of the event. A meteorological dispersion parameter (X/Q) of 4.5E-04 sec/m^3 is used in calculating the maximum potential offsite doses; this X/Q value is consistent with the value referenced in the Oconee SER, Section 3.2.4, Units 2 and 3. Dose conversion factors used are obtained from NRC Regulatory Guide 1.109 and a breathing rate of 3.47E-04 m^3/sec is used in calculating inhalation dose.

There are no structural or thermal consequences resulting from the DSC leakage accident described above. The radiological consequences of this accident are presented in Section 8.2.7.3.

8.2.8.3 Accident Dose Consequences

This postulated accident involves the rupture of one DSC. All fuel rods contained in the ruptured DSC are assumed to fail simultaneously such that 30% of all the fission gasses in the irradiated fuel assemblies are instantaneously released to the atmosphere. Whole body and maximum organ doses are calculated for a hypothetical individual assumed to be present at the Oconee Nuclear Station exclusion zone for the duration of the event. A meteorological dispersion parameter of $4.5E\text{-}4 s/m^3$ is used in calculating the maximum potential offsite doses. The resulting calculated doses are 7 and 200 mr for the maximum offsite whole body and thyroid doses, respectively. These accident doses are well within the 10CFR 72 limit of 5000 mr whole body dose equivalent.

8.2.9 Accidental Pressurization of DSC

This accident addresses the consequences of accidental pressurization of the DSC.

8.2.9.1 Cause of Accident

Internal pressurization of the DSC could result from fuel cladding failure which would release fuel rod fill gas and free fission gas.

8.2.9.2 Accident Analysis

The maximum DSC accident pressurization is calculated assuming that the fuel rod fission gas release fraction is 30%, and that the original fuel rod fill pressure is 480 psig (Oconee fuel actually has a maximum initial fill pressure of 465 psig). The resulting internal DSC pressures at Oconee's maximum ambient temperature of 116°F and at the minimum ambient temperature of -30°F are below the accident pressures reported in Section 8.2.9 of Reference 1 (for temperature extremes of 125°F and -40°F). The limiting accident for DSC pressurization is the loss of transfer cask neutron shield. Under these conditions, the gas temperatures in the DSC will rise to 600°F producing a DSC internal pressure of 49.1 psig. The DSC shell stresses due to accident pressurization are enveloped by those reported in Reference 1.

During DSC opening, appropriate radiation protection techniques will be employed for respiratory protection of the workers and for preventing any uncontrolled releases to the environment. During cutting operations these techniques may include installation of exhaust hoods which discharge to the fuel building ventilation system upstream of the HEPA and carbon filter units and supplied air to the workers. During filling and venting, the vented gases will, also, be routed to the fuel building ventilation system. This is a routine precaution taken for opening of spent fuel shipping casks, and it would provide protection from respirable radioactive particles and, also, from the unlikely presence of a significant amount of escaped fission gases.

8.2.9.3 Accident Dose Calculations

Since the accidental pressurization is within the design basis limits of the DSC, there are no dose consequences.

8.2.10 Load Combinations

The load categories associated with normal operating conditions and accident conditions have been described and analyzed in previous chapters of this report. The load combination evaluation of various Oconee Site-Specific ISFSI safety related components is addressed in this section.

8.2.10.1 Cause of Accident

The simultaneous loading of major Oconee Site-Specific ISFSI components by combined accident and normal loads would result in the load combinations analyzed.

8.2.10.2 Accident Analysis

The methodology used in combining normal operating and accident loads and their associated overload factors for various Oconee Site-Specific ISFSI components is presented in Section 8.2.10 of Reference 1. The Reference 1 analysis envelopes the Oconee ISFSI. The load combination and fatigue analysis in Reference 1 indicates major ISFSI components can withstand severe load combination and thermal cycling without failure.

8.2.10.3 Accident Dose Consequences

There are no dose consequences for postulated load combination events.

8.2.11 Flooding

The elevation of the Oconee Site-Specific ISFSI yard at Elevation 825.0 is more than eleven feet higher than the maximum flood level postulated for Lake Keowee, and therefore, flooding of the ISFSI will not occur.

8.2.12 Explosions

8.2.12.1 Cause of Accident

The explosion on S.C. Highways 130 or 183 of a tanker containing 8,500 gallons of gasoline would subject the Oconee Site-Specific ISFSI to a surface overpressure.

8.2.12.2 Accident Analysis

According to the NRC Regulatory Guide 1.91 "Evaluations of Explosives Postulated on Transportation Routes Near Nuclear Power Plants," the explosion of 8,500 gallons of gasoline 1,100 feet from the Oconee Site-Specific ISFSI on S. C. Highway 130 or 183, would result in a peak overpressure of 1 psi about 1,900 feet from the point of explosion and therefore an overpressure of 2.3 psi at the ISFSI. The HSM has been designed to withstand a maximum tornado wind pressure of 2.75 psi on the HSM leading wall, and -2.48 psi on the HSM roof. Therefore, the HSM overpressure from the explosion of a gasoline tanker on either S. C. Highway 130 or 183 is enveloped by the wind pressure analysis and design for a DBT.

8.2.12.3 Accident Dose Consequences

There are no dose consequences for postulated explosions.

8.3 Site Characteristics Affecting Safety Analysis

All site characteristics affecting safety analyses presented in this UFSAR are noted where they apply.

8.4 References

1. Topical Report for the Nutech Horizontal Modular Storage (NUHOMS®-24P) System for Irradiated Nuclear Fuel, NUH-002, Revision 1A, dated July 1989

2. "SCALE-3: A Modular Code System for Performing Standardized Computer Analysis for Licensing Evaluation," NUREG/CR-0200, ORNL, Revision 3, December 1984

3. Pacific Nuclear Calculation DUK003.0320, "Shielding Evaluation of 140 lb/ft3 Density Concrete HSM", dated 7-2-92.

4. Pacific Nuclear Calculation DUK003.0321, "Shielding Evaluation for Oconee Phase II HSMs", dated 6-26-92.

5. 10CFR 72.48 Evaluation for Revisions to Oconee ISFSI, OSC-3485, Rev. 15, dated October 3, 1995.

6. Memo to file, dated July 9, 2001 documenting Vendor evaluation of ISFSI Phase I & II loaded canisters. ONS Master File No. OS-262.

THIS IS THE LAST PAGE OF THE TEXT SECTION 8.0.

9.0 Conduct of Operations

9.1 Organizational Structure

9.1.1 Corporate Organization

Duke is responsible for development of the Oconee Site-Specific ISFSI including design, construction, quality assurance, testing and operation of the facility. The corporate organization is fully described in Chapter 13 of the Oconee UFSAR.

9.1.1.1 Corporate Functions, Responsibilities and Authorities

The corporate organization provides line responsibility for operation of the Company. Various departments within the Company have responsibility for design, construction, quality assurance, testing and operation of the Oconee Nuclear Station as well as the Oconee Site-Specific ISFSI. Duke's corporate functions, responsibilities and authorities for quality assurance addressed in Topical Report DUKE-1-A, as described in Chapter 11 of this report, are applicable for appropriate portions of the ISFSI.

9.1.1.2 Applicant's In-House Organization

Duke's Nuclear Generation Department, headed by the Senior Vice President, Nuclear Generation, has corporate responsibility for overall nuclear safety, as established by Technical Specifications. Reporting to the Senior Vice President is a Vice President for each nuclear site, and the four Nuclear General Office Location Managers.

The Nuclear Generation Department Organization is described in Section 13.1.2 of the Oconee UFSAR.

9.1.1.3 Interrelationship with Contractors and Suppliers

The development of the ISFSI including design, construction, testing and operation are managed and conducted by Duke. Technical support and other services for the program relating to the Nutech Engineers, Inc. supplied NUHOMS®-24P are provided by Nutech Engineers, Inc. (now Transnuclear, Inc.).

9.1.1.4 Applicant's Technical Staff

The Corporate technical staff supporting the Oconee Site-Specific ISFSI is described in Section 13.1.1 of the Oconee UFSAR.

9.1.2 Operating Organization, Management, and Administrative Control System

9.1.2.1 Onsite Organization

The onsite organization of the Oconee Nuclear Station is responsible for operation of the Oconee Site-Specific ISFSI. The organization for Oconee Nuclear Station is fully described in Section 13.1.2 of the Oconee UFSAR.

9.1.2.2 Personnel Functions, Responsibilities and Authorities

The functions, responsibilities and authorities of major personnel positions, including discussions of specific succession of responsibility for overall operation of the Oconee Nuclear Station including the Oconee Site-Specific ISFSI are described in Section 13.1.2.2.2 of the Oconee UFSAR.

9.1.3 Personnel Qualification Requirements

The qualifications of personnel in the operating staff are in accordance with Section 4 of ANSI 3.1-1978, "Selection and Training of Nuclear Power Plant Personnel," and are in accordance with Regulatory Guide 1.8 (Rev. 1). Section 13.1.3 of the Oconee UFSAR provides more details on personnel qualification requirements.

9.1.3.1 Minimum Qualification Requirements

The minimum qualification requirements for major operating, technical, and maintenance supervisory personnel are described in Section 13.1.3.1 of the Oconee UFSAR.

9.1.3.2 Qualifications of Personnel

The qualification of personnel assigned to the managerial and technical positions are available for inspection on site.

9.1.4 Liaison with Other Organizations

All aspects of the Oconee Site-Specific ISFSI development including design, procurement, construction, and operation have been managed and conducted by Duke. Nutech Engineers, Inc. (now Transnuclear, Inc.), Duke's subcontractor provides certain engineering, technical support, and other services for the ISFSI project relating primarily to the NUHOMS®-24P dry storage cask system design.

9.2 Preoperational Testing and Operation

Prior to operation of the Oconee Site-Specific ISFSI, complete functional tests of the in-plant operations, transfer operations, and HSM loading and retrieval were performed. These tests verified that the storage system components (e.g. DSC, transfer cask, transfer trailer, etc.) could be operated safely and effectively.

9.2.1 Administrative Procedures for Conducting Test Program

Pre-operational testing procedures were written in accordance with existing Oconee procedure controls as governed by Duke's QA Program.

9.2.2 Test Program Description

The testing program required the use of a DSC mock-up, transfer cask and associated handling equipment, transfer trailer, hydraulic ram and an HSM. The tests simulated, as nearly as possible, the actual operations involved in preparing a DSC for storage and ensured that they could be performed safely during actual emplacement of IFAs in the Oconee Site-Specific ISFSI. Shielding verification, which was not completely achievable during dry runs, took place during the initial IFA loadings.

9.2.2.1 Operations

9.2.2.1.1 DSC and Associated Equipment

An actual DSC and a part-length mock-up of a DSC were obtained for pre-operational testing. The DSC was loaded into the transfer cask to verify fit and suitability of the DSC lift rig. Additionally, the DSC was used in operational testing of the transfer equipment and HSM.

The part-length mock-up was similar to the top end of the DSC with lead shield plug facsimile. The mock-up was welded by the automated welding equipment. Emphasis was placed on acceptability of the weld, as well as compliance with approved ALARA practices. The mockup was also used for verification of vacuum drying, helium backfilling, and cutting open operations.

9.2.2.1.2 Transfer Cask and Handling Equipment

Functional testing was performed with the transfer cask, lift yoke, lift extension, and remote actuation equipment associated with the lift yoke. These tests ensured that the transfer cask could be safely transported from the ONS truck bay to the decontamination pit. From there, the DSC/transfer cask was placed into the spent fuel pool cask pit to verify clearances and travel path and proper operation of the annulus seal.

9.2.2.1.3 Off-Normal Testing of the DSC and Transfer Cask

In the unlikely event that a problem arises during loading of IFAs into the DSC, seal welding/evacuation/drying, transport of the DSC, or emplacement of a DSC into an HSM, no immediate action would be required. Operations in the spent fuel pool could be suspended indefinitely with IFA cladding temperatures well below the average long-term storage temperature limit of 340°C. During the other operations the IFA cladding temperature remains well below 570°C - an acceptable temperature for short-term operational and accident conditions. The DSC/transfer cask could be returned to the spent fuel pool if these other operations could not be completed in a timely manner. As stated in Section 9.2.2.1.1, the ability to open a sealed DSC was demonstrated by cutting open the DSC mockup.

9.2.2.1.4 Transfer Trailer and HSM

The DSC/transfer cask was loaded with test weights to simulate loaded fuel and placed on the transfer trailer. It was then transported to the ISFSI and aligned with an HSM. Compatibility of the transfer trailer with the transfer cask, negotiation of the travel path to the Oconee Site-Specific ISFSI, and maneuverability within the confines of the ISFSI were verified. Additionally, it was verified that the 80 inch design basis height for a postulated cask drop could not be exceeded.

The transfer trailer was aligned and docked to the HSM. The hydraulic ram was used to emplace a DSC loaded with test weights in the HSM and remove it. Loading of the DSC into the HSM verified that the transfer skid alignment system, hydraulic positioners, and ram grapple assembly could operate safely for both emplacement of a DSC into an HSM, and removal of a DSC from an HSM.

9.2.2.1.5 Off-Normal Testing of the Transfer Trailer and HSM

In the unlikely event that a problem should occur that prevents loading the DSC into the HSM, no immediate remedial action will be required. IFAs may be stored in the transfer cask while corrective action is taken.

The most severe condition would occur if a failure of the hydraulic ram, after partial insertion of a DSC into an HSM, were to prevent complete emplacement of the DSC. (Radiological shielding and decay heat removal are not compromised by this condition, but the transfer trailer may not be moved away until the

DSC is completely within the confines of either the transfer cask or the HSM.) Pre-operational testing verified that reversal of DSC movement could be completed by the operator of the hydraulic ram.

9.2.3 Test Discussion

1. The purpose of the pre-operational tests was to ensure that a DSC could be properly and safely placed in the spent fuel pool, loaded with IFAs, transported to the Oconee Site-Specific ISFSI, emplaced in the HSM, and removed from the HSM. Proper operation of the DSC, transfer cask, and transfer trailer, as well as the associated handling equipment (e.g. lifting yoke and lift extension, welding equipment, vacuum equipment) provided this assurance.
2. Pre-operational test procedures were developed as stated in Section 9.2.1. Specific detailed procedures were developed and implemented by ONS personnel who were responsible for ensuring that the test requirements were satisfied. Changes made to the pre-operational procedures were incorporated into the appropriate loading procedure.
3. The result of the pre-operational tests was the successful completion of the following without damage to any component associated piece of equipment; loading of a DSC into the transfer cask, seal welding, drying, backfilling, and cutting open of the mockup DSC, placement of the transfer cask into and out of the ONS spent fuel pool, transporting the transfer cask loaded with a DSC to the ISFSI, and emplacement in an HSM and removal from an HSM.

9.3 Training Program

The existing training program for ONS was modified to incorporate the training needed for operation of the Oconee Site-Specific ISFSI, in accordance with the Duke Employee Training and Qualification System (ETQS) Standards Manual. ETQS provides a systematic approach to training as described in the ONS UFSAR, Section 13.1 of the Oconee UFSAR

9.3.1 Training for Operations Personnel

Since the Oconee Site-Specific ISFSI is a passive storage system, generalized training is provided in the areas of cooling, radiological shielding, and structural characteristics of the DSC/HSM.

Detailed operator training is provided for DSC preparation and handling, fuel loading, transfer cask preparation and handling, and transfer trailer loading. Although operations personnel may not be directly involved in transport or HSM loading, detailed training is provided to permit oversight of these operations by fuel handling personnel.

Additionally, Fire Brigade training has been expanded to include the ISFSI in the Oconee Nuclear Station Pre-Fire Plan.

9.3.2 Training for Maintenance Personnel

Maintenance personnel, involved with the Oconee Site-Specific ISFSI operations, receive generalized training in the NUHOMS®-24P storage system. Specific training is provided for use of the automated seal welding equipment for the top end shield plug; operation of the transfer trailer; alignment of the cask skid with the HSM; alignment of the hydraulic ram assembly; and normal and off-normal operation of the hydraulic ram. Specific training is also being provided for cleaning of the HSM air inlets and outlets.

9.3.3 Training for Radiation Protection Personnel

Radiation Protection personnel receive generalized training in the NUHOMS®-24P system. Specific training has been provided in radiological shielding design of the system, particularly the top end shield plug, DSC/transfer cask, the shielding issue associated with transfer of the DSC into the HSM, and the HSM itself.

9.3.4 Training for Security Personnel

Details of the training program for security personnel are provided in the Guard Training Plan contained in a separate enclosure which is withheld from public disclosure in accordance with 10CFR 2.790(d) and 10CFR 73.21.

9.4 Normal Operations

Under normal operations, the Oconee Site-Specific ISFSI provides independent storage of Oconee spent fuel away from the Oconee plant facilities. With the exception of some limited physical and continuous electronic security surveillance, the ISFSI functions as a passive system. Loading of fuel assemblies into the ISFSI, which occurs periodically, requires specific procedures that are separate from those of normal plant operations.

9.4.1 Procedures

Operating, testing, and maintenance procedures are prepared, revised, reviewed, and approved in accordance with the Duke Nuclear Generation Department "Nuclear Policy Manual" (NPM). (The NPM sets forth the specific requirements of the Duke QA Topical Report, DUKE-1-A, which has been approved by the NRC as meeting the requirements of 10CFR 50 Appendix B.)

9.4.2 Records

The Oconee Site-Specific ISFSI records are maintained in accordance with existing Oconee Nuclear Station procedures.

9.5 Emergency Planning

The Emergency Program for Oconee Nuclear Station has been determined to be adequate to manage the consequences of events which might occur involving the Oconee Site-Specific ISFSI. Appropriate reviews were made of the existing emergency plan initiating conditions and it was determined that no changes were necessary. The Emergency Program consists of the Oconee Nuclear Site Emergency Plan and related implementing procedures. Also included are related radiological emergency plans and procedures of state and local governments. The purpose of these plans is to provide protection of plant personnel and the general public and to prevent or mitigate property damage that could result from an emergency at the Oconee Nuclear Site. The combined emergency preparedness programs have the following objectives:

1. Effective coordination of emergency activities among all organizations having a response role.
2. Early warning and clear instructions to the population-at-risk in the event of a serious radiological emergency.
3. Continued assessment of actual or potential consequences both on-site and off-site.
4. Effective and timely implementation of emergency measures.
5. Continued maintenance of an adequate state of emergency preparedness.

The Emergency Plan has been prepared in accordance with Section 50.47 and Appendix E of 10CFR Part 50. The plan shall be implemented whenever an emergency situation is indicated. Radiological emergencies can vary in severity from the occurrence of an abnormal event, such as a minor fire with no radiological health consequences, to nuclear accidents having substantial onsite and/or offsite consequences. In addition to emergencies involving a release of radioactive materials, events such as security threats or breaches, fires, electrical system disturbances, and natural phenomena that have the potential for involving radioactive materials are included in the plans. The plan contains adequate flexibility for dealing with any type of emergency that might occur.

The activities and responsibilities of outside agencies providing an emergency response role are detailed in the State of South Carolina emergency plans and the emergency plans for Oconee and Pickens Counties.

The emergency response resources available to respond to an emergency consist of the following: 1. ONS Site Personnel, 2. Duke corporate headquarters personnel, 3. Other Duke nuclear station personnel, and, in the longer term, federal emergency response organizations (e.g. NRC, DOE, FEMA). The first line of defense in responding to an emergency lies with the normal operating shift on duty when the emergency begins. Therefore, members of the Oconee staff are assigned emergency response roles that are to be assumed whenever an emergency is declared. The overall management of the emergency is initially performed by the shift supervisor until he/she is relieved by the Station Manager. In the event of an emergency, he serves as the Emergency Coordinator. Onsite personnel have preassigned roles to support the Emergency Coordinator and to implement his directives.

Special provisions have been made to assure that ample space and proper equipment are available to effectively respond to the full range of possible emergencies. The emergency facilities available include the Oconee Control Room, Operational Support Center, Technical Support Center, Joint Information Center, and the Emergency Operations Facility. These facilities are described in the site emergency plan.

Emergency plan implementing procedures define the specific actions to be followed in order to recognize, assess, and correct an emergency condition and to mitigate its consequences. Procedures to implement the Plan provide the following information:

1. Specific instructions to the plant operating staff for the implementation of the Plan.
2. Specific authorities and responsibilities of plant operating personnel.
3. A source of pertinent information, forms, and data to ensure prompt actions are taken and that proper notifications and communications are carried out.
4. A record of the completed actions.
5. The mechanism by which emergency preparedness will be maintained at all times

9.6 Physical Security Plan

The purpose of the security program for the Oconee Nuclear Station is to establish and maintain a physical security program that has the capabilities for the protection of spent fuel stored in the NUHOMS®-24P system.

Information regarding the security program for the Oconee Site-Specific ISFSI is withheld from public disclosure in accordance with 10CFR 2.390(d) and 10CFR 73.21.

9.7 References

1. Oconee Nuclear Station Updated Final Safety Analysis Report (UFSAR)

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10.0 Operating Controls and Limits

The Oconee Site-Specific ISFSI operates as a passive system requiring minimal surveillance. However, there are some operating controls and limits that apply. These controls and limits which are listed below are discussed in detail in the following corresponding sections of this chapter. Other items which must be controlled such as those related to fuel movement and loading are based on normal operation and postulated accidents as discussed in Chapter 4 and Chapter 8, respectively, of this UFSAR.

10.1 Operating Controls and Limits

Operating limits and controls are included in Reference 2.

10.2 Development of Operating Controls and Limits

This section provides an overview and general bases for the operating controls and limits specified in Reference 2, which provides the specifications associated with the operation of the Oconee Site-Specific ISFSI to ensure the protection of the public's health and safety.

10.2.1 Functional and Operating Limits, Monitoring Instruments and Limiting Control Settings

The Oconee Site-Specific ISFSI utilizes the NUHOMS®-24P system which is a passive design. Therefore, with the exception of the limit placed on the translational force exerted on the DSC by the hydraulic ram, no monitoring instruments or limiting control settings are utilized at the ISFSI facility. Long term operating variables such as HSM storage temperatures and confinement integrity will be controlled through observance of the operational control and limit specifications described in Reference 2.

Another control which falls under the Oconee Station's 10CFR50 operating license is a restriction on minimum cooling time for fuel stored in certain locations of the spent fuel pools during cask handling operations. These restrictions ensure that any radioactivity releases remain below regulatory guidelines in the event of an in-pool cask drop accident.

10.2.2 Limiting Conditions for Operation

10.2.2.1 Equipment

Limiting conditions for the Oconee Site-Specific ISFSI equipment are specified in Reference 2. In addition, the ram hydraulic system will be pre-set to insure that translational loads on a DSC during movement into the HSM are automatically limited to a maximum of 20,000 lbs. (Override control will be available to hydraulic ram operator for use during off-normal remedial action if needed.)

10.2.2.2 Technical Conditions And Characteristics

The following technical conditions and characteristics are required for the NUHOMS®-24P system:

1. Boron Concentration in DSC Moderator
2. DSC Vacuum Pressure During Drying
3. DSC Helium Backfill Pressure
4. DSC Helium Leak Rate
5. DSC Dye Penetrant Test of Closure Welds

6. Fuel Assembly Retrieval and Inspection
7. DSC Surface Contamination
8. DSC Draining Requirements

A description of the bases for selecting the above conditions and characteristics is detailed in Reference 2. The overall technical and operational considerations are further described in Section 10.2.2.2 of Reference 1.

10.2.3 Surveillance Requirements

Surveillance Requirements for the Oconee Site-Specific ISFSI are specified in Reference 2.

10.2.4 Design Features

Changes to site specific design features important to safety are not anticipated for the Oconee Site-Specific ISFSI. Design features of the NUHOMS®-24P system important to safe operation are outlined in Section 10.2.4 of Reference 1 and in Reference 2. Changes to any of these design features will be implemented only after appropriate regulatory review and approval.

10.2.5 Administrative Controls

Use of existing and proposed Duke organizational and administrative systems and procedures, record keeping, review, audit and reporting requirements (i.e. Duke NGD Nuclear Policy Manual, Oconee Nuclear Site Directives, Operating Procedures, etc.) will be used to ensure that the operations involved in the storage of spent fuel at the Oconee Site-Specific ISFSI are performed in a safe manner. This includes both the selection of assemblies qualified for ISFSI storage, and the verification of assembly identification numbers prior to and after placement into individual storage canisters.

10.2.5.1 Qualification of Spent Fuel

Fuel assembly qualification is based on the requirements for criticality control, decay heat removal, structural integrity, and radiological protection.

For the NUHOMS®-24P subcriticality is assured for fuel assemblies meeting the 4.0 wt% initial enrichment limit of Reference 2 when the DSC is filled with water borated to at least 1810 ppm (as required by Reference 2) or when the DSC is drained.

To ensure subcriticality in the postulated event that the DSC is filled with demineralized, unborated water, the burnup requirements of Figure B-48 are specified for any permissible initial enrichment. Three curves are specified. For Single Region Storage, burnup of the IFAs in each of the 24 locations in the DSC must meet or exceed the curve for "Unrestricted" fuel. For Mixed Region Storage, the burnup of the IFAs in the 4 center DSC locations must meet or exceed the curve for "Filler" fuel. Burnup of the IFAs in the remaining 20 DSC locations must meet or exceed the curve for "Restricted" fuel.

Procedures currently in place for special nuclear materials accountability and record keeping are used to verify initial fuel assembly enrichment and burnup levels at discharge. New fuel enrichments and initial uranium isotopics are recorded from the DOE/NRC Form 741's and stored in both a database file and on duplicate paper copies of the Form 741's. Individual fuel assembly burnups are also stored in the special nuclear materials database. These values are generated by the Oconee Operator Aided Computer utilizing thermal energy production data determined by in-core flux mapping. Burnup and initial enrichment values from special nuclear material accountability records are compared to Figure B-48 to verify that the reactivity level is acceptable for DSC loading and storage of each irradiated fuel assembly. Actual qualification procedures may utilize a tabular version of the enrichment-burnup curves which will allow for each linear interpolation between a number of data points. While this enrichment vs. burnup method for reactivity verification is routinely used as required by procedures, Duke reserves the right to rely on other NRC approved analytical methods to qualify fuel assemblies in special cases.

For decay heat control, only those irradiated assemblies which do not exceed a decay heat level of 0.66 kw qualify for loading into the DSC. Decay heat loadings at or below this level ensure that peak pin clad temperatures are maintained within acceptable levels. Since individual fuel assembly decay heat levels are a function of both the discharge burnup and the decay time, procedural controls are used to verify these parameters prior to fuel assembly loading.

For the Oconee fuel design and routine operating histories, the decay time necessary to achieve a .66 kw decay heat level is generally 7.5 years. The variation in required cooling time is a very strong function of discharge burnup and a very weak function of initial enrichment. It is acceptable to store fuel assemblies cooled less than 10 years provided that decay heat production is no more than 0.66 Kw for each fuel assembly and that neutron and gamma source terms for the DSC are verified not to exceed certain values specified in Reference 2.

As mentioned previously, special nuclear materials accountability records are used to verify fuel assembly burnup. These records are also used to verify spent fuel decay time. The individual assembly burnup and decay time is then compared to Figure B-48 for DSC loading qualification purposes.

To ensure the structural integrity of the spent fuel loaded into the current Site-Specific ISFSI, station records of all damaged assemblies are reviewed. A damaged fuel assembly and component database has been compiled which incorporates previous sipping, ultrasonic (UT) testing, and visual observation. This database is examined as a part of the dry storage qualification process to verify that assemblies with gross structural or gross cladding damage are not included.

If the reactivity, decay heat, cooling time structural integrity, and dose limits criteria are all met, then approval for dry storage for a given assembly will be documented. This documentation will subsequently be referenced through procedures at the station prior to loading fuel into the DSC.

10.2.5.2 Spent Fuel Identification

Administrative controls are utilized to avoid fuel misplacement. Information on fuel assembly qualification for dry storage is documented and transmitted to fuel handling personnel. Prior to any transfer of a fuel assembly in the DSC, specific DSC loading procedures require a review of assembly documentation. This is followed by an independent visual verification of the assembly identification number by two individuals. These procedures ensure that the correct (approved) fuel assembly is being accessed and loaded into the DSC. As a final check, all assembly identification numbers are checked after the DSC has been fully loaded with 24 assemblies.

10.3 Operational Control and Limit Specification

Functional and Operating Limits, Monitoring Instruments and Limiting Control Settings; Limiting Conditions for Operations; and Surveillance Requirements are specified in Reference 2.

10.4 References

1. Topical Report for the Nutech Horizontal Modular Storage (NUHOMS®-24P) System for Irradiated Nuclear Fuel, NUH-002, Revision 1A, July 1989
2. Special Nuclear Materials License SNM-2503, Docket No. 72-4 for the Oconee Independent Spent Fuel Storage Installation

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11.0 Quality Assurance

Duke maintains full responsibility for assuring that its nuclear power plants are designed, constructed, tested and operated in conformance with good engineering practices, applicable regulatory requirements and specified design bases and in a manner to protect the public health and safety. To this end Duke has established and implemented a quality assurance program which conforms to the criteria established in Appendix B to 10CFR Part 50, "Quality Assurance Criteria for Nuclear Power Plants and Fuel Reprocessing Plants" and to approved industry standards such as ANSI N45.2-1971 and ANSI N18.7-1976 and corresponding daughter standards, or to equivalent alternatives.

The activities associated with the Independent Spent Fuel Storage Installation (ISFSI) will be governed by the applicable portions of Duke's Quality Assurance Program. This Quality Assurance Program is described in the Topical Report, DUKE-1-A. The Topical Report provides the current quality assurance program description for Oconee, McGuire, and Catawba Nuclear Stations, Docket Nos. 50-269, 50-270, 50-287, 50-369, 50-370, 50-413, and 50-414.

The Topical Report describes the Quality Assurance Program for those systems, components, items, and services which have been determined to be safety related. In addition, Duke's Quality Assurance Program provides a method of applying a graded Quality Assurance Program to certain non-safety related systems, components, items, and services. This method involves defining a Quality Assurance "Condition" for each level of quality assurance required. These will be designated as "QA Condition ________." The following conditions have been defined.

QA Condition 1 covers those systems and their attendant components, items, and services which have been determined to be safety related. These systems are detailed in the Safety Analysis Report applicable to each nuclear station. The Topical Report applies in its entirety to systems, components, items, and services identified as QA Condition 1.

QA Condition 2 covers those systems and their attendant components, items, and structures important to the management and containment of liquid, gaseous, and solid radioactive waste.

QA Condition 3 covers those systems, components, items, and services which are important to fire protection as defined in the Hazards Analysis for each station. The Hazards Analysis is in response to Appendix A of NRC Branch Technical Position APCSB 9.5-1.

QA Condition 4 covers those seismically designed/restrained systems, components, and structures whose continued functions are not required during and after the seismic event. The general scope of these systems, components, and structures, identified as Seismic Category 11 (SC11) are defined in Regulatory Guide 1.29, Seismic Design Classification.

QA Condition 5 covers those systems, components, items, and services which are important to the mitigation of design basis and other selected events as defined in applicable procedures and directives. QA Condition 5 only applies to Oconee Nuclear Station.

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Appendix A. Tables

Table A-1. Design Parameters for the Oconee ISFSI

GENERAL DESIGN REQUIREMENTS	
Maximum weight on crane hook	100 tons
Capacity (Casks/Canister)	24 PWR Assys
Maximum assembly weight	1682 lbs
Reference Fuel Assembly parameters:	
1. Nominal burnup	40,000 MWD\MTU
2. Initial Enrichment (Maximum)	4.0%
3. Maximum initial Uranium Content	472 kg/assembly
4. Cooling Time	10 years nominal
5. Fuel Rod Array	15 x 15
Fuel Cell Envelope (Minimum)	8.75/8.85 in.
Effective multiplication factor	$K_{eff} < 0.95$
Internal DSC atmosphere	Inert Gas (Helium)
Ambient temperature	-30°F to 116°F
Solar heat load (Maximum)	127 BTU/hr-ft^2
Average doses at HSM surface during storage	20 mr/hr combined gamma and neutron
Maximum Axial Midplane Dose at Transfer Cask Surface during Transport[1]	200 mr/hr combined gamma and neutron
Maximum Loading Height (Fuel Pool)	15' 6" above pool floor
Storage orientation	Horizontal
Normal Operating Equilibrium Clad Temperature	340°C
Assume Credit for Burnup for Criticality Computations[2]	Based on 1.45% Initial Enrichment equivalent.
Accessible with Fuel Mast	
Maximum Assembly Length (Includes Radiation Growth and Control Components)	173 in.
Active Fuel Length	144 in.

Notes:

1. Licensing basis design calculations assume a homogeneous source over the active fuel region (See Section 7.2.1). Elevated dose rates in excess of 200 mrem/hr over limited areas of the transfer cask surface may be observed. In particular, elevated gamma dose rates in excess of 200 mrem/hr, centered on fuel assembly end fittings, can be anticipated based on initial DSC loading dose rate survey data. Supplementary shielding calculations performed subsequent to ISFSI operation demonstrate dose rates as high as 565 mrem/hr centered on fuel or near assembly end fittings can be anticipated.
2. Primary licensing basis criticality control design feature is credit for 1810 ppm soluble boron in DSC cavity during wet loading operations. Fuel assembly initial enrichment/burnup qualification procedures provide additional criticality safety margin.

Table A-2. Summary of ISFSI Fuel Handling Operations

1.	Clean the DSC, if necessary, and Load it into the Transfer Cask
2.	Fill the DSC with borated water and Transfer Cask annulus with demineralized water
3.	Install the Inflatable Annulus Seal to seal the Cask/DSC annulus
4.	Lift the Transfer Cask Containing the DSC into the Spent Fuel Pool
5.	Load the Fuel into the DSC
6.	Place the Top Shield Plug on the DSC
7.	Lift the Transfer Cask Containing the Filled DSC out of the Spent Fuel Pool and Place it in the Decon Pit.
8.	Remove the annulus seal.
9.	Lower the water level in the DSC/transfer cask annulus to approximately 5 to 10 inches below the top of the DSC shell.
10.	Lower the water level in the DSC below the bottom surface of the top shield plug.
11.	Install and seal weld the inner top cover plate onto the DSC Body and perform NDE.
12.	Install Outer Top Cover Plate.
13.	Install Inner Top Cover Plate Strongback device.
14.	Evacuate and Dry the DSC
15.	Backfill the DSC with Helium
16.	Seal Weld Covers for the Drain and Vent Line of the DSC and perform NDE
17.	Remove Inner Top Cover Plate Strongback.
18.	Seal Weld the Outer Top Cover Plate and perform NDE
19.	Install the Transfer Cask Lid and Bolt in Place
20.	Decontaminate the Transfer Cask Surface
21.	Drain the water from the Cask/DSC Annulus
22.	Lift the Transfer Cask onto the Transfer Trailer and Lower it into the Horizontal Position
23.	Tow the Transfer Trailer to the HSM
24.	Remove the HSM Front Access Door
25.	Align the Transfer Cask and the HSM
26.	Remove the Transfer Cask Lid and Bottom Access Plate
27.	Push the DSC into the HSM Using the Hydraulic Ram System
28.	Retract Hydraulic Ram Arm and reposition transfer cask
29.	Replace the HSM Front Access Door and Tack Weld in Place

Table A-3. Primary Design Parameters for the ISFSI Transport Systems

System	Parameters	Value
Transfer Cask	Nominal Cavity Diameter	68 in.
	Nominal Cavity Length	188 in.
	Payload Capacity (Maximum)	90,000 lbs
	Reference Heat Rating	15.8 kw (.66/assembly)
	Shielding (Surface Dose) at Axial Midplane	200 mr/hr average
Transfer Cask Movement	Liftable by Crane	200,000 lbs. maximum.
	Rotatable by Crane from Vertical to Horizontal	Has rotation trunnions
Transfer Cask Lid	Removable in Horizontal Position	5,400 lb
Trailer and Skid	Truck Transportable	-
	Transfer Cask Lid Must Protrude	15.25 cm (6 in.)
	Past End of Trailer and Skid	
	Capacity (Transfer Trailer	109,000kg (120 tons)
	(Transfer Trailer Skid)	100,000kg (110 tons)

Table A-4. Major Systems, Subsystems and Components of the Oconee ISFSI

Dry Storage Canister
1. DSC Basket
a. Guide Sleeve (24)
b. Spacer Disks(8)
c. Support Rods(4)
2. DSC Shell
3. Shielded End Plugs (Top and Bottom)
4. Cover Plates (Top and Bottom)
5. Drain and Fill Ports
6. Grapple Ring
Horizontal Storage Module
1. Reinforced Concrete Walls, Roof, and Basemat
2. DSC Structural Steel Support Assembly
3. DSC Seismic Retainer
4. Cask Docking Flange and Tie-Down Restraints
5. Heat Shield
6. Shielded Front Access Door
7. Ventilation Air Openings (One Inlet, Two Outlets)
8. Shielded Ventilation Air Inlet Plenum
9. Ventilation Air Outlet Shielding Blocks
Transfer Cask
1. Cask Structural Shell Assembly
2. Bolted Top Head Assembly
3. Cask Lifting Trunnions
4. Lead Gamma Shielding
5. Neutron Shield Assembly
6. Ram Access Penetration Cover Plate
Transfer Trailer
1. Heavy Industrial-Grade Trailer
2. Cask Support Skid
3. Skid Positioning and Alignment System
Hydraulic Ram System
1. Hydraulic Cylinder and Supports
2. Hydraulic System
3. Grapple Assembly

Table A-5. Population Growth in Oconee, Pickens, and Anderson Counties, South Carolina (1980-2005)

	Oconee County		Pickens County		Anderson County	
	Population	**Annual Growth %**	**Population**	**Annual Growth %**	**Population**	**Annual Growth %**
1980	48,611	1.8%	79,292	2.8%	133,235	2.4%
1990	57,494	1.7%	93,896	1.7%	145,177	0.9%
1998	64,059	1.4%	107,087	1.7%	160,791	1.3%
2000	66,215	1.5%	110,757	1.7%	165,740	1.4%
2005	69,577	0.9%	113,575	0.7%	175,514	1.1%
Average		1.5%		1.7%		1.4%

Sources: DP-1. Profile of General Demographic Characteristics, Census 2000 Summary File 1 (SF 1) 100-Percent Data, U.S. Bureau of the Census, County Population Estimates for July 1, 2005 and Population Change for July 1, 2004 to July 1, 2005, Population Estimates, Population Division, U.S. Bureau of the Census, County Population Estimates for July 1, 1998 and Population Change for July 1, 1997 to July 1, 1998, Population Estimates Program Division, March 12, 1999; 1998 Upstate Profile; Development of the SC Upstate, Part 1: Population, Income, and Housing; South Carolina Appalachian Council of Governments; Greenville, South Carolina; Knight, H.T. (Ed.) 1998.

Table A-6. Population Projections for Oconee, Pickens, and Anderson Counties, South Carolina (2010-2050)*

	Oconee County	Pickens County	Anderson County
	Population	**Population**	**Population**
2010	74,954	123,563	188,149
2020	86,987	146,250	216,213
2030	100,952	173,104	248,462
2040	117,159	204,888	285,522
2050	135,968	242,508	328,110

*Based on the average annual growth percent from Table A-5 for the respective county.

Table A-7. Joint Frequencies of Wind Direction and Speed by Stability Class

OCONEE METEOROLOGICAL SURVEY TOWER DATA								FOR PERIOD OF MAR. 15, 1970 THRU MAR. 14, 1972				
SUMMARY OF PASQUILL A				WIND OCCURRENCES BY SECTOR & SPEED CLASS (NO. OCCUR, PERCENT)								
												DATE OF REPORT 5-16-72
							WIND SPEED CLASS					
Wind Sector	Item	Sector Total	1.0-3.2 .45-1.49	3.3-5.5 1.5-2.49-	5.6-7.8 2.5-3.49.	7.9-10.0 3.5-4.49	10.1-12.3 4.5-5.49	12.4-14.5 5.5-6.49	14.6-16.7 6.5-7.49	16.8-19.0 7.5-8.49	19.1-21.2 8.5-9.49	>21.2 MPH >=9.5 M/S
360.0	NO	132	15	68	35	8	4	0	2	0	0	0
-N-	PCT	0.92	0.10	0.47	0.24	0.05	0.03	0.00	0.01	0.00	0.00	0.00
22.5	NO	99	5	48	26	10	5	3	2	0	0	0
-NNE-	PCT	0.69	0.03	0.33	0.18	0.07	0.03	0.02	0.01	0.00	0.00	0.00
45.0	NO	172	10	56	30	16	23	18	10	9	0	0
-NE-	PCT	1.20	0.07	0.39	0.21	0.11	0.16	0.13	0.07	0.06	0.00	0.00
67.5	NO	161	8	29	31	20	32	25	13	2	1	0
-ENE-	PCT	1.12	0.05	0.20	0.22	0.14	0.22	0.17	0.09	0.01	0.01	0.00
90.0	NO	165	8	47	52	32	18	6	2	0	0	0
-E-	PCT	1.15	0.05	0.33	0.36	0.22	0.13	0.04	0.01	0.00	0.00	0.00
112.5	NO	137	18	59	35	12	11	2	0	0	0	0
-ESF-	PCT	0.96	0.13	0.41	0.24	0.08	0.08	0.01	0.00	0.00	0.00	0.00
135.0	NO	255	15	76	81	50	22	8	2	1	0	0
-SE-	PCT	1.78	0.10	0.53	0.56	0.35	0.15	0.05	0.01	0.01	0.00	0.00
157.5	NO	200	5	31	63	52	31	12	4	2	0	0
-SSE-	PCT	1.39	0.03	0.22	0.44	0.36	0.22	0.08	0.03	0.01	0.00	0.00
180.0	NO	270	11	49	64	56	45	27	14	2	2	0
-S-	PCT	1.88	0.08	0.34	0.45	0.39	0.31	0.19	0.10	0.01	0.01	0.00
202.5	NO	374	4	53	105	86	67	32	18	8	0	1
-SSW-	PCT	2.61	0.03	0.37	0.73	0.60	0.47	0.22	0.13	0.05	0.00	0.01
225.0	NO	388	5	81	113	60	44	27	33	17	5	3
-SW-	PCT	2.71	0.03	0.56	0.79	0.42	0.31	0.19	0.23	0.12	0.03	0.02
247.5	NO	204	4	50	47	17	19	16	17	14	5	15
-WSW-	PCT	1.42	0.03	0.35	0.33	0.12	0.13	0.11	0.12	0.10	0.03	0.10
270.0	NO	184	8	53	35	8	22	19	16	9	9	5
-W-	PCT	1.28	0.05	0.37	0.24	0.05	0.15	0.13	0.11	0.06	0.06	0.03
292.5	NO	113	7	31	15	10	6	8	8	8	6	14
-WNW-	PCT	0.79	0.05	0.22	0.10	0.07	0.04	0.05	0.05	0.05	0.04	0.10
315.0	NO	123	14	41	15	12	3	6	9	4	5	14
-NW-	PCT	0.86	0.10	0.29	0.10	0.08	0.02	0.04	0.06	0.03	0.03	0.10
337.5	NO	84	12	38	21	4	4	2	2	0	1	0
-NNW-	PCT	0.59	0.08	0.26	0.15	0.03	0.03	0.01	0.01	0.00	0.01	0.00
CALM	NO	0										
	PCT	0.00										
TOTAL	NO	3061	149	810	758	453	356	211	152	76	34	52
	PCT	21.36	1.04	5.65	5.36	3.16	2.48	1.47	1.06	0.53	0.24	0.36
TOTAL VALID OBSERVATIONS			14333							TOTAL OBSERVATIONS 17545		

OCONEE METEOROLOGICAL SURVEY TOWER DATA							FOR PERIOD OF MAR. 15, 1970 THRU MAR. 14, 1972					
SUMMARY OF PASQUILL B + C						WIND OCCURRENCES BY SECTOR + SPEED CLASS (NO. OCCURR, PERCENT)						
											DATE OF REPORT 5-16-72	
			WIND SPEED CLASS									
Wind Sector	Item	Sector Total	1.0-3.2 .45-1.49	3.3-5.5 1.5-2.49-	5.6-7.8 2.5-3.49	7.9-10.0 3.5-4.49	10.1-12.3 4.5-5.49	12.4-14.5 5.5-6.49	14.6-16.7 6.5-7.49	16.8-19.0 7.5-8.49	19.1-21.2 8.5-9.49	>21.2 MPH >=9.5 M/S
360.0	NO	20	3	8	3	4	0	0	2	0	0	0
-N-	PCT	0.14	0.02	0.05	0.02	0.03	0.00	0.00	0.01	0.00	0.00	0.00
22.5	NO	34	6	8	8	2	2	5	2	1	0	0
-NNE-	PCT	0.24	0.04	0.05	0.05	0.01	0.01	0.03	0.01	0.01	0.00	0.00
45.0	NO	57	3	8	9	11	7	9	6	3	1	0
-NE-	PCT	0.40	0.02	0.05	0.06	0.08	0.05	0.06	0.04	0.02	0.01	0.00
67.5	NO	52	0	10	2	12	9	7	7	3	1	1
-ENE-	PCT	0.36	0.00	0.07	0.01	0.08	0.06	0.05	0.05	0.02	0.01	0.01
90.0	NO	37	4	11	10	5	7	0	0	0	0	0
-E-	PCT	0.26	0.03	0.08	0.07	0.03	0.05	0.00	0.00	0.00	0.00	0.00
112.5	NO	32	5	9	12	4	2	0	0	0	0	0
-ESE-	PCT	0.22	0.03	0.06	0.08	0.03	0.01	0.00	0.00	0.00	0.00	0.00
135.0	NO	51	11	16	11	9	4	0	0	0	0	0
-SE-	PCT	0.36	0.08	0.11	0.08	0.06	0.03	0.00	0.00	0.00	0.00	0.00
157.5	NO	40	1	11	12	7	6	2	1	0	0	0
-SSE-	PCT	0.28	0.01	0.08	0.08	0.05	0.04	0.01	0.01	0.00	0.00	0.00
180.0	NO	48	5	9	6	8	10	4	3	2	0	1
-S-	PCT	0.33	0.03	0.06	0.04	0.05	0.07	0.03	0.02	0.01	0.00	0.01
202.5	NO	74	2	13	12	14	11	5	10	5	2	0
-SSW-	PCT	0.52	0.01	0.09	0.08	0.10	0.08	0.03	0.07	0.03	0.01	0.00
225.0	NO	75	7	9	8	18	7	11	10	2	3	0
-SW-	PCT	0.52	0.05	0.06	0.05	0.13	0.05	0.08	0.07	0.01	0.02	0.00
247.5	NO	37	3	6	4	3	2	7	2	4	0	6
-WSW-	PCT	0.26	0.02	0.04	0.03	0.02	0.01	0.05	0.01	0.03	0.00	0.04
270.0	NO	24	3	4	3	0	4	2	2	1	0	5
-W-	PCT	0.17	0.02	0.03	0.02	0.00	0.03	0.01	0.01	0.01	0.00	0.03
292.5	NO	21	2	9	0	0	0	0	3	3	1	3
-WNW-	PCT	0.15	0.01	0.06	0.00	0.00	0.00	0.00	0.02	0.02	0.01	0.02
315.0	NO	28	4	8	2	1	3	2	0	2	1	5
-NW-	PCT	0.20	0.03	0.05	0.01	0.01	0.02	0.01	0.00	0.01	0.01	0.03
337.5	NO	26	4	8	8	3	1	0	0	0	0	2
-NNW-	PCT	0.18	0.03	0.05	0.05	0.02	0.01	0.00	0.00	0.00	0.00	0.01
CALM	NO	0										
	PCT	0.00										
TOTAL	NO	656	63	147	110	101	75	54	48	26	9	23
	PCT	4.58	0.44	1.03	0.77	0.70	0.52	0.38	0.33	0.18	0.06	0.16
TOTAL VALID OBSERVATIONS			14333						TOTAL OBSERVATIONS 17545			

OCONEE METEOROLOGICAL SURVEY TOWER DATA						FOR PERIOD OF MAR. 15, 1970 THRU MAR. 14, 1972					
SUMMARY OF PASQUILL D				WIND OCCURRENCES BY SECTOR + SPEED CLASS (NO. OCCURR, PERCENT)							
										DATE OF REPORT 5-16-72	
					WIND SPEED CLASS						
Wind Sector	Item	Sector Total	1.0-3.2 .45-1.49	3.3-5.5 1.5-2.49-	5.6-7.8 2.5-3:49	7.9-10.0 3.5-4.49	10.1-12.3 4.5-5.49	12.4-14.5 5.5-6.49	14.6-16.7 6.5-7.49	16.8-19.0 7.5-8.49	19.1-21.2 8.5-9.49	>21.2 MPH >=9.5 M/S
360.0	NO	30	10	10	3	4	1	1	0	1	0	0
-N-	PCT	0.21	0.07	0.07	0.02	0.03	0.01	0.01	0.00	0.01	0.00	0.00
22.5	NO	43	2	8	12	11	4	6	0	0	0	0
-NNE-	PCT	0.30	0.01	0.05	0.08	0.08	0.03	0.04	0.00	0.00	0.00	0.00
45.0	NO	95	7	10	18	9	18	19	11	2	1	0
-NE-	PCT	0.66	0.05	0.07	0.13	0.06	0.13	0.13	0.08	0.01	0.01	0.00
67.5	NO	55	4	7	10	12	13	6	0	3	0	0
-ENE-	PCT	0.38	0.03	0.05	0.07	0.08	0.09	0.04	0.00	0.02	0.00	0.00
90.0	NO	63	6	20	14	8	9	4	1	1	0	0
-E-	PCT	0.44	0.4	0.14	0.10	0.05	0.06	0.03	0.01	0.01	0.00	0.00
112.5	NO	26	4	12	7	3	0	0	0	0	0	0
-ESE-	PCT	0.18	0.03	0.08	0.05	0.02	0.00	0.00	0.00	0.00	0.00	0.00
135.0	NO	35	7	12	7	7	2	0	0	0	0	0
-SE-	PCT	0.24	0.05	0.08	0.05	0.05	0.01	0.00	0.00	0.00	0.00	0.00
157.5	NO	43	6	14	10	8	3	1	1	0	0	0
-SSE-	PCT	0.30	0.04	0.10	0.07	0.05	0.02	0.01	0.01	0.00	0.00	0.00
180.0	NO	44	4	7	7	4	7	9	3	3	0	0
-S-	PCT	0.31	0.03	0.05	0.05	0.03	0.05	0.06	0.02	0.02	0.00	0.00
202.5	NO	65	3	9	16	8	14	9	4	1	1	0
-SSW-	PCT	0.45	0.02	0.06	0.11	0.05	0.10	0.06	0.03	0.01	0.01	0.00
225.0	NO	98	2	23	25	13	9	14	11	1	0	0
-SW-	PCT	0.68	0.01	0.16	0.17	0.09	0.06	0.10	0.08	0.01	0.00	0.00
247.5	NO	38	5	10	2	2	5	8	2	1	0	3
-WSW-	PCT	0.26	0.03	0.07	0.01	0.01	0.03	0.05	0.01	0.01	0.00	0.02
270.0	NO	51	8	10	3	5	4	6	5	3	0	7
-W-	PCT	0.36	0.05	0.07	0.02	0.03	0.03	0.04	0.03	0.02	0.00	0.05
292.5	NO	24	2	6	2	1	1	2	0	3	1	6
-WNW-	PCT	0.17	0.01	0.04	0.01	0.01	0.01	0.01	0.00	0.02	0.01	0.04
315.0	NO	36	14	9	1	1	1	1	1	3	1	4
-NW-	PCT	0.25	0.10	0.06	0.01	0.01	0.01	0.01	0.01	0.02	0.01	0.03
337.5	NO	26	6	9	6	3	0	0	0	1	0	1
-NNW-	PCT	0.18	0.04	0.06	0.04	0.02	0.00	0.00	0.00	0.01	0.00	0.01
CALM	NO	0										
	PCT	0.00										
TOTAL	NO	772	90	176	143	99	91	86	39	23	4	21
	PCT	5.38	0.63	1.23	1.00	0.64	0.63	0.60	0.27	0.16	0.03	0.15
TOTAL VALID OBSERVATIONS			14333						TOTAL OBSERVATIONS 17545		

OCONEE METEOROLOGICAL SURVEY TOWER DATA						FOR PERIOD OF MAR. 15, 1970 THRU MAR. 14, 1972						
SUMMARY OF PASQUILL E				WIND OCCURRENCES BY SECTOR + SPEED CLASS (NO. OCCURR, PERCENT)								
										DATE OF REPORT 5-16-72		
					WIND SPEED CLASS							
Wind Sector	Item	Sector Total	1.0-3.2 .45-1.49	3.3-5.5 1.5-2.49-	5.6-7.8 2.5-3.49	7.9-10.0 3.5-4.49	10.1-12.3 4.5-5.49	12.4-14.5 5.5-6.49	14.6-16.7 6.5-7.49	16.8-19.0 7.5-8.49	19.1-21.2 8.5-9.49	>21.2 MPH >=9.5 M/S
360.0	NO	391	50	135	129	49	19	4	3	0	0	2
-N-	PCT	2.73	0.35	0.94	0.90	0.34	0.13	0.03	0.02	0.00	0.00	0.01
22.5	NO	392	35	92	126	64	44	21	4	6	0	0
-NNE-	PCT	2.73	0.24	0.64	0.88	0.45	0.31	0.15	0.03	0.04	0.00	0.00
45.0	NO	611	42	87	120	129	108	90	25	8	2	0
-NE-	PCT	4.26	0.29	0.61	0.84	0.90	0.75	0.63	0.17	0.05	0.01	0.00
67.5	NO	390	30	84	93	92	39	27	15	9	1	0
-ENE-	PCT	2.72	0.21	0.59	0.65	0.64	0.27	0.19	0.10	0.06	0.01	0.00
90.0	NO	313	33	92	106	46	24	8	2	0	2	0
-E-	PCT	2.18	0.23	0.64	0.74	0.32	0.17	0.05	0.01	0.00	0.01	0.00
112.5	NO	165	34	56	47	11	13	2	2	0	0	0
-ESE-	PCT	1.15	0.24	0.39	0.33	0.08	0.09	0.01	0.01	0.00	0.00	0.00
135.0	NO	182	39	57	42	21	17	3	2	0	1	0
-SE-	PCT	1.27	0.27	0.40	0.29	0.15	0.12	0.02	0.01	0.00	0.01	0.00
157.5	NO	166	21	43	44	35	20	2	1	0	0	0
-SSE-	PCT	1.16	0.15	0.30	0.31	0.24	0.14	0.01	0.01	0.00	0.00	0.00
180.0	NO	217	31	36	58	38	25	19	7	2	1	0
-S-	PCT	1.51	0.22	0.25	0.40	0.26	0.17	0.13	0.05	0.01	0.01	0.00
202.5	NO	401	18	64	75	82	73	49	28	12	0	0
-SSW-	PCT	2.80	0.13	0.45	0.52	0.57	0.51	0.34	0.20	0.08	0.00	0.00
225.0	NO	570	35	94	100	84	87	93	60	15	2	0
-SW-	PCT	3.98	0.24	0.65	0.70	0.59	0.61	0.65	0.42	0.10	0.01	0.00
247.5	NO	363	20	54	62	51	69	57	24	11	3	12
-WSW-	PCT	2.53	0.14	0.38	0.43	0.36	0.48	0.40	0.17	0.08	0.02	0.08
270.0	NO	364	39	79	37	26	33	52	32	28	16	22
-W-	PCT	2.54	0.27	0.55	0.26	0.18	0.23	0.36	0.22	0.20	0.11	0.15
292.5	NO	206	22	36	18	16	15	15	25	15	16	28
-WNW-	PCT	1.44	0.15	0.25	0.13	0.11	0.10	0.10	0.17	0.10	0.11	0.20
315.0	NO	275	36	82	50	24	15	15	8	21	5	19
-NW-	PCT	1.92	0.25	0.57	0.35	0.17	0.10	0.10	0.05	0.15	0.03	0.13
337.5	NO	233	38	89	55	19	14	8	4	0	0	6
-NNW-	PCT	1.63	0.26	0.62	0.38	0.13	0.10	0.05	0.03	0.00	0.00	0.04
CALM	NO	17										
	PCT	0.12										
TOTAL	NO	5239	523	1180	1162	787	615	465	242	127	49	89
	PCT	36.55	3.65	8.23	8.11	5.49	4.29	3.24	1.69	0.89	0.34	0.62
TOTAL VALID OBSERVATIONS			14333							TOTAL OBSERVATIONS 17545		

OCONEE METEOROLOGICAL SURVEY TOWER DATA						FOR PERIOD OF MAR. 15, 1970 THRU MAR. 14, 1972						
SUMMARY OF PASQUILL F				WIND OCCURRENCES BY SECTOR + SPEED CLASS (NO. OCCURR, PERCENT)								
										DATE OF REPORT 5-16-72		
						WIND SPEED CLASS						
Wind Sector	Item	Sector Total	1.0-3.2 .45-1.49	3.3-5.5 1.5-2.49-	5.6-7.8 2.5-3.49	7.9-10.0 3.5-4.49	10.1-12.3 4.5-5.49	12.4-14.5 5.5-6.49	14.6-16.7 6.5-7.49	16.8-19.0 7.5-8.49	19.1-21.2 8.5-9.49	>21.2 MPH >=9.5 M/S
360.0	NO	384	38	160	150	30	6	0	0	0	0	0
-N-	PCT	2.68	0.26	1.12	1.05	0.21	0.04	0.00	0.00	0.00	0.00	0.00
22.5	NO	213	24	93	76	16	1	2	1	0	0	0
-NNE-	PCT	1.48	0.17	0.65	0.53	0.11	0.01	0.01	0.01	0.00	0.00	0.00
45.0	NO	170	23	83	45	12	4	2	1	0	0	0
-NE-	PCT	1.19	0.16	0.58	0.31	0.08	0.03	0.01	0.01	0.00	0.00	0.00
67.5	NO	106	12	50	31	5	5	0	1	0	1	1
-ENE-	PCT	0.74	0.08	0.35	0.22	0.03	0.03	0.00	0.01	0.00	0.01	0.01
90.0	NO	88	19	30	31	5	3	0	0	0	0	0
-E-	PCT	0.61	0.13	0.21	0.22	0.03	0.02	0.00	0.00	0.00	0.00	0.00
112.5	NO	53	11	25	12	4	1	0	0	0	0	0
-ESE-	PCT	0.37	0.08	0.17	0.08	0.03	0.01	0.00	0.00	0.00	0.00	0.00
135.0	NO	84	9	33	26	13	3	0	0	0	0	0
-SE-	PCT	0.59	0.06	0.23	0.18	0.09	0.02	0.00	0.00	0.00	0.00	0.00
157.5	NO	84	10	26	26	17	5	0	0	0	0	0
-SSE-	PCT	0.59	0.07	0.18	0.18	0.12	0.03	0.00	0.00	0.00	0.00	0.00
180.0	NO	108	14	27	26	14	21	6	0	0	0	0
-S-	PCT	0.75	0.10	0.19	0.18	0.10	0.15	0.04	0.00	0.00	0.00	0.00
202.5	NO	124	8	31	35	24	12	9	3	1	1	0
-SSW-	PCT	0.86	0.05	0.22	0.24	0.17	0.08	0.06	0.02	0.01	0.01	0.00
225.0	NO	173	16	49	32	35	24	15	1	0	0	1
-SW-	PCT	1.21	0.11	0.34	0.22	0.24	0.17	0.10	0.01	0.00	0.00	0.01
247.5	NO	142	13	40	29	30	14	6	8	2	0	0
-WSW-	PCT	0.99	0.09	0.28	0.20	0.21	0.10	0.04	0.05	0.01	0.00	0.00
270.0	NO	185	34	58	29	20	15	10	11	6	2	0
-W-	PCT	1.29	0.24	0.40	0.20	0.14	0.10	0.07	0.08	0.04	0.01	0.00
292.5	NO	159	23	67	29	16	10	6	5	1	2	0
-WNW-	PCT	1.11	0.16	0.47	0.20	0.11	0.07	0.04	0.03	0.01	0.01	0.00
315.0	NO	246	39	123	50	19	6	4	1	2	1	1
-NW-	PCT	1.72	0.27	0.86	0.35	0.13	0.04	0.03	0.01	0.01	0.01	0.01
337.5	NO	337	38	155	104	30	5	4	1	0	0	0
-NNW-	PCT	2.35	0.26	1.08	0.72	0.21	0.03	0.03	0.01	0.00	0.00	0.00
CALM	NO	3										
	PCT	0.02										
TOTAL	NO	2656	331	1050	731	290	135	64	33	12	7	3
	PCT	18.53	2.31	7.33	5.10	2.02	0.94	0.45	0.23	0.08	0.05	0.02
TOTAL VALID OBSERVATIONS			14333							TOTAL OBSERVATIONS 17545		

OCONEE METEOROLOGICAL SURVEY TOWER DATA						FOR PERIOD OF MAR. 15, 1970 THRU MAR. 14, 1972						
SUMMARY OF PASQUILL G			WIND OCCURRENCES BY SECTOR + SPEED CLASS (NO. OCCURR, PERCENT)									
											DATE OF REPORT 5-16-72	
			WIND SPEED CLASS									
Wind Sector	Item	Sector Total	1.0-3.2 .45-1.49	3.3-5.5 1.5-2.49-	5.6-7.8 2.5-3.49	7.9-10.0 3.5-4.49	10.1-12.3 4.5-5.49	12.4-14.5 5.5-6.49	14.6-16.7 6.5-7.49	16.8-19.0 7.5-8.49	19.1-21.2 8.5-9.49	>21.2 MPH >=9.5 M/S
360.0	NO	370	35	144	139	46	6	0	0	0	0	0
-N-	PCT	2.58	0.24	1.00	0.97	0.32	0.04	0.00	0.00	0.00	0.00	0.00
22.5	NO	143	28	69	38	8	0	0	0	0	0	0
-NNE-	PCT	1.00	0.20	0.48	0.26	0.05	0.00	0.00	0.00	0.00	0.00	0.00
45.0	NO	97	18	41	27	8	2	1	0	0	0	0
-NE-	PCT	0.68	0.13	0.29	0.19	0.05	0.01	0.01	0.00	0.00	0.00	0.00
67.5	NO	72	10	31	18	11	2	0	0	0	0	0
-ENE-	PCT	0.50	0.07	0.22	0.13	0.08	0.01	0.00	0.00	0.00	0.00	0.00
90.0	NO	55	7	27	13	5	1	2	0	0	0	0
-E-	PCT	0.38	0.05	0.19	0.09	0.03	0.01	0.01	0.00	0.00	0.00	0.00
112.5	NO	31	6	14	7	1	2	1	0	0	0	0
-ESE-	PCT	0.22	0.04	0.10	0.05	0.01	0.01	0.01	0.00	0.00	0.00	0.00
135.0	NO	102	11	36	39	14	2	0	0	0	0	0
-SE-	PCT	0.71	0.08	0.25	0.27	0.10	0.01	0.00	0.00	0.00	0.00	0.00
157.5	NO	65	11	22	23	8	1	0	0	0	0	0
-SSE-	PCT	0.45	0.08	0.15	0.16	0.05	0.01	0.00	0.00	0.00	0.00	0.00
180.0	NO	55	8	18	17	10	1	1	0	0	0	0
-S-	PCT	0.38	0.05	0.13	0.12	0.07	0.01	0.01	0.00	0.00	0.00	0.00
202.5	NO	64	11	23	18	10	2	0	0	0	0	0
-SSW-	PCT	0.45	0.08	0.16	0.13	0.07	0.01	0.00	0.00	0.00	0.00	0.00
225.0	NO	142	19	42	46	25	8	1	0	1	0	0
-SW-	PCT	0.99	0.13	0.29	0.32	0.17	0.05	0.01	0.00	0.01	0.00	0.00
247.5	NO	111	23	40	29	10	5	3	0	0	0	1
-WSW-	PCT	0.77	0.16	0.28	0.20	0.07	0.03	0.02	0.00	0.00	0.00	0.01
270.0	NO	99	18	37	24	10	5	2	2	1	0	0
-W-	PCT	0.69	0.13	0.26	0.17	0.07	0.03	0.01	0.01	0.01	0.00	0.00
292.5	NO	110	26	52	19	4	4	3	2	0	0	0
-WNW-	PCT	0.77	0.18	0.36	0.13	0.03	0.03	0.02	0.01	0.00	0.00	0.00
315.0	NO	168	35	80	37	8	4	3	0	1	0	0
-NW-	PCT	1.17	0.24	0.56	0.26	0.05	0.03	0.02	0.00	0.01	0.00	0.00
337.5	NO	242	33	100	77	26	4	1	0	0	0	1
-NNW-	PCT	1.69	0.23	0.70	0.54	0.18	0.03	0.01	0.00	0.00	0.00	0.01
CALM	NO	3										
	PCT	0.02										
TOTAL	NO	1926	299	776	571	204	49	18	4	3	0	2
	PCT	13.44	2.09	5.41	3.98	1.42	0.34	0.13	0.03	0.02	0.00	0.01
TOTAL VALID OBSERVATIONS			14333							TOTAL OBSERVATIONS 17545		

Table A-8. Soil Permeability Test Results

Well No.	h (ft)	r (ft)	$\frac{h}{r}$	T_u (ft)	Q (ft^3./min)	T (°C)	WT Condition	K (ft./min)
NA-4W2	3.83	2.50	1.53(1)	27.0	0.175	23.5	Low	3.9×10^{-5}
NA-11AW2	14.0	0.833	16.8	31.0	0.133	20.5	High	3.3×10^{-4}
NA-13W1	6.17	0.833	7.42(2)	27.0	0.275	20.0	Low	2.0×10^{-4}
NA-15W1	14.0	0.833	16.8	30.3	0.240	20.5	High	6.1×10^{-4} (3)
NA-15W2	12.25	0.833	14.7	30.5	0.190	21.0	High	5.1×10^{-4}

Notes:

1. $\frac{h}{r} \ll 10$, not acceptable
2. $\frac{h}{r} < 10$, possibly acceptable
3. For manual incremental test, $k = 7.4 \times 10^{-4}$ ft/min

Table A-9. Significant Earthquakes in the Southeast United States (Intensity V or Greater)

Year	Date	Intensity (Modified Mercalli)	Locality	Epicentral Location N.Lat	Epicentral Location W.Long.	Perceptible Area (Square Miles)
1843	January 4	VIII	Western Tennessee	35.2	90.0	400,000
1857	December 19	Not Listed	Charleston, S.C.	32.8	79.8	Not Listed
1872	June 17	V	Milledgeville, Ga.	33.1	83.3	Not Listed
1874	February 10 April 17	V	McDowell County, N.C.	35.7	82.1	Local
1875	November 1	VI	Northern Georgia	33.8	82.5	25,000
1875	December 22	VII	Arvonia, Virginia	37.6	78.5	50,000
1877	November 16	V	Western N.C. and Eastern Tennessee	35.5	84.0	5,000
1879	December 12	V	Charlotte, N.C.	35.2	80.0	Not Listed
1884	January 18	V	Wilmington, N.C.	34.3	78.0	Local
1885	August 6	IV-V	North Carolina	36.2	81.6	Local
1886	February 4	V	Alabama	32.8	88.0	1,600
1886	August 31	IX-X	Charleston, S.C	32.9	80.0	2,000,000
1886	October 22 October 22	VI VII	Charleston, S.C. Charleston, S.C.	32.9 32.9	80.0 80.0	30,000 30,000
1886	November 5	VI	Charleston, S.C.	32.9	80.0	30,000
1889	July 19	VI	Memphis, Tenn.	35.2	90.0	Local
1897	April 30	IV-V	Tennessee and Ill.	Not Listed	Not Listed	Not Listed
1897	December 18	V	Ashland, Virginia	37.7	77.5	7,500
1900	October 31	V	Jacksonville, Fla.	30.4	81.7	Local

Year	Date	Intensity (Modified Mercalli)	Locality	Epicentral Location N.Lat	Epicentral Location W.Long.	Perceptible Area (Square Miles)
1902	October 18	V	Southeastern Tenn. and Northwestern Ga	35.0	85.3	1,500
1903	January 23	VI	Georgia and S.C.	32.1	81.1	10,000
1904	March 4	V	Eastern Tenn.	35.7	83.5	5,000
1905	January 27-8	VII	Alabama	34	86	250,000
1907	April 19	V	South Carolina	32.9	80.0	10,000
1911	April 20	V	North Carolina - South Carolina Border	35.2	82.7	600
1912	June 12	VII	Summerville, S.C.	32.9	80.0	35,000
1912	June 20	V	Savannah, Georgia	32	81	Not Listed
1913	January 1	VII-VIII	Union County, S.C.	34.7	81.7	43,000
1913	March 28	VII	Eastern Tennessee	36.2	83.7	2,700
1913	April 17	V	Eastern Tennessee	35.3	84.2	3,500
1914	January 23	V	Eastern Tennessee	35.6	84.5	Local
1914	March 5	VI	Georgia	33.5	83.5	50,000
1914	September 22	V	South Carolina	33.0	80.3	30,000
1915	October 29	V	North Carolina	35.8	82.7	1,200
1916	February 21	VI	Western N.C.	35.5	82.5	200,000
1916	August 26	V	Western N.C.	36	81	3,800
1916	October 18	VII	Alabama	33.5	86.2	100,000
1917	June 29	V	Alabama	32.7	87.5	Local
1918	June 21	V	Tennessee	36.1	84.1	3,000

Year	Date	Intensity (Modified Mercalli)	Locality	Epicentral Location N.Lat	Epicentral Location W.Long.	Perceptible Area (Square Miles)
1918	October 15	V	Western Tennessee	35.2	89.2	20,000
1920	December 24	V	Eastern Tennessee	36	85	Local
1924	October 20	V	Pickens County, S.C.	35.0	82.6	56,000
1926	July 8	VI	Southern Mitchell County, N.C.	35.9	82.1	Local
1927	June 16	V	Alabama	34.7	86.0	2,500
1928	November 2	VI	Western N.C.	36.0	82.6	40,000
1931	May 5	V-VI	Northern Alabama	33.7	86.6	6,500
1933	December 19	IV-V	Summerville, S.C.	33.0	80.2	Local
1935	January 1	V	North Carolina - Georgia Border	35.1	83.6	7,000
1939	May 4	V	Anniston, Ala.	33.7	85.8	Not Listed
1941	November 16	V-VI	Covington, Tenn.	35.5	89.7	Local
1945	June 13	V	Cleveland, Tenn.	35	84.5	Not Listed
1945	July 26	VI	Murray Lake, S.C.	34.3	81.4	25,000
1952	November 19	V	Charleston, S.C.	32.8	80.0	Not Listed
1952	July 16	VI	Dyersburg, Tenn	36.2	89.6	Not Listed
1954	January 22	V	Athens and Etowah, Tennessee	35.3	84.4	Not Listed
1954	April 26	V	Memphis, Tenn.	35.2	90.1	Not Listed
1955	January 25	VI	Tenn-Arkansas-Missouri Border	35.6	90.3	30,000
1955	March 29	VI	Finley, Tenn	36.0	89.5	Not Listed

Year	Date	Intensity (Modified Mercalli)	Locality	Epicentral Location		Perceptible Area (Square Miles)
				N.Lat	W.Long.	
1955	September 5	V	Finley, Tenn.	36.0	89.5	Not Listed
1955	September 28	V	Virginia-N.C. Border	Not Listed	Not Listed	1,700
1955	December 13	V	Dyer County, Tenn.	36	89.5	Not Listed
1956	September 7	VI	Eastern Tennessee	35.5	84.0	8,300
1956	January 28	VI	Tennessee-Arkansas Border	35.6	89.6	Not Listed
1957	April 23	VI	Northern Alabama	34.5	86.7	11,500
1957	May 13	VI	Western N.C.	35.7	82	8,100
1957	June 23	V	Eastern Central Tennessee	36.5	84.5	Not Listed
1957	July 2	VI	Western N.C.	35.5	83.5	Not Listed
1957	November 24	VI	North Carolina-Tennessee Border	35	83.5	4,100
1958	March 5	V	Wilmington, N.C.	34.2	77.7	Not Listed
1958	April 8	V	Obion County, Tenn.	36.2	89.1	400
1958	October 20	V	Anderson, S.C.	34.5	82.7	Local
1959	August 3	VI	South Carolina	33	79.5	25,000
1959	August 12	VI	Alabama-Tennessee Border	35	87	2,800
1959	October 26	VI	Northeastern S.C.	34.5	80.2	4,800
1959	December 21	V	Finley, Tenn	36	89.5	400
1960	January 28	V	Dyer County, Tenn.	36	89.5	Local
1960	February 262	V	Near Coast, S.C.	33	79	3,500
1960	April 15	V	Eastern Tenn.	35.7	84	1,300

Year	Date	Intensity (Modified Mercalli)	Locality	Epicentral Location		Perceptible Area (Square Miles)
				N.Lat	W.Long.	
1960	April 21	V	Lake County, Tenn.	36.3	89.5	Local
1960	July 23	V	Charleston, S.C.	33	80	Local
1971	July 13	IV-VI	Seneca, S.C.	34-35	82-83	Local
1979	August 25	VI	Lake Jocassee, S.C.	35	83	5,800

Table A-10. Physical Characteristics of PWR Fuel Assemblies Based on Nominal Design

Array	15 x 15
Maximum Assembly Length (including radiation growth and control component) (in.)	173
Weight (lb.)	1,682
Number of Fuel Rods	208
Number of Guide Tubes	16
Number of Instrument Tubes	1
Fuel Rod Length (in.)	153.69
Active Fuel Length (in.)	141.8-144.0
Maximum Distance between Grid Straps (in.)	21 7/32(1)

Notes:

Grid straps are placed on intervals of 21 3/32 ± 1/16 inch. Thus the maximum interval is 21 7/32 inch. These tolerances do not accumulate. The spacers in the DSC are two inches wide and the fuel grid straps are 1 ½ inch wide (higher for later zircaloy grid fuel). Therefore, fuel assembly support will be provided at the grid straps by the DSC spacer discs through the entire tolerance range of 20.97 inches (20 31/32) – 21.22 inches (21 7/32). The nominal value of 21.12 used in Revision 1 of the NUHOMS® -24P Topical Report (Table 3.1-2) falls within this range.

Table A-11. Transfer Cask Stress Analysis for Tornado Effects

Load Case	Load Description	Stress Category	Calculated Stresses (ksi) Cask Shell	Calculated Stresses (ksi) Top Cover Plate	Calculated Stresses (ksi) Bottom Cover Plate	Allowable[1] Stress (ksi)
1	Wind Pressure Loads	Primary Membrane	0.9	0.0	0.0	49.0
		Membrane + Bending	2.9	0.4	0.3	70.0
2	Massive Missile	Primary Membrane	6.4	0.0	0.0	49.0
		Membrane + Bending	20.5	19.7	17.5	70.0
3	Penetration Resistance Missile	Primary Membrane	4.9	0.0	0.0	49.0
		Membrane + Bending	30.3	13.2	22.2	70.0
4	Protective Barrier Missile	Primary Membrane	Bounded by Case (3) Above			49.0
		Membrane + Bending				70.0

Note:

1. Service Level D Allowables are used.

Table A-12. Oconee ISFSI Major Components and Functions

Transfer	Cask Onsite IFA Transport, Shielding
Dry Storage Canister (DSC) Guide Sleeves Spacer Disks Support Rods End Shield Plugs DSC Body End Cover Plates	Criticality Control, IFA Support, Cover Gas Containment, Radioactive Material Confinement, Shielding
Horizontal Storage Module (HSM) Concrete Shielding DSC Support Assembly	Shielding, DSC Support, DSC Tornado Missile Protection DSC Cooling
Foundation	HSM Foundation Support
Transfer Components Transfer Trailer Hydraulic Ram Trailer Optical Alignment System	Transfer Cask Movement, DSC Transfers

Table A-13. Oconee ISFSI Radioactive Material Confinement Barriers

Radioactivity Source	Confinement Barriers
Contaminated Spent Fuel Storage Pool Water	1. Demineralized Water in DSC/Transfer Cask Annulus 2. Inflatable Annulus seal between DSC and Transfer Cask
Irradiated Fuel and Fission Gases	1. Fuel Cladding 2. DSC Body 3. Seal Welded Primary Closure (Inner Top Cover Plate) 4. Seal Welded Secondary Closure (Outer Top Cover Plate)

Table A-14. Oconee ISFSI Major Components and Design Requirements

Item	Design Code	Design Criteria
Transfer Cask	ASME Section III Class 2, 1983 Ed. with winter 1985 Addenda	Presented in Ref. 3.1, Section 3.2.5.3
DSC	ASME Section III Class 1, 1983 Ed. with winter 1985 Addenda	Presented in Ref. 3.1, Section 3.2.5.2
HSM Including Foundation and DSC Support Structure	ACI 349-85 ACI 318-83 AISC, 8th Ed.	Presented in Ref. 3.1, Section 3.2.5.1
Transfer Trailer and Skid	Industry Standards[1]	Ref. 3.1, Section 1.3.1.4 and 1.3.1.5
Hydraulic Ram	Industry Standards[2]	Ref. 3.1, Section 1.3.1.6
Cask Lifting Devices	ASME Section III, Subsection NF, 1983 Ed. with winter 1985 Addenda.	None required at HSM site. Fuel bldg. lifts controlled by 10CFR Part 50 criteria.
HSM Site Electrical Power	NEC, NEMA, NEPA (built to the code requirements at the time of construction)	Required for DSC transfer operations only.

Notes:

1. See Section 1.3 and 3.1.2.2 of this UFSAR.
2. See Section 5.1 of this UFSAR.

Table A-15. ONS ISFSI Project Transfer Trailer Design Parameters

Ambient Storage Temperature	-30°F to 116°F
Ambient Operating Temperature	0°F to 110°F
Ambient Humidity	10% to 100%
Ambient Radiation	Negligible
Pressure Altitude	0' to 5000' el.
Payload (Cask + Skid)	120 tons
Minimum Deck Height	34"
Maximum Deck Height	52"
Maximum Deck + Steering Unit Length	25'-0"
Maximum Deck Length	21'-1"
Maximum Width	12'-0"
Inside Turn Radius	9' or less
Outside Turn Radius	27' or less
Maximum Pulling Speed (Laden)	5 mph
Maximum Grade	6.5%
Road Surface:	
(Fully Laden)	Asphalt
(Empty Cask)	Packed Gravel or Asphalt

Table A-16. Oconee ISFSI Major Components and Classification

Transfer Cask	Safety Related(1)
Dry Storage Canister (DSC)	Safety Related(2)
Basket	
Spacer Disks	
Support Rods	
End Shield Plug/Support (top and bottom)	
DSC Body	
End Closure Plates	
Horizontal Storage Module (HSM)	Seismic Interaction Related(3)
Concrete Shielding	
DSC Support Assembly	
Foundation	Seismic Interaction Related(3)
Transfer Components	Industrial Grade
Transfer Trailer	
Ram Assembly	
Instrumentation	Industrial Grade

Notes:

1. To ensure containment and criticality control under all applicable transport accident conditions, transfer cask components are designed, constructed, and tested in accordance with Nuclear Safety Related requirements as defined by 10CFR 50, Appendix B and the DPC QA-1 Quality Assurance Program.
2. To ensure safe and secure, long-term containment and criticality control during transfer and storage of IFAs, DSC components are designed, constructed, and tested in accordance with Nuclear Safety Related requirements as defined by 10CFR 50, Appendix B and the DPC QA-1 Quality Assurance Program.
3. Components which are not required to perform a safety function or mitigate the consequences of an accidental radiological release comparable to 10CFR 100 site dose criteria guide values are designed, constructed, and tested in accordance with the DPC QA-2 Quality Assurance Program. Additionally, the concrete HSMs and foundation are designed to withstand Safe Shutdown Earthquake seismic forces and tornado missiles so as to preclude any interaction with the DSC pressure boundary or loss of shielding Therefore, construction and inspection shall be in accordance with the DPC QA-4 Quality Assurance Program.

Table A-17. Gamma Energy Spectrum

Cask Energy Group No.	E_{upper} (MeV)	E_{mean} (MeV)		Gamma Source Strength (Photons/sec/ MTIHM)
23	10.0			0
24	8.0			0
25	6.5	5.50		3.84+6
		4.75		
26	5.0	4.25		1.16+7
		3.75		
27	4.0	3.25		1.53+9
28	3.0	2.80		8.93+9
		2.40		
29	2.5	2.00		3.96+11
30	2.0			0
31	1.66	1.57		1.88+13
32	1.33	1.13		2.66+14
33	1.0			0
34	0.8	0.65		4.34+15
35	0.6			0
36	0.4	0.30		1.92+14
37	0.3			0
		0.17		
38	0.2	0.12		4.91+14
		0.085		
39	0.1	0.055		1.11+15
		0.030		
40	0.05	0.010	$\sum$ All Group	$\frac{3.38+15}{9.80+15}$

Table A-18. Shielding Analysis Results

Location	Neutron Dose Rate (mr/hr)		Gamma Dose Rate (mr/hr) Primary and Secondary[1]		Total Dose Rate (mr/hr)
	Direct	Reflected	Direct	Reflected	
DSC In HSM					
1. HSM Wall or Roof	0.1	Note 2	7	Note 2	7
2. HSM Phase I Air Outlet Shielding Cap	0	0.2	<1	50	50
3. HSM Phase II Air Outlet Shield Cap	0	.2	<1	12	12
4. HSM Phase I Air Outlet (No Shielding Cap)	0.7	15	265	3270	3551
5. HSM Phase II Air Outlet (No Shield Cap)	0.7	15	288	3539	3827
6. Center of Door	37	Note 2	8	Note 2	45
7. Center of Opening	430	Note 2	330	Note 2	760
8. Center of Air Inlets	0.1	2	<7	86	96.4
9. 4.5 Ft. From HSM Door	20	Note 2	4	Note 2	24
DSC In CASK (Lead Shield Plug)					
1. Centerline Top of DSC Plug (with water in annulus and with 2 inches temporary neutron shielding)	5.3	Note 2	10	Note 2	15
2. Top of DSC Cover Plate (with water in annulus and with 2 inches of temporary neutron shielding)					
a. Centerline	40	Note 2	30	Note 2	70
b. Gap (Peak)[3]	32	Note 2	24	100	156
3. Transfer Cask Surface					
a. Radial	54	Note 2	146	Note 2	200

Location	Neutron Dose Rate (mr/hr) Direct	Neutron Dose Rate (mr/hr) Reflected	Gamma Dose Rate (mr/hr) Primary and Secondary(1) Direct	Gamma Dose Rate (mr/hr) Primary and Secondary(1) Reflected	Total Dose Rate (mr/hr)
(Centerline)					
b. Radial (Peak)(4)	54	Note 2	511	Note 2	565
c. Top axial	15	Note 2	1	Note 2	16
d. Bottom axial	32	Note 2	16	Note 2	48

Notes:

1. The DSC/Cask annulus is filled with water and additional neutron shielding material is utilized as required. In addition, all but top six inches of the DSC inner cavity is assumed to be filled with water for this operation.
2. The reflected dose at these locations is negligible
3. The same gap dose rate applies for case where only top lead plug is on DSC. The dose rates reported are with water in the DSC/cask annulus (however, no water was assumed to be in the DSC).
4. Estimated maximum radial surface dose rate localized near IFA end fitting and fuel pin plenum axial elevations.

Table A--19. Summary of Estimated On-Site Doses Resulting from ISFSI[1] Operations. (Per DSC Transfer to HSM)

Operation	Number of Personnel	Time$^{(2)}$ (Hours)	Ave. Dist. From Cask/ DSC/Cask Surface (Feet)	Dose Rate (mR/Hr)	Total Personnel Dose (P-mR)
Location: Fuel Pool					
Load Fuel into DSC	2	8	GA$^{(3)}$	2	32
Place Sheilded End Plug on DSC	2	0.5	GA	2	2
Location: Cask Handling Area					
Decontaminate and Survey Surface of Cask	3	2	8 Side	35	210
Lower Water Level in DSC Cavity and DSC/Transfer Cask Annulus	2 2	0.25 2	1.5 F/D Port GA	48 2	24 8
Tack Weld Top End Shield Plug to DSC	1	0.25	1.5 Top Edge	48	12
Set up Automatic Welder and Seal Weld Top End Shield Plug to DSC	2 2	1.5 3	1.5 Top Edge GA	48 2	144 12
Perform Dye Penetrant Test on Welds	1	.0.5	1.5 Top Edge	48	24
Remove Remaining Water/Vacuum Dry DSC Cavity	2 2	0.25 3.75	1.5 F/D Port GA	55 2	27 15
Backfill DSC Cavity With Helium	2	0.5	GA	2	2
Helium Leak Test	1	0.5	1.5 Top Edge	61	31
Seal Weld Vent/Siphon Ports	2	1	1.5 F/D Port	61	122
Perform Dye Penetrant Test on Welds	1	0.25	1.5 Top Edge	61	15
Install Top Cover Plate	2	0.25	1.5 Top Edge	61	31
Weld Top Cover Plate to DSC	2 2	0.35 2.65	1.5 Top Edge GA	61 2	43 11
Perform Dye Penetrant Test on Weld	1	0.5	1.5 Top Edge	61	31
Remove Seal, Drain Cask/DSC Annulus and Swipe	2 2	0.75 3.25	1.5 Top Edge GA	151 2	227 13
Install Cask Head and Bolt Into Place	2	0.5	1.5 Top Edge	85	85
Lower Transport Cask to Skid and Trailer	2 4	1 2	4 Side 8 Side	120 67	240 536
Location: Trailer/HSM					
Attach Skid-Tiedown to Trailer	2	0.25	1.5 Side	210	105

Operation	Number of Personnel	Time(2) (Hours)	Ave. Dist. From Cask/ DSC/Cask Surface (Feet)	Dose Rate (mR/Hr)	Total Personnel Dose (P-mR)
Transport Cask to HSM	1	1	8 Side	67	67
	3	1	GA	2	6
Remove Cask Head, Bottom Cover Plate and Position Ram	2	0.5	1.5 Bot/Top	90	90
Align Cask with HSM and Install Cask Restraints	4	1.5	4 Side	120	720
Transfer DSC from Cask to HSM	4	0.5	4 Side	120	240
Install Seismic Restraint	2	0.08	1 DSC Top	760	122
Close and Tack Weld HSM Door	1	0.25	4.5 HSM	23	6
Radiation Protection Survey of HSM	1	1	3 HSM	5	5
Total for Transfer Operation (P-mrem)					3255

Notes:

1. Monitoring operation - Personnel will be monitoring the operation so that any problems which may arise can be swiftly corrected. The personnel may leave the area if necessary and the operation could be monitored from a remote location out of the radiation field.
2. Estimated times are conservative estimates for personnel working in the radiation field around the cask or HSM.
3. GA refers to General Area and is used to indicate workers in the room or area with the DSC/Transfer Cask to maintain visual control over operations in areas where the dose contribution from ISFSI operations is very low.

Table A-20. Dose Estimate for Construction of Additional Horizontal Storage Modules Based on Labor Estimates for 2 X 10 Array

Task	Number Workers	Hours in Radiation Area	Average Dose Rate (mRem/hr.)	Maximum Indiv. Dose (P-mRem)	Total Task Dose (P-mRem)
Survey	4	50	2	25	100
Excavation	4	192	2	96	383
Concrete Basemat	8	192	2	48	383
Forming Scaffolding Rebar	8	8496	2	2124	16992
Crane Operation	1	96	2	192	192
Steel Installation	8	1920	1	240	1920
Welding	1	30	1	30	30
Surveyors (steel)	4	167	1	42	167
Crane Operation (steel)	1	75	1	75	75
Paint	8	96	1	12	96
Clean up	2	42	1	21	42
TOTALS		11354			20379

Notes:

1. Estimated dose/module constructed = 1.02 Person Rem
2. Estimated maximum individual dose/module = 106 Person mRem

Table A-21. Neutron and Gamma Energy Spectra

	Cask Library Group No	Normalized Flux
Neutrons[1]		
	1	0.000005
	2	0.000030
	3	0.000138
	4	0.000982
	5	0.002567
	6	0.002456
	7	0.002970
	8	0.007440
	9	0.006820
	10	0.011135
	11	0.017633
	12	0.018344
	13	0.026756
	14	0.042225
	15	0.019154
	16	0.024170
	17	0.020290
	18	0.014654
	19	0.019803
	20	0.017683
	21	0.018689
	22	0.726046
Gammas[2]		
	23	0.000018
	24	0.000145
	25	0.000248
	26	0.000283
	27	0.000383
	28	0.000275
	29	0.001008
	30	0.009272
	31	0.007947
	32	0.057772
	33	0.051577
	34	0.074007
	35	0.123743
	36	0.093142
	37	0.137524
	38	0.316630
	39	0.125240
	40	0.000775

Notes:

1. Sum of Neutrons = 1.0
2. Sum of Gammas = 1.0

Table A-22. Comparison of Total Dose Rates for HSM With and Without Air Outlet Shielding Blocks

Distance (meters) from Nearest HSM Wall, 2x10 Array	Normal Case Dose Rate[(1)] (mrem/hr.) (with Shield Blocks)	Accident Case Dose Rate[(1)] (mrem/hr.) (Without Shield Blocks)
10	2.85	21.9
100	0.0587	0.533
500	8.97E-4	2.14E-3
2000	3.77E-8	9.62E-7

Note:

1. Air scattered plus direct radiation.

Table A-23. Cask Drop Target Parameters

1.	Slab reinforcement:
	a. Bottom mat - #5's @ 6″ c-c each way b. Top mat - #4's @ 6″ c-c each way c. Yield strength = 60 ksi per ASTM 615.
2.	Slab thickness = 1'-6″ of concrete
3.	Concrete strength (28 days) = 4000 psi (minimum)
4.	Soil ultimate strength - 12.0 ksf (Based on laboratory testing)
5.	Soil elastic modulus = 174 ksf (Based on laboratory testing)
6.	Poisson's ratio of soil = 0.3 (Based on soil test data and "Foundation Analysis and Design" 3rd Ed., Joseph E. Bowles.)

Appendix B. Figures

Figure B-1. Location of ISFSI

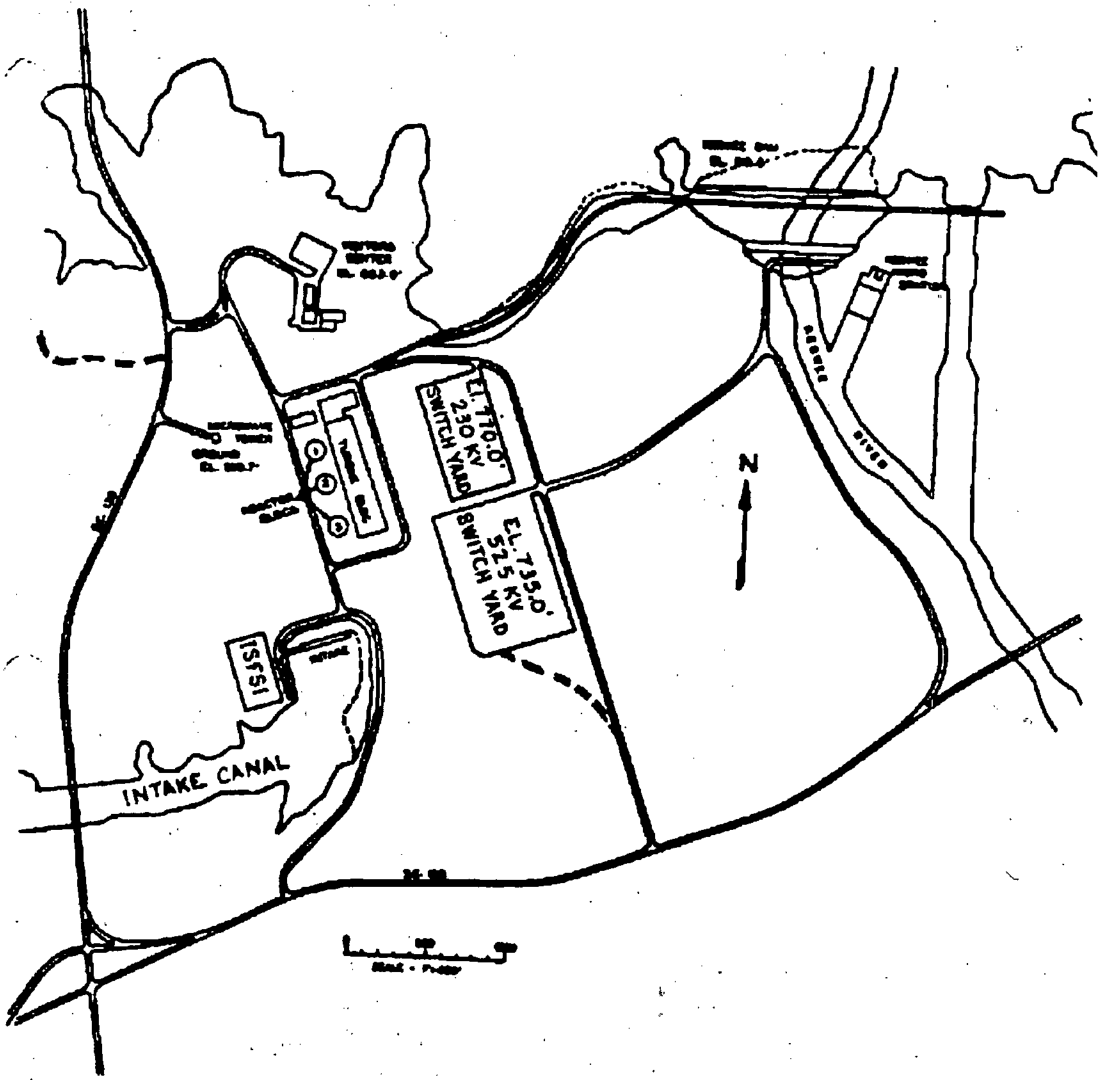


Figure B-2. General Location

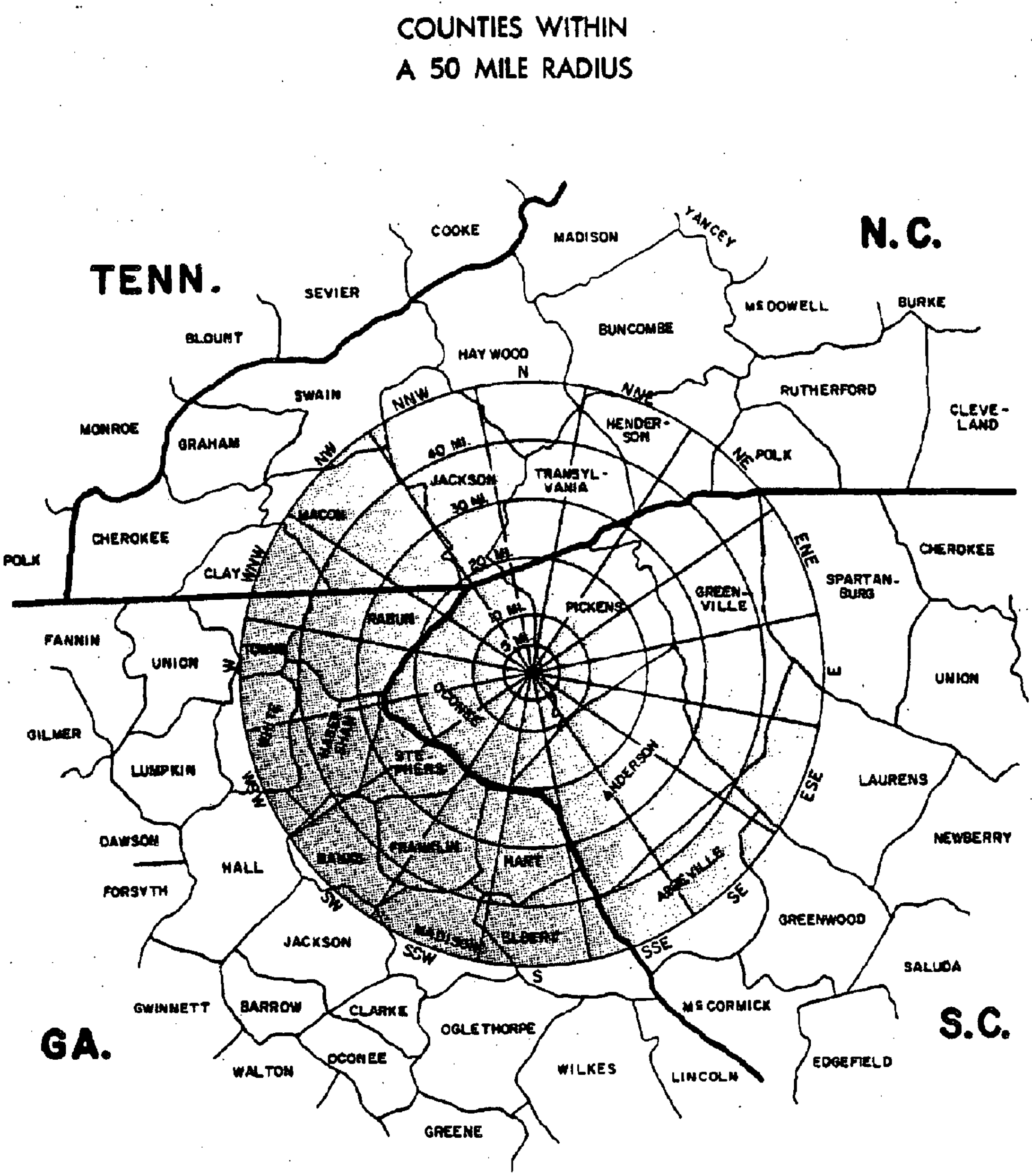


Figure B-3. Site Plan

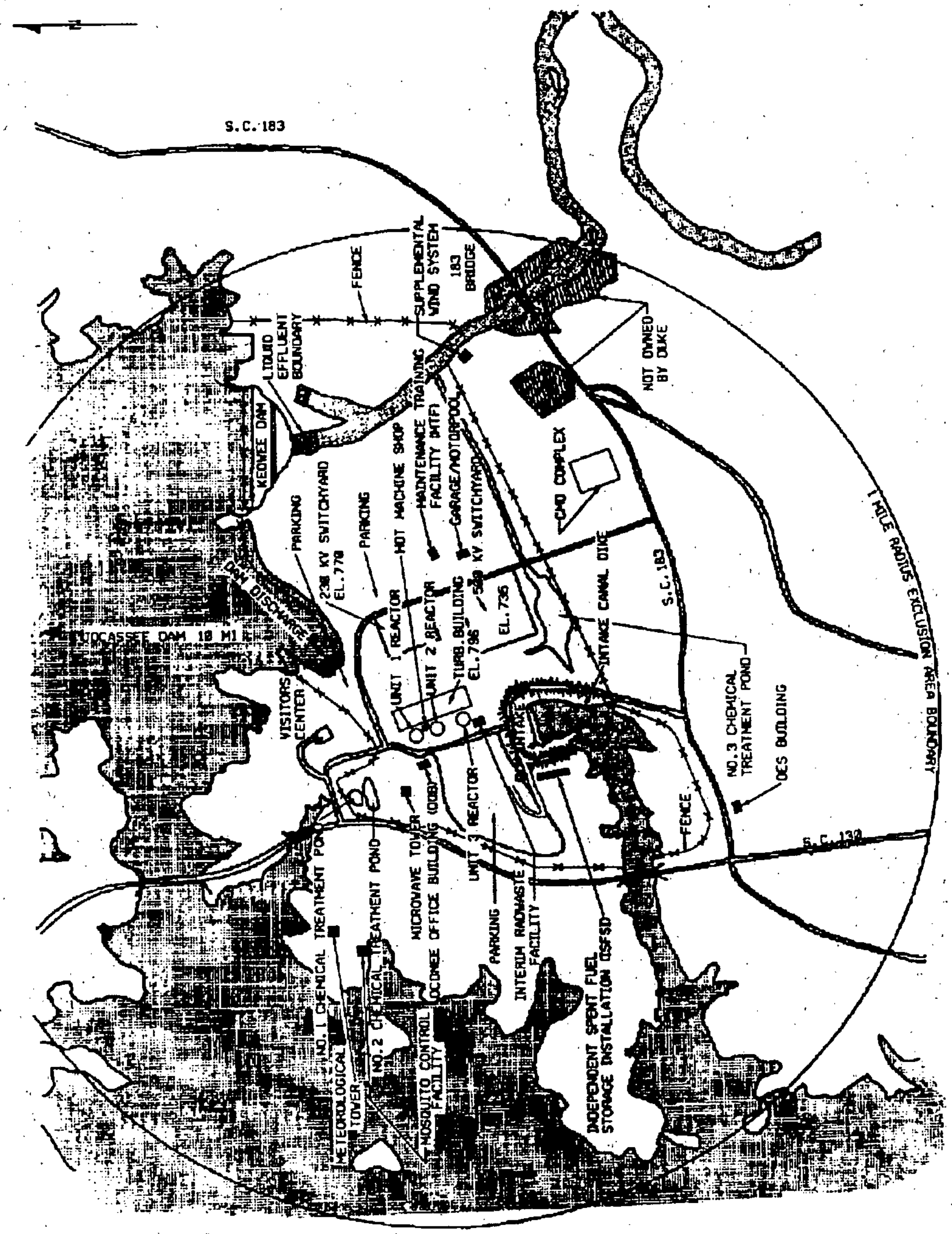


Figure B-4. ISFSI Layout

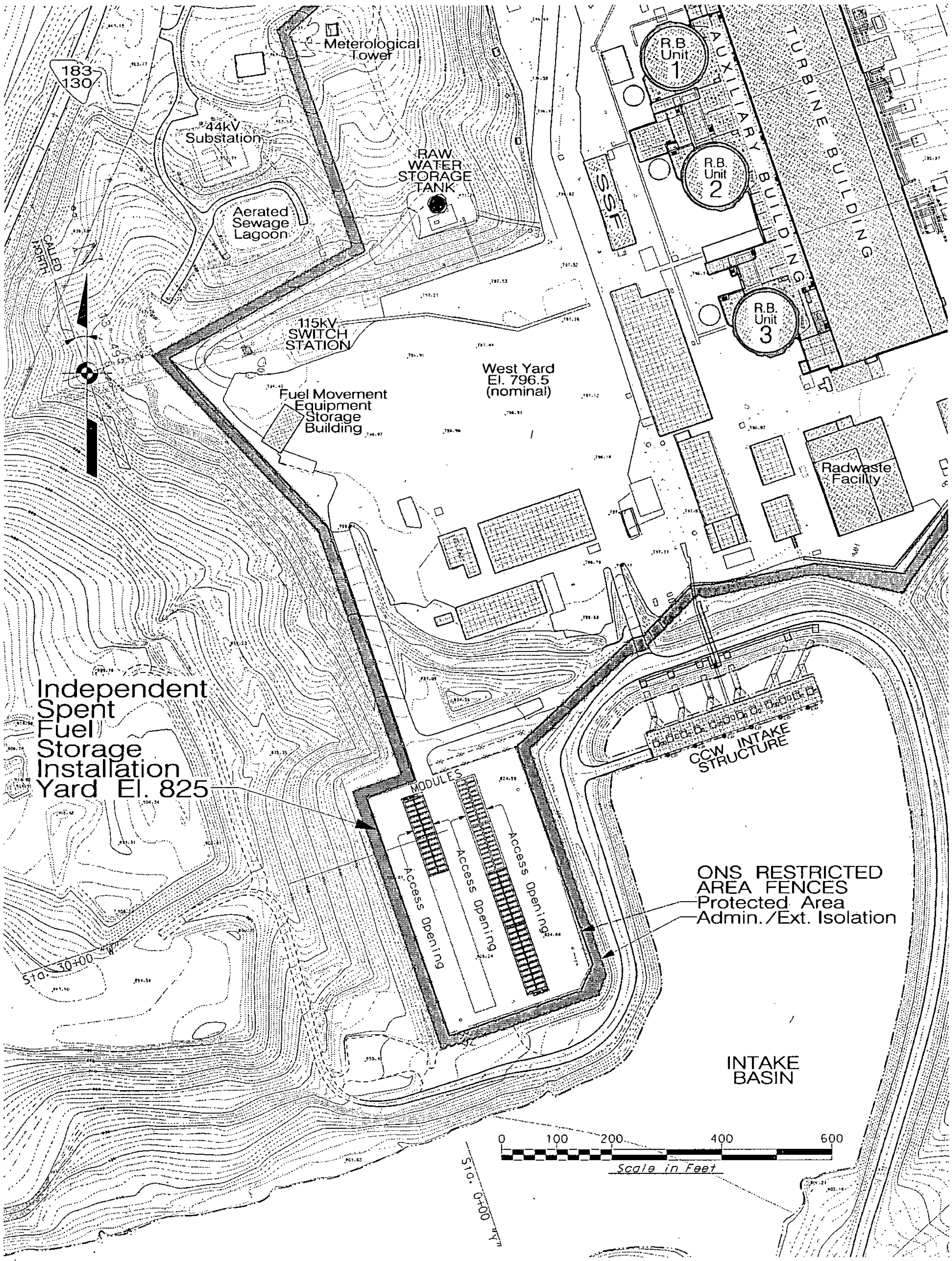


Figure B-5. Topography Within 5 Miles

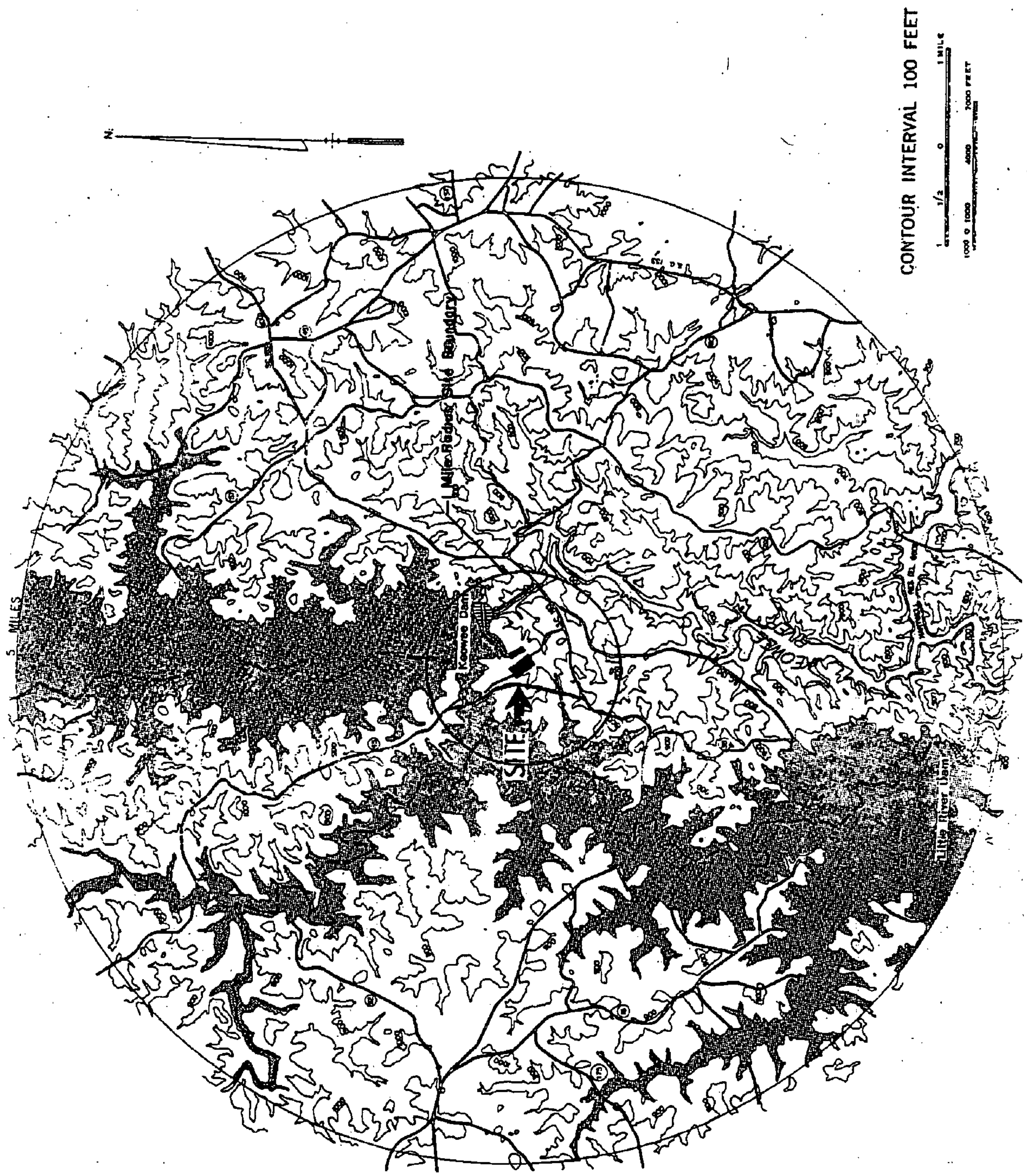


Figure B-6. Relative Positions of Meteorological Instruments

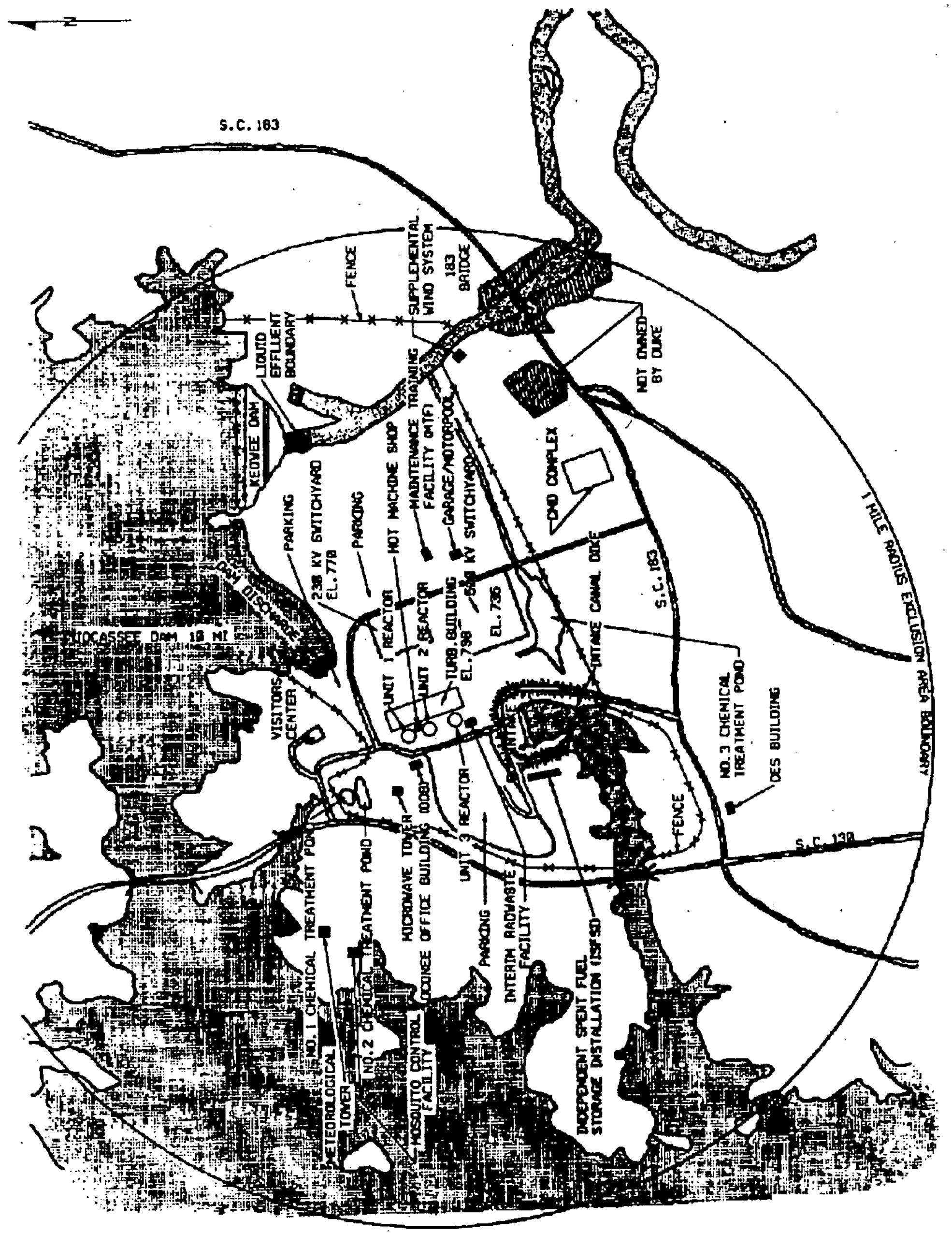


Figure B-7. Relative Elevations of Meteorological Instruments

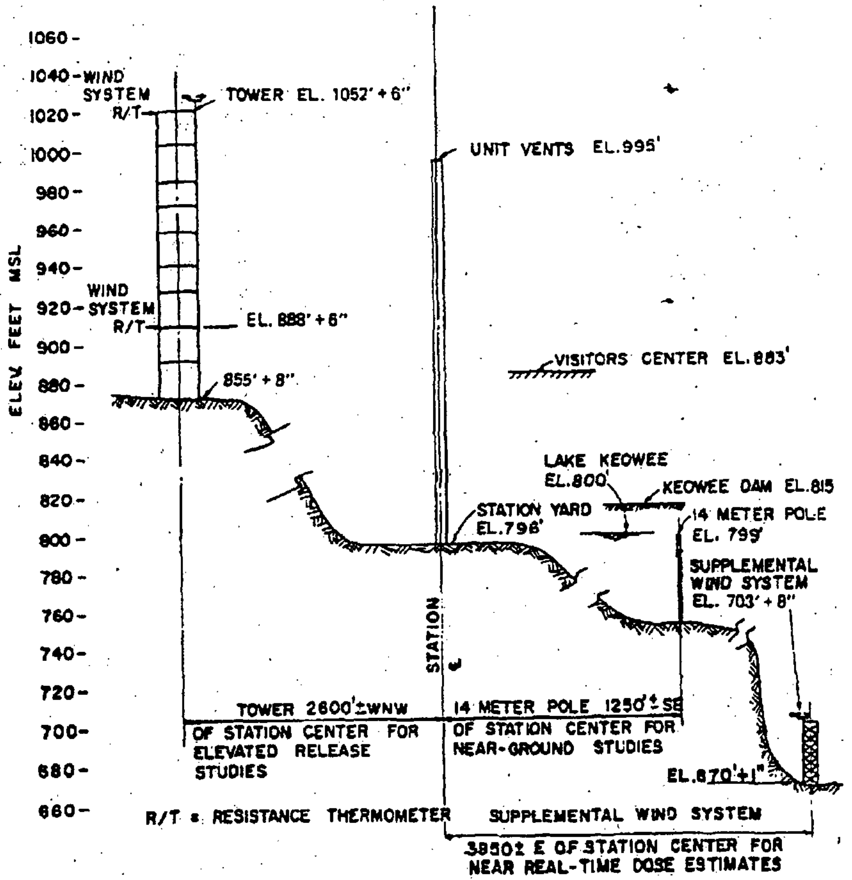


Figure B-8. Areal Groundwater Survey

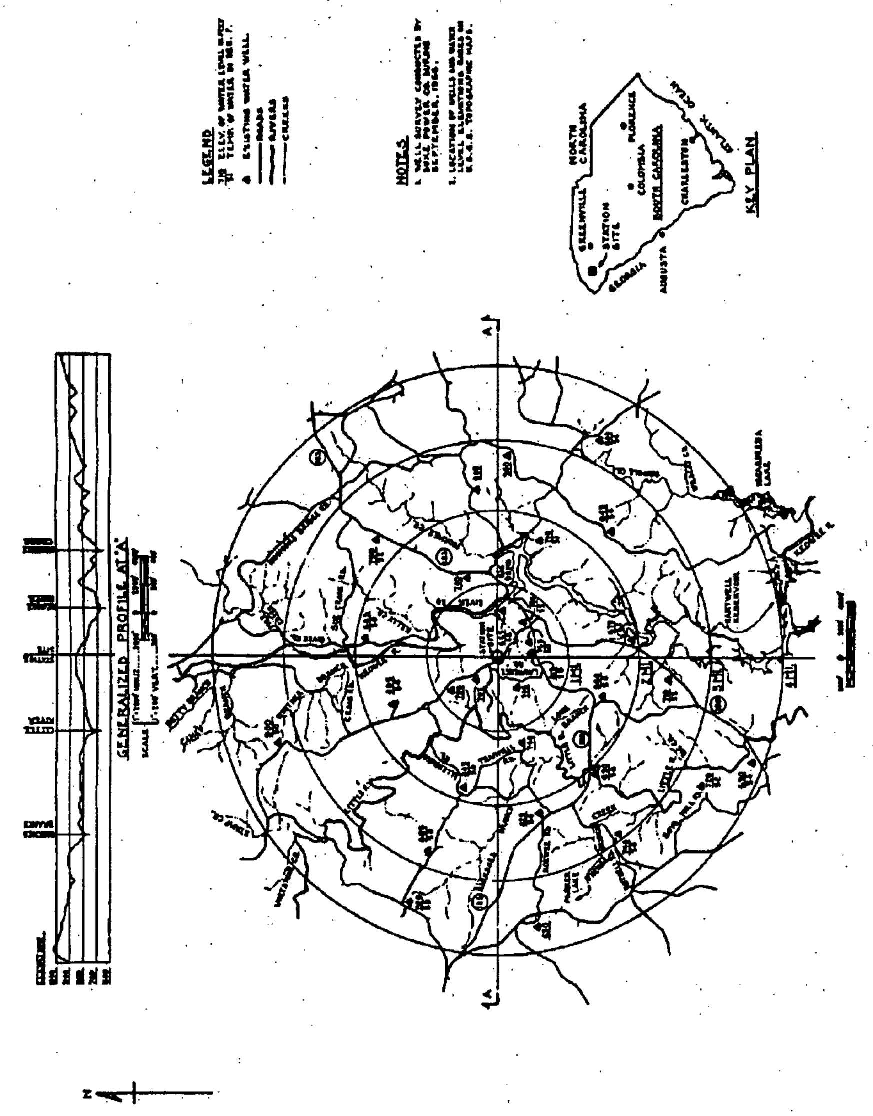


Figure B-9. Groundwater Survey at Station Site

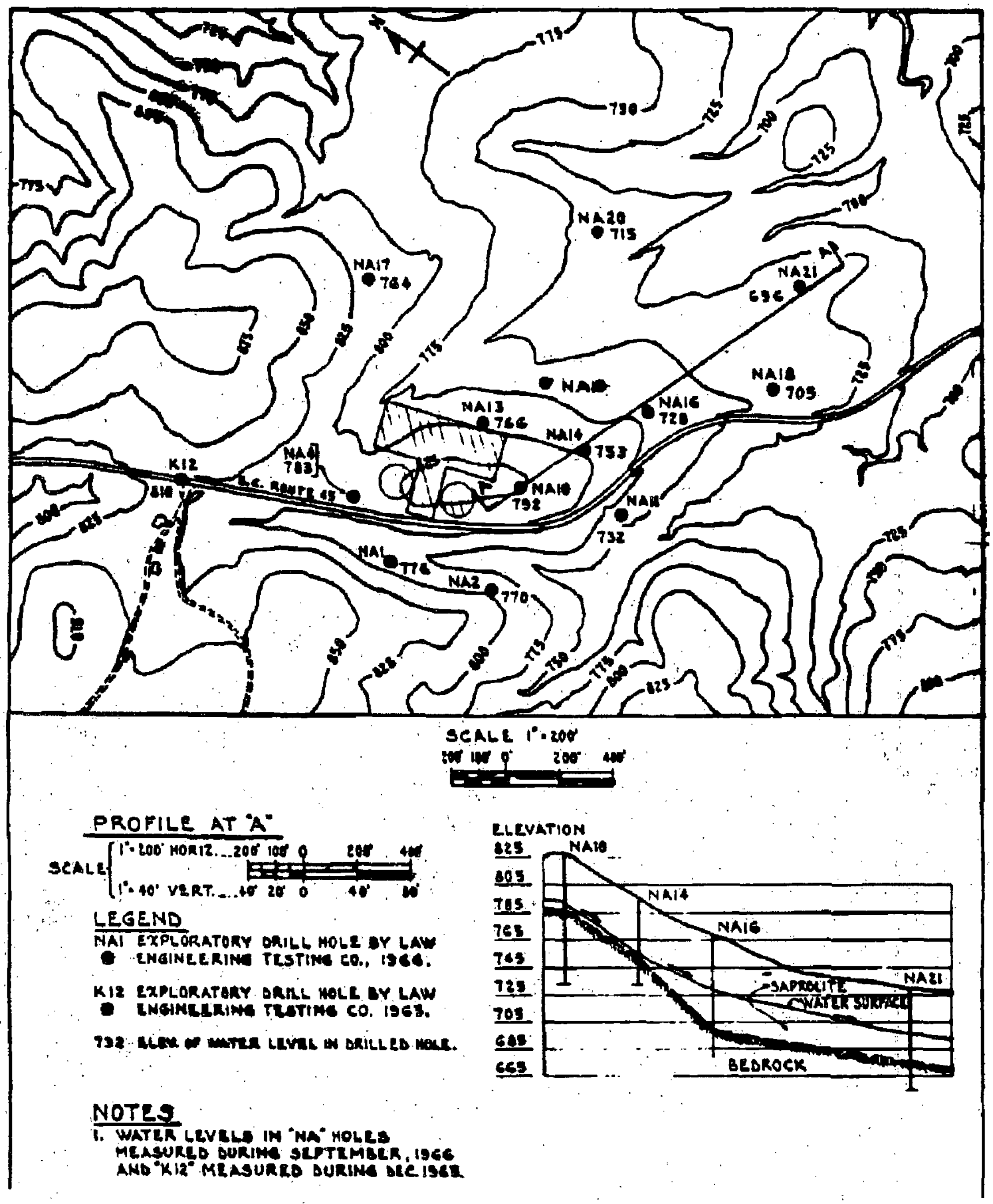


Figure B-10. Well Permeameter Test Apparatus

FIELD PERMEABILITY TESTING

The tests were run according to the Bureau of Reclamation's Field Permeability Tests, Designation E-19. The immediate vicinity of each of the exploratory borings were selected as the locations for the wells: MA-4, MA-11, MA-13, and MA-15 (Figure 2.4.13-2). Two 8 in. diameter holes were drilled at each location, to the refusal of the auger used. The MA-4 test wells were drilled with a 27 in. auger. Generally, the test wells were within 20 ft. of the exploratory borings.

The wells were prepared with care in order to cause as little disturbance to the surrounding soil as possible. No water was encountered in any of the wells. After the wells were excavated, the sides and bottoms were lightly cleaned where necessary, and the loose soil was removed from the bottom.

After cleaning, all wells were backfilled with 3/8 in. to Number 4 size crushed stone and covered with plastic sheets until time of testing. The equipment used for these permeability tests is shown to the right. Each 50 gallon drum was calibrated in increments of 1/16 of an inch change in water level which corresponds to 0.0142 cubic feet of water.

For each test the permeability equipment, as shown, was set up. The crushed stone was removed to a depth of approximately 1 ft. in the well from the ground surface and the Robert's Type valve float bob was adjusted so that a water level would be maintained constant at about a 6 in. depth. All depths from the ground surface were measured from a baseline string stretched across the hole at ground level. The drum was filled with water and the test started. Water and ground temperatures were taken and recorded at varied time intervals. Readings of water level (to the nearest 1/16 of an inch) and time (to the nearest minute) were taken throughout the test. Plots of cumulative water volume versus time were prepared during each test. In general, the dry soil at the start of the test absorbed water at a comparatively high rate, but as the soil below the test became saturated, the rate decreased to a point where it was practically constant. When this occurred, as evidenced by the plotted points on the curve falling on practically a straight line for several hours, the tests were discontinued. This data is available but has not been included on the test summary. The slope of the straight line gave the rate of flow to be used in computations of coefficient of permeability, k. Figure 2.4.13-4 shows the formulas used for determining the coefficient of permeability, k and Table 2.4.13-1 summaries the results of the test.

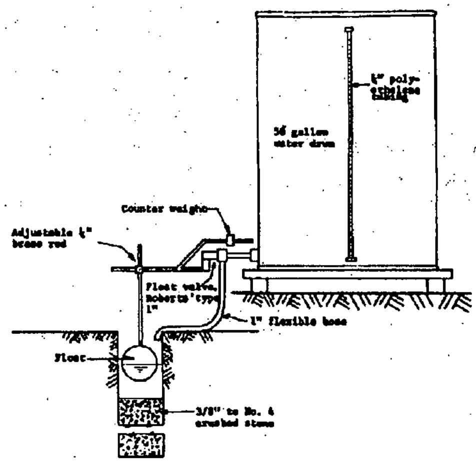
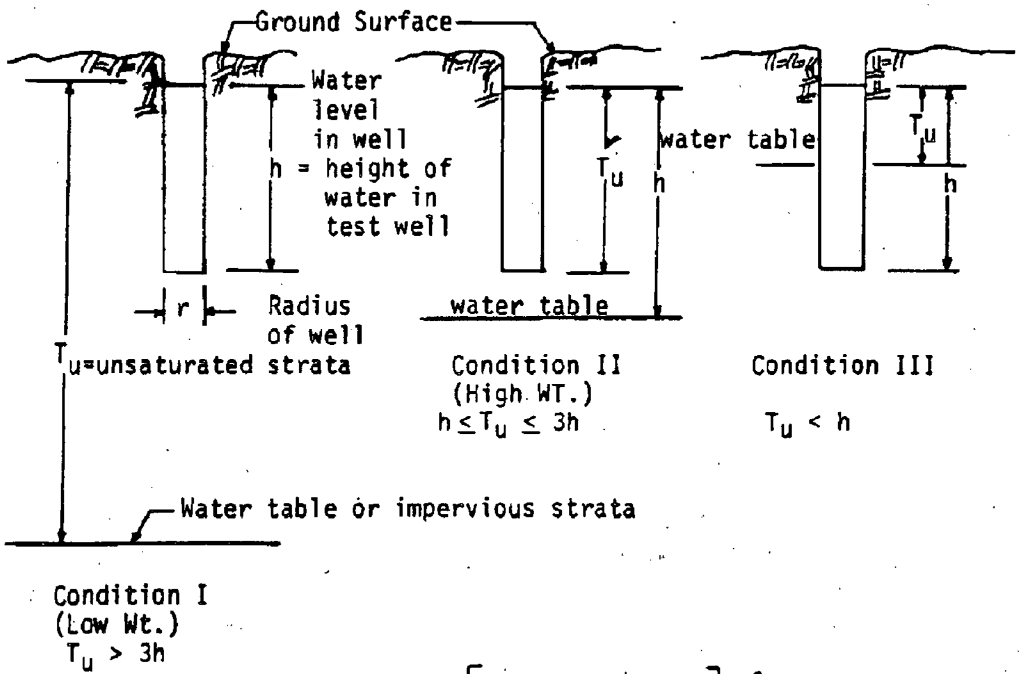


Figure B-11. Formulae For Determining Permeability



Condition I: $$k_{20} = 525{,}600 \frac{\left[\sinh^{-1} \frac{h}{r} - 1\right] \frac{Q}{2\pi}}{h^2} \left(\frac{\mu_T}{\mu_{20}}\right)$$

Condition II: $$k_{20} = \frac{525{,}600 \log_e \frac{h}{r} \overset{h^2}{\frac{Q}{2\pi}}}{h^2 \left[\frac{1}{6} + \frac{1}{3}\left(\frac{h}{T_u}\right)\right]^{-1}} \left(\frac{\mu_T}{\mu_{20}}\right)$$

k_{20} = coefficient of permeability, feet per year

h = height of water in the well, feet

r = radius of well, feet

Q = discharge rate of water from the well for steady state condition, ft^3/min.

μ_T = viscosity of water at temperature T

μ_{20} = viscosity of water at 20°-C

T_u = unsaturated distance between the water surface in the well and the water table, feet

Figure B-12. General Site Area

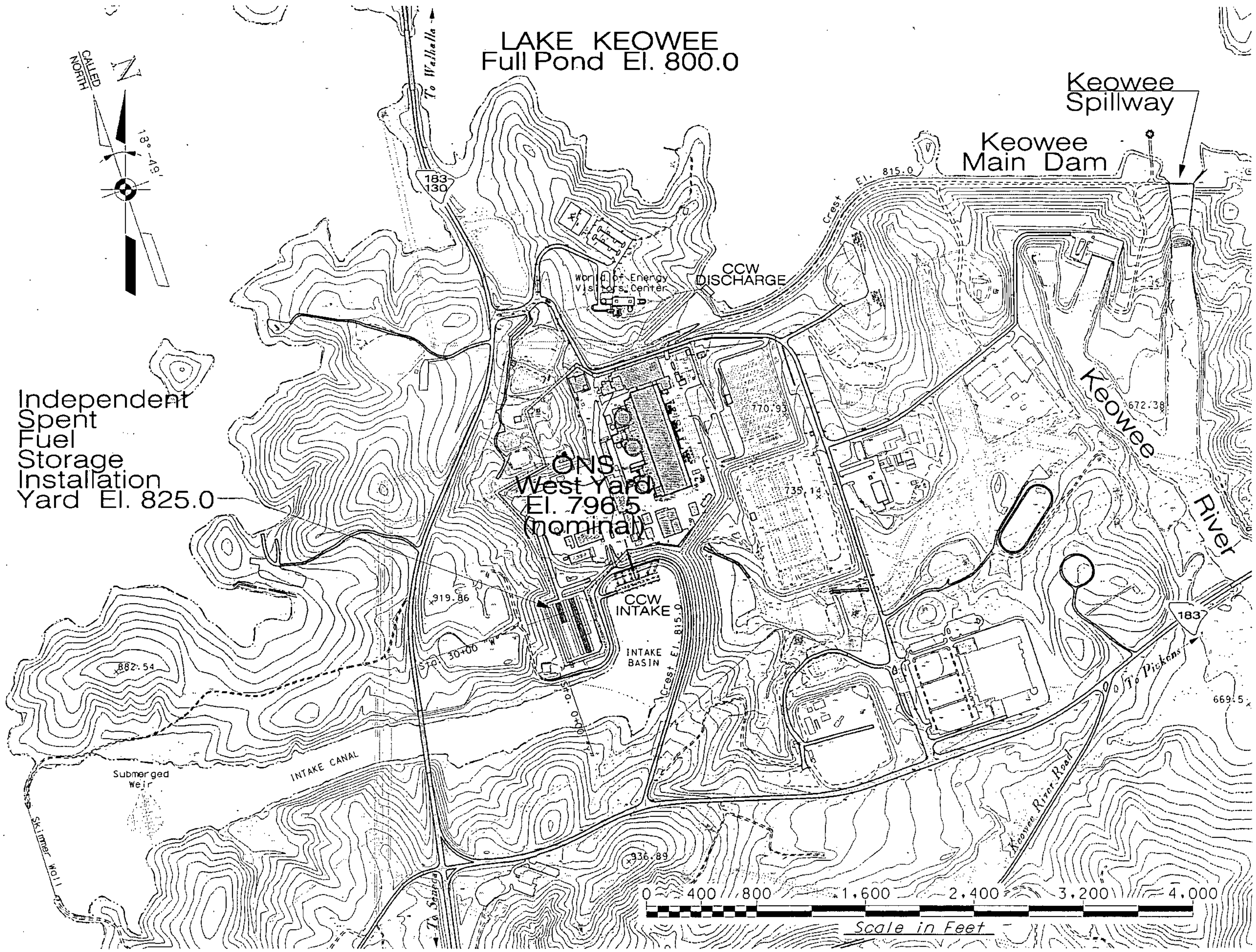


Figure B-13. Site Boring Plan

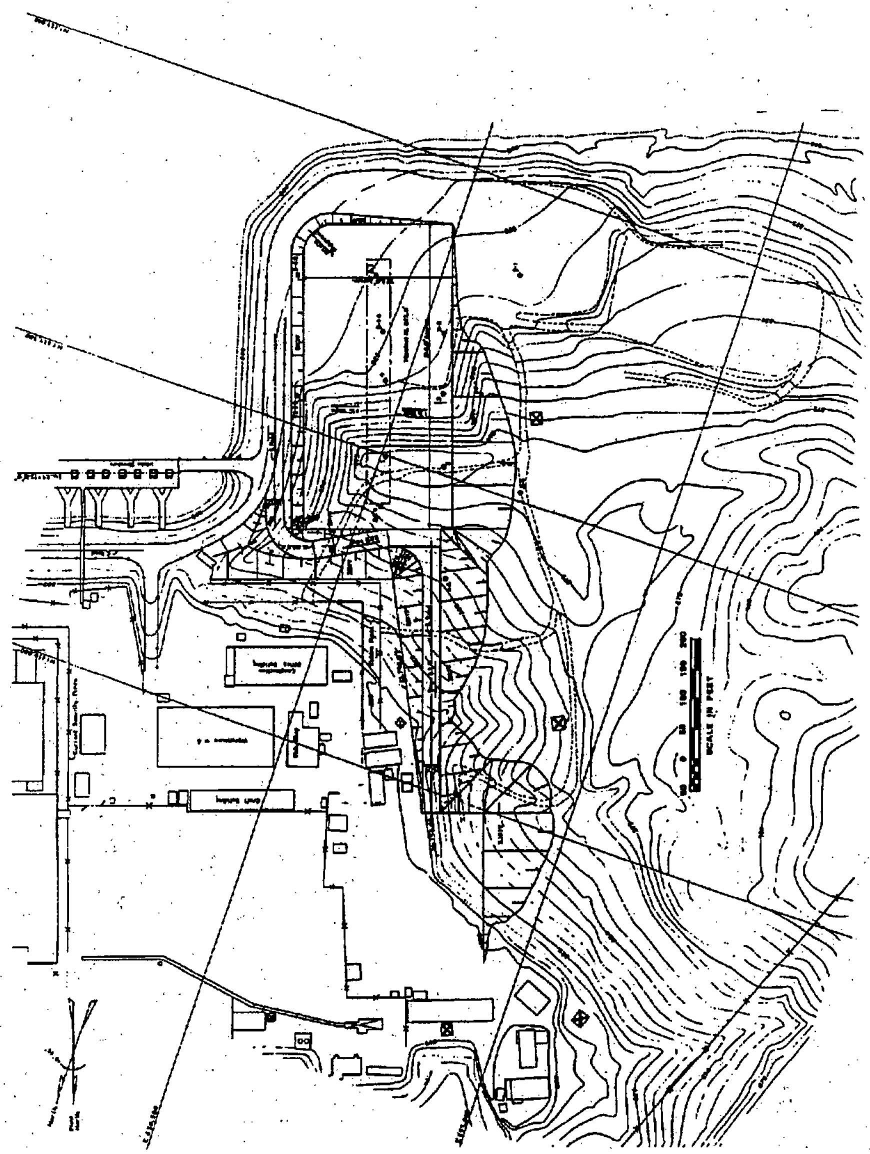


Figure B-14. Core Boring Record

BORING DESIGNATION 1

Depth Ft	Description	ROD %	BIT Size	Elev	Remarks
0.0	Red micaceous silty fine to medium sand			881.80	N = 13
5.0	Strong brown micaceous fine to medium sandy silt			876.80	N = 6
10.0	Gray/brown micaceous silty fine/coarse sand			871.80	N = 11
15.0				866.80	Undisturbed Sample 17.6′ – 19.5′
20.0	Black/gray micaceous slightly silty fine/coarse sand w/gravel			861.80	N = 12
22.6	Brown micaceous silty fine/coarse sand Black/reddish brown very micaceous fine to medium sandy silt			859.20	N = 6
25.0	Brown/white micaceous silty fine to coarse sand			856.8	N = 10
30.0	Black/gray micaceous silty fine to coarse sand			851.8	N = 100

BORING DESIGNATION 1

Depth Ft	Description	ROD %	BIT Size	Elev	Remarks
35.0	Black light gray micaceous slightly silty fine to coarse sand			846.80	N = 100 Undisturbed Sample 37.6′ – 37.8′
40.0	Light brown/light gray micaceous slightly silty fine to coarse sand			841.80	N = 49
45.0	Top: Reddish brown micaceous fine sandy silt. Bottom: Light brown to gray (light) micaceous slightly silty fine to coarse sand			836.80	N = 100
50.7	Carbide fishtail refusal			831.10	
55.0		42.9	NX		
60.0		84.5	NX	821.80	
60.2	Water Table			821.60	
70.0		98.0	NX	811.80	
79.4	Coring Terminated			802.40	

Figure B-15. Core Boring Record

BORING DESIGNATION 2

Depth Ft	Description	ROD %	BIT Size	Elev	Remarks
0.0	Bownish red micaceous silty fine to coarse sand			881.62	N = 29
5.0	Brownish red micaceous fine to medium sandy silt, Black/light gray silty sand at bottom of sample			876.62	N =100
10.0	Black strong brown micaceous silty fine to coarse sand			871.62	N = 100
14.5	Carbide fishtail refusal			867.12	
15.0		0.0	NX	866.62	
20.0				861.62	
25.0		0.0	NX	856.62	
30.6	Re-enter Hole w/fishtail Light brown to gray micaceous silty fine to medium sand			851.02	N = 17
35.0				846.62	Undisturbed sample 38.1′ – 39.9′
40.0	Brown to light gray micaceous silty fine to coarse sand			841.62	N = 100

BORING DESIGNATION 2

Depth Ft	Description	ROD %	BIT Size	Elev	Remarks
45.0	Brown to light gray micaceous silty fine to coarse sand			836.62	N = 100
53.7	Carbide fishtail refusal			827.92	
55.0				826.62	
60.0		97.0	NX	821.62	
60.3	Water Table			821.32	
70.0		100.0	NX	811.62	
78.8	Coring Terminated			802.82	

Figure B-16. Core Boring Record

BORING DESIGNATION 3

Depth Ft	Description	ROD %	BIT Size	Elev	Remarks
0.0				834.41	
5.0	Light brown/light gray micaceous silty fine to medium sand, strong brown/black micaceous silty fine to medium sand			829.41	N = 100
10.4	Carbide fishtail refusal			824.01	
15.0		43.6	NX	819.41	
18.9	Water Table			815.51	
19.9	Boring Terminated			814.51	

Figure B-17. Core Boring Record

BORING DESIGNATION 4

Depth Ft	Description	ROD %	BIT Size	Elev	Remarks
0.0				828.37	
5.0	Yellowish brown/light gray micaceous silty fine to coarse sand			823.37	N = 37
10.0	Brown/light gray micaceous silty fine to coarse sand			818.37	N = 100
13.1	Carbide fishtail refusal			815.27	
15.0		59.4	NX	813.37	
18.1	Water Table			810.27	
20.0	Coring Terminated			808.37	

Figure B-18. Core Boring Record

BORING DESIGNATION B-1

Depth Ft	Description	ROD %	BIT Size	Elev	Remarks
0.0	Reddish brown, mica, silty, fine to coarse sand (some ground)			828.32	N = 45
5.0				823.32	Undisturbed Sample 7.4′ – 9.9′
10.0	Olive brown, mica, silty, fine to medium sand			818.32	N = 10
15.0	Reddish yellow, mica, silty, fine to medium sand			813.32	Undisturbed Sample 17.4′ – 19.9′ N = 51
20.0	Reddish yellow, mica, silty, fine to medium sand			808.32	N = 44
25.0	Light olive brown/white, mica, silty, fine to medium sand			803.32	Undisturbed Sample 27.4′ – 28.6′ N = 49
30.0	Light olive brown/white, mica silty, fine to medium sand			798.32	Undisturbed Sample 32.4′ – 33.5′ N = 100
32.5	Water Table			795.82	

BORING DESIGNATION B-1

Depth Ft	Description	ROD %	BIT Size	Elev	Remarks
35.0	Light olive brown, mica, silty fine to coarse sand			793.32	N = 100
40.0	Light olive brown/white, mica, silty fine to medium sand			788.32	N = 100
46.7	Carbide fishtail refusal			781.62	
50.0		55.4	NQ	778.32	
55.0				773.32	
60.0		90.5	NQ	768.32	
64.5	Coring Terminated			763.82	

Figure B-19. Core Boring Record

BORING DESIGNATION B-2

Depth Ft	Description	ROD %	BIT Size	Elev	Remarks
0.0				831.01	Undisturbed Sample 2.5′ – 5.0′
5.0	Strong brown, mica, silty fine to medium sand			826.01	N = 8 Undisturbed Sample 7.5′ – 10.0′
10.0	Light pole brown, mica, silty, fine to medium sand			821.01	N = 15 Undisturbed Sample 12.5′ – 15.0′
15.0	Yellowish brown, mica, silty, fine to medium sand			816.01	Undisturbed Sample 15.0′ – 16.7′ N = 23
20.0	Strong brown, mica, silty, fine to medium sand			811.01	N = 100
25.0	No Description			806.01	N = 100
30.0	Very pale brown/yellowish brown mica, silty, fine to coarse sand			801.01	N = 30
32.2	Water Table			798.81	

BORING DESIGNATION B-2

Depth Ft	Description	ROD %	BIT Size	Elev	Remarks
37.4	Carbide fishtail refusal			793.61	
40.0		40.8	NQ	791.01	
45.0		61	NQ	786.01	
50.0		100	NQ	781.01	
59.0	Coring Terminated			772.01	

Figure B-20. Core Boring Record

BORING DESIGNATION B-3

Depth Ft	Description	ROD %	BIT Size	Elev	Remarks
0.0				820.98	Undisturbed Sample 2.0′ – 4.5′
5.0	Light yellowish brown/reddish brown, mica, silty, fine to medium sand			815.98	Undisturbed Sample 4.5′ – 7.0′ N = 12
10.0	Light yellowish brown/strong brown, mica, fine to medium sandy silt			810.98	Undisturbed Sample 12.0′ – 14.5′ N = 11
15.0				805.98	Undisturbed Sample 17.0′ – 19.5′
20.0	Light yellowish brown/strong brown mica, fine to medium sandy silt			800.98	Undisturbed Sample 19.5′ – 22.0′ N = 13
23.9	Water Table			797.08	
25.0				795.98	Undisturbed Sample 27.0′ – 29.5′
30.0	White/pinkish gray, mica, silty, fine to coarse sand			790.98	N = 65 Undisturbed Sample 32.0′ – 33.6′

BORING DESIGNATION B-3

Depth Ft	Description	ROD %	BIT Size	Elev	Remarks
35.0	White/pinkish gray, mica, silty, fine to medium sand			785.98	N = 100
37.0	White/pinkish gray, mica, silty, fine to medium sand			783.98	N = 27
40.1	Carbide fishtail refusal			780.88	
45.0		99	NQ	775.98	
50.1	Coring Terminated			770.88	

Figure B-21. Core Boring Record

BORING DESIGNATION B-4

Depth Ft	Description	ROD %	BIT Size	Elev	Remarks
0.0				878.53	Undisturbed Sample 2.4′ – 4.9′
5.0	Reddish brown/red, mica, silty, fine to medium very sandy clay			873.53	N = 19 Undisturbed Sample 7.4′ – 9.9′
10.0	Reddish brown/red, mica, silty, fine to medium very sandy clay			868.53	N = 100
	Light brown yellow/yellowish brown, mica, silty, fine to coarse sand (with gravel)				N = 49
15.0	Light brownish yellow/yellowish brown, silty, fine to coarse sand			863.53	N = 100
20.2	Carbide fishtail refusal			858.33	
25.0		12.1	NQ	853.53	
30.0		0	NQ	848.53	
35.0				843.53	
40.0	Yellow/brownish yellow, mica, silty fine to medium sand			838.53	N = 100

BORING DESIGNATION B-4

Depth Ft	Description	ROD %	BIT Size	Elev	Remarks
	Pale brown/light yellow brown, mica, silty, fine to medium sand				N = 100
43.9	Water Table			834.63	
45.0	No Description			833.53	N = 100
49.9	Carbide fishtail refusal			828.63	
50.0				828.53	
55.0		91	NQ	823.53	
59.9	Coring Terminated			818.63	

Figure B-22. Core Boring Record

BORING DESIGNATION B-5

Depth Ft	Description	ROD %	BIT Size	Elev	Remarks
0.0				853.63	Undisturbed Sample 2.2′ – 4.7′
5.0	Red/Reddish brown, mica, silty, fine/medium sand			848.63	N = 12 Undisturbed Sample 7.2′ – 8.2′
	Red/yellowish red, mica, silty, clay, fine to medium sand				N = 12
10.0				843.63	Undisturbed Sample 12.2′ – 14.7′
15.0	Light yellow brown/brownish yellow, mica, silty, fine to coarse sand (with gravel)			838.63	Undisturbed Sample 14.7′ – 17.2′ N = 11
20.0				833.63	Undisturbed Sample 22.2′ – 24.7′
25.0	White yellowish brown, mica, silty fine to coarse sand			828.63	Undisturbed Sample 24.7′ – 26.7′ N = 100
27.8	Carbide fishtail refusal			825.38	
30.0		0	NQ	823.68	

BORING DESIGNATION B-5

Depth Ft	Description	ROD %	BIT Size	Elev	Remarks
35.0	White/dark red mica, silty fine to coarse sand			818.63	
36.5	Carbide fishtail refusal			817.13	
40.0		50	NQ	813.63	
44.9	Water Table			808.73	
45.0		48	NQ	808.63	
50.0				803.63	
55.0		96	NQ	798.63	
64.3	Coring Terminated			789.33	

Figure B-23. Core Boring Record

BORING DESIGNATION B-1*

Depth Ft	Description	ROD %	BIT Size	Elev	Remarks
0.0	Strong brown/reddish brown mica, silty, fine to coarse sand			824.59	N = 12
5.0				819.59	Undisturbed Sample 7.0′ – 9.5′
10.0	Reddish brown/brownish yellow, mica. silty fine/coarse sand			814.59	N = 17 Undisturbed Sample 9.5′ – 12.0′
15.0				809.59	Undisturbed Sample 17.0′ – 19.5′
20.0	White/brown mica, silty fine/coarse sand w/gravels			804.59	N = 59 Undisturbed Sample
25.0	White/brown mica, silty fine to coarse sand			799.59	N = 100
26.2	Water Table			798.39	
30.4	Carbide Refusal Boring Terminated			794.19	

Figure B-24. Core Boring Record

BORING DESIGNATION B-2*

Depth Ft	Description	ROD %	BIT Size	Elev	Remarks
0.0	Red mica, silty, clayey, fine/medium sand			869.38	N = 20
5.0				864.38	Undisturbed Sample 6.9' – 9.4'
10.0	Strong brown/white, mica, silty fine/medium sand			859.38	N = 8 Undisturbed Sample 9.4' – 11.4'
15.0	Strong brown/dark brown, silty, mica, fine/medium sand			854.38	N = 9 Undisturbed Sample 16.9' – 18.9' Undisturbed Sample 18.9' – 20.9'
20.0	White, brown mica, silty fine to medium sand			849.38	Undisturbed Sample 20.9' – 22.9' N = 100
25.0				844.38	
30.0	Yellowish red/strong brown mica, silty fine/medium sand			839.38	N = 16

BORING DESIGNATION B-2*

Depth Ft	Description	ROD %	BIT Size	Elev	Remarks
35.0				834.38	Undisturbed Sample 36.9′ – 38.9′ Undisturbed Sample 38.9′ – 40.9′
40.0	White/brown, mica, silty, fine/medium sand			829.38	N = 17
45.0	White/strong brown mica, silty, fine/medium sand			824.38	N = 21
50.0	Brown/yellowish red, mica, silty, fine medium sand			819.38	Undisturbed Sample 51.9′ – 54.1′ N = 29
55.0	Yellowish red/brown, mica, silty, fine/coarse sand			814.38	N = 27
60.0	White/brown mica, silty fine/ medium sand			809.38	N = 100 Undisturbed Sample 61.9′ – 62.65′
67.0	Carbide refusal Boring Terminated			802.38	

Figure B-25. Core Boring Record

BORING DESIGNATION B-3*

Depth Ft	Description	ROD %	BIT Size	Elev	Remarks
0.0	Red, mica, silty, clayey, fine/medium sand			861.54	N = 16
5.0				856.54	Undisturbed Sample 7.0′ – 9.5′
	Dark brown/strong brown, mica, silty fine/coarse sand with gravels				N = 20
10.0	Brown/strong brown, mica, silty, fine/medium sand			851.54	N = 12
15.0				846.54	
20.0				841.54	Undisturbed Sample 20.0′ – 22.5′ Undisturbed Sample 22.5′ – 24.4′
25.0	White/light brown mica, silty, fine/medium sand			836.54	N = 25 Undisturbed Sample 26.9′ – 28.8′
	White/light brown, mica, silty, fine/medium sand				N = 48
30.0	White/strong brown, mica, silty, fine/coarse sand			831.54	N = 46

BORING DESIGNATION B-3*

Depth Ft	Description	ROD %	BIT Size	Elev	Remarks
35.0	Brown/dark brown, mica, silty, fine/medium sand			826.54	N = 21
40.0				821.54	N = 100
45.0				816.54	N = 100
50.9	Carbide refusal Boring Terminated			810.64	

Figure B-26. Core Boring Record

BORING DESIGNATION B-4*

Depth Ft	Description	ROD %	BIT Size	Elev	Remarks
0.0	Light gray/yellowish brown, mica, silty, fine/coarse sand			814.66	N = 18
5.0				809.66	Undisturbed Sample 7.1′ – 9.6′
10.0	Red mica, silty, fine/medium very sandy clay			804.66	Undisturbed Sample 9.6′ – 12.1′ N = 19
15.0				799.66	Undisturbed Sample 17.1′ – 19.6′
18.3	Water Table			796.36	
20.0	Red/Yellowish red, mica, fine/medium sandy silt			794.66	Undisturbed Sample 19.6′ – 22.1′ N = 12
25.0				789.66	Undisturbed Sample 27.1′ – 29.6′ Undisturbed Sample 29.6′ – 30.1′
30.0	White/brown, mica, silty, fine to medium sand			784.66	N = 52 Undisturbed Sample 32.1′ – 33.5′

BORING DESIGNATION B-4*

Depth Ft	Description	ROD %	BIT Size	Elev	Remarks
35.0	Gray/white, mica, silty fine/medium sand			779.66	N = 55
	White/brown, mica, silty, fine/coarse sand				N = 37
40.0	Pinkish gray, mica, silty, fine/coarse sand			774.66	N = 52
45.0	Light brown/reddish yellow, mica silty, fine/coarse sand			769.66	N = 100
50.0	Dark brown/yellowish brown, mica, silty, fine/coarse sand			764.66	N = 100
57.4	Carbide fishtail refusal			757.26	
	Boring Terminated				

Figure B-27. Core Boring Record

BORING DESIGNATION B-5*

Depth Ft	Description	ROD %	BIT Size	Elev	Remarks
0.0	Dark brown/white, mica, silty, fine/medium sand			817.17	N = 25
5.0				812.17	Undisturbed Sample 6.5′ – 8.0′
10.0	White/brown, mica, silty, fine/coarse sand			807.17	N = 100
12.6	Carbide fishtail refusal Boring Terminated			804.57	

Figure B-28. ISFSI Foundation Profile

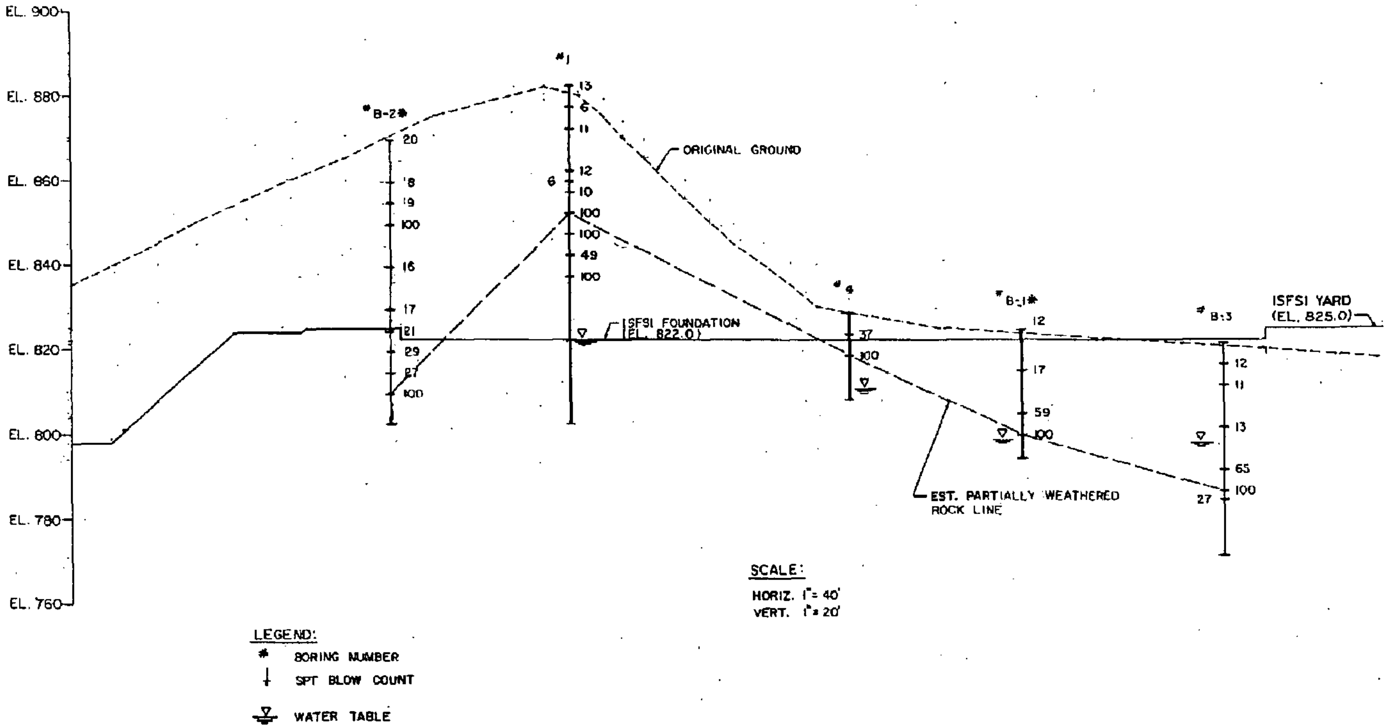


Figure B-29. Site Layout and Route

Figure Withheld Under 10 CFR 2.390

Figure B-30. Site Plan

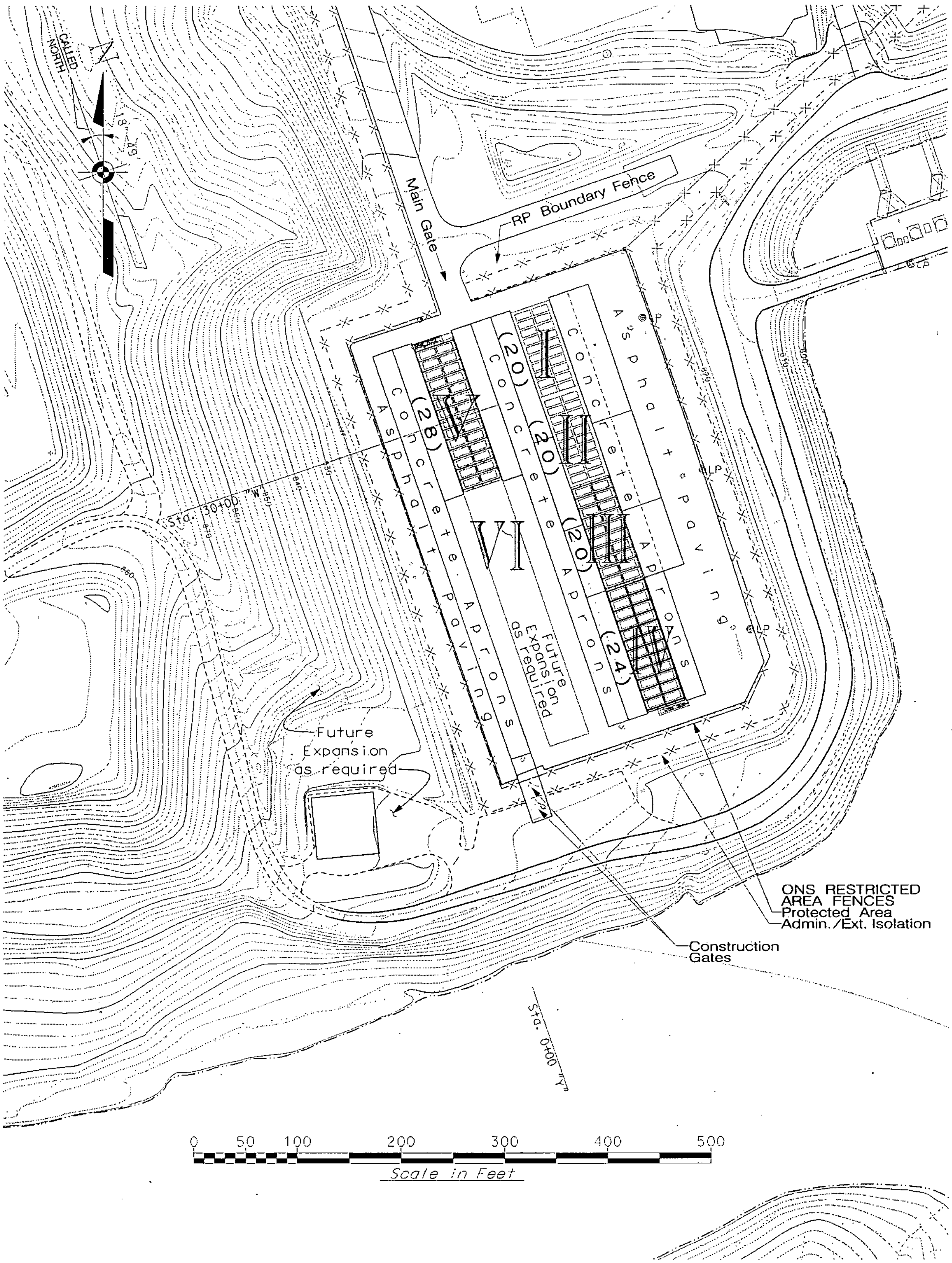


Figure B-31. Transfer Cask Lifting Yoke

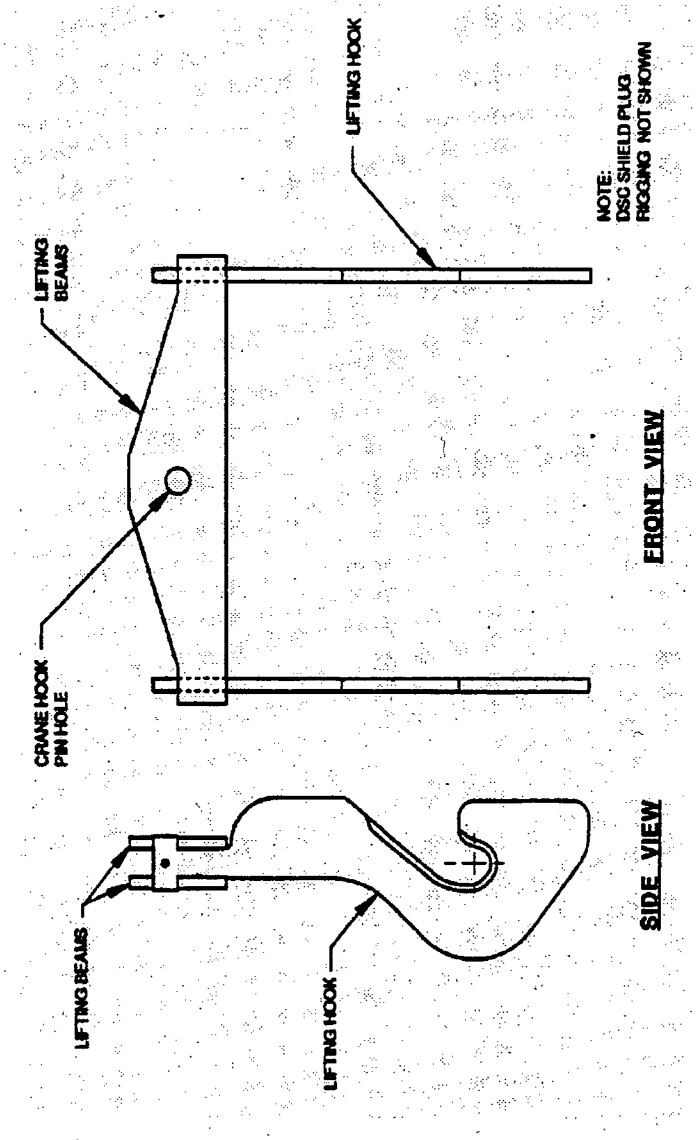


Figure B-32. Transfer Cask Lift Extension

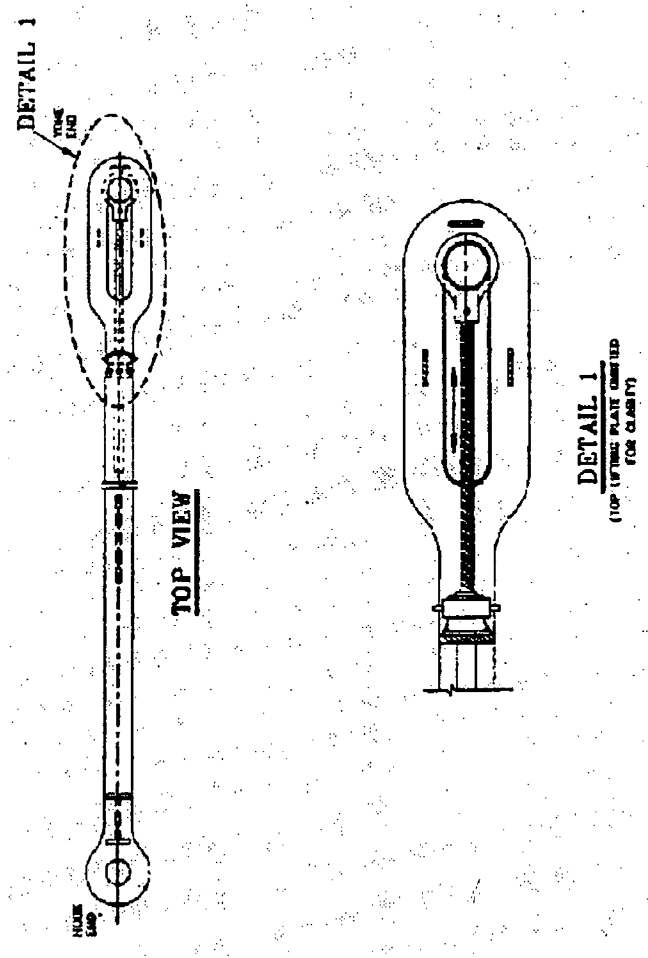


Figure B-33. Spent Fuel Pool Area

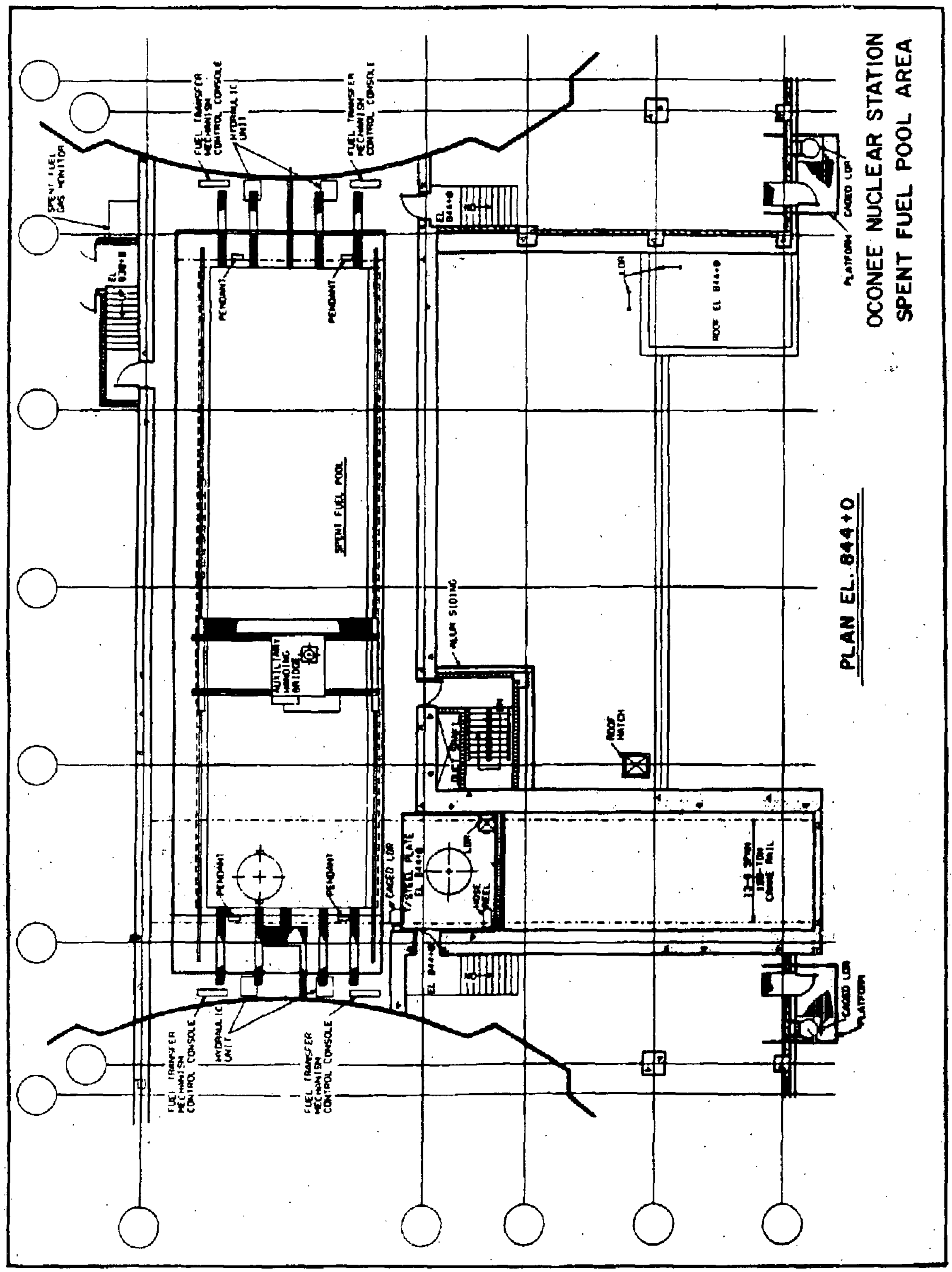


Figure B-34. Spent Fuel Pool Area

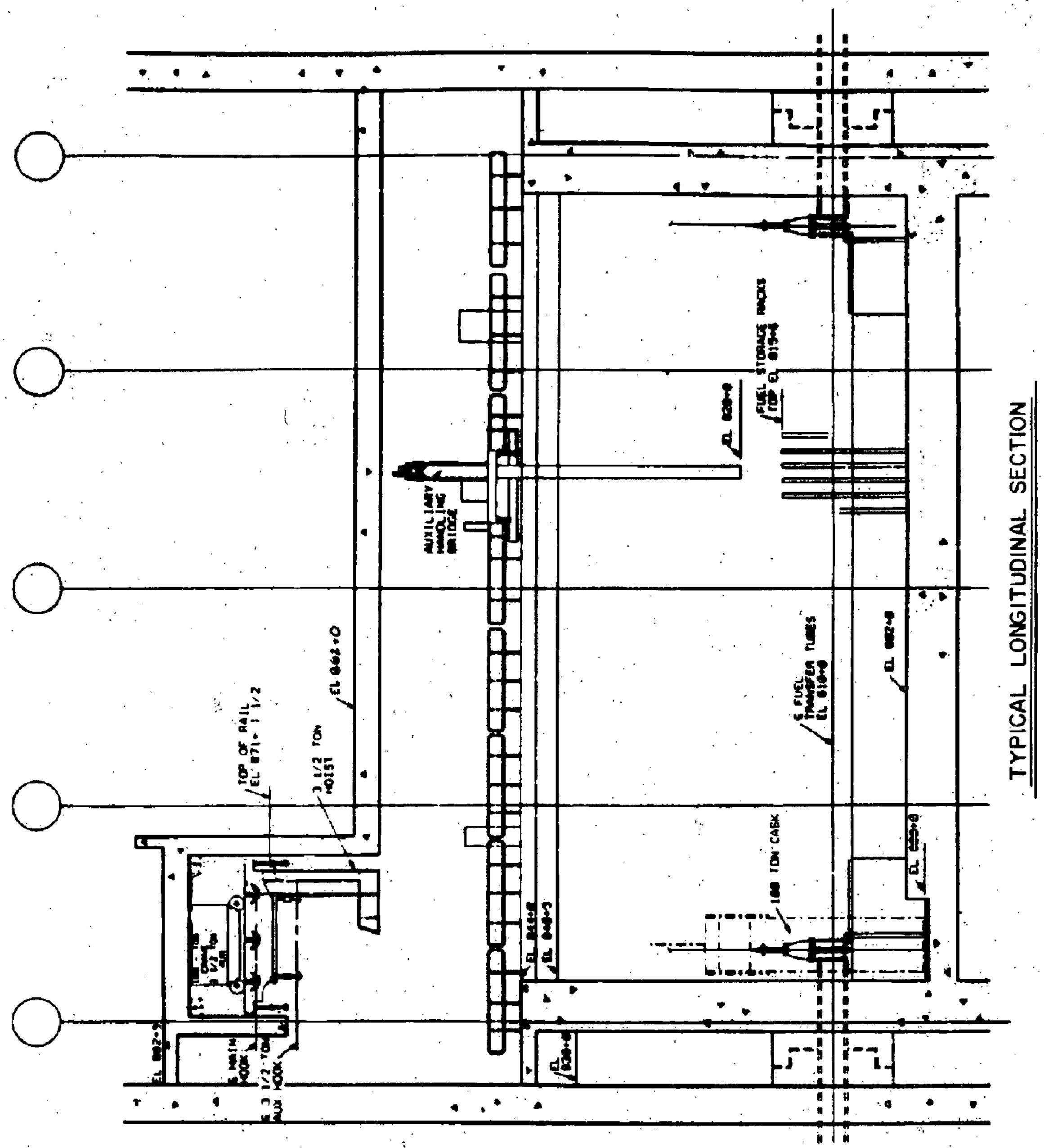
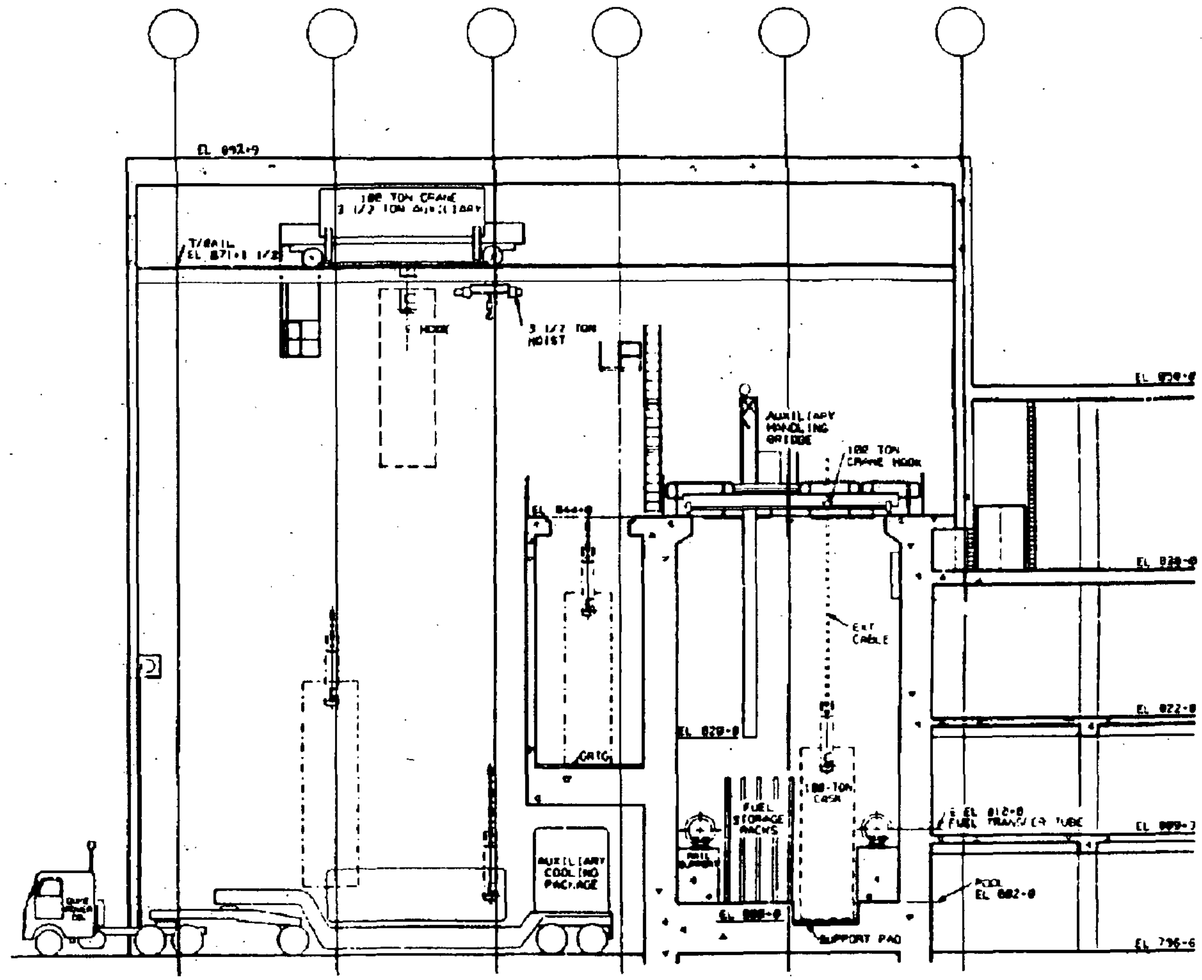


Figure B-35. Spent Fuel Pool Area



TYPICAL CROSS SECTION

Figure B-36. NUHOMS® System Loading Operations Flowchart.

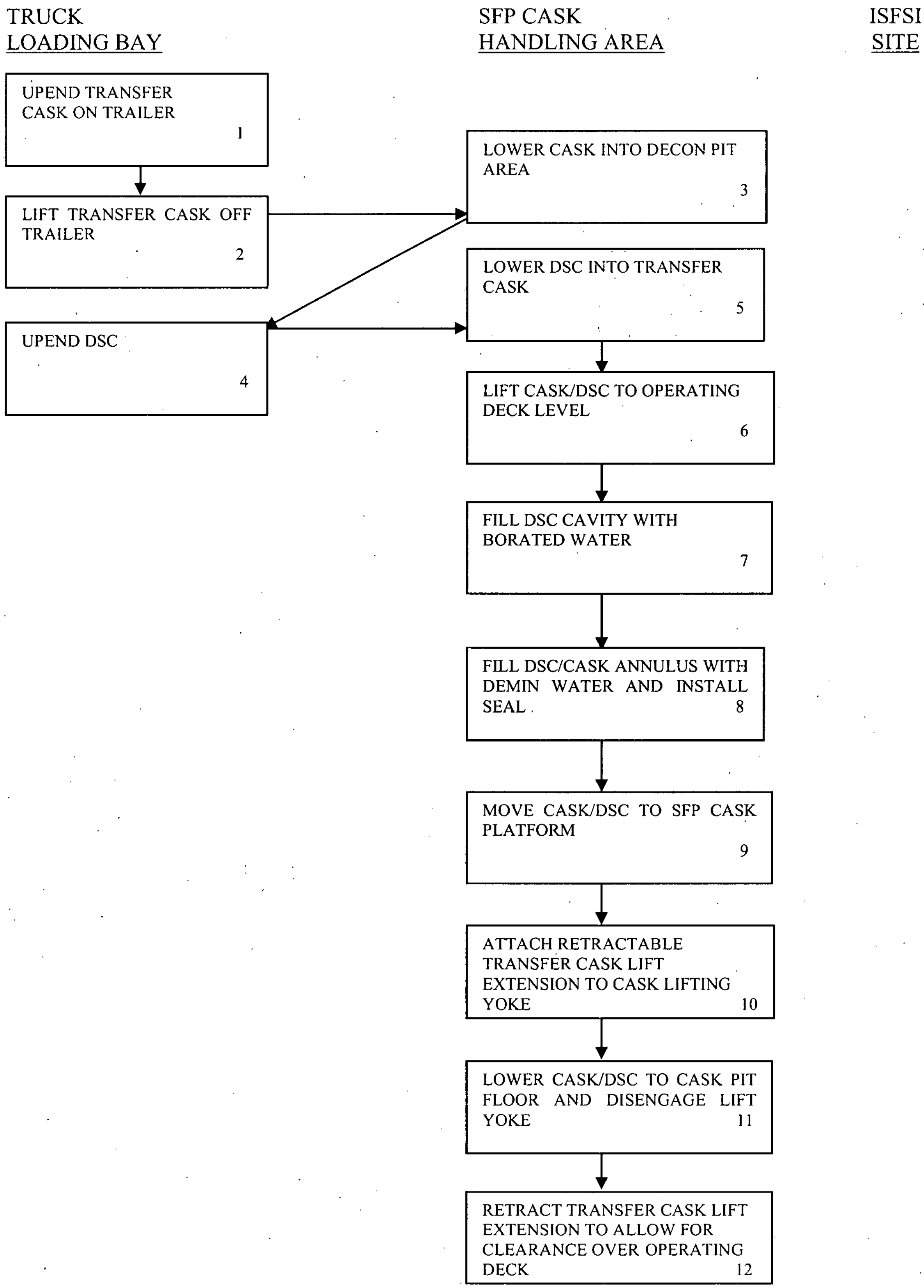


Figure B-37. NUHOMS® System Loading Operations Flowchart.

TRUCK
LOADING BAY

SFP CASK
HANDLING AREA

ISFSI
SITE

MOVE CRANE TO POSITION LIFT EXTENSION, YOKE, & PLUG OVER DECON PIT 13

LOAD 24 IFSs INTO SUBMERGED CASK/DSC 14

RIG DSC TOP SHIELD PLUG TO CRANE LIFT YOKE 15

LOWER DSC SHIELD PLUG ONTO CASK/DSC 16

RAISE CASK/DSC TO SFP CASK PLATFORM AFTER RE-ENGAGING LIFTING YOKE 17

DISENGAGE LIFT YOKE, ROTATE AND PLACE ON TOP OF CASK 18

REMOVE CRANE LIFT EXTENSION & HOOK CRANE TO LIFT YOKE 19

LIFT CASK/DSC FROM SFP CASK PLATFORM TO DECON PIT 20

Figure B-38. NUHOMS® System Loading Operations Flowchart.

TRUCK LOADING BAY | SFP CASK HANDLING AREA | ISFSI SITE

DECON TOP SURFACE OF DSC AND CASK AS CASK IS LOWERED 21

↓

REMOVE DSC/CASK ANNULUS SEAL, LOWER WATER LEVEL ~5-10 INCHES 22

↓

CHECK FOR SURFACE CONTAMINATION AND FLUSH AS NECESSARY 23

↓

REMOVE ~60 GALS OF WATER FROM DSC CAVITY 24

↓

WITH DSC VENT PORT OPEN, SEAL WELD DSC TOP SHIELD PLUG INNER TOP COVER PLATE (ITCP) 25

↓

TEST FIT OUTER TOP COVER PLATE (OTCP), THEN REMOVE 26

↓

INSTALL ITCP STRONG-BACK DEVICE 27

↓

PUMP HELIUM INTO DSC CAVITY DISPLACE WATER 28

↓

Figure B-39. NUHOMS® System Loading Operations Flowchart.

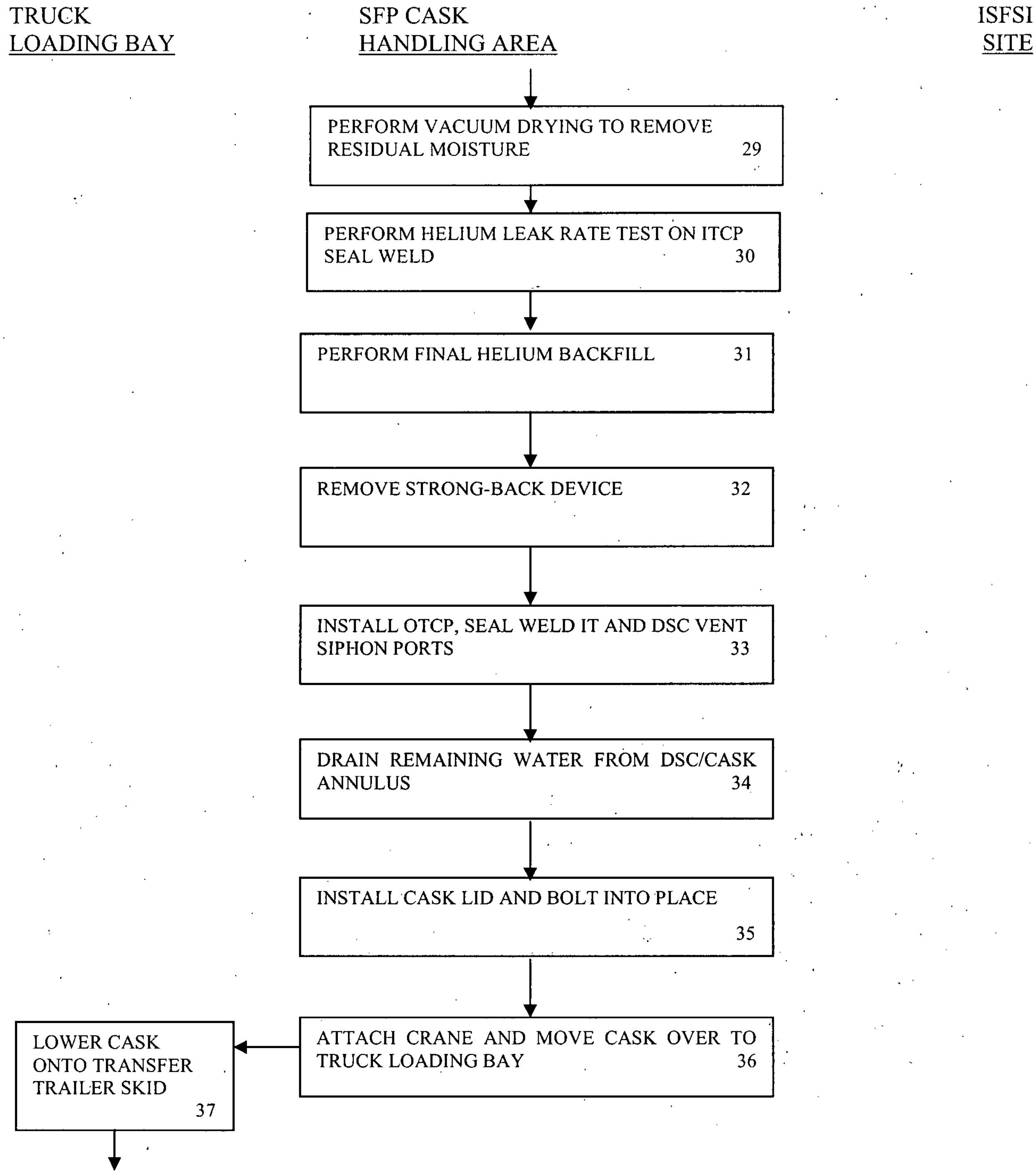


Figure B-40. NUHOMS® System Loading Operations Flowchart

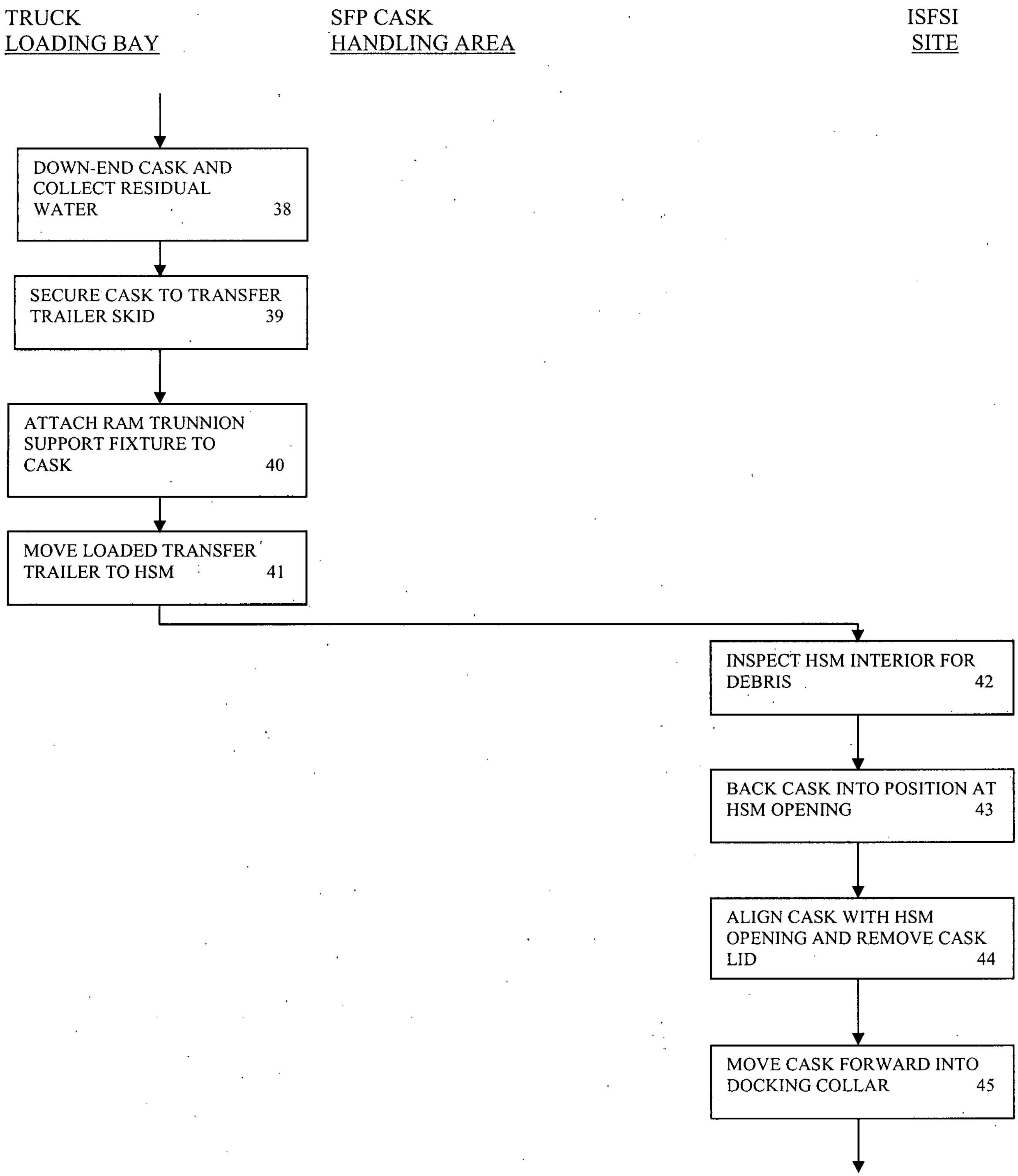
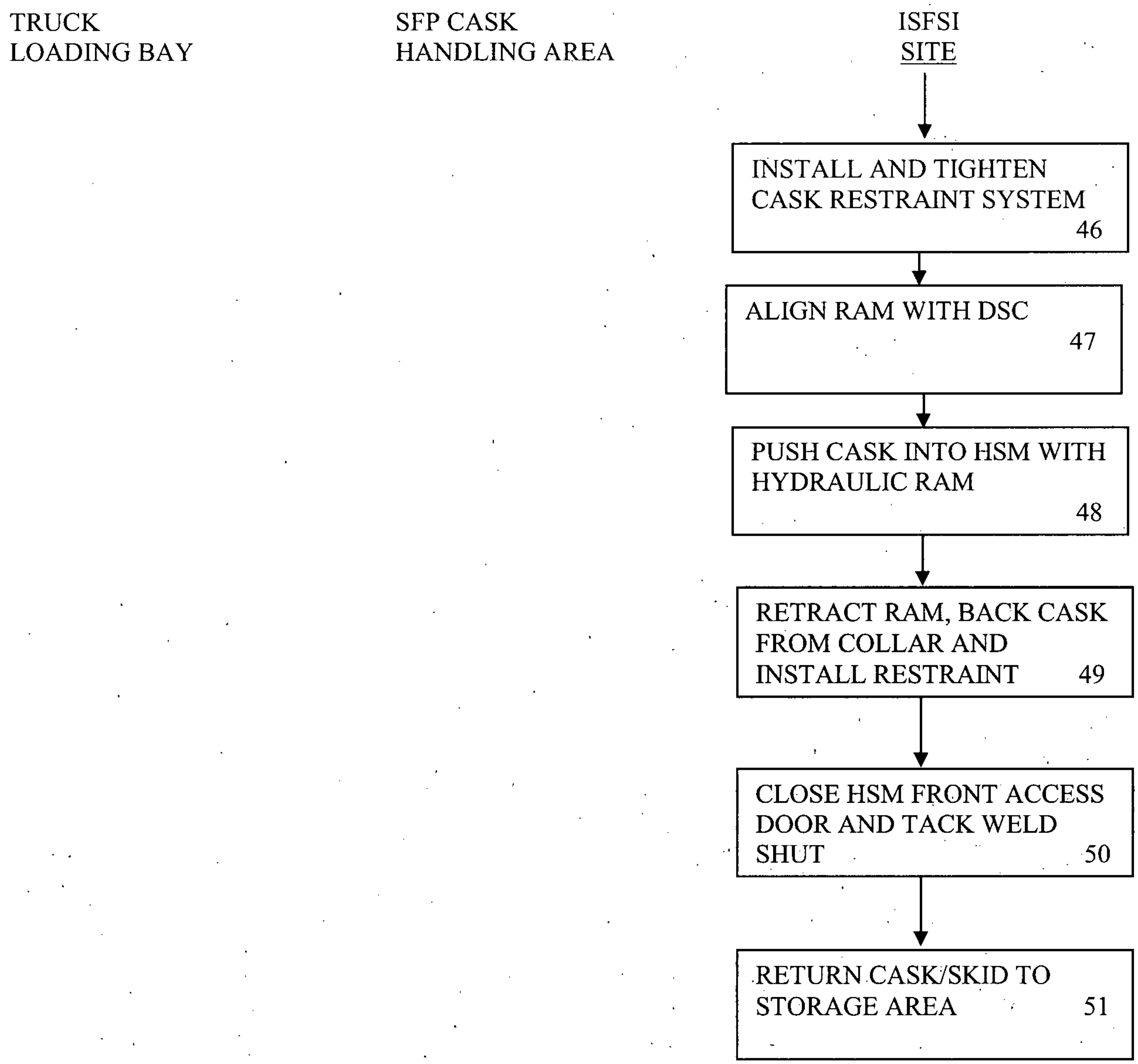


Figure B-41. NUHOMS® System Loading Operations Flowchart



NOTE: NUHOMS® SYSTEM RETRIEVAL OPERATIONS FLOW CHART IS SHOWN IN FIGURE 5.1-4 OF REFERENCE 5.1

Figure B-43. Dose Rate Versus Distance From Surface of HSM

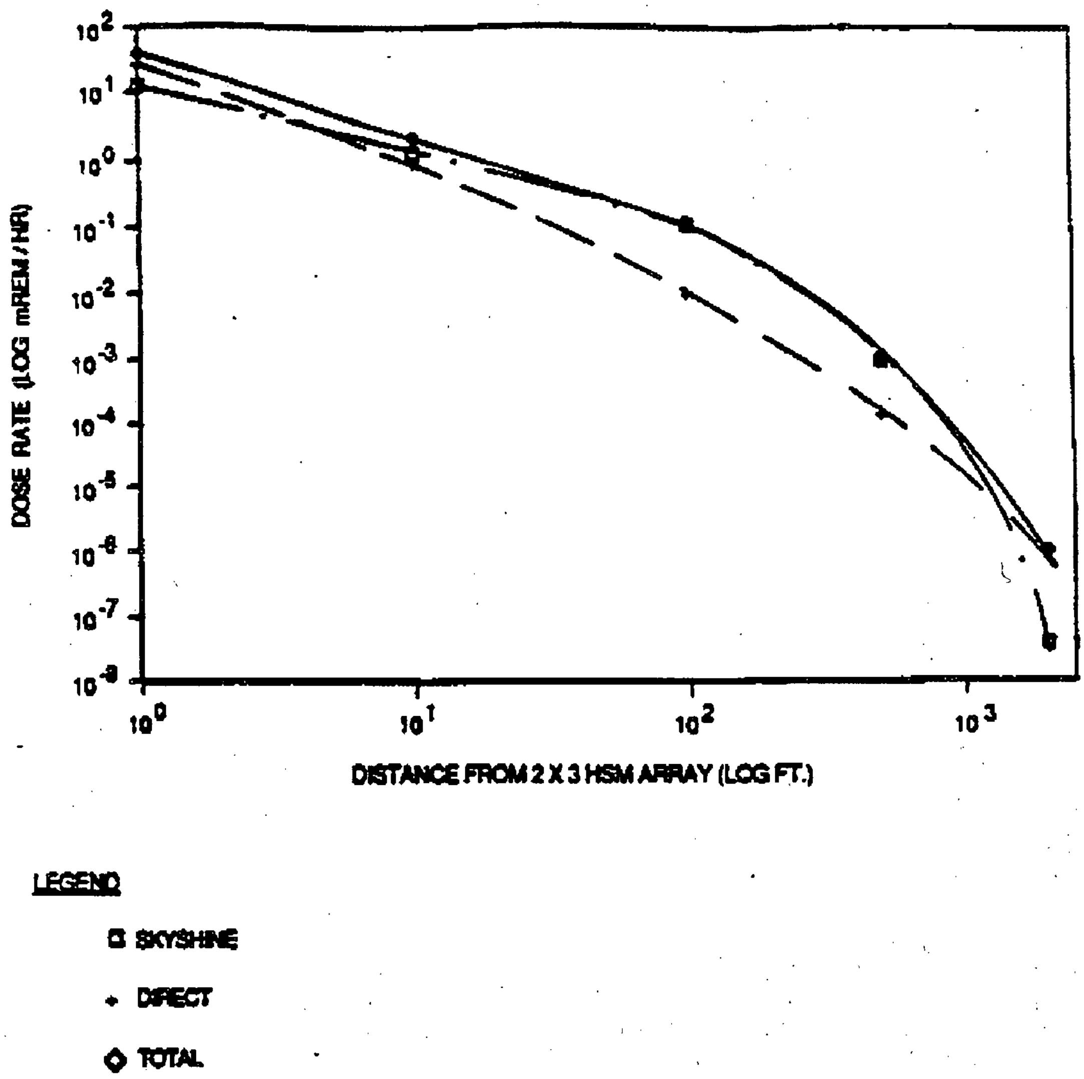


Figure B-44. Dose From Filled HSM Array

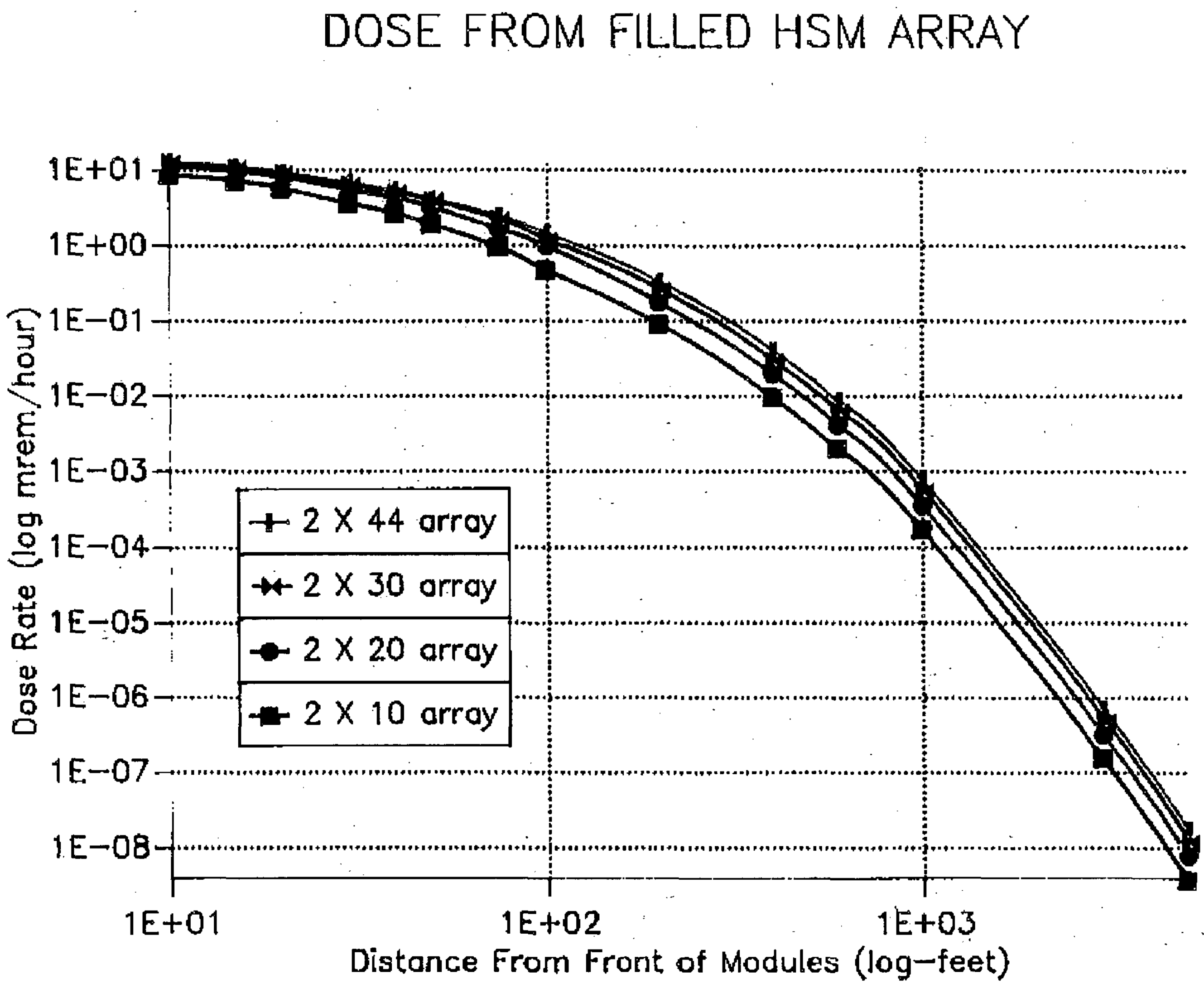


Figure B-45. Dose From Filled HSM Array

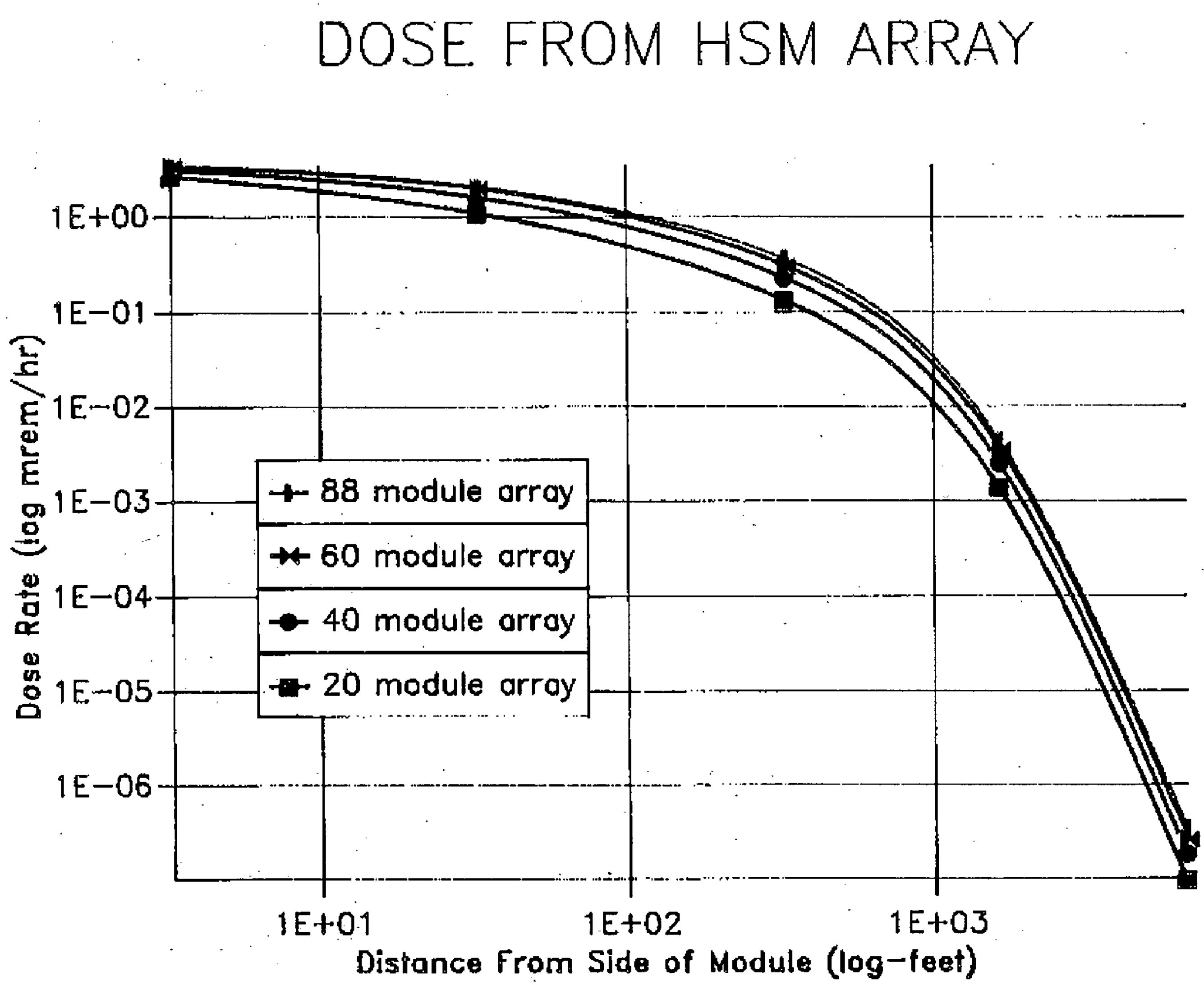
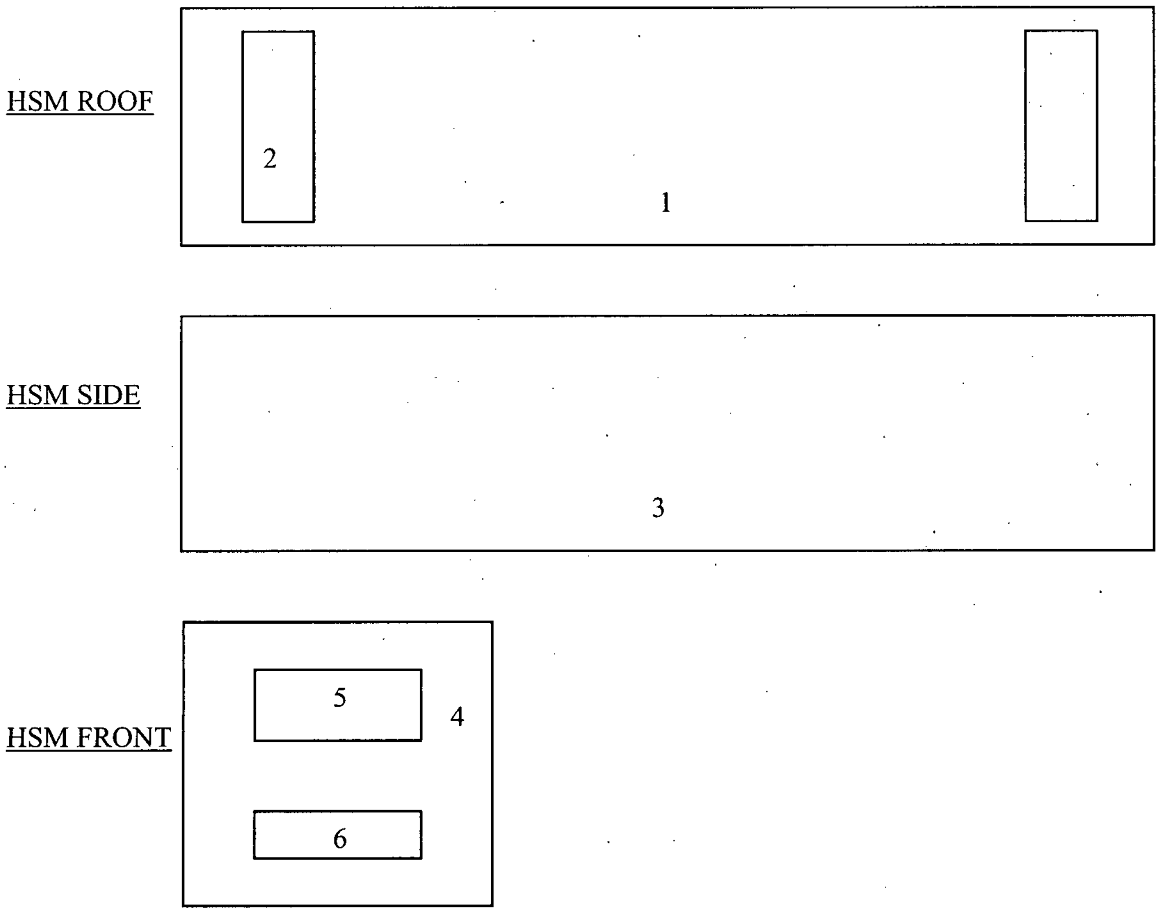


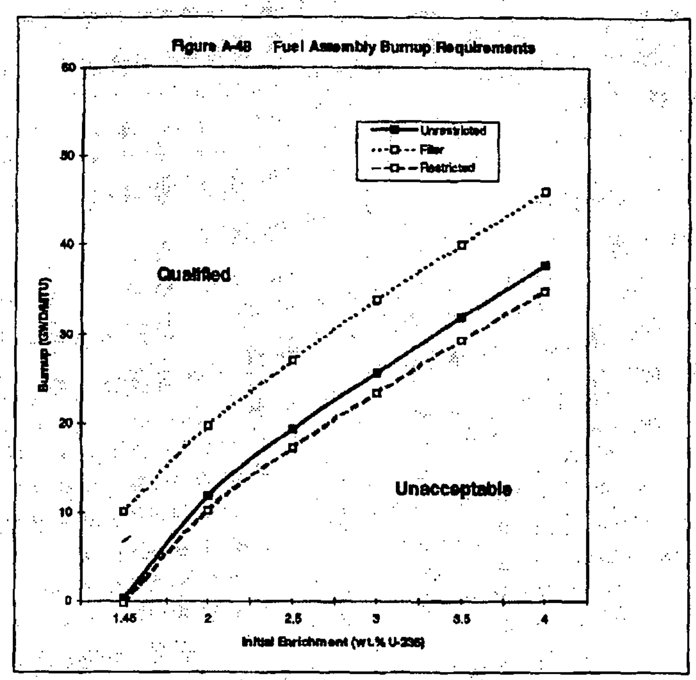
Figure B-46. Radiation Zone Map of Modules Surface Dose Rates



Location	Eff Area (ft2)	Generic Dose Rates (mrem/hr)			Phase II Dose Rates (mrem/hr)		
		Neutron	Gamma	Total	Neutron	Gamma	Total
1 Roof	98.6	0.11	6.5	6.6	0.13	7.05	7.18
2 shield block	6.0	0.20	50.0	50.2	0.24	12.10	12.34
Average	--------	0.04	3.38	3.42	0.05	2.76	2.81
3 Side	186.0	0.11	6.5	6.6	0.13	7.05	7.18
Average	--------	0.06	3.71	3.77	0.07	4.02	4.09
4 Front	49.0	0.11	6.5	6.6	0.13	7.05	7.18
5 Door	26.0	37.0	7.6	44.6	10.50	2.60	13.1
6 Air Inlet	6.0	2.1	94.3	96.4	2.1	94.3	96.4
Average	--------	5.18	5.76	10.94	1.55	5.21	6.76

Figure B-47. Deleted per 1991 Update

Figure B-48. Fuel Assembly Burnup Requirements



Single Region Storage: each fuel assembly must meet or exceed the "Unrestricted" curve

Mixed Region Storage: assemblies in the four center locations of the DSC must meet or exceed the "Filler" curve, and assemblies in the remaining 20 locations in the DSC must meet or exceed the "Restricted" curve.