

TMI-2 License Renewal Status, Cost/Schedule Update and Recommendation

DRAFT

The project schedule documented in PLN-3660, Revision 1 is provided below with an activity status.

Activity	Early Start Date	Early Completion Date	Status
Scoping Evaluation	April 2011	October 2011	Completed and documented in EDF-5589, Revision 1, May 2012.
Pre-Application Meeting with USNRC	October 2011	October 2011	First meeting was conducted in September 2013.
Aging Management Review (AMR, TLAA, AMP, LBD inclusive)	October 2011	January 2016	Behind schedule, but have completed the required remote visual inspections.
Renewal Application	January 2016	March 2017	As Scheduled
Requests for Additional Information (RAI)	March 2017	March 2019	As Scheduled

During the September 2013 pre-license application meeting with the USNRC, the following further detailed schedule was presented.

Activity	Early Start Date	Early Completion Date	Status
Aging Management Review (AMR)	October 2011	December 2014	Delayed in 2013 and 2014 due to competing priorities. Remote visual inspections were completed, but awaiting funding to continue the rest of the review. Should be able to complete in 2015.
Time-Limited Aging Analyses (TLAA)	January 2014	December 2014	Pending outcome of AMR, but should be able to complete in 2015.
Aging Effects Management Program (AMP)	October 2011	No Completion Date	Although concrete inspections have been ongoing for several years, PLN-4493 (AMP) was issued in May 2013. Updates will occur as inspections and SSC-specific AMRs are

			completed.
License Basis Document Changes (LBD)	January 2015	December 2015	SAR chapters, Environmental Report, and Decommissioning Plan updates should be completed in 2015, but carry over into 2016 is acceptable.
Interface Meetings with USNRC	October 2011	December 2016	One completed, but anticipate the need for a couple more meetings, with one being in Idaho to visit the ISFSI. Also anticipate several teleconference meetings to discuss RAIs.

PLN-3660 indicates the initial project was estimated to cost \$2.7M based on an actual \$924K for the FSV ISFSI license renewal, an estimated \$1.3M for AMRs and AMP development, and \$496K for canister inspection (remote visual inspection). The Budgeted Cost of Work Performed (BCWS) during ICP II for TMI-2 ISFSI license renewal (WBS E.1.03.01.04) was/is as follows.

Units	2013 BCWS	2014 BCWS	2015 BCWS	Total BCWS
Dollars	136,865	284,695	162,985	584,545
Hours	950	970	1,150	3,070

The TMI-2 ISFSI license renewal (WBS E.1.03.01.04) performance and funding analysis as of October 2014 indicated the following Actual Cost of Work Performed (ACWP) and Estimate to Completion (ETC).

Units	2013 ACWP	2014 ACWP	2015 ETC	Total
Dollars	3,764	7,637	139,671	151,072
Hours	23	50	840	913

In response to the DOE-ID Facility Director's request, the following should be noted and/or is recommended:

- The remaining AMR schedule for the HSMs, DSCs, Support Structures, End Shield Walls, and Defueling Canisters (content inclusive) needs to be compressed into the balance of FY 2015 with minimal carryover into FY 2016. At least \$140K of funding should be requested/allocated to cover the 840 hours needed for three engineers (280 hours each) to complete the AMR. Additional funding allocation will provide surety of completing the AMR work in FY 2015.
- Technology Development (WBS T.M.02.01.07) funding covered the cost for performing remote visual inspection necessary to meet the NUREG-1927 requirement for license renewal application. However, based on the conditions observed in HSM 16/DSC 2, a few more HSMs/DSCs should be visually inspected. The AMR results will surely recommend this. Some

funding (\$100K) should be allocated to cover this cost, but can be moved into FY2016 as necessary.

- The extent of corrosion observed on one DSC may warrant the need for development of a TLAA, but the need for additional TLAA's is not anticipated. Such was the case during the FSV ISFSI AMR. An additional \$100K should be allocated to cover this cost.
- The cost for periodic updates to the AMP as SSC AMRs are completed can and should be covered under the TMI-2 ISFSI Operations cost.
- License Basis Document updates can be completed in FY 2015/2016, but additional funding allocation (\$50K) will be needed for this portion of the project to get started.
- A total funding allocation request of \$500K is therefore recommended.