

List

Independent Spent Fuel Storage Installation Commitment Matrix

**Idaho
Cleanup
Project**

CH2M ♦ WG Idaho, LLC is the Idaho Cleanup Project contractor for the U.S. Department of Energy

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| INTEC | List | For Additional Info: http://EDMS | Effective Date: 04/24/13 |
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Manual: INTEC NRC

Change Number: 338889

*The current revision can be verified on EDMS.

FORWARD

Commitments are statements of specific methods or actions, which meet or exceed regulatory requirements. The following matrix shows implementation documents for commitment statements made in the following:

- Three Mile Island 2 (TMI-2) Independent Spent Fuel Storage Installation (ISFSI) Safety Analysis Report
- TMI-2 ISFSI Technical Specifications
- TMI-2 ISFSI emergency response plan (ERP)
- Fort St. Vrain (FSV) ISFSI Safety Analysis Report
- FSV ISFSI Technical Specifications
- The FSV emergency response plan (ERP)
- The FSV Spent Fuel Management Program
- MCP-2925, “Screen and Evaluate Changes”
- PRD-317, “Radiation Protection, Safety and Health, and Environmental Protection Programs for NRC Regulated Facilities”
- FSV Environmental Report
- FSV Decommissioning Plan.

This matrix may also show commitments made in correspondence originating from the Department of Energy’s Idaho Operations Office (DOE-ID) and the Nuclear Regulatory Commission (NRC). There are no commitment statements in the Nuclear Regulatory Commission (NRC) generated safety evaluation report different from those made in the SAR.

Commitments, which are the responsibility of DOE-ID to implement, are noted in the matrix as “DOE.” DOE-ID procedures are not included for the DOE commitments, and the contractor does not validate the DOE commitments.

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This Commitments Matrix is intended to provide a snapshot (single point in time) indication of the implementation of commitments. Changes to implementing documents (for example, renumbering steps) do not require changes to the Commitments Matrix until the next scheduled field verification or revision. Periodic reviews of LST-14 will be tracked in EDMS. The initials of the verifier and date of verification will be recorded to show that the verification has been completed. Verification includes a review for adequacy of the implementation (for example, the implementing document(s) completely satisfies the commitment.)

This commitment matrix is broken into three tables. Table 1 contains commitments that are common to both the FSV ISFSI and the TMI ISFSI. Table 2 contains TMI commitments, and Table 3 contains FSV commitments.

NOTE: The Idaho Spent Fuel Facility (ISFF) Safety Analysis Report (SAR) and Technical Specifications (TS) have been reviewed for commitments for possible inclusion in LST-14. Because of the futuristic style in which the SAR in particular has been written, there are far too many commitments to include in LST-14. Many of the commitments will be implemented at various phases of the project (further design, construction, management, and operation) and the SAR updated accordingly. Possible inclusion of ISFF license basis document commitments in LST-14 will be reevaluated prior to ISFF operation.

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VERIFICATION

Field Verification

The following individual(s) performed a field verification of the commitments according to instructions stated in MCP-3191, "ISFSI Commitments Management."

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| Harry L Lord Signature—Typed or Printed Name | 1/13 Date | HLL Initials |
| Signature—Typed or Printed Name | Date | Initials |
| Signature—Typed or Printed Name | Date | Initials |

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Table 1. Commitments common to FSV and TMI.

NOTE: *Unless specific steps are identified, implementation is the entire document listed.*

| Line No. | Document/ Page No. Section | FSV/TMI Common Commitment Statement | Implementing Documents | Validation |
|----------|---|--|---|------------|
| 1. | FSV TS 5.1 5.1.1 5.1.2 5.1.3 5.1.4 5.1.5 5.1.6 | <p>The Manager, DOE-ID is responsible for the operation of the FSV ISFSI and for compliance with all applicable regulatory requirements and license conditions.</p> <p>The Facility Director is responsible for overall ISFSI operation. The Facility Director and any alternates shall be designated in writing.</p> <p>Although not in residence at the FSV ISFSI, the Facility Director shall maintain routine electronic and verbal communication with the facility staff.</p> <p>The Facility Director shall be present during significant operational or maintenance evolutions, emergency exercises, and announced NRC inspections. During prolonged evolutions, the Facility Director shall be present during initial activities and at least monthly thereafter.</p> <p>The Facility Director shall visit the FSV ISFSI at least twice a year for the purpose of verification or audit of FSV ISFSI compliance with regulatory requirements and license basis commitments, to communicate in person with facility staff, and to apprise DOE-ID management of FSV ISFSI status based on observations.</p> <p>The Facility Director shall review and concur with all FSV ISFSI evaluations prepared pursuant to 10 CFR 72.44(e), 10 CFR 72.44(f), 10 CFR 72.48, ITS 5.5.1.b, ITS 5.5.2.3, and ITS 5.5.3.2</p> | DOE DOE DOE DOE DOE MCP-2925 | HLL 1/13 |
| 2. | TMI TS 5.1 5.1.1 5.1.2 5.1.3 5.1.4 5.1.5 | <p>The Manager, DOE-ID, is responsible for the operation of the TMI-2 ISFSI and for compliance with all applicable regulatory requirements and license conditions.</p> <p>The TMI-2 Facility Director is responsible for overall ISFSI operation. The TMI-2 Facility Director and any alternates shall be designated in writing.</p> <p>The TMI-2 Facility Director shall maintain routine electronic and verbal communication with the facility staff.</p> <p>The TMI-2 Facility Director is stationed near the TMI-2 ISFSI at the INL site or in Idaho Falls, Idaho.</p> <p>The TMI-2 Facility Director shall review and concur with all TMI-2 ISFSI evaluations prepared pursuant to 10 CFR 72.44(e), 10 CFR 72.44(f), 10 CFR 72.48, TS 5.5.1.b, and TS 5.5.2.3.</p> | DOE DOE DOE DOE MCP-2925 | HLL 1/13 |

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Table 1. (continued).

| Line No. | Document/ Page No. Section | FSV/TMI Common Commitment Statement | Implementing Documents | Validation |
|----------|----------------------------------|---|---|------------|
| 3. | FSV/TMI TS 5.2.1 | Onsite and offsite organizations shall be established for facility operation and support services, respectively. The onsite and offsite organizations shall include the positions for activities affecting safety of the ISFSI. | ISFSI Management Org. Chart Employee Position Descriptions | HLL 1/13 |
| 4. | FSV/TMI TS 5.2.1.1 | Lines of authority, responsibility, and communication shall be defined and established throughout the organization, from senior management levels to all operational and support positions. These relationships shall be documented and updated, as appropriate, in organization charts, functional descriptions of departmental responsibilities and relationships, and job descriptions for key positions, or in equivalent forms of documentation. These requirements, including the facility-specific titles of those personnel fulfilling the responsibilities of the positions delineated in these TS, shall be documented (<i>FSV: ...in the SAR</i>). | ISFSI Management Org. Chart Employee Position Descriptions | HLL 1/13 |
| 5. | FSV/TMI TS 5.2.1.2 | <i>(FSV: The responsible Department executive, ...)</i> (<i>TMI: The Manager, DOE-ID, ...</i>) as delegated by the Energy Secretary, shall have Department responsibility for overall facility nuclear safety and shall take any measures needed to ensure acceptable performance of the staff in operating, maintaining, and providing technical support to the facility to ensure nuclear safety. | DOE | DOE |
| 6. | FSV/TMI TS 5.2.1.3 | The individuals who (<i>TMI: train the operating staff, carry out health physics, or...</i>) perform QA functions may report to the appropriate onsite manager; however, these individuals shall have sufficient organizational freedom to ensure their independence from operating pressures. | PLN-466 | HLL 1/13 |

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| Line No. | Document/ Page No. Section | FSV/TMI Common Commitment Statement | Implementing Documents | Validation |
|----------|----------------------------------|---|--|------------|
| 7. | FSV/TMI TS 5.2.1.4 | <p>The Safety Review Committee (SRC) shall provide oversight of FSV/TMI ISFSI operation by performing reviews of:</p> <ul style="list-style-type: none"> A. Performance indicators (audit findings, reportable events and conditions, TS violations) B. Evaluations performed pursuant to 10 CFR 72.44(e), 10 CFR 72.44(f), 10 CFR 72.48, (<i>FSV: TS 3.3.1 (A.3), TS 5.5.1.b, TS 5.5.2.3, and TS 5.5.3.2</i>), (<i>TMI: TS 5.5.1.b, and TS 5.5.2.3</i>) C. Proposed license amendments D. Selected activities of the As Low As Reasonably Achievable (ALARA) Committee and the staff level document review committee E. Preparation for major operation (such as defueling) for potential safety hazards F. Special reviews at the direction of the NE-ID Facility Director. <p>The SRC members and chair shall be appointed in writing. The Facility Director shall be informed of all appointments to the SRC:</p> <p>The SRC membership shall represent the following disciplines: Radiological Safety, Criticality Safety, Nuclear Facility Operations, Nuclear QA, and Engineering.</p> <p>A quorum for a SRC meeting shall include a minimum of three committee members representing the technical disciplines appropriate for matters under consideration. The DOE-ID Facility Director, acting in an ex-official capacity, shall be present to constitute a quorum.</p> <p>The SRC shall meet at least once every twelve months and at least once not more than three months prior to the start of defueling operations.</p> | CTR-19 | HLL 1/13 |
| 8. | FSV/TMI TS 5.3.1 | <p>Each member of the facility staff shall meet specified minimum qualifications (<i>FSV: ...specified in the SAR</i>).</p> | MCP-3043 Employee Position Descriptions | HLL 1/13 |

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| Line No. | Document/ Page No. Section | FSV/TMI Common Commitment Statement | Implementing Documents | Validation |
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| 9. | FSV TS 5.3.1 TMI TS 5.3.2 | Personnel who operate or supervise the operation of equipment identified as important to safety shall be trained and certified under the NRC approved training program. | MCP-3043 | HLL 1/13 |
| 10. | FSV/TMI TS 5.4.1.a | Written procedures shall be established, implemented, and maintained for the following: Administrative controls. | All of the following documents: LST-14, LST-24, MCP-2924, MCP-2925, MCP-2928, MCP-2955, MCP-3043, MCP-557, MCP-3177, MCP-3182, MCP-3183, MCP-3191, MCP-3562, MCP-3815, PLN-466, PDD-8 PRD-317 TMI MCP-1635 | HLL 1/13 |
| 11. | FSV/TMI TS 5.4.1.b | Written procedures shall be established, implemented, and maintained for the following: Routine ISFSI operations. | FSV facility specific technical procedures (TPRs) TMI facility specific technical procedures (TPRs) LST-24, and all referenced procedures | HLL 1/13 |
| 12. | FSV/TMI TS 5.4.1.c | Written procedures shall be established, implemented, and maintained for the following: emergency response. | All of the following documents: MCP-3177 FSV PLN-143, EPI-101 through -110, EPI-77, Rev. EPI-80 TMI PLN-1610EPI-9, EPI-11, , EPI-19, EPI-77, EPI-78, EPI-80, EPI-81, EPI-82, EPI-83 | HLL 1/13 |
| 13. | FSV/TMI | Written procedures shall be established, implemented, and maintained for the | MCP-2811, PLN-466 | HLL 1/13 |

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| | TS 5.4.1.d | following: design control. | | |
| 14. | FSV/TMI TS 5.4.1.e | Written procedures shall be established, implemented, and maintained for the following: facility changes, test, and experiments. | MCP-2925 | HLL 1/13 |
| 15. | FSV/TMI TS 5.4.1.f | Written procedures shall be established, implemented, and maintained for the following: control of surveillances and tests. | PLN-466, MCP-3056 | HLL 1/13 |
| 16. | FSV/TMI TS 5.4.1.g | Written procedures shall be established, implemented, and maintained for the following: control of special processes. | PLN-466, MCP-37 | HLL 1/13 |
| 17. | FSV/TMI TS 5.4.1.h | Written procedures shall be established, implemented, and maintained for the following: maintenance. | STD-101 | HLL 1/13 |
| 18. | FSV/TMI TS 5.4.1.i | Written procedures shall be established, implemented, and maintained for the following: health physics, including ALARA practices. | PRD-317 | HLL 1/13 |
| 19. | FSV/TMI TS 5.4.1.j | Written procedures shall be established, implemented, and maintained for the following: spent fuel management. | MCP-2861, PRD-319 | HLL 1/13 |
| 20. | FSV TS 5.4.1.k TMI TS 5.4.1.l | Written procedures shall be established, implemented, and maintained for the following: quality assurance inspections and audits. | MCP-552, MCP-591, MCP-2482 PLN-466 | HLL 1/13 |

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| 21. | FSV TS 5.4.1.1 TMI TS 5.4.1.m | Written procedures shall be established, implemented, and maintained for the following: physical protection. | FSV PLN-176, MCP-324, MCP-325, MCP-3025 TMI PLN-428 | HLL 1/!# |
| 22. | FSV TS 5.4.1.m TMI TS 5.4.1.n | Written procedures shall be established, implemented, and maintained for the following: records management. | MCP-557 | HLL 1/13 |
| 23. | FSV TS 5.4.1.n TMI TS 5.4.1.o | Written procedures shall be established, implemented, and maintained for the following: reporting. | MCP-2924 MCP-2928 | HLL 1/13 |
| 24. | FSV TS 5.4.1.0 TMI TS 5.4.1.p | Written procedures shall be established, implemented, and maintained for the following: all programs specified in Section 5.5. FSV/TMI 5.5.1 Technical Specification (TS) Bases Control Program 5.5.2 Essential Program Control (AQ, REMP, Training) TMI 5.5.3 Radioactive Effluent Control Program 5.5.4 Physical Protection Program FSV 5.5.3 Natural Gas and Oil Monitoring Program 5.5.4 Radioactive Effluent Control Program | MCP-3177, MCP-2925, PRD-317, MCP-2955 FSV MCP-3754, MCP-3043 TMI TPR-7066, MCP-3043, PLN-428 | HLL 1/13 |
| 25. | FSV/TMI TS 5.4.2 | The Facility Director will ensure performance, and review the results of DOE-performed surveillances, assessments, or audits of changes to procedures described above. The DOE-ID QA Manager is responsible to ensure performance of audits of the QA Program. Each area will be reviewed at least biennially. | DOE | DOE |

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| 26. | FSV/TMI TS 5.5.1 | <p>TS Bases Control Program shall be established, implemented, and maintained. This program provides a means for processing changes to the Bases of these TS.</p> <ul style="list-style-type: none"> A. Changes to the Bases of the TS shall be made under appropriate administrative controls and reviews. B. Changes may be made to Bases without prior NRC approval provided the changes do not involve either of the following: <ul style="list-style-type: none"> 1. A change in the TS incorporated in the license 2. A change to the SAR or Bases which involves an unreviewed safety question, a significant increase in occupational exposure, or a significant unreviewed environmental impact as defined in 10 CFR 72.48. C. The Bases Control Program shall contain provisions to ensure the Bases are maintained consistent with the SAR. D. Proposed changes which don't meet the criteria of 5.5.1.b above shall be reviewed and approved by the NRC before implementation. Changes to the Bases implemented without prior NRC approval shall be provided to the NRC on a frequency consistent with 10 CFR 72.48(b)(2). | MCP-3177, MCP-2925 | HLL 1/13 |
| 27. | FSV/TMI TS 5.5.2 | <p>Essential Program Control Program.</p> <ul style="list-style-type: none"> 1. This program provides a means for processing changes to the following essential programs. <ul style="list-style-type: none"> a. Quality Assurance Program b. Radiological Environmental Monitoring Program c. Training Program. 2. Changes to essential programs shall be made under appropriate administrative controls and reviews. 3. The licensee may make changes to essential programs without prior NRC approval provided the changes do not involve either of the following: <ul style="list-style-type: none"> a. A change in the TS incorporated in the license, or b. A decrease in effectiveness. | MCP-3177 MCP-2925 | HLL 1/13 |

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| | | <p>4. The Essential Programs Change Control program shall contain provisions to ensure essential programs are maintained consistent with the regulations.</p> <p>5. Proposed changes to essential programs which don't meet the criteria of 5.5.2.3 above shall be reviewed and approved by the NRC before implementation.</p> <p>6. Changes to essential programs implemented without prior NRC approval shall be provided to the NRC on a frequency consistent with 10 CFR 72.70(b).</p> <p>7. DOE-ID will review and approve all submittals to the NRC made pursuant to TS 5.5.2.5 and TS 5.5.2.6.</p> | | |
| 28. | FSV/TMI TS 5.6.1 | All reports required by 10 CFR Part 72 for the TMI-2 and FSV ISFSIs and all reports required by the TMI-2 and FSV ISFSI licenses and TS, shall be submitted by the Manager of DOE-ID or the DOE-ID Facility Director. | MCP-2924, PRD-317, MCP-2925, MCP-3177, MCP-2928, MCP-2955 | HLL 1/13 |
| 29. | FSV/TMI TS 5.6.2 | All instances of noncompliance with the Limiting Conditions for Operations, Surveillance Requirements, Design Features, or Administrative Controls contained within these TS shall be reported in writing to the NRC Document Control Desk within 30 days of discovery of the noncompliance. Copies shall be provided to the Director, Office of Nuclear Material Safety and Safeguards and the Regional Administrator, Region IV. | MCP-2924 | HLL 1/13 |
| 30. | FSV/TMI SAR 9.1.1 | The Manager of DOE-ID is authorized to be the license holder for the FSV/TMI-2 ISFSI (materials license SNM-2504/SNM-2508). This authority was delegated and responsibility was assigned to the DOE-ID Manager by the Secretary of Energy pursuant to 10 CFR 72.16(b) in Delegation Order No. 10CFR72.512.1. As the facility owner and licensee, DOE retains ultimate responsibility for the safe operation of the facility and for compliance with all license conditions. | | DOE |

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| 31. | FSV/TMI SAR 9.1.2 | The Manager of DOE-ID is the authorized DOE representative having direct authority and responsibility for compliance with the FSV/TMI-2 ISFSI License. The Manager of DOE-ID is responsible for overall executive management of the Idaho Operations Office, has signature authority for the FSV/TMI-2 license and is the person ultimately responsible for compliance with the facility’s license conditions and overall facility nuclear safety. The DOE-ID Manager shall take any measures needed to ensure acceptable performance of the staff in operating, maintaining, and providing technical support to the facility to ensure nuclear safety and compliant operations. The responsibilities of the personnel reporting directly to the Manager, as depicted in Figure 9.1-1, are described below. | | DOE |
| 32. | FSV SAR 9.1.2 TMI SAR 9.1.2 | The responsibility of the Deputy Manager for the Idaho Cleanup Project is the overall execution of the EM-funded programs and operations at the INL, under which spent nuclear fuel storage (including NRC-licensed ISFSI operations) falls. The actual day-to-day execution of programs and operations associated with the NRC-licensed ISFSIs is performed by a contractor. The Deputy Manager for ICP and staff provide management direction and oversight of contractor performance in accordance with DOE-ID's Quality Assurance Program and commitments herein. | | DOE |
| 33. | FSV/TMI SAR 9.1.2 | The Deputy Manager for Operations Support is independent of facility line management and is responsible for environmental protection, safety, health, quality assurance, and security. This Office provides DOE-ID oversight of the contractor for licensed activities, independent of the ICP organization. | | DOE |
| 34. | FSV/TMI SAR 9.1.2 | The responsibility for developing the appropriate revisions to the contract is assigned to the Assistant Manager for Administration Support. | | DOE |
| 35. | FSV/TMI SAR 9.1.2.1 | Reporting directly to the Assistant Manager for Facility and Material Disposition is the FSV/TMI-2 Facility Director, who is responsible for oversight of the contractor and to ensure that approved requirements and performance objectives are met for the TMI-2 ISFSI. The FSV/TMI-2 Facility Director has an alternate, designated in writing, who meets the training and qualification requirements for the Facility Director. The FSV/TMI-2 Facility Director has direct access to the Manager of DOE-ID on issues related to the safety and surety of ISFSI operations. | | DOE |

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| 36. | FSV/TMI SAR 9.1.2.1 | Also reporting to the Assistant Manager for Facility and Material Disposition through the Materials Disposition Project Team Leader is the NRC Licensing Manager. The Licensing Manager is responsible for the preparation and submittal of license applications (including any necessary amendments thereto), timely response to NRC communications and inquiry, and other licensing and interface support to the FSV/TMI-2 Facility Director. | | DOE |
| 37. | FSV/TMI SAR 9.1.2.1 | The responsibility for oversight of both the contractor’s QA Program for the NRC-licensed ISFSIs as well as the DOE-ID oversight program of the ISFSI operations is delegated through the Deputy Manager for Operations Support and Assistant Manager for Operational Support to the Quality and Safety Director. The Quality and Safety Director delegated the responsibility for QA oversight of the ISFSIs to the ISFSI Quality Assurance (QA) Manager. The roles and responsibilities of the ISFSI QA Manager are further described in Chapter 11 of this SAR. As with the TMI-2 Facility Director, the ISFSI QA Manager has direct access to the Manager of DOE-ID on issues related to the safety and surety of ISFSI operations. | PLN-466 | HLL 1/13 |
| 38. | FSV/TMI SAR 9.1.2.2 | The DOE utilizes a contractor for the FSV/TMI-2 ISFSI activities. The authority for the management and operation of the facility is contractually delegated and the responsibility for compliance with license requirements and applicable regulations is contractually assigned to the contractor. To exercise DOE's ultimate responsibility, DOE will: (1) retain responsibility for and perform independent audits of the contractor’s FSV/TMI-2 ISFSI Quality Assurance program (both the achievement of quality by contractor management and the verification of quality by contractor QA personnel), (2) ensure the license requirements for the facility are included in the contract, (3) assess the performance of the contractor against the terms of the contract, (4) retain the responsibility to budget funds necessary and sufficient to safely operate the facility, and (5) retain the authority to revise the contract in the event contract deficiencies are found relative to proper implementation of license requirements. | Contract DE-AC0705ID14516. | DOE |

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| 39. | FSV/TMI SAR 9.1.2.2.1 | The Facility Director is the day-to-day management DOE-ID employee responsible for the compliance of FSV and TMI-2 ISFSI operations. The Facility Director shall verify or audit the FSV and TMI-2 ISFSIs for compliance with regulatory requirements and license basis commitments and apprise DOE-ID management of FSV and TMI-2 ISFSI status based on observations. Although not in residence at the FSV ISFSI, the Facility Director shall maintain routine electronic and verbal communication with the facility staff. | | DOE |
| 40. | FSV/TMI SAR 9.1.2.2.1 | The DOE-ID Facility Director or alternate shall perform surveillances of the contractor's ALARA Committee and the ISFSI Safety Review Committee and shall be an ex officio member (and is a quorum requirement) of these committees when they meet to review ISFSI matters to ensure these committees' functions are satisfactory and to report to DOE-ID management as needed. (See Section 9.1.3.1.1 for the duties of the ISFSI Safety Review Committee.) | CTR-19 | HLL 1/13 |
| 41. | FSV/TMI SAR 9.1.2.2.1 | DOE Facility Director or alternate shall review results of management assessments performed for the following contractors' programs: training, security, emergency, quality assurance, and radiation protection. | | DOE |
| 42. | FSV/TMI SAR 9.1.2.2.1 | The DOE-ID FSV/TMI Facility Director or alternate shall review and concur with, All, the following: <ul style="list-style-type: none"> A. All 72.48 evaluations for the FSV and TMI-2 ISFSIs B. 10 CFR 72.44(e)—Physical Protection Plan evaluations and 10 CFR 72.44(f)—Emergency Plan evaluations evaluations of changes to DOE-ID's other essential programs (TS 5.5.2) C. Changes to the TS Bases D. All Changes to the SAR E. 10 CFR 72.70 SAR update F. Nuclear Material Status Reports (submitted electronically) G. Annual Environmental Report. Other reports which may be submitted to NRC in response to conditions or events which are not submitted by the Manager of DOE-ID. | MCP-2925, MCP-2955, MCP-3177 | HLL 1/13 |

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| 43. | FSV/TMI SAR 9.1.2.3 | The DOE Idaho Operations Office has a technical staff representing several areas of expertise with the wide variety of projects and activities at the INL. This staff is available to assist the management and oversight of the activities at the FSV and TMI-2 ISFSIs. Staff assigned to assist the management and oversight in the areas of security, radiation protection, emergency preparedness, and quality assurance are trained and qualified in accordance with Licensing Management Procedures, or perform work directly under the supervision of the Facility Director. | | DOE |
| 44. | FSV/TMI SAR 9.1.3 | The operating organization, line management, and administrative control systems are provided by DOE’s contractor personnel. The DOE and its contractor commit to provide the NRC with ready access to the FSV/TMI-2 ISFSI, personnel, and records that NRC considers necessary to carry out its responsibilities. | | DOE |
| 45. | FSV/TMI SAR 9.1.3 | DOE-ID has assigned responsibility and delegated authority for the management and operation of the facility to the contractor. DOE-ID policy requirements for operating the FSV/TMI-2 ISFSI are assigned to the contractor through the contract. Specifically, the contract requires the contractor to manage and operate the FSV/TMI-2 ISFSI in compliance with all applicable: <ul style="list-style-type: none"> • Human health and safety regulations, • Environmental regulations, • NRC regulations and license conditions, and • Quality assurance requirements. | Contract DE-AC0705ID14516 | DOE |
| 46. | FSV/TMI SAR 9.1.3 | DOE-ID commits to providing a contractor with management and staff for routine operation and maintenance of the ISFSI and support organizations to implement DOE’s program commitments in quality assurance, security, training, radiological protection, environmental monitoring, and spent fuel accountability. | | DOE |
| 47. | FSV/TMI SAR 9.1.3.1 2 nd | The contractor corporate structure provides the necessary organizations for operating the FSV and TMI-2 ISFSIs. The contractor organization supports the missions at the INL, not all of which are applicable to the management and operation of the ISFSI | Contract DE-AC0705ID14516 | HLL 1/13 |
| 48. | FSV/TMI SAR 9.1.3.1 2 nd | The contractor's chief executive officer is responsible for overall management of contractor activities and is accountable for complying with the contract conditions. | PLN-466, PRD-317, STD-101, MCP-3043 | HLL 1/13 |

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| | | <p>Authorities are delegated and resources are provided to manage the FSV and TMI-2 ISFSIs in the areas of emergency preparedness, engineering, environmental management, operations, maintenance, quality assurance, radiological control, safety and health, security, training, and transportation. In addition to the interfaces shown on Figure 9.1-1 personnel assigned to the above functions maintain interfaces with their functional counterparts at DOE-ID.</p> | | |
| 49. | <p>FSV/TMI SAR 9.1.3.1, 3rd</p> | <p>Reporting to the Manager of ISFSI Management are the Fort St. Vrain (FSV) ISFSI Manager, the TMI-2 ISFSI Manager, and the Compliance Engineering Lead. Support staff for essential positions within the ISFSI Management department report to the ISFSI Manager for services provided for the ISFSI. The Manager of ISFSI Management works closely with the DOE-ID Facility Director. This interface is the primary operations interface between DOE-ID and its contractor for the FSV/TMI-2 ISFSI.</p> | <p>PLN-466, ISFSI Management Org. chart</p> | <p>HLL 1/13</p> |
| 50. | <p>FSV/TMI SAR 9.1.3.1, 4th</p> | <p>The Quality Assurance Manager assigned to the (FSV/TMI-2) ISFSI reports to a level equal to or above the reporting level of the Manager of ISFSI Management. The QA Manager assigned to the (FSV/TMI-2) ISFSI also interfaces with the DOE-ID ISFSI Quality Assurance Manager who is responsible for the (FSV/TMI-2 ISFSI) QA Program.(See Chapter 11)</p> | <p>PLN-466 ISFSI Management Org. chart</p> | <p>HLL 1/13</p> |
| 51. | <p>FSV/TMI SAR 9.1.3.1.1 1st</p> | <p>Reporting to and chartered by a senior executive is the ISFSI Safety Review Committee. This committee is comprised of senior technical personnel and management personnel with extensive nuclear experience in various areas.</p> | <p>CTR-19</p> | <p>HLL 1/13</p> |
| 52. | <p>FSV/TMI SAR 9.1.3.1.1 2nd</p> | <p>The purpose of this committee is to evaluate the performance of staff level safety review committees, to review performance indicators (such as audit findings, reportable events and conditions, Technical Specification violations); to review 10 CFR 72.48 evaluations (and associated procedure or design changes); to review changes to the Technical Specification Bases, SAR, Emergency Response Plan, and Physical Protection Plan; to approve license amendment requests; and to review preparations for major changes in operation (such as removing fuel from the ISFSI). The ISFSI Safety Review Committee shall also perform special reviews at the direction of the DOE-ID Facility Director.</p> | <p>CTR-19</p> | <p>HLL 1/13</p> |

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| 53. | FSV/TMI SAR 9.1.3.1, 3rd | Core members, appointed in writing by the chartering senior executive, provide the needed technical expertise in engineering, radiological control, criticality safety, nuclear facility operations, and nuclear quality assurance; their technical qualifications are described in section 9.1.4.1. Other members may be appointed as considered appropriate by the chartering senior executive. | CTR-19 | HLL 1/13 |
| 54. | FSV/TMI SAR 9.1.3.1, 4th | A quorum shall include 3 core members, the technical disciplines appropriate for the matters under review, and the DOE-ID FSV/TMI-2 Facility Director. The DOE-ID FSV/TMI-2 Facility Director is informed of all appointments to the Safety Review Committee. | CTR-19 | HLL 1/13 |
| 55. | FSV/TMI SAR 9.1.3.2.1st | The daily management of the ISFSI operation is provided by the FSV or TMI-2 ISFSI Manager. The FSV or TMI-2 ISFSI Manager reports to the Manager of ISFSI Management. Assuring requirements are satisfied in the operation of the ISFSI is the responsibility of the ISFSI Manager. | ISFSI Management Org Chart | HLL 1/13 |
| 56. | FSV/TMI SAR 9.1.3.2, 2 nd | FSV: Personnel assigned to FSV ISFSI operations report to the ISFSI Manager. The ISFSI Manager, Facility Safety Officer (FSO), and the Security Watch personnel are routinely stationed at the ISFSI. Other support personnel from the INL are periodically sent to the ISFSI and are either matrixed directly to the ISFSI Manager or the FSO while on site. The ISFSI Manager is responsible for maintaining the Operations log; this log will be used to note the performance of all significant on site activities and conditions. TMI: Personnel assigned to TMI-2 ISFSI operations report to the ISFSI Manager. Other personnel from the INL that may be assigned to work at the ISFSI will report to the TMI-2 ISFSI Manager while at the ISFSI site. The TMI-2 ISFSI Manager is responsible for maintaining the Operations log; this log will be used to note the performance of all significant on site activities and conditions. | PLN-466 CPP-1774 Operations log is maintained in the FSO office. | HLL 1/13 |
| 57. | FSV/TMI SAR 9.1.3.2, 3 rd | ISFSI staff-level committees include an ALARA Committee and staff level safety review committee(s) or board(s) responsible to review changes to license basis documents and any associated evaluations. | MCP-91 CTR-56 | HLL 1/13 |

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| 58. | FSV/TMI SAR 9.1.4 | The following DOE-ID positions require minimum qualifications and training for the management and oversight of the FSV or TMI-2 ISFSI: <ul style="list-style-type: none"> • ISFSI QA Manager • Facility Director and designated alternate The following contractor positions require minimum qualifications and training for the operation of the FSV or TMI-2 ISFSI: <ul style="list-style-type: none"> • ISFSI Safety Review Committee members • Manager of ISFSI Management • FSV or TMI-2 ISFSI Manager and designated alternate • FSV or TMI-2 Facility Safety Officer and designated alternate • Certified ISFSI Operator • Quality Assurance manager | MCP-3043 CTR-19 | HLL 1/13 |
| 59. | FSV/TMI SAR 9.1.4.1 2 nd | The DOE-ID ISFSI QA Manager shall have a minimum of a Baccalaureate degree in an engineering or physical science field and five years experience in nuclear quality assurance and certification as lead auditor. The minimum training for this position shall include 72.48 process, QA program indoctrination, NRC requirements, and the ISFSI License Basis (consisting of the identification of and orientation to the license and design basis documents). | | DOE |

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| 60. | FSV/TMI SAR 9.1.4.1 3 rd | The ISFSI Facility Director shall have a minimum of a Baccalaureate degree in an engineering or physical science field and five years experience in nuclear facility operations. The minimum training for this position shall include 72.48 process, QA program indoctrination, Technical Specifications, NRC requirements, and the ISFSI License Basis. The designated alternate for the ISFSI Facility Director shall meet the same minimum qualifications and training requirements. | | DOE |
| 61. | FSV/TMI SAR 9.1.4.1, 4 th | <p>The Chair, Members, and Alternates of the ISFSI SRC shall have a minimum of a Baccalaureate degree in an engineering or physical science field and five years experience in one or more of the following technical areas at nuclear facilities:</p> <ul style="list-style-type: none"> A. Radiological Safety B. Nuclear Safety (with at least two years experience in criticality safety analysis) C. Nuclear Facility Operations D. Nuclear Quality Assurance E. Engineering. <p>The minimum training for the Chair, Members, and Alternates of the ISFSI SRC shall include 72.48 Process, QA program indoctrination, Technical Specifications, NRC requirements, and the FSV /TMI-2 ISFSI License Basis.</p> | CTR-19, MCP-3043 | HLL 1/13 |
| 62. | FSV/TMI SAR 9.1.4.1 5 th | The Manger of ISFSI Management shall have a minimum of a Baccalaureate degree in an engineering or physical science field and five years supervisory experience in nuclear facility operations. No minimum training requirements are associated with this position. | MCP-3043 Position Descriptions Individual Training Plans | HLL 1/13 |

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| 63. | FSV/TMI SAR 9.1.4.1, 6 th | <p>The (FSV/TMI-2) ISFSI Manager shall have a minimum of a Baccalaureate degree in an engineering or physical science field and five year supervisory experience in nuclear facility operations or equivalents for education and experience as approved by the Manager of ISFSI Management. The minimum training for this position shall include 72.48 Process.</p> <p>FSV: <i>FSV ISFSI License Basis, Radiological Control Technician, Certified Protection Officer, Emergency Response, and Certified Fuel Handler. The designated alternate for the FSV ISFSI Manager shall meet the same minimum qualifications and training requirements.</i></p> <p>TMI: <i>TMI-2 ISFSI License Basis, Radiation Worker, Emergency Response, and TMI-2 Facility Qualification training The designated alternate for the TMI-2 ISFSI Manager shall meet the same minimum qualifications and training requirements.</i></p> | MCP-3043 Position Description Individual Training Plans | HLL 1/13 |
| 64. | FSV/TMI SAR 9.1.4.1, 7 th | <p>FSV: The FSV Facility Safety Officer shall have a minimum of a Baccalaureate degree in an engineering or physical science field and five years supervisory experience in nuclear facility operations or equivalents for education and experience as approved by the Manager of ISFSI Management. The minimum training for this position shall include 72.48 process, FSV ISFSI License Basis, Radiological Control Technician, Certified Protection Officer, Emergency Response, and Certified Fuel Handler. The designated alternate for the FSV Facility Safety Officer shall meet the same minimum qualifications and training requirements.</p> <p>TMI: The TMI-2 Facility Safety Officer shall have a minimum of a Baccalaureate degree in an engineering or physical science field and five year supervisory experience in radiation protection for nuclear facility operations or equivalents for education and experience as approved by the Manager of ISFSI Management. The minimum training for this position shall be the ISFSI Radiation Protection Program. The designated alternate for the TMI-2 Facility Safety Officer shall meet the same</p> | MCP-3043 Position Descriptions | HLL 1/13 |

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| | | minimum qualifications and training requirements. | | |
| 65. | FSV SAR 9.1.4.1 9 th TMI SAR 9.1.4.1, 8 th | FSV: The minimum qualifications for the position of Certified Fuel Handlers are a high school diploma and successful completion of the biennial medical examination. The position of Certified Fuel Handler requires training and certification in accordance with the requirements in Section 9.3. TMI: The minimum qualifications for the position of Certified ISFSI Operators are successful completion of the biennial medical examination and training and certification in accordance with the requirements in Section 9.3. | MCP-3043 | HLL 1/13 |
| 66. | FSV SAR 9.1.4.1, 10 th TMI SAR 9.1.4.1, 9 th | The minimum qualification for the QA Manager assigned to the FSV and TMI-2 ISFSIs are a Baccalaureate degree in an engineering or physical science field and five years experience in nuclear operations quality assurance. No minimum training requirements are associated with this position. | MCP-3043 Position Description | HLL 1/13 |
| 67. | FSV/TMI SAR 9.1.4.2 | The resumes or other appropriate documentation of personnel occupying positions listed in Section 9.1.4.1 on file to demonstrate compliance with Section 9.1.4.1 requirements. | Form INTEC-8221, Human Resources (HR) keeps with resumes, MCP-3043 | HLL 1/13 |
| 68. | FSV/TMI SAR 9.3, 1 st | The requirements of the ISFSI Training Program are implemented by contractor procedures providing for the administration of training programs. | PDD-8 | HLL 1/13 |
| 69. | FSV/TMI SAR 9.3, 1 st | A management assessment of the contractor's implementation of this training program shall be performed biennially. | PDD-8 | HLL 1/13 |
| 70. | FSV/TMI SAR 9.3 1 st | Changes, which do not decrease the effectiveness of the training program, will be documented with SAR updates. | MCP-3177 | HLL 3/13 |
| 71. | FSV/TMI SAR 9.3 2 nd | Training will use a systematic and graded approach, with the training of CFHs subject to the most rigorous application. | PDD-8 | HLL 3/13 |
| 72. | FSV/TMI SAR 9.3 3 rd | DOE, through its contractor commits to maintain additional training to support emergency plan, physical security plan, quality assurance plan, and administrative and safety requirements. | PDD-8 | HLL 3/13 |
| 73. | FSV/TMI SAR | Procedures and lesson plans used to implement this training program will be | PDD-8 | HLL 3/13 |

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| | 9.3 3 rd | developed and maintained by the contractor. | | |
| 74. | FSV/TMI SAR 9.3.1, 1 st | The Training Coordinator or designee is responsible for the administration of training programs and for maintaining up-to-date records on the status of contractor trained personnel, training of new employees, and refresher or upgrade training of present personnel. | PDD-8, MCP-3043 | HLL 3/13 |
| 75. | FSV/TMI SAR 9.3.1, 2 nd and 3 rd | The (FSV/TMI-2) ISFSI Manager is responsible for ensuring that training requirements are specified for personnel assigned to support the (FSV/TMI-2) ISFSI. In this role, the ISFSI Manager or designee will approve all (FSV/TMI-2) specific lesson plans. FSV: <i>The FSV FSO is responsible for ensuring that training requirements have been satisfied for personnel assigned to the FSV ISFSI.</i> TMI: <i>The TMI-2 ISFSI Manager is responsible for ensuring that training requirements have been satisfied for personnel assigned to the TMI-2 ISFSI.</i> | PDD-8 | HLL 3/13 |
| 76. | FSV/TMI SAR 9.3.2 | The following records on the status of trained personnel will be maintained for a minimum of five years in accordance with Section 9.4.2 below: a. Results of each Certified ISFSI Operator’s biennial medical examination. The records of these examinations are controlled by medical. b. The completed records of certification. | PDD-8 | HLL 3/13 |
| 77. | FSV/TMI SAR 9.3.3 | The contractor shall provide for and document the qualification and training of Training Staff. | PDD-8 MCP-29 | HLL 3/13 |
| 78. | FSV/TMI SAR 9.3.4 | The contractor shall maintain procedures providing for the analysis of jobs, design of initial and continuing training, development of instructional material, implementation (conduct of training), and evaluation (examinations, boards, performance demonstration, etc.). The development of training material shall be performed by qualified and trained staff. The contractor shall maintain all training materials, both academic lesson plans and On-the-Job training (OJT) guides, developed in accordance with this training program. | PDD-8 | HLL 3/13 |

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| 79. | FSV/TMI SAR 9.3.5 | The contractor shall provide for and document the evaluation of training programs in order to ensure the continued improvement of training material and the conduct of training. | PDD-8 | HLL 3/13 |
| 80. | FSV/TMI SAR 9.3.6 | Applications for waivers of training requirements shall be approved by the FSV/TMI-2 ISFSI Manager. Successful completion of equivalent training programs may be used as a basis for waiver from academic training requirements. This training should be comparable in content, performance criteria, and duration. Any information used in the evaluation for a waiver should be verified. Previous work experience may be used as a basis for waiver from OJT requirements. | PDD-8 | HLL 3/13 |
| 81. | FSV/TMI SAR 9.3.7 | Training requirements must be completed within the period specified in the sections below for Certified ISFSI Operator Training; however, a grace period of 25% is allowed. Not completing the retraining requirements within the specified frequency will require completion of the initial training course in order to have qualification reinstated. | PDD-8 | HLL 3/13 |
| 82. | FSV/TMI SAR 9.3.8 | <p>FSV: General employee training will be provided to ISFSI certified fuel handlers and their direct supervision. Topics required for certified fuel handlers may be included in the generalized training.</p> <p>The GET training program is composed of an initial training course and required biennial retraining.</p> <p>A score of <80% on the examination will require a retest. Individuals who write or review lesson plans or tests are excused from taking GET exams.</p> <p>The GET course shall consist of materials dealing with:</p> <ul style="list-style-type: none"> A. Physical description of the TMI-2 ISFSI (Structural characteristics) B. Heat transfer design characteristics C. Applicable regulations and standards D. Radiological shielding E. General ISFSI information on building alarms, and access control F. Emergency response G. 10 CFR 19.12 | PDD-8 | HLL 3/13 |

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| | | <p>TMI: General employee training (GET) will be provided to all qualified or certified ISFSI operators and their direct supervision. Topics required for certified operators may be included in the generalized training. The GET training program is composed of an initial training course and required biennial retraining. A score of <80% on the examination will require a retest. Individuals who write or review lesson plans or tests are excused from taking GET exams. The GET course shall consist of materials dealing with:</p> <ul style="list-style-type: none"> A. Physical description of the TMI-2 ISFSI (Structural characteristics) B. Heat transfer design characteristics C. Applicable regulations and standards D. Radiological shielding E. General ISFSI information on: <ul style="list-style-type: none"> 1. Access control 2. Building monitors 3. Alarms. F. 10 CFR 19.12 | | |

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| 83. | FSV/TMI SAR 9.3.9, 2 nd | <p>FSV: The training for ISFSI personnel shall provide for initial testing of personnel who operate equipment identified as Important to Safety and will also provide retraining, proficiency testing, and requalification as required. Certified Fuel Handlers will be actively maintained for the life of the ISFSI.</p> <p>TMI: The training for certified ISFSI operators and supervisors shall provide for initial training and testing of personnel who operate equipment identified as Important to Safety and will also provide retraining, proficiency testing, and requalification as required. Certified ISFSI operators will be actively maintained during transport and HSM loading and unloading operations. During the extended storage period, qualifications will be required for HSM and DSC monitoring activities. During periods when Certified ISFSI operators are not required, the appropriate lesson plans will be retained as records.</p> | <p>MCP-3043, FSV ISFSI Training Courses</p> <p>MCP-3043, TMI-2 ISFSI Training Courses</p> | HLL 3/13 |
| 84. | FSV/TMI SAR 9.3.9, 3 rd | FSV/TMI-2 ISFSI equipment and controls that have been identified as important to safety in this SAR and in the license shall be operated by either personnel who have been trained and certified in accordance with this section or who are under the direct visual supervision of a trained, certified individual. | MCP-3043 | HLL 3/13 |
| 85. | FSV/TMI SAR 9.3.9, 4 th | Instructors designated to teach the Certified ISFSI Operator Program shall possess a current CFH certification or sufficient subject matter expertise for a particular subject or topic. Instructors initially qualified will maintain qualifications by instructing classes, and administering or grading examinations and OJT guides, and preparing, reviewing, or revising Certified ISFSI Operator instructional material. | MCP-29, MCP-3043, PDD-8 | HLL 3/13 |

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| 86. | FSV/TMI SAR 9.3.9, 9 th | Certification as an (FSV ISFSI CFH)(INL TMI-2 ISFSI Operator) is contingent upon meeting the following criteria: obtaining a score of >80% on all (FSV: CFH) (TMI: Certified ISFSI Operator) academic examinations; and satisfactory performance of all OJT practical evaluations. A score of <80% on any (FSV: CFH) (TMI Certification) academic examination will require retesting. Failure to demonstrate satisfactory performance of a second OJT practical examination will constitute cause for dismissal from the (FSV CFH) (TMI: Certified ISFSI Operator) Training Program. | MCP-3043 | HLL 3/13 |
| 87. | FSV/TMI SAR 9.3.9, 10 th | The evaluation criterion for initial certification ...shall not be waived; nor shall the evaluation criterion be waived for two or greater consecutive recertification cycles. | MCP-3043 | HLL 3/13 |
| 88. | FSV/TMI SAR 9.3.9, 11 th | The physical condition and general health of certified personnel will be verified by physical examination before initial certification and biennially thereafter. These physical examinations consider conditions which might cause impaired judgement or motor coordination. In addition, if an employee's behavior or condition creates a hazard to health or safety, then stop work may be imposed. | MCP-2722 MCP-3043 MCP-553 | HLL 3/13 |
| 89. | FSV/TMI SAR 9.3.10 | Training for the applicable support positions will include the administrative and management controls associated with ensuring compliance with the FSV/TMI-2 ISFSI license conditions. | MCP-3043 Individual Training Plans | HLL 3/13 |

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| 90. | FSV/TMI SAR 9.4.1 1 st | <p>FSV: Detailed written procedures will be developed and maintained for the ISFSI operations, maintenance, surveillance, and testing described in Section 5.1. These procedures shall constitute the “procedures described in the SAR” associated with the requirements of 10CFR 72.48.</p> <p>TMI: Detailed written procedures will be developed and maintained for the ISFSI operations, maintenance, surveillance, and testing described in Section 5.1.1 and 5.1.2. Procedure changes in 5.1.1 are subject to DOE Unreviewed Safety Question analysis as they are conducted under the parameters and cognizance of the TAN SAR under DOE regulation. However, any procedure changes that could have an impact or bearing on the design basis or safety basis of TMI ISFSI components, performance specifications or requirements in the TMI SAR or Tech Specs shall also be subject to 10 CFR 72.48. Such applicable activities will be clearly denoted in Section 5.1.1 procedures. All TMI ISFSI procedures will be developed, reviewed, revised, approved, and controlled by the INL contractor in accordance with approved administrative procedures.</p> | <p>MCP-2925, MCP-135, MCP-9395, TPRs executed at TAN and executed for transfer operations are complete.</p> <p>TPR-7066 TPR-7069</p> | HLL 3/13 |
| 91. | FSV/TMI SAR 9.4.1, 2 nd | The format and content of written procedures include; purpose, scope and applicability; limitations and precautions; prerequisites; personnel (number and function) and equipment required; and detailed instructions (sequence, forms to be generated, acceptable conditions, actions if conditions aren't acceptable, records generated, approvals) | STD-9 | HLL 3/13 |
| 92. | FSV/TMI SAR 9.4.1, 3 rd | Maintenance of the written procedures shall be in accordance with Sections 11.5 and 11.6 as implemented by established management control procedures. The Electronic Document Management System (EDMS) provides written requirements for review, approval, revision, and controlled distribution of the written procedures. | MCP-135 | HLL 3/13 |

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| 93. | FSV/TMI SAR 9.4.2, 1 st | <p>The following FSV/TMI-2 ISFSI records will be maintained: QA records relating to design, construction, testing, surveillance, operation, and maintenance of the ISFSI.</p> <p>Decommissioning records:</p> <ul style="list-style-type: none"> A. Records of spills or other unusual occurrences involving the spread of contamination in and around the facility, equipment, or site. B. As-built drawings and modifications of structures and equipment in restricted or inaccessible areas. C. A list contained in a single document of all areas designated and formerly designated as restricted areas and all areas outside of restricted areas that require documentation due to spread of contamination. D. Records of the cost estimate performed for decommissioning. <p>Security records:</p> <ul style="list-style-type: none"> H. Records of changes to the Physical Protection Plan made without prior NRC approval. I. The Physical Protection Plan and the Safeguards Contingency Matrix. J. Other security records as specified in the Physical Protection Plan. <p>Training records as specified in the (TMI-2 ISFSI) Training Plan (Section 9.3.2) Changes, Tests and Experiments made without prior NRC approval, including the safety evaluations.</p> <p>Spent fuel material records, including current inventory and material control and accountability procedures.</p> <p>Emergency preparedness records as specified in the FSV/TMI-2 ISFSI Emergency Response Plan(s) and ISFSI Safety Review Committee records.</p> <p>Records required by the operating, maintenance, and testing procedures described in Section 9.4.1.</p> | <p>MCP-557 PLN-466</p> <p>TMI-2 Decommissioning Records Index, Located in the ISFSI Records Center</p> | <p>HLL 3/13</p> |

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| 94. | FSV/TMI SAR 9.7 (FSV) and 9.7 (TMI) | The ISFSI physical protection program is described in the Physical Protection Plan for the facility. The Plan includes, as appendices, the Security Training and Qualification Plan, The Safeguards/Security Contingency Plan, and the Threat Analysis and Design for Physical Protection. The Physical Protection Plans are controlled and protected in accordance with 10 CFR 73.21 and 10 CFR 2.790. | PLN-176 PLN-428 | HLL 3/13 |
| 95. | FSV/TMI SAR 11.0, 1 st | It is the policy of DOE-ID to ensure that the facility is designed, constructed, handled, shipped, stored, cleaned, assembled, inspected, tested, operated, maintained, modified and decommissioned in a manner that assures the health and safety of workers and the public and protects the environment. | PLN-466 | HLL 3/13 |
| 96. | FSV/TMI SAR 11.0, 2 nd | DOE-ID maintains full responsibility for the development and execution of the [ISFSI] Quality Assurance Program. The program applies to design; purchase; fabrication; handling; shipping; storing; cleaning; assembly; inspection; testing; operation; maintenance; repair; modification of structures, systems, and components; and decommissioning activities that are important to safety. The program is maintained to satisfy the requirements established in 10 CFR 72, Subpart G, "Quality Assurance". | | DOE |
| 97. | FSV/TMI SAR 11.0, 3 rd | The QA program for DOE spent fuel storage and transportation activities is the DOE's Office of Civilian Radioactive Waste Management's Quality Assurance Requirements and Description, DOE/RW-0333P, Revision 10 (QARD). For ISFSI activities, DOE-ID and its contractor will apply applicable portions of the QARD to systems, structures, and components important to safety. The QA program shall be implemented by DOE-ID and its contractor through the use of approved, controlled implementing documents. | PLN-466 | HLL 3/13 |
| 98. | FSV/TMI SAR 11.0, 4 th | Changes that significantly reduce the effectiveness of the quality assurance program will be submitted to the NRC for its review and acceptance prior to implementation. | PLN-466 | HLL 3/13 |

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| 99. | FSV/TMI SAR 11.0, 7 th | All structures, systems, and components are analyzed to determine whether their functions or physical characteristics are essential to the safety function. Those items determined to be important to safety are subject to the applicable requirements of the QARD and identified in Table 3.4-1. Structures, systems and components, which are not important to safety, have the Quality Assurance program applied in a graded approach. | PLN-466 LST-28 | HLL 3/13 |
| 100. | FSV/TMI SAR 11.1, 2 nd | DOE-ID, as facility owner and licensee, retains ultimate responsibility for the safe operation of the facility and compliance with all license conditions. To exercise its ultimate responsibility, DOE-ID will: <ol style="list-style-type: none"> 1. Retain responsibility for and perform independent assessments of the contractor's ISFSI quality assurance program 2. Ensure that the license conditions for the facility are included in the contractor's contract 3. Assess the performance of the contractor against the terms of their contract; 4. Retain the responsibility to budget funds necessary and sufficient to safely operate the facility 5. Retain the authority to revise the contract in the event contract deficiencies are found relative to proper implementation of license conditions. | | DOE |
| 101. | FSV/TMI SAR 11.1, 3 rd | The contractor's Quality Assurance (QA) Director has responsibility for development, management, and implementation of the contractor's quality assurance program. As part of this responsibility, the QA&O Director ensures that other subtier contractor Quality Assurance Programs meet all applicable requirements of the QARD for their scope of work. | PLN-466 | HLL 3/13 |
| 102. | FSV/TMI SAR 11.1, 5 th | Stop work authority for conditions adverse to quality or significant conditions adverse to quality is assigned to the Manager of DOE-ID. Contractor stop work authority resides with the INTEC QA Manager. | | DOE |
| 103. | FSV/TMI SAR 11.1.1, 11.1.2, 11.1.3, 11.1.4 | [Detailed descriptions of DOE-ID organizations.] | | DOE |

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| 104. | FSV/TMI SAR 11.1.5 3 rd | The DOE-ID contractor is responsible for development of its Quality Assurance Program, which shall be consistent with the requirements of the QARD. Contractor personnel have the authority to stop work pending resolution of any quality problem. | PLN-466 | HLL-3/13 |
| 105. | FSV/TMI SAR 11.1.5 4 th | The topics from the QARD Section 1.0, Organization, that are implemented are Requirements; Line Management; Quality Assurance Management; Responsibility for Quality; Delegation of Work; Resolution of Quality Disputes; and Other OCRWM Affected Organizations | PLN-466 | HLL-3/13 |
| 106. | FSV/TMI SAR 11.2, 1 st | Quality Assurance Program elements that are implemented and discharged by DOE-ID are those identified as Organization, Quality Assurance Program, Implementing Documents, Document Control, Corrective Action, Quality Assurance Records, and Audits. | | DOE |
| 107. | FSV/TMI SAR 11.2, 2 nd | The ISFSI QA Manager has the assigned responsibility for ensuring that required DOE-ID quality assurance program implementing documents are established at the earliest practical time consistent with the schedule for accomplishing quality affecting activities. Instructions to DOE-ID personnel for implementation of quality activities including performance of verification activities are described by implementing documents. | | DOE |
| 108. | FSV/TMI SAR 11.2, 3 rd | <p>Specific DOE-ID performance and verification activities include, but are not limited to:</p> <ul style="list-style-type: none"> • Reviews and approvals of various DOE-ID and contractor documents • Surveillances, assessments, and evaluations of the DOE-ID and contractor's quality assurance program • Readiness evaluations with the contractor • Verification and validation of DOE-ID's personnel training and qualification records. | | DOE |

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| 109. | FSV/TMI SAR 11.2, 5 th , 6 th | The ISFSI QA Manager and the contractor initiate management assessments of the Quality Assurance program. All pertinent correspondence, checklists, and reports related to assessments are placed in the Quality Assurance files. The graded approach for performing management assessments is commensurate with the risk associated with the item or activity affecting quality being assessed. Any identified corrective actions as a result of management assessments shall be tracked to completion. | Implemented by DOE-ID PLN-466 | HLL-3/13 |
| 110. | FSV/TMI SAR 11.2, 7 th | Delegation of authority for implementation of Quality Assurance Program requirements is accomplished through contracts between DOE-ID and its contractor and/or technical direction given by DOE-ID. Contracts and technical direction specify that the applicable QARD requirements are to be established and functioning before initiating any activities affected by the contractor's Quality Assurance Program. These documents additionally require that the need for special controls, processes, test equipment, tools, and skills to attain the required quality and the need for verification of quality by inspection and testing be taken into account for the scope of work. | | DOE |
| 111. | FSV/TMI SAR 11.2, 8 th | The graded approach is applied to indoctrination and training commensurate with the scope, complexity, and nature of the activity. The graded approach is not applied to the qualification and certification of inspectors, NDE personnel, and auditors. | PLN-466 | HLL-3/13 |
| 112. | FSV/TMI SAR 11.2, 10 th | Delegation of authority for implementation of Quality Assurance Program requirements is accomplished through contracts between DOE-ID and its contractor and/or technical direction given by DOE-ID. Contracts and technical direction specify that the applicable QARD requirements are to be established and functioning before initiating any activities affected by the contractor's Quality Assurance Program. These documents additionally require that the need for special controls, processes, test equipment, tools, and skills to attain the required quality and the need for verification of quality by inspection and testing be taken into account for the scope of work. | | DOE |
| 113. | FSV/TMI SAR 11.3, 1 st | Design control requirements ensure that designs as specified in the license application are correctly defined, controlled, and verified. | PLN-466 | HLL-3/13 |

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| 114. | FSV/TMI SAR 11.3, 6 th | Design verification shall require a level of skill at least equal to that of the original designer, design checking can be performed by less experienced persons. | PLN-466 | HLL-3/13 |
| 115. | FSV/TMI SAR 11.3, 8 th | The graded approach for design verification is a function of importance to safety and the complexity of design, the degree of standardization, the state of the art, and the similarity with previous designs. | PLN-466 | HLL-3/13 |
| 116. | FSV/TMI SAR 11.3, 11 th | DOE-ID monitors its contractor's design control activities, by surveillance and assessment and periodically reviews the contractor's practices to ensure proper implementation and adequacy. | | DOE |
| 117. | FSV/TMI SAR 11.4, 7 th | The graded approach for applying Quality Assurance Program requirements on suppliers depends on type and end-use of the item or activity affecting quality being procured. | PLN-466 | HLL-3/13 |
| 118. | FSV/TMI SAR 11.4, 8 th | DOE-ID monitors its contractor's procurement document control practices that support program activities, or, by surveillance and assessment, periodically reviews its contractor's practices to ensure their proper implementation and adequacy. | | DOE |
| 119. | FSV/TMI SAR 11.5, 1 st | The graded approach for the direction of work processes, in the form of instructions, procedures, and drawings is commensurate with risk, complexity, and importance of the work. | PLN-466 | HLL-3/13 |
| 120. | FSV/TMI SAR 11.5, 4 th | DOE-ID has a procedural control system for its implementing documents which assigns responsibility and provides instructions for preparation, review, approval, release, issuance, distribution, and control of changes to implementing documents. | | DOE |
| 121. | FSV/TMI SAR 11.5, 5 th | The ISFSI QA Manager participates in and monitors program execution of these implementing documents related to program quality affecting activities. Periodically the ISFSI QA Manager performs surveillance or arranges for an independent assessment of DOE-ID Quality Assurance Program practices to document their level of implementation and adequacy. | | DOE |
| 122. | FSV/TMI SAR 11.5, 6 th | DOE-ID monitors its contractor's procedural practices related to implementing documents, and, by surveillance or assessments, periodically reviews its contractor's practices to document their level of implementation and adequacy. | | DOE |

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| 123. | FSV/TMI SAR 11.6, 1 st | The document control system provides for identification, preparation, review, approval and distribution of documents in a graded manner. | PLN-466 | HLL-3/13 |
| 124. | SAR 11.6, 5 th | A master list (either hard-copy or electronic) shall be established and identify the current revision number of instructions, procedures, specifications, drawings, and procurement documents. This list shall be updated and distributed to pre-determined responsible personnel to preclude the use of superseded documents. | EDMS on Intranet | HLL-3/13 |
| 125. | FSV/TMI SAR 11.6, 6 th | DOE-ID monitors its contractor's procedural practices related to document control, and, by surveillance or assessments, periodically reviews its contractor's practices to document their level of implementation and adequacy. | | DOE |
| 126. | FSV/TMI SAR 11.7, 6 th | Surveillance shall be performed on those items where verification of procurement requirements cannot be determined upon receipt. That verification documentation shall be available for the life of the NRC issued operating license for the operation of the ISFSI. | PLN-466 | HLL-3/13 |
| 127. | FSV/TMI SAR 11.7, 9 th | The graded approach for verification of supplier activities, the selection of suppliers, and amount of supplier documentation, including planning is applied based on the relative importance, complexity, and quantity of the item or activity being procured. | PLN-466 | HLL-3/13 |
| 128. | FSV/TMI SAR 11.7, 11 th | DOE-ID monitors its contractor's control of purchased items and services practices in support of program activities, and, by surveillance and assessments, periodically reviews its contractor's practices to document their level of implementation and adequacy. | | DOE |
| 129. | FSV/TMI SAR 11.8, 3 rd | The graded approach for identification and control of items, and traceability requirements are specified in applicable codes, standards, or specifications. | PLN-466 | HLL-3/13 |
| 130. | FSV/TMI SAR 11.8, 5 th | DOE-ID monitors its contractor's identification and control of item practices and, by surveillance and assessments, periodically reviews its contractor's practices to ensure proper implementation and adequacy. | | DOE |
| 131. | FSV/TMI SAR 11.9, 2 nd | The graded approach is not applicable for special processes. | PLN-466 | HLL-3/13 |

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| 132. | FSV/TMI SAR 11.9, 4 th | DOE-ID monitors its contractor's special processes control practices related to program activities, and, by surveillance and assessments, periodically reviews its contractor's practices to ensure proper implementation and adequacy. | | DOE |
| 133. | FSV/TMI SAR 11.10, 5 th | The graded approach for inspection, verification and documentation is applied based on the importance or complexity of the item or activity affecting quality being inspected or tested. | PLN-466 | HLL-3/13 |
| 134. | FSV/TMI SAR 11.10, 8 th | DOE-ID monitors its contractor's inspection practices associated with program activities, and, by surveillance and assessments, periodically reviews its contractor's practices to ensure proper implementation and adequacy. | | DOE |
| 135. | FSV/TMI SAR 11.11, 5 th | DOE-ID monitors its contractor's testing and test control practices related to program activities, and, by surveillance and assessments, periodically reviews its contractor's practices to ensure proper implementation and adequacy. | | DOE |
| 136. | FSV/TMI SAR 11.12, 1 st | The graded approach is not applicable for measuring and test equipment used for activities affecting quality. | PLN-466 | HLL-3/13 |
| 137. | FSV/TMI SAR 11.12, 7 th | DOE-ID monitors its contractor's measuring and test equipment control practices related to program activities, and, by surveillance and assessments, periodically reviews its contractor's practices to ensure proper implementation and adequacy. | | DOE |
| 138. | FSV/TMI SAR 11.13, 3 rd | Application of the graded approach for handling, storage, and shipping of items is specified in work and inspection instructions, and depends on how critical, sensitive, perishable, or high-value the item is. | PLN-466 | HLL-3/13 |
| 139. | FSV/TMI SAR 11.13, 5 th | DOE-ID monitors its contractor's handling, storage, and shipping practices related to program activities, and, by surveillance and assessments, periodically reviews its contractor's practices to ensure implementation and adequacy. | | DOE |
| 140. | FSV/TMI SAR 11.14, 2 nd | The graded approach is not applicable for inspection, test and operating status. | PLN-466 | HLL-3/13 |
| 141. | FSV/TMI SAR 11.14, 5 th | DOE-ID monitors its contractor's practices related to program activities for indicating inspection, test, and operating status, and, by surveillance and assessments, periodically reviews its contractor's practices to ensure implementation and adequacy. | | DOE |

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| Line No. | Document/ Page No. Section | FSV/TMI Common Commitment Statement | Implementing Documents | Validation |
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| 142. | FSV/TMI SAR 11.15, 2 nd | A corrective action system is established and executed which promotes a “no fault” attitude toward identification of conditions that are adverse to quality. | PLN-466 | HLL-3/13 |
| 143. | FSV/TMI SAR 11.15, 5 th | The graded approach is not applicable for the identification and control of nonconforming items. | PLN-466 | HLL-3/13 |
| 144. | FSV/TMI SAR 11.15, 9 th | DOE-ID also retains authority to identify and require that DOE-ID and contractor identified non-conformances be entered into its contractor’s nonconformance control system. | | DOE |
| 145. | FSV/TMI SAR 11.15, 10 th | DOE-ID monitors its contractor’s nonconformance control practices related to program activity, and, by surveillance and assessments, periodically reviews its contractor’s nonconformance practices to ensure implementation and adequacy. | | DOE |
| 146. | FSV/TMI SAR 11.16, 2 nd | The DOE-ID ISFSI QA Manager provides follow-up to verify timely and proper implementation of corrective action. | | DOE |
| 147. | FSV/TMI SAR 11.16, 3 rd | Corrective action to preclude recurrence of a nonconforming condition is commensurate with the item’s importance. | PLN-466 | HLL-3/13 |
| 148. | FSV/TMI SAR 11.16, 4 th | Corrective action documentation is provided to appropriate DOE-ID and its contractor’s management, and requires appropriate quality assurance organizational concurrence with proposed actions. | PLN-466 | HLL-3/13 |
| 149. | FSV/TMI SAR 11.16, 5 th | DOE-ID monitors its contractor’s corrective action systems related to program activities, and, by surveillance and assessments, periodically reviews its contractor’s systems to ensure implementation and adequacy. | | DOE |
| 150. | FSV/TMI SAR 11.16, 7 th | Quality trends and results of remedial actions are reported to the DOE-ID ISFSI QA Manager who is responsible for corrective action tracking and providing appropriate DOE-ID upper management appraisal. | PLN-466 | HLL-3/13 |
| 151. | FSV/TMI SAR 11.16, 8 th | Evaluations [of adverse quality trends] are performed to determine systemic root cause(s) and determine if a course of action for correction is required. | PLN-466 | HLL-3/13 |
| 152. | FSV/TMI SAR 11.17, 1 st | The graded approach for Quality Assurance Records is as specified in design documents, procurement documents, test procedures, and operational procedures. | PLN-466 | HLL-3/13 |
| 153. | FSV/TMI SAR 11.17, 1 st | To aid in minimizing the retention of unnecessary records, the records program shall list records to be retained by “type of data” rather than by record title. | PLN-466 | HLL-3/13 |

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| 154. | FSV/TMI SAR 11.17, 5 th | DOE-ID monitors its contractor's records' practices related to program activities, and by surveillance and assessments, periodically reviews its contractor's practices to ensure implementation and adequacy. | | DOE |
| 155. | FSV/TMI SAR 11.17, 6 th | Quality Assurance records generated by DOE-ID will be maintained within the DOE-ID records management system. | | DOE |
| 156. | FSV/TMI SAR 11.18, 1 st | DOE-ID retains responsibility for the development and implementation of an audit plan which will evaluate the performance of the contractor as well as the adequacy of DOE-ID's oversight of the contractor. | | DOE |
| 157. | FSV/TMI SAR 11.18, 2 nd | DOE-ID Quality Assurance audits and surveillances conducted under the direction of the DOE-ID ISFSI QA Manager will be planned, performed, and reported by trained and qualified personnel in accordance with implementing procedures. | | DOE |
| 158. | FSV/TMI SAR 11.18, 2 nd | All audits of the contractor related to NRC regulated activities will be lead by an Audit Team Leader who is not an employee of the contractor or parent organizations. | | DOE |
| 159. | FSV/TMI SAR 11.18, 5 th | DOE-ID monitors its contractor's records practices related to audits, and by surveillance and assessments, periodically reviews its contractor's practices to ensure implementation and adequacy. | | DOE |
| 160. | FSV/TMI SAR 11.19.1, 3 rd | DOE-ID monitors its contractor's practices related to program activities for software configuration, and, by surveillance and assessments, periodically reviews its contractor's practices to assure implementation and adequacy. | | DOE |
| 161. | FSV/TMI SAR 11.19.5, 3 rd | DOE-ID monitors its contractor's practices related to program activities for control of the electronic management of data, and, by surveillance and assessments, periodically reviews its contractor's practices to assure implementation and adequacy. | | DOE |

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Table 2. TMI-2 ISFSI commitments.

| Line No. | Document/ Page No. Section | TMI-2 ISFSI Commitment Statement | Implementing Documents | Validation |
|----------|----------------------------------|--|---|------------|
| 1. | TS 2.1.1 | <p>The spent nuclear fuel to be stored in DSCs at the TMI-2 ISFSI shall meet the following requirement:</p> <p>The spent fuel is the TMI-2 core debris resulting from the partial melting of the TMI-2 reactor core (1979). The TMI-2 core debris shall be contained in the stainless steel TMI-2 Canisters. The core debris includes severely damaged spent fuel assemblies, partially intact spent fuel assemblies, and various core components and in-core instruments recovered from the damaged TMI-2 reactor. The core debris was loaded into the TMI-2 Canisters during the 1986 TMI-2 reactor defueling and transported to the INL for underwater storage.</p> | <p>Form INTEC-6824, Form INTEC-6829, MCP-2861</p> <p>NOTE: <i>TMI fuel transfers were completed 4/01 and all documentation is in the records center.</i></p> | HLL-3/13 |
| 2. | TS 2.2 | <p>If the Functional and Operating Limit is violated, the following actions shall be completed:</p> <p>2.2.1 The affected TMI-2 Canisters shall be placed in a safe condition.</p> <p>2.2.2 Within 24 hours, notify the NRC Operations Center.</p> <p>2.2.3 Within 30 days, submit a special report which describes the cause of the violation and actions taken to restore compliance and prevent recurrence.</p> | <p>MCP-2924</p> <p>NOTE: <i>TMI fuel transfers were completed 4/01 and all documentation is in the records center.</i></p> | HLL-3/13 |
| 3. | TS 3.1.1 LCO | <p>The leak rate of the vent housing seals shall not exceed 1×10^{-2} standard cc/sec.</p> <p>APPLICABILITY: During STORAGE OPERATIONS.</p> | <p>See TS 3.1.1 Surveillance Requirements, 3.1.1.1</p> <p>TPR-7066</p> | HLL-3/13 |
| 4. | TS 3.1.1.1 SR | <p>Perform leak check of the vent housing double metallic seals on each DSC containing TMI-2 Canisters.</p> <p>Frequency:</p> <p> Within 7 days after insertion of DSC into HSM</p> <p> AND</p> <p> Every 5 years during Storage Operations.</p> <p>NOTE: <i>SR 3.0.2 is not applicable.</i></p> | <p>TPR-7066</p> <p>INTEC Surveillance Schedule</p> | HLL-3/13 |

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| 5. | TS 3.1.1.A | CONDITION A. The vent housing seal leak rate is exceeded during Storage Operations A.1 Reseat or replace seals. (7 days) AND A.2 Perform leak check on seal. (7 days) OR A.3 Transport the DSC to TAN or other appropriate facility for corrective actions. (30 days) | TPR-7066 TPR-7068 | HLL-3/13 |
| 6. | TS 3.1.2 LCO | Handling or transporting a DSC containing TMI-2 Canisters shall not be performed when DSC temperature is less than 20°F or when the ambient air temperature is less than 0°F. APPLICABILITY: During TRANSFER OPERATIONS. | TPR-7064 (suspended) – TPR will be activated if necessary See TS 3.1.2 Surveillance Requirements, 3.1.2.1 and 3.1.2.2 NOTE: <i>Transfer Operations were completed 4/01. Documentation is in the Records Center</i> | HLL-3/13 |
| 7. | TS 3.1.2.1 SR | Measure the outside air temperature. Frequency: Immediately before commencing Transfer Operations. AND During Transfer Operations. | TPR-7064 (suspended) – TPR will be activated if necessary NOTE: <i>Transfer Operations were completed 4/01. Documentation is in the Records Center.</i> | HLL-3/13 |

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| 8. | TS 3.1.2.2 SR | <p>Measure the DSC temperature or the cask temperature. Frequency: Immediately before commencing Transfer Operations.</p> | <p>TPR-7064 (suspended) – TPR will be activated if necessary NOTE: <i>Transfer Operations were completed 4/01. Documentation is in the Records Center.</i></p> | HLL-3/13 |
| 9. | TS 3.1.2.A | <p>CONDITION A. Temperature limits not met while DSC is being transported A.1 Place DSC in a safe condition. (Immediately)</p> | <p>TPR-7064 (suspended) – TPR will be activated if necessary NOTE: <i>Transfer Operations were completed 4/01. Documentation is in the Records Center.</i></p> | HLL-3/13 |
| 10. | TS 3.2.1 LCO | <p>The HSM dose rates shall not exceed: A. 100 mrem/hour gamma average on the outside surface of the front HSM door on the DSC centerline B. 20 mrem/hour gamma average on the outside surface of the end shield wall of each group of HSMs. APPLICABILITY: After completing each DSC transfer to HSM.</p> | <p>TPR-7064 (suspended) – TPR will be activated if necessary NOTE: <i>Transfer Operations were completed 4/01. Documentation is in the Records Center.</i></p> | HLL-3/13 |
| 11. | TS 3.2.1.1 SR | <p>Perform radiation survey on the HSM after completing the transfer of the DSC. Frequency: 24 hours after completing each HSM loading.</p> | <p>TPR-7064 (suspended) – TPR will be activated if necessary NOTE: <i>Transfer Operations were completed 4/01. Documentation is in the Records Center.</i></p> | HLL-3/13 |

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| 12. | TS 3.2.1.A | <p>CONDITION A. The HSM dose rates are exceeded</p> <p>A.1 Perform analysis to verify compliance with the ISFSI offsite radiation protection requirements of 10 CFR Part 20 and 10 CFR Part 72. (Immediately)</p> <p>AND</p> <p>A.2 Provide verbal notification to the NRC. (24 hours)</p> <p>AND</p> <p>A.3 Evaluate the cause of excessive dose rates. (7 days)</p> <p>AND</p> <p>A.4 Take corrective actions to reduce the dose rates within limits. (30 days)</p> <p>AND</p> <p>A.5 Provide letter report to the NRC summarizing results of evaluation. (30 days)</p> | <p>TPR-7064 (suspended) – TPR will be activated if necessary</p> <p>NOTE: <i>Transfer Operations were completed 4/01. Documentation is in the Records Center.</i></p> | HLL-3/13 |
| 13. | TS 3.2.1.B | <p>CONDITION B. The ISFSI offsite radiation protection requirements of 10 CFR Part 20 or 10 CFR Part 72 are exceeded.</p> <p>B.1 Provide supplemental shielding to reduce the dose rates in accordance with 10 CFR Part 20 and 10 CFR Part 72. (30 days)</p> <p>OR</p> <p>B.2 Transport the DSC to TAN or other appropriate facility for corrective actions. (30 days)</p> | <p>TPR-7064 (suspended) – TPR will be activated if necessary</p> <p>NOTE: <i>Transfer Operations were completed 4/01. Documentation is in the Records Center.</i></p> | HLL-3/13 |
| 14. | TS 3.2.2 LCO | <p>The surface dose rate of each HSM rear access door shall not exceed 100 mrem/hour gamma; and the surface dose rate of each HEPA filter housing shall not exceed 1,200 mrem/hour gamma.</p> <p>APPLICABILITY: During STORAGE OPERATIONS.</p> | <p>See TS 3.2.2 Surveillance Requirements, 3.2.2.1</p> <p>TPR-7066 TPR-7068</p> | HLL-3/13 |

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| 15. | TS 3.2.2.1 SR | Perform a radiation survey at the vent of each DSC. Frequency: Monthly during first year Quarterly during second through fifth years Annually thereafter. NOTE: <i>Frequency shall be determined by the number of years after DSC insertion into HSM or the most recent entry into Condition A.</i> | TPR-7066 | HLL-3/13 |
| 16. | TS 3.2.2.A | CONDITION A. If the surface dose rates are exceeded A.1 Evaluate the cause of increased dose rates. (7 days) AND A.2 Take corrective actions to restore dose rates within limits. (30 days) | TPR-7066 TPR-7068 | HLL-3/13 |
| 17. | TS 3.2.3 LCO | The hydrogen gas concentration inside each DSC at the ISFSI shall not exceed 0.5% by volume. APPLICABILITY: During STORAGE OPERATIONS. | See TS 3.2.3 Surveillance Requirements, 3.2.3.1, TPR-7066 | HLL-3/13 |
| 18. | TS 3.2.3.1 SR | Sample the gas inside each DSC containing spent fuel. Frequency: Monthly during first year Annually thereafter. NOTE: <i>Frequency shall be determined by the number of years after DSC insertion into HSM or the most recent entry into Condition A.</i> | TPR-7066 | HLL-3/13 |
| 19. | TS 3.2.3.A | CONDITION A. If the hydrogen concentration within a DSC is exceeded A.1 Purge the gas within the DSC until the hydrogen concentration is within limits. (7 days) AND A.2 Replace the HEPA filter for the DSC after the DSC purge operation is complete. (24 hours after completion of A.1) | TPR-7066 TPR-7069 | HLL-3/13 |

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| 20. | TS 4.1.1 | The total storage capacity of the TMI-2 ISFSI is limited to 30 HSMs, 29 which will be loaded, and one extra. Each of 29 HSMs holds a NUHOMS-12T DSC containing up to 12 TMI-2 Canisters. | Vendor Data/Design Package | HLL-3/13 |
| 21. | TS 4.2.1.1 | Design Exceptions to Codes, Standards, and Criteria Table 4-1 lists approved exceptions for the design and fabrication of the TMI-2 ISFSI DSC. | Vendor Data/Design Package | HLL-3/13 |
| 22. | TS 4.2.1.2 | Construction/Fabrication Exceptions to Codes, Standards, and Criteria Proposed alternatives to ASME Code, Section III, 1992 Edition with Addenda through 1993, including exceptions allowed by Section 4.3.1, may be used when authorized by the Director of the Office of Nuclear Material Safety and Safeguards or designee. The licensee should demonstrate that: <ol style="list-style-type: none"> 1. The proposed alternatives would provide an acceptable level of quality and safety 2. Compliance with the specified requirements of American Society of Mechanical Engineers (ASME) Code Section III, 1992 Edition with Addenda through 1993, would result in hardship or unusual difficulty without a compensating increase in the level of quality and safety. | Vendor Data/Design Package | HLL-3/13 |
| 23. | TS 4.2.1.3 | DSC top shield plug seal weld (inner cover plate) and top cover plate (outer cover plate) seal welds shall meet the applicable requirements of ASME Boiler and Pressure Vessel Code (B&PVC) Section III, NB-5340 for magnetic particle examination (MT) OR NB-5350 for liquid penetrant (PT) examination, prior to commencing Transfer Operations. | TPR-6477—Historical MCP-2861 TMI TAN Checklist Documentation Package for INTEC NOTE: <i>These activities were completed in 4/01 with the final shipment of TMI core debris from TAN to the TMI-2 ISFSI.</i> | HLL-3/13 |

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| 24. | TS 4.2.1.4 | Leak rate testing of the vent housing seals shall be conducted in accordance with ANSI N14.5 and shall not exceed 1×10^{-2} standard cc/sec prior to commencing Transfer Operations. | TPR-1217, (completed at TAN) —Historical MCP-2861, TPR-7065 TMI TAN Checklist Documentation Package for INTEC NOTE: <i>These activities were completed in 4/01 with the final shipment of TMI core debris from TAN to the TMI-2 ISFSI.</i> | HLL-3/13 |
| 25. | TS 4.2.2 | The governing Codes for the Horizontal Storage Modules used at the TMI-2 ISFSI are American Concrete Institute (ACI) 349, Code Requirements for Nuclear Safety Related Concrete Structures and Commentary, 1985 Edition, and American National Standards Institute (ANSI) 57.9, Design Criteria for an ISFSI (Dry Storage Type), 1984 Edition. | Vendor Data/Design Package | HLL-3/13 |
| 26. | TS 5.4.1.k | Written procedures shall be established, implemented, and maintained for the following activities: k. Transfer operations. Implementing procedures may be common with the INL procedures provided that all ISFSI requirements are met. | NOTE: <i>Transfer Operations were completed 4/01. Documentation is in the Records Center.</i> TPR-7065 exists for transferring from one HSM to another. (suspended) – TPR will be activated if necessary | HLL-3/13 |

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| 29. | SAR 1.1, 4th | For the Idaho National Laboratory (INL) TMI-2 ISFSI, NRC regulations shall apply and have precedence over DOE Orders, Requirements, and Guidelines. The INL TMI-2 ISFSI is exempted from those DOE Orders that duplicate or overlap NRC requirements. | Contract DE-AC0705ID14516 | HLL-3/13 |
| 30. | SAR 1.1.2, 2nd | This transportation will be treated in accordance with 10 CFR Part 71 as an off-site transport operation or in accordance with 10 CFR 72 as an on-site transport operation. This SAR provides the information necessary for the transportation from TAN to Idaho Nuclear Technology and Engineering Center (INTEC) using the NRC 10 CFR 71 certified MP-187 transportation system. Appendix E of this SAR provides detailed information necessary for the transportation from TAN to INTEC using the NRC 10 CFR 72 approved OS-197 Transfer Cask. Movement and transfer of loaded casks within the TAN Hot Shop will be conducted in accordance with INL procedures and DOE Orders, whereas, movement and transfer of the cask outside of the TAN Hot Shop and within the INTEC and ISFSI fences will be treated as on-site transfer operations according to 10 CFR Part 72. | PLN-456—Historical TPR-6283—Historical TPR-1218—Historical TPR-6284—Historical NOTE: <i>These activities were completed in 4/01 with the final shipment of TMI core debris from TAN to the TMI-2 ISFSI.</i> | HLL-3/13 |
| 31. | SAR 1.3.3, 4th | VDS exhaust and general cask decontamination wastes are generated during Dry Shielded Canister (DSC) evacuation and sealing operations as well as during the normal storage mode where periodic purging of the DSC may be required. Both waste streams will be managed in accordance with established waste processing practices at INL. These wastes are discussed in Chapter 6. | TPR-7068 TPR-7069 | HLL-3/13 |
| 32. | SAR 3.1.2.1, 1st | This equipment (refers to handling and transfer equipment) is designed and tested to applicable governmental and industrial standards and is maintained and operated according to the manufacturer’s specifications. | Transfer cask SAR and operating manual. <i>Currently there is no handling and transfer equipment at the TMI ISFSI.</i> | HLL-3/13 |

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| 33. | SAR 3.1.2.1, 2nd | All equipment will be functionally tested, including load tests as appropriate, to demonstrate that each item meets its operational requirements. The cask and DSC are designed, tested and documented as Important to Safety equipment to ensure that they will meet all design conditions. The non-safety related support equipment is designed and built to meet commercial codes and standards and functionally tested. | Transfer cask SAR and operating manual. <i>Currently there is no handling and transfer equipment at the TMI ISFSI.</i> | HLL-3/13 |
| 34. | SAR 3.3.7.1.2 SAR 3.3.2.1, 2nd | Surface swipes of the upper (outside) end of the DSC exterior will be taken after DSC closure, but prior to installing the cask lid to assure that the maximum DSC removable contamination does not exceed: Beta/Gamma Emitters 22,000 dpm/100 cm ² and Alpha Emitters 2,200 dpm/100 cm ² . | NOTE: <i>These activities were completed in 4/01 with the final shipment of TMI core debris from TAN to the TMI-2 ISFSI.</i> | HLL-3/13 |
| 35. | SAR 4.2.5.2, 15th | The DSC is loaded in a dry environment and will be unloaded in a similar environment. | NOTE: <i>These activities were completed in 4/01 with the final shipment of TMI core debris from TAN to the TMI-2 ISFSI.</i> | HLL-3/13 |
| 36. | SAR 4.3.1.1, 1st | The filters are high-efficiency particulate air (HEPA) grade for radionuclides, exhibiting a particle removal efficiency of greater than 99.97%. | MCP-2746 | HLL-3/13 |
| 37. | SAR 4.3.11 | The maintenance system consists of a testing program to verify there is no abnormal radioactive release, sampling of the DSC for hydrogen buildup, and periodic testing of the mechanical seal attaching the vent housings to the DSC. The maintenance program also involves inspection of the vent access doors to ensure they remain operational and that no build-up of debris or snow occurs in the vent area. | TPR-7066 | HLL-3/13 |
| 38. | SAR 4.5.1 | The MP-187 cask and lifting hardware will be inspected prior to each use. Any indications of damage, failure to operate, or excessive wear will be evaluated to ensure that the safe operation of the cask is not impaired. | N/A for OS-197 Cask | HLL-3/13 |

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| 39. | SAR 4.5.2, 1st | <p>Inspections will be performed in accordance with 10 CFR Part 71 license condition requirements for the MP-187 cask. Examples of inspections to be performed include:</p> <ul style="list-style-type: none"> A. Visually inspect the cask exterior surfaces for cracks, dents, gouges, tears, or damaged bearing surfaces. Particular attention will be paid to the cask trunnions and lifting yoke. B. Visually inspect all threaded parts and bolts for burrs, chafing, distortion or other damage. C. Check all fittings to ensure their proper operation. D. Visually inspect the interior surface of the cask for any indications of excessive wear to bearing surfaces. E. Visually inspect neutron shield jacket. | N/A for OS-197 Cask | HLL-3/13 |
| 40. | SAR 4.5.2, 2nd | <p>The following inspections and tests will be performed on an annual basis when the cask is used for on-site transfer operations controlled by 10 CFR Part 72:</p> <ul style="list-style-type: none"> A. Test the cask cavity fittings and seals for leak tightness in accordance with American National Standards Institute (ANSI) N14.5. (SAR 4.7.3.2 states an exemption for the requirements to use the metallic seals and specified bolt preloads. Therefore, no leak check is required.) B. Examine the cask trunnions and cask lifting devices in accordance with ANSI N14.6. | N/A for OS-197 Cask | HLL-3/13 |
| 41. | SAR 4.5.2, 3rd | Detailed inspections will be performed in accordance with the cask operating manual. | <i>Currently there is no cask at the TMI ISFSI.</i> | HLL-3/13 |
| 42. | SAR 4.7.3.2, 1st | When used as a transportation cask all operations of the MP-187 cask are performed in accordance with the requirements of the MP-187 SAR (4.11) for Part 71 applications. | N/A for OS-197 Cask | HLL-3/13 |

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| 43. | SAR 4.7.3.2, 2nd | When used for on-site transfer operations, under the rules of Part 72, the MP-187 transportation cask is used in the same general configuration as described in the Part 71 SAR (4.11) except, there is no requirement to include the metallic seals or specified bolt preloads. | N/A for OS-197 Cask | HLL-3/13 |
| 44. | SAR 4.7.3.4, 3rd | Three measures are taken to avoid accidental lowering of the trailer payload: the hydraulic pump is de-energized after the skid has been aligned (the jacks are also hydraulically locked-out during operation of the horizontal cylinders); there are mechanical locking collars on the cylinders; and pilot-operated check valves are located on each jack assembly to prevent fluid loss in the event of a broken hydraulic line. | TPR-7064 <i>Currently there is no cask at the TMI ISFSI.</i> | HLL-3/13 |
| 45. | SAR 5.1 | Operating procedures will be developed for the NUHOMS-12T system to ensure these sequences are followed to: minimize the amount of time required to complete the subject operations; minimize personnel exposure; and assure that all operations required for DSC loading, closure, transfer, and storage are performed safely. | TPR-7064 (suspended) – TPR will be activated if necessary TPR-7065 (suspended) – TPR will be activated if necessary TPR-7066 | HLL-3/13 |
| 46. | SAR 5.1.4.2 | Material control procedures at the Test Area North (TAN) facility will ensure that no hazardous chemicals or surface contaminants are introduced. | NOTE: <i>These activities were completed in 4/01 with the final shipment of TMI core debris from TAN to the TMI-2 ISFSI.</i> | HLL-3/13 |
| 47. | SAR 5.1.4.5 | The NUHOMS®-12T system does not require maintenance during storage except when sampling of the DSCs indicates that filter replacement and DSC purging is required. . | TPR-7069 | HLL-3/13 |

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| 48. | SAR 5.2.1.2, 2nd and 3rd | To ensure that the minimum amount of force is applied to the DSC during the transfer operation, the cask cavity rails and the HSM support rails are coated with a lubricant. A low coefficient of friction minimizes the amount of force applied to the DSC, thus minimizing the possibility of damage to the DSC. If the motion of the DSC is impeded during the transfer operation and the ram continues to travel, the force exerted by the ram on the DSC will increase. To indicate the occurrence of such an event, the amount of force which the ram may exert is limited by the ram control system and monitored by the operator. | NOTE: <i>These activities were completed in 4/01 with the final shipment of TMI core debris from TAN to the TMI-2 ISFSI.</i> | HLL-3/13 |
| 49. | SAR 5.3.2 | Spare HEPA filters are available in the event that sampling activities indicate replacements are necessary. | TPR-7069 | HLL-3/13 |
| 50. | SAR 6.0 | All waste produced by the INL TMI-2 ISFSI is handled and disposed of in accordance with the existing procedures for handling waste at the INL. Drying of the TMI-2 canisters is done prior to loading in the DSC in accordance with INL procedures. INL has existing facilities to treat and dispose both liquid and solid waste | TPR-7066 TPR-7068 TPR-7069 | HLL-3/13 |
| 51. | SAR 6.4 | During operations the only solid wastes would be those associated with the HEPA vent system and the facility decommissioning wastes described above. These wastes will be packaged, treated and disposed in accordance with the existing procedures that are in place at the INL. | TPR-7066 TPR-7068 TPR-7069 | HLL-3/13 |
| 52. | SAR 6.4.6 | The waste will be transported immediately from the ISFSI to the INL waste handling system where it will undergo further treatment, or sent directly to a disposal facility. | TPR-7066, TPR-7068, TPR-7069 | HLL-3/13 |
| 53. | SAR 6.5 | None of the waste will be stored at the ISFSI. As waste is generated it will be disposed of in the INL waste system. | TPR-7066, TPR-7068, TPR-7069 | HLL-3/13 |

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| 54. | SAR 7.1.1, 2nd | To comply with this policy (refers to As Low As Reasonably Achievable [ALARA]), all levels of line management are accountable for radiological performance. The responsibility for compliance with the radiological protection requirements and for minimizing personnel radiation exposure begins at the worker level and broadens as it progresses upward through the line organization. Line managers are responsible for taking all necessary actions to ensure that requirements are implemented and that performance is monitored and corrected as necessary. Radiological Control Technicians (RCTs) assist line management by routinely evaluating and monitoring all radiological conditions. Also, RCTs oversee activities to ensure that all reasonable precautions are taken by personnel. | TPR-7064 (suspended) – TPR will be activated if necessary TPR-7065 (suspended) – TPR will be activated if necessary TPR-7066 PRD-317 | HLL-3/13 |

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| 55. | SAR 7.1.1, 3rd SAR 7.1.1, 1st | <p>The requirements for the ALARA policy and program are provided by 10 CFR Part 20, “Standards for Protection Against Radiation,” (7.7.1). DOE-ID is committed to reducing safety and health risks associated with hazardous substances (including ionizing radiation) by promoting ALARA policy awareness, and reducing and keeping radiation exposures to ALARA levels. The following methods are used to achieve ALARA objectives.</p> <ul style="list-style-type: none"> A. Establishing employee and organizational level ALARA goals, tracking employee exposure, and maintaining associated records. B. Allocating the appropriate technical, administrative, and supervisory resources. C. Appointing an ALARA committee to oversee and evaluate efforts, and to provide technical assistance for identifying needed improvements. D. Controlling access to radiation and radioactive contamination areas. E. Minimize the working time required in high radiation areas and high surface contamination areas, as appropriate. F. Using engineered controls (for example, ventilation, remote handling, and shielding) and monitoring equipment (for example, continuous air monitors and remote area monitors). G. Requiring an ALARA review of procedures and work packages for the INL TMI-2 ISFSI that involve radiological work resulting in either 100 mrem individual exposure, 500 mrem collective exposure, or entries into High Radiation Areas where the general area radiation levels exceed 1 rem/hr. | MCP-91 PRD-317 | HLL-3/13 |
| 56. | SAR 7.1.3 | <p>Consistent with the DOE-ID’s overall commitment to keep occupational radiation exposures ALARA, specific plans and procedures will be followed by ISFSI operations personnel to ensure that ALARA goals are achieved consistent with the intent of Regulatory Guides 8.8 and 8.10 and the requirements of 10 CFR Part 20.</p> | TPR-7064 (suspended) – TPR will be activated if necessary, TPR-7065 , (suspended) – TPR will be activated if necessary TPR-7066, MCP-91, PRD-317 | HLL-3/13 |

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| 57. | SAR 7.1.3 | Maintenance activities that could involve significant radiation exposure of personnel will be carefully planned. They will utilize previous operating experience, and be carried out using well trained and certified personnel and proper equipment. Where applicable, formal ALARA reviews will be prepared which specify radiation exposure reduction techniques, such as those set out in Regulatory Guide 8.8. | STD-101 MCP-91 PRD-317 | HLL-3/13 |
| 58. | SAR 7.3.1.A | A. Access control to the ISFSI is through a controlled gate in the perimeter fence. | PLN-428 | HLL-3/13 |
| 59. | SAR 7.3.2.1, 4th | Additional portable shielding during DSC handling, transport, and transfer operations will be used by the DOE contractor as needed in accordance with existing ALARA practices. | TPR-7064(suspended) – TPR will be activated if necessary TPR-7065 (suspended) – TPR will be activated if necessary | HLL-3/13 |
| 60. | SAR 7.3.4 | Radiological monitoring and contamination control at the ISFSI is performed to ensure that radiation exposure and release limits contained in 10 CFR Part 20 are not exceeded. The ISFSI was added to the existing INL radiological control program which monitors, as appropriate, radiation levels, contamination levles and airborne radioactivity. | PRD-317 TPR-7066 MCP-2955 | HLL-3/13 |
| 61. | SAR 7.5.1 | The radiation protection program at the TMI-2 ISFSI is described in a Radiation Protection Plan (RPP) which has been developed in accordance with 10 CFR 20 . The program is implemented through the RPP as well as several INL radiation protection procedures references in the RPP. | PRD-317 | HLL-3/13 |
| 62. | SAR 7.6.1, 2nd | TLDs will be used to record gamma radiation doses at appropriate intervals along the ISFSI perimeter fence. | MCP-2955 | HLL-3/13 |
| 63. | SAR 7.6.1, 4th | The INL meteorological and environmental surveillance programs will be continued through the life of the INL TMI-2 ISFSI. The ISFSI specific raiological environmental monitoring program will also continue through the life of the TMI-2 ISFSI. | MCP-2955 | HLL-3/13 |

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| 64. | SAR 8.1.2.1 | <p>Based on the dimensions of the DSC, cask, and HSM, the maximum misalignment of the sliding surfaces is limited by operating procedures to 1/8 inch or less.</p> | <p>TPR-7064 (suspended) – TPR will be activated if necessary, TPR-7065 (suspended) – TPR will be activated if necessary NOTE: <i>These activities were completed in 4/01 with the final shipment of TMI core debris from TAN to the TMI-2 ISFSI.</i></p> | HLL-3/13 |
| 65. | SAR 8.2.9.2 | <p>At any given time, the total amount of fuel in service vehicles and other containers within the ISFSI boundaries will be limited to less than 300 gallons. Note on implementation: <i>INTEC TPRs contain checklists for operators to add up the fuel in service vehicles. These checklists ensure the 300-gallon limit is not exceeded. INTEC Security personnel also limit vehicle access according to instructions contained in the TMI-2 Post Orders and TMI-2 INTEC Security (Desktop) procedure. These documents contain a list of vehicles authorized to enter the boundary. If all these authorized vehicles entered at the same time, the service fuel total would be much less than 300 gallons. INTEC Security must contact the TMI-2 Facility Manager and Security Officer to authorize access for any vehicle not on this list.</i></p> | <p>TPR-7064 (suspended) – TPR will be activated if necessary TPR-7065 (suspended) – TPR will be activated if necessary</p> | HLL-3/13 |
| 66. | SAR 9.2 | <p>Prior to loading the ISFSI with the TMI-2 canisters, a series of preoperational, startup and performance tests will be developed and implemented. The tests will include functional tests of the in-plant operations, the on-site transport operations, and DSC insertion and retrieval (operations at the ISFSI). These tests are intended to verify that the storage system components (for example, DSC, HSM, transfer cask, transfer equipment, etc.) operate safely and effectively.</p> | <p>One-time commitment— Complete</p> | HLL-3/13 |

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| 67. | SAR 9.2.1 | Approval of procedures, performance of tests, evaluation of test results, and incorporation of any needed system modifications or procedure changes (based on the results of the tests) will be performed by the INL contractor using administrative controls existing at the INL. | One-time commitment— Complete | HLL-3/13 |

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| 68. | SAR 9.2.2, 1st | <p>The testing program to be conducted utilizes a DSC loaded with mock-up fuel, the transfer cask and associated transfer equipment, and an HSM. The tests will simulate, as nearly as possible, the actual operations involved in preparing a DSC for storage and ensure that they can be performed safely during actual emplacement of TMI-2 core debris in the ISFSI. Verification of ALARA practices, which are not completely achievable during dry runs, will take place during the initial fuel loading. Guidelines for such tests are provided in the following paragraphs:</p> <ol style="list-style-type: none"> 1. An actual DSC will be utilized for preoperational testing. The DSC will be loaded into the transfer cask to verify fit and adequacy of the cask/DSC annulus seal. Additionally, the DSC may be used in operational testing of the transfer equipment and HSM. 2. Functional testing is to be performed with the transfer cask and lifting devices. These tests are to ensure that the transfer cask can be safely lifted from the trailer, to the upending skid, to the cask work area. 3. The transfer cask will be placed on the transport trailer, which will then be transported to the ISFSI along a predetermined route and aligned with an HSM. Compatibility of the transport trailer with the transfer cask, verification of the transfer route to the ISFSI, and maneuverability within the confines of the ISFSI will be verified. 4. The transfer trailer will be aligned and docked with the HSM. The hydraulic ram will be functionally tested and then used to insert a DSC loaded with test weights into the HSM, and then retrieve it. A weighted DSC will also be loaded into and retrieved from the HSM with the DSC overpack. This testing will be completed after initiation of the loading operations, but prior to the shutdown of the TAN Hot Shop. Until such time, the TAN Hot Shop will be used for recovery of a challenged DSC. Transfer of the DSC to the HSM should verify that the support skid positioning system and the hydraulic ram system operate safely for both insertion and retrieval of a DSC. | One-time commitment— Complete | HLL-3/13 |

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| 69. | SAR 9.2.2, 2nd | <p>In addition (testing program), since a vented system is proposed to address concerns over radiolysis in the TMI-2 canisters, monitoring will be performed at three phases of the loading and storage campaign. First, a representative sample of canisters will be monitored in their current storage location in the TAN pool for generation of off-gases. Second, a sample of actual TMI-2 core debris will be dried and tested for potential release of fissile material. This will aid in the design of the canister dewatering and drying system. Third, each individual DSC (containing up to 12 TMI-2 canisters) will be monitored during storage at the ISFSI for internal build-up of hydrogen and radiological releases in accordance with the corresponding TS.</p> <p>The HEPA filter design for the DSCs will also be tested prior to operation of the ISFSI. This testing will be done in accordance with typical industry testing and acceptance methods for HEPA filters.</p> | One-time commitment— Complete | HLL-3/13 |

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| 70. | SAR 9.2.3 | <p>Implementation of the test program is discussed in the paragraphs which follow.</p> <p>1The purpose of the preoperational tests is to ensure that a DSC can be properly and safely placed in the TAN hot cell, loaded with TMI-2 fuel, transported to the ISFSI, inserted in the HSM, and retrieved from the HSM. Proper operation of the DSC, transfer cask, and transfer equipment, as well as the associated auxiliary equipment (for example, automatic welding equipment and vacuum drying system), provides such assurance.</p> <p>The purpose of the TMI-2 canister demonstration test program is to ensure that the TMI-2 canisters can be properly and safely dried and stored in the ISFSI.</p> <p>2Detailed procedures will be developed and implemented by contractor’s personnel who are responsible for ensuring that the test requirements are satisfied.</p> <p>4The expected results of the preoperational tests are the successful completion of the following: placement of a DSC into the transfer cask, loading of the DSC with TMI-2 canisters, transporting the transfer cask loaded with a DSC and test weights to the ISFSI, and transfer of a DSC to/from the HSM. The tests are deemed successful if the expected results are achieved safely and without damage to any of the components or associated equipment. The expected results of the TMI-2 canister demonstration test program are the successful completion of canister drying and successful ongoing DSC vent performance.</p> <p>4Should any equipment or components require modification in order to achieve the expected results, it will be retested to confirm that the modification is adequate. Should any preoperational procedures change in order to achieve the expected results, the changes will be incorporated into the appropriate operating procedures.</p> | One-time commitment— Complete | HLL-3/13 |

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| 70. (cont.) | | 5INTEC operations are not affected by testing of the ISFSI. Testing operations can generally be conducted concurrently with plant operation. All normal prerequisites for safe handling of components will be satisfied, and normal safety and radiological practices will be employed. | | |
| 71. | SAR 9.4.2 | Copies of selected records will be maintained to facilitate interface with outside organizations. The Records are maintained at the INTEC Records Center in accordance with storage requirements. | MCP-557 | HLL-3/13 |
| 72. | SAR 9.6.1, 2nd | Near the end of operations at the INL TMI-2 ISFSI, a decommissioning plan will be developed to provide specific details of decommissioning based on the technologies that exist at that time. | Conceptual Plan For Decommissioning INEEL TMI-2 ISFSI | HLL-3/13 |
| 73. | SAR 9.6.4 | Records that support decommissioning will be treated as QA records. The Conceptual Plan for Decommissioning the INL TMI-2 ISFSI identifies the types of records that will be maintained to facilitate the ISFSI decommissioning. | Conceptual Plan For Decommissioning INEEL TMI-2 ISFSI | HLL-3/13 |
| 74. | SAR App. E 1.1.2 SAR App. E 5.0 | However, movement of the OS-197 Cask from TAN to INTEC will be treated as an on-site transfer in compliance with 10 CFR 72 requirements (1.3) and public access will be denied to the small portion of Idaho Highway 33 which crosses the INL during public highway transfer operations. | NOTE: <i>These activities were completed in 4/01 with the final shipment of TMI core debris from TAN to the TMI-2 ISFSI.</i> | HLL-3/13 |

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| 75. | SAR App. E 2.1.2 | <p>2.1.2.1 In addition, the bridge has been evaluated for transport of the MP-187 Cask and found to be adequate subject to the following restrictions.</p> <ul style="list-style-type: none"> A. The load shall traverse the bridge no faster than 8 km/h (5 mph) to reduce the possibility of impact loading the structure. B. The transporter shall not normally stop on the bridge. C. The transporter shall travel down the centerline of the bridge (Figure E2.1-4). <p>With the previously noted, 20% reduction in loaded OS-197 Cask weight versus the MP-187 Cask weight, the bridge is acceptable for OS-197 Cask transfers if these same restrictions are applied. Of note, although the OS-197 Cask trailer has only four axles (versus five for the MP-187 Cask), the load per axle is identical due to the 20% lower total weight for the loaded OS-197 Cask (that is, 80% of the load and 80% of the axles). Finally, prior to the first transfer of a loaded OS-197 Cask across the bridge, a trial run with a simulated maximum canister load will be made as an added verification of bridge integrity.</p> <p>2.1.2.2 By requiring the trailer to be driven down the center of the bridge at low speed, and by imposing a few additional operational constraints, such an accident becomes noncredible. The specific constraints are as follows. These are in addition to (or refinements of) the constraints needed to ensure bridge integrity as presented in Section 2.1.2.1 of this appendix.</p> <ul style="list-style-type: none"> A. The centerline of the transporter is required to be within 0.6 m (2 ft) of the centerline of the bridge when any portion of the trailer is on the bridge surface. B. Transfers between TAN and INTEC will only occur under conditions of good visibility. C. Transfers between TAN and INTEC will not take place if snow or ice exists on the bridge surface. | <p>NOTE: <i>These activities were completed in 4/01 with the final shipment of TMI core debris from TAN to the TMI-2 ISFSI.</i></p> | HLL-3/13 |

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| 76. | SAR App. E 4.5.1 | <p>The following inspections will be performed prior to each use of the transfer cask and lifting hardware:</p> <ul style="list-style-type: none"> A. Visual inspection of the cask exterior for cracks, dents, gouges, tears, or damaged bearing surfaces. Particular attention is to be paid to the cask trunnions and lifting yoke. B. Visually inspect all threaded parts and bolts for burrs, chafing, distortion, or other damage. C. Check all quick-connect fittings to ensure their proper operation. D. Visually inspect the interior surface of the cask for any indications of excessive wear to bearing surfaces. E. Visual inspection of neutron shield jacket. | NOTE: <i>These activities were completed in 4/01 with the final shipment of TMI core debris from TAN to the TMI-2 ISFSI.</i> | HLL-3/13 |
| 77. | SAR App. E 5.1.1.1.1 | Prior to placement in dry storage, the TMI-2 canisters are to be dewatered and vacuum dried to ensure that no free water is contained in the canisters. A verified record of final TMI-2 canister drying will be maintained for each canister. | NOTE: <i>These activities were completed in 4/01 with the final shipment of TMI core debris from TAN to the TMI-2 ISFSI.</i> | HLL-3/13 |
| 78. | SAR App. E 5.1.1.1.5 | The DSC is to be cleaned and any loose debris removed. Cleaning methods shall not introduce any chemical residues. | NOTE: <i>These activities were completed in 4/01 with the final shipment of TMI core debris from TAN to the TMI-2 ISFSI.</i> | HLL-3/13 |
| 79. | SAR App. E 5.1.1.1.6 | Verify the unique identification of the DSC and using a crane, lower the DSC into the cask cavity by the internal lifting lugs and rotate the DSC to match the cask and DSC alignment marks and keyway. | NOTE: <i>These activities were completed in 4/01 with the final shipment of TMI core debris from TAN to the TMI-2 ISFSI.</i> | HLL-3/13 |
| 80. | SAR App. E 5.1.1.2.1 | During the DSC loading process, check, record, and independently verify the identity and location of each TMI-2 canister in the DSC. | NOTE: <i>These activities were completed in 4/01 with the final shipment of TMI core debris from TAN to the TMI-2 ISFSI.</i> | HLL-3/13 |

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| 81. | SAR App. E 5.1.1.2.3 | (Radiological holdpoint) Check radiation levels along the surface of the shield plug. | NOTE: <i>These activities were completed in 4/01 with the final shipment of TMI core debris from TAN to the TMI-2 ISFSI.</i> | HLL-3/13 |
| 82. | SAR App. E 5.1.1.3.4 | Take appropriate measures to assure that concentrations of flammable gases are below the flammable limit, or sample the environment in the DSC for flammable gases before welding. | The vertical orientation of the DSC and the configuration of the bottom surface of the shield plug prevents trapping or accumulation of concentrations of lighter than air flammable gases, ensuring conditions are below the flammable limit when welding in the TAN Hot Shop. | HLL-3/13 |
| 83. | SAR App. E 5.1.1.4.4 SAR App. E 5.1.1.3.6 SAR App. E 5.1.1.4.3 | Perform surface examination of the seal welds in accordance with TS (5.1). | NOTE: <i>These activities were completed in 4/01 with the final shipment of TMI core debris from TAN to the TMI-2 ISFSI.</i> | HLL-3/13 |
| 84. | SAR App. E 5.1.1.5.5 SAR App. E 5.1.2.3.2 SAR App. E 5.1.2.5.2 SAR App. E 5.1.2.7.9 | Prior to transfer activities, verify that DSC temperatures and outside temperatures are within the control limits of the TS. | NOTE: <i>These activities were completed in 4/01 with the final shipment of TMI core debris from TAN to the TMI-2 ISFSI.</i> | HLL-3/13 |
| 85. | SAR App. E 5.1.2.4, 2nd | DSC opening operations described below are to be carefully controlled in accordance with DSC unloading procedures. This operation is to be performed under the INL safety and radiological control procedures for welding, grinding, and handling of potentially highly contaminated equipment. | Implement when Condition Occurs | HLL-3/13 |

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| 86. | SAR App. E 5.1.2.5.18 | <p>(Transfer to the DSC Overpack)</p> <p>Install and weld the DSC overpack cover and perform surface examination of the root and final pass of the weld in accordance with the DSC closure weld requirements in Chapter 10 of the INL TMI-2 ISFSI SAR (5.1).</p> <p>(Implementation note: ICARE TMI-2 Workgroup item 2471.</p> <p>Section 9.2.2, Item 4 of the TMI-2 ISFSI SAR, Revision 1, dated March 1999, currently states: "...A weighted DSC will also be loaded into and retrieved from the HSM with the DSC overpack. This testing will be completed after initiation of the loading operations, but prior to the shutdown of the TAN Hot Shop. Until such time, the TAN Hot Shop will be used for recovery of a challenged DSC."</p> <p>Section 3.1 of the TMI-2 ISFSI SAR, specifies that "An extra HSM serves as a backup in case temporary storage of a DSC is required or in case a challenged canister needs additional confinement." Since recovery from the design basis accidents described in Chapter 8 of the TMI-2 ISFSI SAR does not require this extra HSM, the 30th HSM with the cylindrical overpack is truly an extra and is not required to ensure safe operation of the TMI-2 ISFSI.)</p> | Not implemented per management direction. The overpack is stored in HSM-15. Transfer trailer has not been loaded with fuel. | HLL-3/13 |
| 87. | SAR App. E 5.1.2.6.1 | <p>(DSC Overpack Monitoring Operations)</p> <p>Perform routine security surveillance in accordance with the INL TMI-2 ISFSI security plan.</p> | Not implemented per management direction. The overpack has not been loaded with fuel. | HLL-3/13 |
| 88. | SAR App. E 5.1.2.6.2 | <p>(DSC Overpack Monitoring Operations)</p> <p>Perform surveillance of the DSC overpack vent system in accordance with the Chapter 10 requirements for a standard HSM/DSC vent system.</p> | Not implemented per management direction.. | HLL-3/13 |
| 89. | SAR App. E 8.1.2.1 SAR App. E 4.7.3.6 SAR Chp. 3.3.1.2.1 | A 36,287 kg (80,000-lb) maximum hydraulic ram load is covered in both the NUHOMS SAR (8.1) and the INL TMI-2 ISFSI SAR (8.2). With a maximum - 12T DSC weight of 31,752 kg (70,000 lb), the hydraulic ram force will be limited to 31,752 kg (70,000 lb), thus increasing margins of safety over those previously determined. | NOTE: <i>These activities were completed in 4/01 with the final shipment of TMI core debris from TAN to the TMI-2 ISFSI.</i> | HLL-3/13 |

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| 90. | SAR App. E 8.1.2.2, 2nd | Although the -45.6°C (-50°F) minimum extreme temperature at INL is 5.6°C (10°F) below that previously considered for the OS-197 Cask, this case need not be addressed because no DSC handling or transportation operations will be performed when the DSC temperature is less than 20°F or the ambient temperature is below -17.8°C (0°F). | NOTE: <i>These activities were completed in 4/01 with the final shipment of TMI core debris from TAN to the TMI-2 ISFSI.</i> | HLL-3/13 |
| 91. | TMI-2 ERP PLN-1610 3.7 | The written agreement for offsite emergency medical services will be reviewed every five years and updated as needed (NRC Commitment, October 27, 2005). | PLN-1610 | HLL-4/13 |

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Table 3. FSV ISFSI commitments.

NOTE: This list references NRC License (SNM-2504) Amendment 6 TSs for the FSV ISFSI and FSV ISFSI SAR, Rev. 2.

| Line No. | Document Page No. Section | FSV ISFSI Commitment Statement | Implementing Documents | Validation |
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| 1. | TS 2.1.1 | The spent nuclear fuel to be stored in Fuel Storage Containers (FSCs) at the FSV ISFSI shall meet the following requirement: The fuel elements stored at the ISFSI shall not exceed those within the facility as of February 9, 1996, as specified in the Contract No. DE-AC07-96IDI3425 between the United States Department of Energy (DOE) and the Public Service Company of Colorado (PSC). No other spent fuel shall be received and stored in the Modular Vault Dry Storage (MVDS). | PRD-319 | HLL-3/13 |
| 2. | TS 2.2 | If the Functional and Operating Limit is violated, the following actions shall be completed: 2.2.1 The affected spent fuel shall be placed in a safe condition. 2.2.2 Within 24 hours, notify the NRC Operations Center. 2.2.3 Within 30 days, submit a special report which describes the cause of the violation and actions taken to restore compliance and prevent recurrence. | MCP-2924 NOTE: FSV fuel transfers were completed 6/92 and all documentation is in the records center. | HLL-3/13 |
| 3. | TS 3.1.1 LCO | Blockage of the cooling inlet or outlet protective mesh screen areas shall not exceed 50 percent of either mesh screen area. APPLICABILITY: During STORAGE OPERATIONS. | See TS 3.1.1 Surveillance Requirements, 3.1.1.1 | HLL-3/13 |
| 4. | TS SR 3.1.1.1 | Perform a visual inspection of the cooling inlets and outlets screens. | TPR-5593 | HLL-3/13 |
| 5. | TS 3.2.1 LCO | The CHM shall be fully operable. APPLICABILITY: During HANDLING OPERATIONS | See TS 3.2.1 Surveillance Requirements, 3.2.1.1 and 3.2.1.2 | HLL-3/13 |
| 6. | TS SR 3.2.1.1 | Visually inspect the Container Handling Machine (CHM) raise/lower mechanism components. | TPR-5605 | HLL-3/13 |
| 7. | TS SR 3.2.1.2 | Functionally test the charge face isolation valves. | TPR-5606 | HLL-3/13 |
| 8. | TS SR 3.2.1.2 | Functionally test the CHM isolation valve and all applicable CHM control interlocks. | TPR-5653, TPR-5655 | HLL-3/13 |

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| 9. | TS 3.2.2 LCO | The MVDS Crane Hoist lift limits shall be operable APPLICABILITY: During STORAGE OPERATIONS and HANDLING OPERATIONS | See TS 3.2.2, Surveillance Requirements, 3.2.2.1 and 3.2.2.2 | HLL-3/13 |
| 10. | TS SR 3.2.2.1 | Visually inspect the MVDS crane hoist dead stop device. | TPR-5612 | HLL-3/13 |
| 11. | TS SR 3.2.2.2 | Functionally test the MVDS crane hoist limit switch. | TPR-6271 | HLL-3/13 |
| 12. | TS 3.3.1 LCO | The FSC or storage well seal leakage rate shall not exceed 1×10^{-3} standard cc/sec APPLICABILITY: During STORAGE OPERATIONS | See TS 3.3.1, Surveillance Requirements, 3.3.1.1 | HLL-3/13 |
| 13. | TS SR 3.3.1.1 | Leak-test one FSC from each vault. | TPR-5604, TPR-6304 | HLL-3/13 |
| 14. | TS 3.3.2 LCO | The ambient air temperature shall not be less than 12°F APPLICABILITY: During HANDLING OPERATIONS | See TS 3.3.2, Surveillance Requirements, 3.3.2.1 | HLL-3/13 |
| 15. | TS SR 3.3.2.1 | Verify ambient air temperature within limits. | TPR-5653, TPR-5655, TPR-5659 | HLL-3/13 |
| 16. | TS 4.1.1 | The FSV ISFSI is located on part of the original FSV Nuclear Generating Station site, approximately 1500 feet northeast of the fossil-fueled, power plant building, which is about three and one-half miles northwest of Platteville, CO. Platteville is located in Weld County and is about 35 miles north of Denver. The nearest boundaries of Longmont, Greeley, and Loveland are all about 14 miles from the ISFSI location. | USGS maps of area | Hll-3/13 |
| 17. | TS 4.2.1 | The FSV ISFSI is licensed to store spent fuel in the Fuel Storage Canisters within the MVDS. The FSCs shall be constructed of carbon steel with a coating of aluminum applied to the outer surface. Each FSC can store up to six fuel elements. The fuel storage environment is air. Each FSC is stored in a storage position within the six MVDS vaults or within one of the three storage wells. | Vendor Data/Design Package | HLL-3/13 |
| 18. | TS 4.2.2 | The MVDS structure is reinforced concrete, with three storage wells, six vaults, and a Transfer Cask Reception Bay. Each vault holds up to 45 FSCs, with the FSC storage array determined by a Charge Face Structure at the top of the FSCs and by vault module floor supports at the bottom of the FSCs. | Vendor Data/Design Package | HLL-3/13 |

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| 19. | TS 5.5.3 | <p>This program provides a means for monitoring the development of natural gas, and oil infrastructure and assessing the risk that such development poses to the FSV ISFSI.</p> <ol style="list-style-type: none"> 1. The licensee shall establish and maintain a database of all natural gas and oil infrastructure within one-half mile of the FSV ISFSI. 2. The database shall include an analysis of the hazard posed by failure of individual infrastructure components (such as gas well, collector pipes, transmission pipelines, or feeder pipes). Such analysis may be a quantitative evaluation of the effect of postulated failures on the MVDS or may be a qualitative comparison to the hazard analysis of bounding cases provided by the safety analyses supporting the initial issuance of and Amendment No. 1 to Materials License SNM-2504. 3. The licensee shall ensure that the database is updated at least once every six months. 4. For any new natural gas or oil infrastructure planned or completed installation within one-half mile of the ISFSI, the licensee shall submit a report describing the new infrastructure and a summary of the hazard analysis to the NRC Document Control Desk with a copy to the Director, Office of Nuclear Material Safety and Safeguards and the Regional Administrator, NRC Region IV: <ol style="list-style-type: none"> a. within 60 days of identifying the new infrastructure if that new infrastructure poses a hazard which exceeds that analyzed in the initial issuance of and Amendment No. 1 to Materials License (sic) SNM-2504, or b. with the periodic SAR update If the new infrastructure poses a hazard bounded by that analyzed in the initial issuance of and Amendment No. 1 to Materials License SNM-2504. | MCP-3754 | HLL-3/13 |

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| 20. | TS SR 5.5.4 | <p>This program implements the requirements of 10 CFR 72.44(d).</p> <ul style="list-style-type: none"> a. The FSV ISFSI does not create any new radioactive materials or have any radioactive waste treatment system. Some low-level radioactive waste may be created during the course of periodic maintenance and surveillance activity or during future defueling operations as authorized by Condition 7B of this license. Procedures for the control of radioactive waste shall be developed and implemented. <p>In addition to the procedural controls for low-level radioactive waste, TS 3.3.1, Seal Leak Rate, provide assurance that there are essentially no radioactive effluents from the FSV ISFSI.</p> <ul style="list-style-type: none"> b. This program includes an environmental monitoring program. c. An annual report shall be submitted pursuant to 10 CFR 72.44(d) (3) specifying the quantity of each of the principal radionuclides released to the environment in liquid and gaseous effluents during the previous calendar year of operation. This report shall be submitted within 60 days after January 1 of each year. | PRD-317 MCP-2955 | HLL-3/13 |

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| 21. | FSV TS 5.5.5 | <p>Aging Management Program</p> <p>This program provides a means for monitoring and mitigating potential aging effects of the modular vault system.</p> <p>a.</p> <p>The licensee shall establish and implement procedures for remote visual inspection of the FSC, SS, CFS underside (vault ceiling), and vault wall and floor surfaces for signs of degradation.</p> <p>b.</p> <p>The licensee will repair and/or perform additional inspection of concrete and metal conditions exceeding second tier-criteria within the guidance of ACI 349.3R-02 or later editions.</p> <p>c.</p> <p>The licensee will develop concrete inspector training and qualification program in accordance with ACI 349.3R-02 or later editions, prior to the next MVDS inspection in June 2014.</p> | PLN-2974 | HLL-4/13 |
| 22. | SAR 1.1.1.2 No. 9 | The CHM will also be used for any fuel movements required if leakage occurs and when emptying the MVDS prior to decommissioning using a reverse procedure. | TPR-5655, TPR-5653 | HLL-3/13 |
| 23. | SAR 1.1.1.2 No. 13 | The MVDS is subject to routine manual surveillance and monitoring. Security access monitoring and surveillance are also conducted. | PLN-176 | HLL-3/13 |
| 24. | SAR 1.2.4 | MVDS fuel handling procedures will be used for all fuel handling operations using certified fuel handlers. | TPR-5653, TPR-5655 | HLL-3/13 |
| 25. | SAR 1.3.2.1 | The FSC is the inner container that will be used in the more recently licensed TN-FSV spent fuel-shipping casks. | TPR-5655 | HLL-3/13 |

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| 26. | SAR 1.4 | DOE will: <ul style="list-style-type: none"> A. Retain responsibility for and perform independent audits of the contractor's FSV ISFSI QA Program (both the achievement of quality by contractor management and the verification of quality by contractor QA personnel) B. Ensure the license conditions for the facility are in the contract C. Assess the performance of the contractor against the terms of the contract D. Retain the responsibility to budget funds necessary and sufficient to safely operate the facility E. Retain the authority to revise the contract in the event contract deficiencies are found relative to proper implementation of license conditions. | DOE | DOE |
| 27. | SAR 2.4.2 | Routine surveillance checks for water buildup inside the pipe. The water is tested for contamination prior to its disposal. | TPR-5613 | HLL-3/13 |
| 28. | SAR 3.3.5 | ALARA is effected by access control and the provision of appropriate shielding on the TCRB, CHM, and the vault. | PRD-317 Vendor data/design packages | HLL-3/13 |
| 29. | SAR 3.3.5.1 | Access to the MVDS installation is controlled in accordance with 10 CFR 72 and 73. | PLN-176 | HLL-3/13 |
| 30. | SAR 3.3.5.3, SAR 4.24 | Portable radiation monitors will be used as required during the operation and maintenance of the installation. | PRD-317 | HLL-3/13 |
| 31. | SAR 3.3.5.3 | Radiation monitoring of the controlled area boundary and charge face level will be carried out as described in Section 7.3.3. | PRD-317, TPR-5613 | HLL-3/13 |
| 32. | SAR 3.3.6 | Security members will be trained in the use of hand-held portable fire suppression equipment. | MCP-325 | HLL-3/13 |
| 33. | SAR 3.3.6 SAR 7.6.4.4 | (dry active waste) would be packaged in 55 gallon steel drums and temporarily staged at the ISFSI while awaiting shipment. ... there will not be more than 15 drums of low-level waste (LLW) stored at the ISFSI at any given time ... | PRD-317 | HLL-3/13 |
| 34. | SAR 3.3.6 | ... the ISFSI entrance building will meet all local fire codes and applicable National Fire Protection Association (NFPA) guidelines. | PRD-199 | HLL-3/13 |

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| 35. | SAR 3.3.7.1 | The handling of spent fuel is conducted with the fuel fully contained by its FSC and shielded within the transfer cask or CHM. | TPR-5653, TPR-5655 | HLL-3/13 |
| 36. | SAR 3.4.1.1 | DOE will use the ISFSI design criteria to classify structures systems and components involved with any future design modifications | LST-28 | HLL-3/13 |
| 37. | SAR 3.4.1.2 | DOE will apply its QA Program ... to these important-to-safety items. | RW-0333P QARD, LST-28, PLN-466, MCP-540 | HLL-3/13 |
| 38. | SAR 3.6.4 SAR 6.1.1 | In the off-normal operation of changing fuel elements from one FSC to another, any FSC gas pressure is released and filtered before the FSC is opened. If purging is required any gasses released will be high-efficiency particulate air (HEPA) Filtered and monitored during the release. | TPR-5653 TPR-5655 TPR-5659 | HLL-3/13 |
| 39. | SAR 4.3.2 | Defueling will involve transfer of an FSC from a vault module to a TN-FSV cask in the Cask Loading/Unloading Port (CLUP). | TPR-5655 | HLL-3/13 |
| 40. | SAR 4.4.3 | In the event that some activity produces radioactive contamination, it will be decontaminated as required. | PRD-317 | HLL-3/13 |
| 41. | SAR 4.4.4 SAR 6.1.1 | FSCs are leak tested after being loaded. If the containment boundary is leaking, the FSC will be transferred to Standby Storage Well (SSW) by the CHM then sealed to prevent further leakage. If seals fail leak test after being replaced, the fuel would be transferred to a new FSC. | TPR-5653, TPR-5655, TPR-5659, TPR-5604 | HLL-3/13 |
| 42. | SAR 4.4.4 | After use, the individual fuel element grapple would be checked for contamination... if contaminated, it will be decontaminated or bagged and dispatched from MVDS for decontamination. | PRD-317 | HLL-3/13 |
| 43. | SAR 4.4.5 | Engineering plans and drawings for these systems are maintained (utility supplies and systems: electricity, communications and domestic water). | MCP-2811, MCP-2377 | HLL-3/13 |
| 44. | | . | | |
| 45. | | | | |

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| 46. | SAR 4.2.3.2.3 SAR 4.4.4.1 SAR 5.1.1.1 | DOE commits to preclude handling of a loaded FSC or removal of lid bolts, until such a time as the gas space inside the FSC has been analyzed. And determined not to have a combustible gas mixture, or evacuated and purged with air to assure hydrogen concentrations are below flammable levels. | TPR-5655, TPR-5653, TPR-5659, TPR-6493 | HLL-3/13 |
| 47. | SAR 5.1.5 | Seismic instrumentation will be used to determine severity of seismic disturbances. | TPR-5665 | HLL-3/13 |
| 48. | SAR 5.1.6.2 | Should any cracks or general degradation of the concrete be observed, they will be evaluated as to the effect on the structure and required repairs. | TPR-5589 | HLL-3/13 |
| 49. | SAR 5.3 | Following the license transfer to DOE, a 100% Tamper Indication Device (TID) inventory will be performed. | TPR-5662, - Historical This is a one-time commitment not subject to periodic verification. | HLL-3/13 |

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| 50. | SAR 5.3 | <p>DOE’s Spent Fuel Management Program is implemented through contractor procedures for the following activities:</p> <ul style="list-style-type: none"> A. Records showing the receipt, inventory and location, disposal, acquisition, and transfer of all spent fuel in storage are kept in accordance with 10 CFR 72.72(a). B. A physical inventory of, All, the spent fuel in storage is conducted every 12 months in accordance with 10 CFR 72.72(b). A copy of each inventory is retained as a record until license termination. C. Written material control and accounting procedures that are sufficient to enable accounting for material in storage are established, maintained, and followed in accordance with 10 CFR 72.72(c) and are maintained until license termination. D. Records of spent fuel in storage are kept in duplicate and in separate locations in accordance with 10 CFR 72.72(d). E. Accidental criticality events and any loss of special nuclear material are reported in accordance with 10 CFR 72.74 and the ERP. F. A material status report is completed in computer-readable format, in accordance with NUREG/BR-0007 (Ref. 5) and Nuclear Material Safety and Safeguards (NMSS) Report D-24 (Ref. 7). And submitted to the NRC within 30 days of March 31 and September 30 for each 6 month reporting period in accordance with 10 CFR 72.76(a) unless otherwise directed by the NRC. | <p>MCP-557 PRD-319 MCP-2754 MCP-2752 EPI-102 EPI-103 PDD-103</p> | HLL-3/13 |
| 47. (cont.) | SAR 5.3 | <ul style="list-style-type: none"> G. Computer-readable Nuclear Material Transaction Reports are completed in accordance with 10 CFR 72.78(a), NUREG/BR-0006 (Ref. 6), and NMSS Report D-24 whenever spent fuel is either transferred or received. | | |
| 51. | SAR 5.4 | The spent fuel elements will be transported from the MVDS using a NRC licensed shipping cask. | TPR-5655 | HLL-3/13 |

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| 52. | SAR 6.4 | All solid and liquid wastes generated are collected in suitable containers and disposed in accordance with all applicable federal, state, and burial site regulations. | PRD-317 | HLL-3/13 |
| 53. | SAR 6.5 | Procedures describe proper collection and handling of radioactive material at the MVDS and provide instructions for shipping radioactive materials from the facility. | PRD-317 | HLL-3/13 |
| 54. | SAR 6.5 | Personnel who prepare radioactive materials for shipment and supervisors who review and oversee these preparations are trained and periodically retrained prior and during the performance of shipping activities. | PRD-317 | HLL-3/13 |
| 55. | SAR 6.5 | (The low point in the vault area) is sampled periodically and is analyzed to determine if any water collected is above the free release limits of 10 CFR 20. Should this water be above these limits, it will be collected and dispose in accordance with ISFSI procedures. | TPR-5613 | HLL-3/13 |
| 56. | SAR 7.1.1 | ALARA Program will be implemented to maintain personnel exposures low, including the following key elements: 1Design and procedural ALARA reviews by qualified staff and committees. 2Pre- and post-job reviews including the establishment of person-rem goals, planning for special tools, ventilation, shielding, services, and communications equipment 3Trending of radiological performance factors including worker exposures, personnel contamination, waste generation and area contamination. 4ALARA committee reviews of selected activities. 5Training for selected jobs. 6Management review of Radiation Protection Program effectiveness. | PRD-317 | HLL-3/13 |
| 57. | SAR 7.3.1.1 SAR 7.4 | Access to the ISFSI is controlled in accordance with 10 CFR 72. Normal access to the MVDS is through a single access point that includes a Health Physics Control Station when radiological conditions warrant. | MCP-324 PRD-317 | HLL-3/13 |
| 58. | SAR 7.3.3 TS SR 3.3.1.1 | DOE commits to performing leak test of inter-space between O-ring on 6 FSCs at 5 yr intervals. | TPR-5604 | HLL-3/13 |

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| 59. | SAR 7.5 | No real individual member of the public located beyond the controlled area boundary will receive a dose rate in excess of 25 mR/yr as required by 10 CFR 72. | MCP-2955, PRD-317 | HLL-3/13 |
| 60. | SAR 7.6 | Health Physics Program is implemented by INL contractor MCP and TPRs specifically for use at the ISFSI. | PRD-317, TPR-5613 | HLL-3/13 |
| 61. | SAR 7.6 | The effectiveness and implementation of the ISFSI Radiation Protection Program is reviewed annually by DOE or its contractor. | PRD-317 | HLL-3/13 |
| 62. | SAR 7.6.1 | Facility Safety Officer (FSO) is responsible for radiation protection at ISFSI ... in accordance with approved procedures. | PRD-317 | HLL-3/13 |
| 63. | SAR 7.6.1 | FSO acts as the ISFSI representative on the INTEC ALARA Committee. | PRD-317 | HLL-3/13 |
| 64. | SAR 7.6.1 | Radiation safety issues that arise are brought to the attention of the INTEC ALARA Committee by the FSO in accordance with the ALARA Committee charter. | PRD-317, MCP-91 | HLL-3/13 |
| 65. | SAR 7.6.1 | Stop work authority is granted to any individual who observes an actual or potential unsafe radiation condition. | PRD-317, PRD-186, MCP-553 | HLL-3/13 |
| 66. | SAR 7.6.2 | Radiation surveillance instrumentation and Radiological Control (RadCon) supplies are available to perform assessment of RadCon. | PRD-317 | HLL-3/13 |
| 67. | SAR 7.6.3.1 | Occupational radiation exposure is ... controlled in accordance with and with the exception of planned special exposure, limited to 20% of limits in 10 CFR 20, Subpart C, Occupational Dose Limits. | PRD-317 | HLL-3/13 |
| 68. | SAR 7.6.3.2 | Radiation exposure to ... public is limited to ... Effective Dose Equivalent of 25 mR. In accordance with 40 CFR 190.03. | PRD-317 | HLL-3/13 |
| 69. | SAR 7.6.3.2 | The results of the FSV ISFSI REMP are used to verify compliance with the exposure limit. | PRD-317 | HLL-3/13 |
| 70. | SAR 7.6.3.3 | Any (High Radiation Areas) and (Very High Radiation Areas) created during FSC movement will be posted ... in accordance with 10 CFR 20.1601 and 20.1602 respectively. | PRD-317 | HLL-3/13 |
| 71. | SAR 7.6.3.4 | Use of respiratory protection equipment is performed in accordance with 10 CFR 20.1703 through services provided by the INL. | PRD-317 | HLL-3/13 |

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| 72. | SAR 7.6.4 | Procedures and engineering controls are used to achieve doses that are ALARA. | PRD-317 | HLL-3/13 |
| 73. | SAR 7.6.4.1 | Capability (for internal and external exposure monitoring) is maintained. | PRD-317 | HLL-3/13 |
| 74. | SAR 7.6.4.1 | Tritium monitoring has been instituted within the ISFSI . . . samples installed on the charge face and in the chimneys are retrieved periodically and the absorbed atmospheric water vapor is analyzed for tritium. | TPR-6370 | HLL-3/13 |
| 75. | SAR 7.6.4.1 | Radiation and contamination surveys are performed periodically in the ISFSI and within the perimeter fence. | TPR-5613, PRD-317 | HLL-3/13 |
| 76. | SAR 7.6.4.1 | Radiation and contamination monitoring instrumentation is calibrated periodically for the types of radiation measured. | PRD-317 | HLL-3/13 |
| 77. | SAR 7.6.4.1 | When occupational radiation exposure monitoring is performed, direct reading and/or electronic dosimetry is utilized. | PRD-317 | HLL-3/13 |
| 78. | SAR 7.6.4.1 | Personnel thermoluminescent dosimetry (TLD), when used, is processed at the INL by a DOE Laboratory Accreditation Protocol (LAP) accredited processor. | PRD-317 | HLL-3/13 |
| 79. | SAR 7.6.4.1 | All material leaving a posted contamination area is surveyed prior to unrestricted release. | PRD-317 | HLL-3/13 |
| 80. | SAR 7.6.4.2 | Licensed material is controlled in accordance with 10 CFR 20.1801 and 20.1802. | PRD-317 | HLL-3/13 |
| 81. | SAR 7.6.4.3 | Radiation areas (per 10 CFR 20.1003) are posted and controlled in accordance with 10 CFR 20.1901 through 1903. | PRD-317 | HLL-3/13 |
| 82. | SAR 7.6.4.3 | Containers of licensed material are labeled and controlled in accordance with 10 CFR 20.1904 and 20.1905. | PRD-317 | HLL-3/13 |
| 83. | SAR 7.6.4.3 | Receipt and opening of packages containing quantities of radioactive material exceeding Type A quantities is performed in accordance with 10 CFR 20.1906. | PRD-317 | HLL-3/13 |
| 84. | SAR 7.6.4.4 | The sources are stored in a fire-rated storage cabinet located at the south end of the ISFSI charge face. | MCP-137 Vendor data/design packages | HLL-3/13 |
| 85. | SAR 7.6.4.4 | The cabinet is locked when unattended, with keys controlled by the FSO. | MCP-137 | HLL-3/13 |
| 86. | SAR 7.6.4.4 | The radioactive sources, or packaging containing the sources, are labeled and the cabinet posted in accordance with 10 CFR 20 requirements. | MCP-137, PRD-317 | HLL-3/13 |

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| 87. | SAR 7.6.4.4 | Radiation protection personnel are responsible for receipt, storage, use, inventory, performance of source leak checks, and final disposition of sources, in accordance with approved procedures. | PRD-317 | HLL-3/13 |
| 88. | SAR 7.6.4.4 | Radiation protection personnel that use sources are trained in proper handling. | PRD-317, MCP-137 | HLL-3/13 |
| 89. | SAR 7.6.4.4 SAR 8.2.4.2 | Staging of LLW in the transfer cask reception bay is not permitted when a cask containing spent fuel is in the cask load/unload port in order to assure a potential fire does not impact a loaded cask. | PRD-317 TPR-5655 | HLL-3/13 |
| 90. | SAR 7.6.4.4 SAR 8.2.4.2 | To reduce the potential for a low-level radioactive waste fire from involving the DUPs, staging of LLW is not permitted within 20 ft (20 ft horizontal separation is required between the DUPs and any drums containing LLW stored at the ISFSI). | PRD-317 | HLL-3/13 |
| 91. | SAR 7.6.4.4 | The DUP storage areas are posted in accordance with 10 CFR 20 requirements. | PRD-317 | HLL-3/13 |
| 92. | SAR 7.6.4.5 | Temporary on-site storage of (licensed material designated as radioactive waste) will be the interim option until the disposal procedure approval is obtained. | PRD-317 | HLL-3/13 |
| 93. | SAR 7.6.4.5 | If and when transfer of low-level radioactive waste for disposal at a land disposal facility becomes necessary, a shipping manifest tracking system will be established in accordance with 10 CFR 20.2006. Control of such transfers will also be implemented in accordance with 10 CFR 20.2006. | PRD-317 | HLL-3/13 |
| 94. | SAR 7.6.4.6 | Records ... of Radiation Protection Program, survey results...measurement results and calculations ... results of air sampling, surveys, bioassays ... calculations to evaluate release are maintained for the duration of the license. | PRD-317 | HLL-3/13 |
| 95. | SAR 7.6.4.6 | Records of audits and reviews of the program content and implementation radiation surveys and radiation monitor equipment calibrations are maintained for 3 years. | PRD-317 | HLL-3/13 |
| 96. | SAR 7.6.4.6 | Prior occupational dose for individuals who are likely to exceed annual occupational exposure above required monitoring thresholds while employed at the ISFSI is determined and documented in accordance with 10 CFR 20.2104. Information documented on the NRC Form 4. Is maintained for the duration of the license. Records used in preparing the Form 4 are maintained for a minimum of 3 years. | PRD-317 | HLL-3/13 |

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| 97. | SAR 7.6.4.6 | Records of individual occupational radiation monitoring results planned special exposures and exposure to individual members of the public will be documented and controlled in accordance with 10 CFR 20.2015, 20.2016, and 20.2017 and maintained for the duration of the license. | PRD-317 | HLL-3/13 |
| 98. | SAR 7.6.4.6 | Records of licensed material disposal will be retained for the duration of the license. | PRD-317 | HLL-3/13 |
| 99. | SAR 7.6.4.7 | Reports (will be made) in accordance with 10 CFR 20.2201 through 2206. | PRD-317 | HLL-3/13 |
| 100. | SAR 7.6.5 | DOE LAP accredited... Dosimetry processor will be used to process TLDs worn by workers at ISFSI. The processor will have demonstrated successful proficiency testing in those radiation performance categories that approximate the radiation environment at the ISFSI. | PRD-317 | HLL-3/13 |
| 101. | SAR 7.7 | No planned radioactive effluents are released from the ISFSI during storage conditions. Environmental monitoring is performed to detect unplanned radioactive effluents from the ISFSI. | MCP-2955 | HLL-3/13 |
| 102. | SAR 7.7 | The results of this program are used to verify the effectiveness of measures applied to prevent the release of radioactive materials. | MCP-2955 | HLL-3/13 |
| 103. | SAR 7.7.1 | FSO will oversee the conduct of REMP sampling. | MCP-2955 | HLL-3/13 |
| 104. | SAR 7.7.1 | Radiological environmental monitoring dosimeters will be collected from the specific locations given in Table 7.7-1. | MCP-2955 | HLL-3/13 |
| 105. | SAR 7.7.2 | Radiological environmental monitoring dosimeters will be processed pursuant to the requirements of Table 7.7-1. | MCP-2955 | HLL-3/13 |
| 106. | SAR 7.7.3 | A radiological environmental monitoring report shall be submitted to the NRC within 60 days of January 1 of each year. | MCP-2955 | HLL-3/13 |
| 107. | SAR 7.7.3 | Radiological Environmental Monitor Report shall include summaries, interpretations and analyses or trends of results of the REMP, quantity of each of principal nuclides released to the environment ... and any other required information to estimate dose commitment. | MCP-2955 | HLL-3/13 |
| 108. | SAR 7.7.3 | Each radiological environmental report shall contain a map with detailed information on sampling station locations. | MCP-2955 | HLL-3/13 |

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| 109. | SAR 7.7.3 | Every effort shall be made to complete corrective action before next sampling period if samples are unobtainable. | MCP-2955 | HLL-3/13 |
| 110. | SAR 7.7.3.2 | Changes in sampling locations and schedule shall be explained in each annual report. | MCP-2955 | HLL-3/13 |
| 111. | SAR 8.1.5.3, SAR 8.1.7.3 | Adequate protective equipment is used during SSW operations. | TPR-5653, TPR-5655, TPR-5659 | HLL-3/13 |
| 112. | SAR 8.1.9.3 | Site speed limits will be administratively limited to 10 mph. | Sign Posted | HLL-3/13 |
| 113. | SAR 8.2.4.2 | Low-level radioactive waste is not permitted to be staged in the TCRB when a cask containing fuel is in the CLUP. | TPR-5655 | HLL-3/13 |
| 114. | SAR 9.1.2 | Manager of DOE-ID is responsible for executive management and has signature authority for the NRC license and is ultimately responsible for compliance. The Manager shall take any measures needed to ensure acceptable performance of the staff in operating, maintaining, and providing technical support to the facility to ensure nuclear safety and compliant operations. | NRC License SNM-2504 This is a one time commitment not subject to periodic verification. | HLL-3/13 |
| 115. | SAR 9.1.4.1 | DOE-ID Facility Director and alternate will meet the training and qualification requirements as specified. | DOE | DOE |
| 116. | SAR 9.1.4.1 8 th | Security personnel shall meet the employment suitability and training requirements described in the FSV ISFSI Physical Protection Plan and its addendum, Security Training and Qualification Plan. Security personnel training includes implementation of emergency response duties. | PLN-176 | HLL-3/13 |
| 117. | SAR 9.2 | PSCo will assist in the activities needed to ensure that DOE-ID and its contractor are prepared to assume operation of the ISFSI. | License has been issued. This is a one time commitment, documented by FSV Transition Plan, Rev. 1, INEEL/EXT-97-00101. This commitment is not subject to periodic verification. | HLL-3/13 |

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| 118. | SAR 9.1.2.2.1 | The FSV Facility Director or alternate shall be present during significant operations or maintenance evolutions, emergency exercises, and announced NRC inspections. Surveillances of these activities will be performed. During prolonged evolutions, the FSV Facility Director shall be present during initial activities and at least monthly thereafter. | DOE | DOE |
| 119. | SAR 9.1.3.2 | Personnel on site at the FSV ISFSI report to the ISFSI Manager to ensure clear lines of authority. The ISFSI Manager, Facility Safety Officer (FSO), and the Security personnel are routinely stationed at the ISFSI.. | Organization Chart | HLL-3/13 |
| 120. | SAR 9.1.5 | Arrangements have been made with local agencies to provide support services related to ISFSI operations, security, environmental monitoring, and emergency response: Platteville Gilcrest Fire Protection District, Platteville, Co. (Fire Protection/Ambulance Service), North Colorado Medical Center, Greeley Co. (Medical Treatment, Decontamination and Air Ambulance Service)) Weld County Sheriff's Department Greeley Co. (Security Assistance). •Weld County Paramedic Service, Greeley, CO (Ambulance Service) | PLN-176 PLN-143 | HLL-3/13 |
| 121. | SAR 9.2 | | FSV SAR section 9.2 commitments will not be implemented until fuel movement. | HII-3/13 |
| 122. | SAR 9.3 | Records will be retained for three years when changes are made to this training program without prior NRC approval. | MCP-557 | HLL-3/13 |
| 123. | SAR 9.3.9 | Detailed certified fuel handler and direct supervision training will be provided for those performing the operations described in Section 5.1. | MCP-3043 | HLL-3/13 |

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| 124. | SAR 9.3.9 | <p>The CFH Training Program will consist of lesson plans and associated examinations in, but not limited to, the following categories:</p> <ul style="list-style-type: none"> A. Fuel Characteristics: <ul style="list-style-type: none"> – Elementary nuclear theory – Fuel element description/identification – Fuel storage configuration. B. Equipment, Component, and Design Description: <ul style="list-style-type: none"> – Crane – Transfer CLUP – Isolation valves – Shield plug-handling devices – Charge face/standby storage wells – CHM – FSCs – Utility supplies and systems – Ventilation system – Equipment operational interlocks – Shipping cask. C. Regulations, Procedures, and Limitations: <ul style="list-style-type: none"> – Administrative control of CFH actions – Description of events and sequence of fuel handling operations – Identified applicable procedures and regulations including normal, emergency, and 10 CFR 72-related TSSs. | PDD-8 | HLL-3/13 |

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| 125. | SAR 9.3.9 (continued) | D. Accident Analysis, Emergency Systems, and Safety Devices: <ul style="list-style-type: none"> – Accident analysis from the FSV ISFSI SAR for off normal operations and accidents – Confinement barriers/systems – FSV ISFSI cooling, equipment and instrumentation criticality prevention. E. Radiological Protection F. General Organization. | PDD-8 | HLL-3/13 |
| 126. | SAR 9.3.9 | The CFH Training Program will include operational training (OJT) involving actual and/or mock control manipulations of the following: <ul style="list-style-type: none"> A. CHM B. Isolation valves C. Shield plug-handling devices D. CLUP E. Crane. Manipulations will include CFH responses, instrumentation, indications, abnormal situations, corrective measures, alarms and annunciators, prerequisites, and procedures. Actual manipulation and operations are preferred to mock manipulations to the extent practicable based upon equipment availability | PDD-8 | HLL-3/13 |
| 127. | SAR 9.3.9 | All OJT will be repeated biennially and approximately half the total will be performed annually for recertification. The classroom material and written examinations associated with the OJT will be presented and completed prior to the OJT. Based on a job and task analysis, some parts of the training are identified as [pre-train] items. Training on pre-train items is only completed prior to doing the task. Additionally, classroom material will be presented as needed in order to convey pertinent modifications, procedure changes, regulatory changes, or other significant material in a timely manner. | MCP-3043 | HLL-3.13 |

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Table 3. (continued).

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| 128. | SAR 9.3.9 | <p>Certification as an FSV ISFSI CFH is contingent upon meeting the following criteria:</p> <p>Obtaining a score of $\geq 80\%$ on all CFH academic examinations, and satisfactory performance of all OJT practical evaluations. A score of $< 80\%$ on any CFH academic examination will require re-testing. A score of $< 80\%$ on the retest will constitute cause for dismissal from the CFH Training Program, A score of $< 80\%$ on any three initial academic examinations will constitute cause for dismissal from the CFH Training Program. Failure to demonstrate satisfactory performance of the OJT practical examinations will require re-testing. Failure to demonstrate satisfactory performance of a second OJT practical examination will constitute cause for dismissal from the CFH Training Program.</p> | MCP-3043 | HLL-3/13 |
| 129. | SAR 9.3.9 | The evaluation criterion for initial certification of CFHs shall not be waived; nor shall the evaluation criterion be waived for two or greater consecutive recertification cycles. | MCP-3043 | HLL-3/13 |
| 130. | SAR 9.3.9 | Physical condition and general health of fuel handlers will be verified by physical examination before certification and biennially thereafter. | MCP-3043 | HLL-3/13 |
| 131. | SAR 9.3.10 | Training for the applicable support positions will include the administrative and management controls associated with ensuring compliance with the FSV ISFSI license conditions. | PDD-8 | HLL-3/13 |
| 132. | SAR 9.5 | The following DOE resources are available in an emergency: the INL WCC, engineering and technical analysis personnel at the INL radiation protection and dose assessment personnel from the INL or DOE Region 6 Radiological Assistance Program. | EPI-77 | HLL-3/13 |
| 133. | SAR 9.5 | Emergency plan exercises will be conducted biennially at the ISFSI, in accordance with the ERP. | EPI-108 | HLL-3/13 |

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| 134. | SAR 9.8 | DOE-ID will implement all measures and enhanced procedures recommended in the aging management reviews and as committed in the response to the Request for Additional Information (RAI) following the license renewal application (Ref. 6). Inaccessible areas of the vaults that can be remotely inspected will be visually inspected every 10 years to assess FSC, SS, CFS underside (vault ceiling), and vault wall and floor surfaces for signs of degradation. | TPR-7812 | HLL-3/13 |
| 135. | SAR 9.8 | The gas inside one FSC in each of the six vault modules will be sampled for hydrogen no later than June 2015. The FSCs selected will be the same six FSCs scheduled for seal leak testing. | TPR-6493 | HLL-3/13 |
| 136. | ERP 3.2 | Records of drills, exercises, activities performed under EPI-108, "Requirements of Ft. St. Vrain Emergency Response Plan," and actual emergencies, and this plan are quality records and shall be controlled as such.. | MCP-557 | HLL-3/13 |
| 137. | ERP 6.1 | The Facility Manager is a trained Emergency Coordinator. | MCP-3043, EPI-109 | HLL-3/13 |
| 138. | ERP 6.1 | The FSO is a trained Emergency Coordinator. | MCP-3043, EPI-109 | HLL-3/13 |
| 139. | ERP 6.1.1 | The NRC and DOE Operations Centers shall be notified immediately after notification of the appropriate offsite response organizations and not later than 1 hour after declaration of an emergency. The NRC is the lead federal agency for emergency response to an NRC licensed facility | EPI-103 | HLL-3/13 |
| 140. | ERP 6.2.2.3 | The Command Post will be staffed and operational within 60 minutes after classification of an ALERT level incident. | EPI-101 | HLL-3/13 |
| 141. | ERP 6.3 | Letters of agreement are maintained, are reviewed annually, and updated every 5 years or as necessary. | EPI-108 | HLL-3/13 |
| 142. | ERP 6.4.2 | Methodology used to predict Emergency Planning Zone (EPZ) dose rates is contained in ERP implementing procedures. | EPI-107 | HLL-3/13 |
| 143. | ERP 6.4.5.2 | Protective actions for personnel on ISFSI property will be taken whenever a radiological emergency has occurred that could result in a significant unplanned exposure to ISFSI workers. | EPI-104 | HLL-3/13 |

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| 144. | ERP 6.4.5.3.1 | Accountability will be completed within 1 hour of making an appropriate announcement. | EPI-101 | HLL-3/13 |
| 145. | ERP 6.4.6 | Emergency workers will carry appropriate dosimetry. | EPI-105, | HLL-3/13 |
| 146. | ERP 6.4.6.3 | Contaminated personnel will be transported to/treated at North Colorado Medical Center. | EPI-106 | HLL-3/13 |
| 147. | ERP 6.5.1.1 | Emergency assessment and control is directed from the CP by the EC. | EPI-101 | HLL-3/13 |
| 148. | ERP 6.5.1.4 | Weld County Regional Communications Center will be called for a fire. | EPI-103 | HLL-3/13 |
| 149. | ERP 6.5.1.5 | Decontamination supplies will be maintained at the ISFSI. | EPI-108 | HLL-3/13 |
| 150. | ERP 6.5.1.6 | Equipment is available to perform radiation monitoring inside and outside of the ISFSI. | EPI-108 | HLL-3/13 |
| 151. | ERP 6.5.1.7 | Seismic instrumentation can be evaluated by a computer link. | TPR-5665 | HLL-3/13 |
| 152. | ERP 6.6.1.1 | A training and annual retraining program is maintained. | EPI-109 | HLL-3/13 |
| 153. | ERP 6.6.1.2.1 | Drills and exercises are conducted periodically. | EPI-108 | HLL-3/13 |
| 154. | ERP 6.6.1.3 | Communications links and notification procedures are tested on a periodic basis. | EPI-108 | HLL-3/13 |
| 155. | ERP 6.6.2.1 | ERP is reviewed and updated annually. | EPI-108 | HLL-3/13 |
| 156. | ERP 6.7 | Recovery is performed under the direction of the Recovery Manager. | EPI-80 | HLL-3/13 |