

- **NDCAP  
Presentation**

- **Observations from Meeting with San Onofre  
September 7, 2023**

- **Paul Blanch Nuclear Energy Consultant**

- **Effectiveness of  
NDCAP**

- **Based on my distant and informal observations, I have found the NDCAP endeavors to be valuable and productive.**

# • **SONGS Issues of Interest and Observations**

- **- Retrievability, as defined in 10 CFR 72.122(I)**
- **- Lack of a canister transporter**
- **- Inability to detect loss of helium due to chloride stress corrosion cracking**
- **- No effective radiation monitoring 10 CFR 72.122(i)**
- **- Flooding at SONGS --not an issue for VY**
- **- Transportation**
- **- Residual below ground radioactivity remaining after decommissioning**
- **-Unlike SONGS, I do not see any immediate safety issues at VY.**

- **10 CFR 72.122(I)**

- (I) ***Retrievability***. Storage systems must be designed to allow ready retrieval of spent fuel, high-level radioactive waste, and reactor-related GTCC waste for further processing or disposal.

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- **10 CFR 72.122(h) states:**

“(4) Storage confinement systems must have the capability for continuous monitoring in a manner such that the licensee will be able to determine when corrective action needs to be taken to maintain safe storage conditions. **For dry spent fuel storage, periodic monitoring is sufficient provided that periodic monitoring is consistent** with the dry spent fuel storage cask design requirements. The monitoring period must be based upon the spent fuel storage cask design requirements.”

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# • 10 CFR 72.122(i)

- **10 CFR 72.122(i) *Instrumentation and control systems.*** Instrumentation and control systems for wet spent fuel and reactor-related GTCC waste storage must be provided to monitor systems that are important to safety over anticipated ranges for normal operation and off-normal operation. Those instruments and control systems that must remain operational under accident conditions must be identified in the Safety Analysis Report.
- ***For dry spent fuel storage, periodic monitoring is sufficient provided that periodic monitoring is consistent with the dry spent fuel storage cask design requirements. The monitoring period must be based upon the spent fuel storage cask design requirements.***

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- **Conclusions,  
Recommendations,  
Questions?**

- **Is the radiation monitoring adequate?**
- **Will VY meet the Retrievability Regulation?**
- **How will VY detect canister leakage?**
- **What is the impact of the loss of helium??**
- **Feedback from NDCAP**

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