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Assumptions for Evaluating Feasibility of Direct Geologic Disposal of Existing Dual-Purpose Canisters

Fuel Cycle Research & Development

Prepared for U.S. Department of Energy Used Fuel Disposition Campaign

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Revision History

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The previous version of this report (Rev. 0) included substantial contributions from authors Andy Miller (now at Emporia State University) and Robert Rechard (Sandia National Laboratories).

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ACRONYMS

US United States

YFF Youngest Fuel First

ASSUMPTIONS FOR EVALUATING FEASIBILITY OF DIRECT DISPOSAL OF EXISTING DUAL-PURPOSE AND STORAGE-ONLY CANISTERS IN VARIOUS MEDIA

1. INTRODUCTION

In the *Nuclear Waste Policy Act of 1982* (NWPA), Congress required the U.S. Department of Energy (DOE) to cooperate with the private sector to conduct demonstrations of alternatives to storage of used nuclear fuel (UNF) in pools (NWPA 1983). The demonstration was to be licensed by the U.S. Nuclear Regulatory Commission (NRC). The cooperative program, which licensed its first demonstration in Virginia in 1986, and various additional studies, provided a foundation for utilities to build dry cask storage to alleviate the limited wet storage available at reactors. A variety of dry fuel storage systems have been developed and deployed since 1986. The total inventory of UNF currently consists of more than 65,000 metric tons of heavy metal (MTHM) discharged from reactors as of 2010, of which more than 25% is stored in approximately 1,700 dry storage canisters. Most of these canisters are, or can be licensed for transportation in addition to storage, and are referred to as dual-purpose canisters (DPCs). A few older systems are single purpose (storage only), and none of the systems are licensed for disposal. The amount of UNF that will be transferred from wet to dry storage is expected to increase at a rate of approximately 100 DPCs/yr. The nuclear power industry is currently using large DPCs, typically containing 32 or more assemblies from pressurized water reactors (PWRs), or boiling water reactor (BWR) equivalent.

1.1 Objective of Evaluation

Direct disposal of the DPCs in a geologic repository is beyond current domestic and international capabilities (Hardin et al. 2012). The large capacities of loaded canisters could require significant duration of surface decay storage, and greater thermal loading may limit the choice of geologic disposal media or may require ventilated, open-drift emplacement. Control of postclosure criticality in the far future after waste packages are degraded by corrosion is another challenge.

This report is part of a multi-year study by the Used Fuel Disposition (UFD) R&D campaign to identify, research, and evaluate technical challenges to DPC direct disposal. The results will provide input to waste management strategy decisions that include the extent to which direct disposal could be deployed in the U.S.

The principal alternative to direct disposal of DPCs is re-packaging of UNF into smaller, purpose-designed canisters for disposal. Re-packaging would increase flexibility in selecting concepts or sites for disposal, potentially decrease surface decay storage duration, and avoid any need to modify DPCs for criticality control. However, re-packaging could incur significant additional costs. As an example, the Virginia Electric Power Company (Dominion) has estimated that the total cost of re-packaging some of their dry storage canisters would be \$1.5 million per storage canister: \$150K for unloading, \$150K for re-loading, \$1M for a new canister, and \$200K for disposal of the old canister/cask (Rice 2011). In addition, they estimate that re-packaging would increase personnel radiation exposure by an estimated 250 person-mrem per canister.

1.2 Approach

The general approach for this study began in 2012 with an initial Scoping and Assumptions phase, as described in the multi-year plan (Howard et al. 2012, Section 3). This report is the result of that phase. Its purpose is to provide background on the current status of DPCs and single-use canisters (Chapter 2), and define the assumptions that will be used throughout the study to represent technical, regulatory, and administrative constraints (Chapter 3). The original version of this report (FCRD-UFD-2012-000352 Rev. 0) was used during FY13 to identify disposal concepts for evaluation, perform scoping thermal, criticality and logistical analyses, and establish direction for supporting R&D. This update (Rev. 1) changes some of the technical and regulatory assumptions to address lessons learned from technical analysis, and is intended to guide the study through FY14 and beyond.

2. CATALOG OF DRY STORAGE SYSTEMS

Chapter 2 documents principal canister characteristics in order to support future technical analyses related to direct disposal of DPCs, and provide preliminary information for consideration in standardized canister design (Howard et al. 2012, Section 3.1.3). Descriptive information on DPCs was obtained through licensing documents (Tables A-1 and A-2). Data from licensing documents on burnup and enrichment limits, and the age of fuel in dry storage, are compared to projected values from the logistics simulation code CALVIN (BSC 2003b) in Section 2.4. A parallel effort has gathered information on dry storage canisters currently in use at both operating and shutdown reactor sites, and is summarized by a spreadsheet of these characteristics (LeDuc 2012) updated in Table A-3 (filename: *DryCask&WetStagedStorage US_20130205.xls*).

Throughout this discussion the terms canister and cask have specific meanings. A canister is sealed by welding and generally not reusable. Canisters are designed to be used with shielded transfer, storage, and transportation casks that are reusable and have bolted closures. Another type of cask accepts one or more bare fuel assemblies and may be used for storage or transportation, but typically not both.

2.1 Methodology and Resources

2.1.1 Information Presented

The starting point for the data collection effort presented here was a spreadsheet developed under the Transportation/Storage Logistics UFD work package, which listed several characteristics of canisters currently in use. These characteristics include: utility company and site, canister vendor, type of reactor (PWR/BWR), total number of canisters by type and location, and other information related to storage and transportation. This analysis extended the information to include characteristics important to direct disposal of DPCs.

The information presented here for DPCs consists of

- External dimensions (length, diameter)
- Assembly capacity (PWR and BWR)
- Maximum loaded mass
- Maximum thermal output vs. time for both storage and transportation.

In addition the following information was sought for the most commonly used systems:

- Design-basis burnup
- Canister shell material composition
- Canister internal materials and structural design
- Basket materials
- Neutron absorber materials
- Spacers and thermal shunts
- Shield plug (if any)
- Other hardware components (e.g., control rods/burnable poison inserts)
- Actual content of loaded DPCs
- Method relied on for criticality control (e.g., burnup credit, flux traps).

Most of these items were obtained for the more commonly used canister systems. Items that were not obtained include the actual content of loaded DPCs, and thermal histories. These two items are not included among the sources used in this study. Although no information was found on DPC thermal output as a function of time, the maximum initial thermal output (before decay) is a well-documented design specification, and time history can be approximated using initial enrichment, burnup, and fuel age. Limits specified by the license are included both for the canister as a whole and on a per assembly basis. Other information that may be important to future analyses was also included. These items include: internal diameter, canister weight without fuel, min/max loaded weights, and min/max initial uranium enrichment. The spreadsheet also lists originating documents for the listed information. The output from this analysis is both the spreadsheet itself as well as the collected documents. All of this is archived on the Advanced Nuclear Energy Program (ANEP) SharePoint site at Sandia National Laboratories (SNL). The spreadsheet is presented in Tables A-1 and A-2.

An ongoing industry survey, is expected to round out the available information on existing dry storage, and to improve projections. The as-loaded description of existing dry storage systems will be forthcoming from the GC-859 survey of utilities, similar to the RW-859 survey performed in 2002 by the DOE Energy Information Administration. The GC-859 survey is currently underway and the results are expected to be available in 2014 or 2015. Until then, the available information on DPCs and fuel inventory is limited to that represented by Appendix A to this report.

Another source of DPC information is the UNF – Storage, Transportation & Disposal Analysis Resource and Data System (UNF–ST&DARDS) database that is managed by Oak Ridge National Laboratory (Peterson et al. 2013), which contains detailed as-loaded information for DPCs at just a few storage sites.

2.1.2 Resources Accessed

The majority of the information gathered here originated from the Agency-wide Documents Access and Management System (ADAMS) on the NRC website. The ADAMS website is divided into two main sections: the Public Library and the Public Legacy Library. The Public Library consists of publicly available documents for which electronic, downloadable copies are available. The Public Legacy Library contains documents that are publicly available but which are not currently available electronically. Obtaining these documents requires a fee to transfer the material from microfiche to electronic versions. A final document type, which is not included in ADAMS, is non-publicly available documents. Although these documents cannot be found through a search on ADAMS, their presence can be detected through other generic search engines (e.g., Google) or from other NRC documentation. Obtaining a non-publicly available document requires making a request under the Freedom of Information Act (FOIA). The documents used here all fall into the first category (ADAMS, Public Library) and were downloaded from the ADAMS website. The other two document types were not pursued, mainly because similar information can be found through other avenues. Also, the few documents that fall into the latter two categories are for canister systems making up only a small fraction of the total number of canisters currently in use.

From the ADAMS website, several main document types could be found relating to the performance characteristics of dry storage canisters. These include (1) the Final Safety Analysis Report (FSAR, also referred to as a Topical Safety Analysis Report, TSAR), (2) a certificate of compliance (COC) for licensed canisters, and (3) a safety evaluation report (SER). The FSAR is the most informative of these documents. It is the culmination of thermal, mechanical, criticality, and operational analyses. The vendor must submit the FSAR to the NRC. The NRC response to the FSAR is the SER and eventually a COC in most cases. Common components of the FSAR include: a general canister description, principal design criteria, structural evaluation, thermal evaluation, shielding evaluation, criticality evaluation, confinement evaluation, operating procedures, canister maintenance, radiation protection and accident analyses. Several of the vendors submitted an "umbrella" FSAR with generic analyses for the canister. Specific consideration of a certain packing condition is then given in an appendix. For example, the Transnuclear NUHOMS series of DPCs uses a single external canister for the majority of their designs but uses different internal components to allow for different fuel arrangements and capacities. The umbrella FSAR addresses the external canister, while the separate appendices give specifics on the internal components and associated analyses for the different fuels and configurations.

A few other documents found through internet searching were also used, including documents from DOE and the Electric Power Research Institute (EPRI). These documents describe testing of the canisters by DOE, or general fuel storage documents from EPRI. For a few of the canisters, an FSAR from an Independent Spent Fuel Storage Installation (ISFSI) was used.

A recently published volume summarizing DPC characteristics and implementation (Greene et al. 2013) includes a wide range of descriptive data for all dry storage systems (canister-based and casks). Because of its coverage and detail, the reader is referred there for additional information. The following sections are provided for background.

2.1.3 Data Limitations

Values tabulated in Tables A-1 and A-2 are generally limits, based on licensing documents as noted. Also, in some cases, optional components or fuel-specific modifications are mentioned with conditions for use. For example, fuel with greater heat output may require thermal shunts. Depending on the geometry of fuel assemblies and the canister, spacers may be required. Licensing documents do not have the as-built information to determine how such components or modifications are used. A similar limitation on data from licensing documents is small uncertainties associated with system specifications such as canister length and diameter, system weight, etc., which can vary according to how such parameters are used in supporting analyses. Licensing documents are inherently limited. While Final Safety Analysis Reports (FSARs) contain much useful information, they are not available for all canister types. As-loaded information is often protected for security reasons.

2.2 Results

More than 1,570 loaded dry storage systems are currently in use at active or decommissioned reactors. Figure 1 shows the proportion of the total made up by each canister type. This same data are re-plotted in Figure 2 with the individual canister types grouped based on design and

vendor. Canister systems from a single vendor often share design features such as physical dimensions and material compositions. The top five canisters in use today are the HI-STORM MPC-68 (Holtec), the NAC-UMS UMS-24 (NAC International), the NUHOMS 24P (Transnuclear), the HI-STORM MPC-32 (Holtec), and the NUHOMS 61BT (Transnuclear). When broken down by vendor/design, just three vendors have provided approximately 75% of the total canisters in use. These are, in descending order: NUHOMS (Transnuclear), HI-STORM (Holtec), and NAC-UMS UMS-24 (NAC International).

Figure 1. Relative frequency of storage systems in use.

Figure 2. Relative frequency of existing storage systems grouped by design and vendor.

2.3 Comparison of Canister Designs

Designs for the most popular canisters are similar. Basic design features for these systems are likely to remain popular for some time, and are therefore representative. The basic design and components for a majority of existing dry storage canisters are shown in Figure 3. Among the commonly used canisters, nearly all use stainless steel for major components (canister shell, fuel basket, shield plugs, and top and bottom containment and structural lids). Overall dimensions are largely determined by the fuel and are therefore similar. Shell thickness for the most popular canisters is typically 1.5 to 3.7 cm and overall length is just under 5 meters. Canister weights are variable, with empty canisters weighing from \sim 13 to 56 metric tons (MT). Heavier systems are early, outlier designs and include casks. The most commonly used DPCs weigh from 15 to 25 MT when empty, and from 34 to 46 MT when fully loaded and sealed. Maximum initial thermal limits range from 12.5 to 40.8 kW (including systems for both PWR and BWR fuel). Thermal limits for the more commonly used systems range from approximately 18 to 37 kW.

Internal component designs are also similar among different storage systems, with the greatest differences in materials used, and whether the fuel basket uses a grid of plates ("egg-crate") or tubes to hold individual assemblies. Baskets are typically made from stainless steel, and typically include the fuel assembly grid or tubes, basket supports (rods and rings), and spacer disks. For criticality control borated aluminum (e.g., Boral®) is typically used, fixed in place by welded covers of stainless steel in thin sheets.

Spacer disks are oriented transversely (Figure 1) and may be made from stainless steel or aluminum. The aluminum disks serve as thermal shunts are are typically alternated with stainless steel ones. Shield plug materials include stainless steel, coated carbon steel, and lead or depleted uranium encased in stainless steel. Coatings are used with reactive materials such as carbon steel to prevent particulate shedding in fuel pools. The major differences in design relate to the numbers of fuel assemblies, and the use of flux traps for criticality control in PWR fuel storage canisters. Figure 3 shows the construction of a typical storage canister of the NUHOMS design containing 24 PWR assemblies.

Among less common systems there is a wider range of designs, such as thick-walled casks with cooling fins. These designs are more difficult to typify. For example, the MC-10 cask design (Efferding 1990) shown in Figure 4 has a wall thickness up to 60 cm for integral shielding. Hydrogenous moderator rods are used for neutron absorption. The exterior fins dissipate heat. In the less common designs there is also wider use of materials other than stainless steel, for example, the CASTOR V/21 system uses a canister shell composed of nodular cast iron with nickel plating (variants of the CASTOR system are common internationally). Various types of steel are used in these designs, including Type 304 and 316 stainless steels in various grades, SA-516 Grade 70, and SA-203 Grade E. Overall, these less common systems comprise a relatively small fraction (<20%) of dry storage systems, and this fraction is likely to decrease as more recent designs proliferate.

Source: TransNuclear (2004, Appendix N)

Figure 3. Representative design of DPC canister. NUHOMS 24PHB shown.

A previous study considering the feasibility of direct disposal of DPCs at an unsaturated, openmode repository (BSC 2003a) found that the major concerns are: 1) postclosure criticality; 2) physical dimensions; and 3) vertical handling modifications for canisters designed for horizontal storage. Neutron absorbing materials used for criticality controls (e.g., Boral®) can degrade and mobilize in certain disposal environments, separating from the fuel assemblies. Stainless steel supports can also degrade so that the internal fuel structure collapses. These findings were relevant for a specific disposal concept, in an oxidizing environment with groundwater present in amounts sufficient to flood breached waste packages. Suitability of other disposal concepts for DPC disposal will be addressed in the feasibility study. The previous study identified the importance of comprehensive burnup credit in postclosure criticality analyses for DPCs (BSC 2003a).

Figure S-1. MC-10 Spent Fuel Storage Cask Source: Dominion (2004)

Figure 4. Representative uncommon canister design. MC-10 shown.

2.4 Comparison of License Values to Calculated Values

As mentioned previously, the data presented here for burnup and thermal limits on storage systems are defined in licensing documents, and bound the characteristics of UNF actually in storage. For additional perspective, the CALVIN 4.0 (BSC 2003b) database was queried to estimate burnup, enrichment and fuel age for fuel in dry storage. For each of these measures CALVIN reports the average, maximum, and minimum for each site with dry storage. CALVIN 4.0 has limitations, chief among them is that post-2002 data are projections. Also, the data capture most of the sites and most of the systems in use, but are incomplete. Data were tabulated for the more popular canisters located at 53 sites (Table 1), and a few representative values and trends are observed. Figures 5 through 8 show the characteristics for representative storage systems at these sites.

Figures 5 through 8 show the average, minimum, and maximum burnup by site for five commonly used storage systems shown also in Table 1 (HI-STORM MPC-68 and MPC-32, NAC-UMS-24, NUHOMS 24P and 61BT). Of the 37 sites known to be using at least one of these five systems, 27 are represented in the figures. In general, the projected average burnup values are lower than the licensed maximum values. Overall, the average values are distributed through a range of 30 to 90% of the maximum value. The few instances where CALVIN projections are slightly larger than the maximum, can be attributed to limited precision of the estimates.

Similarly, the projected enrichment values for UNF in dry storage are mostly lower than the licensed maximum values (Figures 9 and 10). Figure 11 shows that UNF age and burnup have a weak, negative correlation. That trend is expected to continue as facilities continue to increase burnup in reactor operations.

Site	Cask System	Canister Type	Site	Cask System	Canister Type
SURRY	Castor	V/21 and X33	PALO VERDE	NAC-UMS	UMS-24
ARK NUCLEAR	FuelSolutions	VSC-24	HADDAM NECK	Note A	$MPC-26$
PALISADES	FuelSolutions	VSC-24	BEAVER VALLEY	Note A	Note A
POINT BEACH	FuelSolutions	VSC-24	PERRY	Note A	Note A
BIG ROCK	FuelSolutions	W150	DAVIS-BESSE	NUHOMS	24P
HUMBOLDT BAY	HI-STAR	MPC-80	OCONEE	NUHOMS	24P
BYRON	HI-STORM	$MPC-32$	RANCHO SECO	NUHOMS	24PT
DIABLO CANYON	HI-STORM	$MPC-32$	SAN ONOFRE	NUHOMS	24PT1
FARLEY	HI-STORM	$MPC-32$	CALVERT CLF	NUHOMS	32P
INDIAN PT 1&2	HI-STORM	$MPC-32$	FORT CALHOUN	NUHOMS	32PT
INDIAN PT 3	HI-STORM	$MPC-32$	GINNA	NUHOMS	32PT
SALEM	HI-STORM	$MPC-32$	KEWAUNEE	NUHOMS	32PT
SEQUOYAH	HI-STORM	$MPC-32$	MILLSTONE	NUHOMS	32PT
BROWNS FERRY	HI-STORM	MPC-68	SEABROOK	NUHOMS	32PTH
DRESDEN	HI-STORM	MPC-68	ST LUCIE	NUHOMS	32PTH
FITZPATRICK	HI-STORM	MPC-68	SUSQUEHANNA	NUHOMS	52B
GRAND GULF	HI-STORM	MPC-68	COOPER STN	NUHOMS	61BT
HATCH	HI-STORM	MPC-68	DUANE ARNOLD	NUHOMS	61BT
HOPE CREEK	HI-STORM	MPC-68	MONTICELLO	NUHOMS	61BT
QUAD CITIES	HI-STORM	MPC-68	OYSTER CRK	NUHOMS	61BT
RVR BEND	HI-STORM	MPC-68	BRUNSWICK	NUHOMS	61BTH
VT YANKEE	HI-STORM	MPC-68	ROBINSON	NUHOMS	7P
WASH NUCLEAR	HI-STORM	MPC-68	TROJAN	Transter Cask	MPC-24E/EF
YANKEE-ROWE	NAC-MPC	MPC-36	NORTH ANNA	TN Metal Casks	TN-32
CATAWBA	NAC-UMS	UMS-24	PRAIRIE ISL	TN Metal Casks	TN-40
MAINE YANKEE	NAC-UMS	UMS-24	PEACHBOTTOM	TN Metal Casks	TN-68
MCGUIRE	NAC-UMS	UMS-24			

Table 1. Sites and canisters considered at each site (data from CALVIN 4.0, BSC 2003b).

Note A: From CALVIN 4.0 database.

Note: Shaded cells show burnup ranges in Figures 5, 6, 7, and 8.

Note: The solid columns represent average burnup, and the bars are maximum and minimum values. The maximum authorized burnup is 68,200 MW-d/MTU.

Figure 5. Burnup for sites using the HI-STORM MPC-68 (BWR) canister.

Note: The solid columns represent average burnup, and the bars are maximum and minimum values. The maximum authorized burnup is 68,200 MW-d/MTU.

Figure 6. Burnup for sites using the HI-STORM MPC-32 (PWR) canister.

The solid columns represent average burnup, and the bars are maximum and minimum values. The maximum authorized burnup is 45,000 MW-d/MTU.

Figure 7. Burnup for sites using the NAC-UMS 24 (PWR) canister.

Note: The red columns are type 24P, and the blue columns are 61BT. The columns represent average burnup, and the bars are maximum and minimum values. The maximum authorized burnup is 40,000 MW-d/MTU for both canister types.

Figure 8. Burnup for sites using NUHOMS (PWR and BWR) canisters.

Note: The solid columns are average values, and the bars are maximum and minimum values. The open columns are maximum licensed values.

Figure 9. Percent enrichment by reactor site.

Note: The solid columns are average values, the bars are maximum and minimum values. The open columns are the maximum licensed values.

Figure 10. Percent enrichment by reactor site.

Figure 11. Fuel age as a function of burnup.

It is clear from these figures that using the maximum values from license documents is conservative. A good alternative is to use quantiles of data generated for discrete canisters, to better understand the distributions of important parameters. Generating data for discrete canisters from CALVIN 4.0 is more labor intensive, but for illustrative purposes, projections for individual canisters at the Dresden site were generated. Dresden was chosen as it has a relatively large number of HI-STORM MPC-68 canisters. Dresden has one retired reactor, and the overall fuel age is slightly older than the fleet average. CALVIN estimates the total number of canisters to be 60, while the actual number is 45. Figure 12 shows a cumulative distribution function of burnup for the 60 MPC-68 canisters listed by CALVIN. The distribution (for canister averages reported by CALVIN) is smooth and nearly linear from approximately 7,000 to 32,000 MWd/MTU.

Further specifics for the Dresden projections are given in Table 2. There are a few small discrepancies between integrating CALVIN data at the site level compared to the canister level. Again, they show that the CALVIN estimates have limited precision, but that using the licensed maximum values for canister characteristics is conservative.

Figure 12. Cumulative distribution of burnup for the 60 total HI-STORM MPC-68 canisters listed in CALVIN for the Dresden site.

		CALVIN 4.0 All fuel assemblies at Dresden site	CALVIN 4.0 Averages for loaded canisters
Burnup (MW-d/MTU)	Average	23,271	22,988
	Minimum	3,388	7,161
	Maximum	33,835	31,692
	Average	2.37	2.34
Initial Enrichment (%)	Minimum	1.47	1.99
	Maximum	2.82	2.82
	Average	32.69	32.66
Age (yr)	Minimum	24.17	24.17
	Maximum	43.32	42.37

Table 1. CALVIN data comparison when integrated by site or by canister.

3. ASSUMPTIONS FOR EVALUATING FEASIBILITY OF DIRECT DISPOSAL OF DUAL-PURPOSE CANISTERS

Feasibility evaluation for direct geologic disposal of dual-purpose and storage-only canisters will be evaluated using targeted technical and regulatory analyses. Assumptions are needed because: 1) the analyses are generic (no site specified); 2) there is a recognized need for statutory and regulatory changes or clarifications (BRC 2012); and 3) the timing of disposal is uncertain so that the future state of the overall fuel management system in the U.S. must be assumed. The goal of these assumptions is to provide a common, underlying basis for targeted analyses, and not to specify how the analyses will be conducted. Assumptions are categorized into three areas:

- Engineering and technology assumptions
- Statutory and regulatory framework for disposal
- Logistical, regulatory, and technological assumptions related to storage and transportation that influence disposal feasibility

3.1 Engineering and Technology Assumptions

3.1.1 DPC Characteristics

1. DPCs contain commercial UNF. Average burnup for existing UNF in dry storage is nominally 40 GWd/MT, with a bounding value of 60 GW-d/MT for future DPCs. These values may be used in generalized analyses to evaluate DPC disposal feasibility (more reactor-site specific or canister-specific bounding values may be available as discussed in Section 2).

Basis: Analysis and projections in Carter et al. (2012), and an assumption that UNF in DPCs is similar to the overall average of the total inventory. In fact, the enrichment and burnup of UNF in DPCs may be less than the overall averages reported by Carter et al. (2012), as indicated from the data summary (Section 2).

2. The capacity of DPCs is typically 32 PWR assemblies or 68 BWR assemblies. Larger DPCs are now available (Greene et al. 2013) from NAC International (Magnastor 37/87 system, nominally 37-PWR or 87-BWR), Holtec International (MPC-37/88, nominally 37-PWR or 88-BWR), and Transnuclear (NUHOMS 37 series).

Basis: The 32-PWR size (or BWR equivalent) is typical and addresses a great majority of existing canisters. For limiting analysis the larger size (37-PWR or BWR equivalent) should be used.

3. Storage-only canisters can be included in the evaluations.

Basis: Storage-only canister based systems include the MSB (24-PWR, Energy Solutions) and the NUHOMS-24PS, -24PL, -24PHBS, -24PHBL, -52B and -07P (Transnuclear). These canisters currently exist at the Idaho National Laboratory, and at the Calvert Cliffs, Surry, Oconee, Arkansas Nuclear One, Palisades, Davis-Besse, Point Beach, Susquehanna, and H.B. Robinson nuclear power plants. These are sealed canisters, not to be confused with non-canistered cask systems (storage-only or storagetransportation) which have bolted closures. An implementing organization could develop approaches to allow transport to a centralized storage facility, and then a repository.

4. DPCs designed for vertical storage can be readily approved, with modifications as appropriate, for horizontal disposal.

Basis: The NUHOMS canister systems are all designed for horizontal storage and transport, and constitute a large fraction of the existing DPCs. Modifications to canisters designed for vertical storage (and horizontal transport for DPCs) can be readily licensed and implemented to allow horizontal disposal.

5. DPCs designed for horizontal storage can be readily transferred to disposal overpacks in either vertical or horizontal orientation, for disposal.

NUHOMS canisters do not include features that allow direct lifting of the loaded and sealed canister, for example to remove them from transportation casks in vertical orientation. The NUHOMS system is designed with lifting features on the transfer cask, which may be loaded vertically (e.g., in the fuel pool) or horizontally (e.g., for unloading horizontal storage vaults). To package these canisters for disposal, new fixtures are needed, for example to slide canisters horizontally from either transportation casks or transfer casks, into disposal overpacks. This handling issue was identified by BSC (2003a, Section 3.2).

6. Existing canisters may be analyzed for uniform average enrichment, average burnup, and average age for the assemblies contained.

Basis: This simplifying assumption avoids the complication of nonuniform loading within canisters, whereby cooler or less reactive assemblies are intentionally placed in certain positions of a DPC basket. The assumption may be used with thermal management analyses, if a suitably conservative maximum canister wall temperature (e.g., 200°C; BSC 2008) is used, to ensure that fuel temperature does not exceed prescribed limits (350°C; CRWMS M&O 2000). Results obtained with uniform loading can be tested later for specific cases of nonuniform loading.

Investigators may choose not to apply this assumption for some analyses, and to use assembly-specific information instead. For example, analysis of DPC nuclear reactivity (Hardin et al. 2013) may exploit reactivity margin inherent in differences between the asloaded canister contents, and the fuel content assumptions used to license the canister design.

7. Residual moisture in sealed DPCs can be estimated from the drying procedures required in license documents.

Basis: Direct measurement of residual water content is not possible for sealed canisters. To the extent that residual moisture content in sealed canisters is important, it can be estimated.

3.1.2 Disposal Concepts

1. Surface decay storage of DPCs and storage-only canisters for up to 100 yr (out-ofreactor) can be assumed in disposal feasibility evaluations.

Basis: This assumption is equivalent to an assumption that storage licenses can be extended to 100 yr, and that transportation licenses can be extended to fuel with 100-yr age. It is based on reasonable projections of current trends, but has not been substantiated by regulatory findings as to 100-yr extended storage or associated transportation.

This assumption is generally consistent with an "No Action Alternative" considered in an Environmental Impact Statement for a geologic repository. The EIS assumed that storage facilities would be completely replaced in 100 years and possibly every 100 years afterword, including the *existing* DPCs (DOE 2002).

2. Open emplacement modes (Hardin et al. 2012) are limited to 50 yr of operation (e.g., ventilation) after waste emplacement in a disposal panel.

Basis: The combined durations of surface storage and repository operation will not be evaluated beyond 150 yr out-of-reactor, to limit any additional assumptions about longterm stability of institutions responsible for waste management. Note that SNF will be produced in the U.S. for at least 90 years (from circa 1965 to 2055 or beyond), and that emplacement operations could be of similar duration to allow for cooling and other factors. Thus, combined duration in terms of time since reactor discharge is a more representative measure of disposal conditions.

3. Thermal limits will not be assigned to the disposal system *a priori*. Rather, near-field peak temperature targets or other thermal criteria will be used to evaluate thermal loading of the repository and repository performance.

Basis: Near- and far-field temperature limits have been imposed previously (DOE 2008), but we wish to evaluate whether previous limits can be relaxed and still show adequate performance, provided sufficient scientific understanding of thermal behavior in various media has increased

4. Underground handling and transport of DPCs will be shielded.

Basis: Shielded transporters and handling equipment substantially decrease the risk of accidental worker exposure, and are the norm in disposal concepts being investigated world-wide.

5. Disposal mode may be shielded (e.g., by borehole emplacement) or unshielded (e.g., indrift emplacement).

Basis: Both shielded and unshielded modes continue to be investigated internationally, and have been investigated by previous studies in the U.S.

3.1.3 Criticality Analysis

1. Analysis of postclosure criticality will include include burnup credit (i.e., actinides and fission products), and assembly-specific or cask-specific characteristics.

Basis: Past studies have identified situations where burnup credit and more detailed modeling (principal isotopes, BSC 2003a; more complete isotopics, EPRI 2008) is needed in DPC disposal analysis.

2. Consequence analysis may also be used to include or exclude postclosure criticality.

Basis: Previous studies (e.g., Rechard et al. 1996) have shown that criticality events may not significantly change postclosure repository performance. Additional analysis may be needed to determine the type of criticality event that could occur, and the impact of heat and pressure on the disposal system.

3. Reactor operating records can be used for selecting more realistic modeling parameters to characterize the discharge isotopic composition and residual reactivity levels associated with UNF

Basis: Numerous studies (e.g., Wagner and Sanders 2003) have examined the impact of depletion and criticality analysis assumptions which suggest that a considerable amount of uncredited margin is incorporated into most cask loadings. Reducing uncertainty associated with parameter selection and calculating more realistic safety margins will enable a higher percentage of DPCs to satisfy subcriticality requirements.

3.1.4 Surface Facilities

1. Canisters will be sealed at the reactors or at a centralized storage facility and SNF will not be removed at the repository. However, opening and subsequent re-sealing of dewatering ports may be permitted.

Basis: This study will consider canister remediation options that involve re-opening the canister, such as pumping filler material in through dewatering ports. Canisters would be re-sealed prior to disposal.

2. Surface facility throughput will be sufficient to dispose of all nominally storage-only canisters and DPCs at minimum age/burnup.

Basis: Surface facilities can be readily designed, constructed and operated to handle and package DPCs for disposal. Such facilities would be similar in scope, with similar throughput, as previously designed facilities to package transportation-aging-disposal (TAD) canisters (DOE 2008). This assumption is needed for logistical studies and costing, where the size of facilities and the duration of operations are estimated.

3. Any necessary DPC inspection can be done remotely in a hot cell, and detected damage can be corrected or mitigated by re-packaging.

Basis: Inspections may be required to confirm the condition of canisters prior to packaging and emplacement, to protect workers, and to conform to postclosure waste isolation related requirements as applicable. Canisters may accumulate minor damage from corrosion, especially if stored in marine environments.

3.2 Statutory and Regulatory Framework for Disposal

The generic health standard for mined geologic disposal (40 CFR 191) from the U.S. Environmental Protection Agency (EPA) is still in force, and could in principle be applied to future repositories. However, the evolution in the strategy adopted by the EPA and NRC in the site-specific regulations for a repository in tuff, 40 CFR 197 and 10 CFR 63, would likely be adopted for a future repository.

The National Academies/National Research Council (NAS) recommendations for standards specific to a repository in unsaturated tuff developed pursuant to the *Energy Policy Act of 1992*, may be applicable to other repositories for SNF and high-level waste (HLW) even though this act only addresses standards for a repository at Yucca Mountain. If so, then licensing of future repositories will require demonstration of compliance with a peak dose standard, for a period of geologic stability ($\sim 10^6$ yr was recommended by the NAS).

Any changes to the EPA standards for repositories in media other than at Yucca Mountain would likely change 40 CFR 191, and would be reflected in corresponding changes to NRC regulation 10 CFR 60. The 10 CFR 60 rule is still applicable to any geologic repository other than at Yucca Mountain, and was not revised when fundamental changes were made to performance assessment requirements in the promulgation of 10 CFR Part 63. In particular, NRC has evolved from disposal subsystem requirements (e.g., EBS containment) to rely on mean annual dose computed from total system performance assessment (TSPA). Consequently, NRC stated when promulgating 10 CFR 63 that the "generic Part 60 requirements will need updating" (Rubenstone 2012; NRC 2001). Furthermore, NRC has suggested that regulations for future repositories would likely look similar to 10 CFR 63, in presentations to the Blue Ribbon Commission on America's Nuclear Future (BRC) and the Nuclear Waste Technical Review Board (McCartin 2010; 2012).

3.2.1 Statutory Framework

1. The *Nuclear Waste Policy Act* (as amended) will be further amended or replaced with legislation that permits developing one or more geologic repositories for U.S. commercial SNF at sites other than Yucca Mountain, and doing so on a schedule consistent with assumptions in Section 3.1.2 above.

Basis: The scope of this study is to consider DPC disposal alternatives that would not be constrained by current statutory limits, including limits on repository capacity. This assumption does not address the total inventory of U.S. SNF (projected by Carter et al. 2012). The purpose of the study is to determine technical feasibility of DPC direct disposal in repositories of any capacity.

2. Future repositories will be regulated by the NRC, implementing requirements of the National Environmental Policy Act (NEPA), and implementing performance standards promulgated by the EPA.

Basis: These conditions are required by current legislation in effect.

3.2.2 Regulatory Framework

In general, the regulatory framework controlled and implemented by EPA and NRC will be similar to existing site-specific regulations (§63.113).

- 1. Expected peak dose to a reasonably maximally exposed individual (RMEI) at the boundary of the accessible environment will be the primary measure of individual dose, for two time periods: a limit of 0.15 mSv/yr before 10^4 yr, and 1 mSv/yr for the mean of simulations beyond $10⁴$ yr through the period of geologic stability, or approximately 10^6 yr.
- 2. The accessible environment for performance assessment of DPC disposal will be at least 5 km away from the boundary of the repository (§63.302).
- 3. The NRC requirement for retrievability will remain similar:

…the geologic repository operations area must be designed so that any or all of the emplaced waste could be retrieved on a reasonable schedule starting at any time up to 50 years after waste emplacement operations are initiated, unless a different time period is approved or specified by the Commission. $(\S 63.111[e])$

- 4. In general, features, events, and processes (FEPs) and scenario classes formed from these FEPs will be retained or omitted based on their influence on performance in the first $10⁴$ yr (§63.114). The criterion for screening FEPs and scenario classes based on probability will remain at 10^{-8} in any one year. Seismic and climate change effects will be projected beyond 10^4 years (§63.342).
- 5. Lead, chromium or other materials used in fabrication of DPCs is part of waste packaging that will not be subject to regulation under the *Resource Conservation and Recovery Act* (RCRA).
- 6. NRC requirements for barriers of the disposal system will remain similar: Licensee must identify components of the disposal system that are important for isolation and demonstrate their performance (§63.115). No subsystem containment requirements will be specified as discussed in Section 3.2 above.
- 7. Inadvertent human intrusion will not be included in the probabilistic dose calculations. Individual dose to the RMEI will assessed, conditioned on the intrusion. The dose pathway will be limited to groundwater (or to airborne transport if significant). Dose to the crew responsible for intruding will not be evaluated (§63.321).
- 8. The circumstances of human intrusion will be similar, in that a stylized calculation will be specified such that a single well bypasses a portion of the natural barrier system vertically above or below the repository, but the remainder of the natural barrier in the horizontal direction to accessible environment is retained (\$63.321).

3.3 Assumptions for Storage and Transportation

The condition of DPCs or storage-only canisters during storage and transportation establish initial conditions for disposal. Other limits on storage and transportation such as permitted durations or age of UNF, also interface with disposal.

3.3.1 Storage

1. Licensing activities will proceed under 10 CFR Parts 71 and 72 to allow transport of commercial UNF in DPCs (and possibly in existing storage-only canisters) for up to 100 yr from reactor discharge, in accord with Assumption 3.1.2(1).

Basis: The influence of shorter and long storage durations can be evaluated in sensitivity studies.

3.3.2 Transportation

1. Transportation casks for all existing and future DPCs, and storage-only canisters, will be developed and licensed for use in transporting UNF to a centralized storage facility, and from there to the repository.

Basis: The availability of licensed infrastructure for transporting DPCs to the repository is beyond the scope of this study.

3.3.3 Movement from Storage

1. The preferred disposition pathway is to transport SNF directly from a centralized storage facility operated conjunctively with the repository.

Basis: This assumption can be used in logistical simulations, to expedite transfer of responsibility for SNF from the utilities, to an authority responsible for long-term management and disposal.

2. DPCs or storage-only canisters can be selected for transport to the repository using various strategies, including oldest fuel first (OFF) and youngest-fuel-first (YFF), and variations thereof.

Basis: Once fuel is stored in a centralized facility, selection can be optimized for disposal and other fuel management priorities without directly involving the electric utilities.

3. SNF can be transported from ISFSIs at power plants, directly to the repository, if the fuel is cool enough for disposal and no other fuel suitable for disposal is available at a centralized storage facility.

Basis: Operation of the disposal system should not be suspended because the only fuel suitable for disposal is at power plant sites.

4. NEXT STEPS

Follow-on work will be performed in accordance with the work plan (Howard et al. 2012). The next phase (Section 3.3 of that plan) will be a multi-year effort that investigates a range of technical issues (Hardin et al. 2013, Section 10). Part of the effort will be performance assessments to compare postclosure safety of DPC direct disposal, with the safety of disposing of the same SNF in the same geologic settings, using re-packaging into new canisters purpose-built for disposal.

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Appendix A: Information on Existing DPCs

Tables A-1 and A-2 present a spreadsheet of information for the individual canisters types, compiled from licensing-related documents available on the NRC ADAMS server. The Excel version of this table has hyperlinks to schematics and drawings for many canister types. The reader is referred to Greene et al. (2013) for more recent data on canister characteristics. Table A-3 is a current (February, 2013) summary of dry storage systems in us operating and shutdown reactor sites, and wet storage at shutdown sites (Dan LeDuc, personal communication).

Table A-1. DPC types and physical dimensions (from

Table A-2. DPC Construction and Criticality Control

Table A-3. Fuel storage data (dry storage and we storage at shutdown reactor sites) updated February, 2013 (Dan LeDuc, personal communication).

