

FSV OIL & GAS MONITORING		Identifier: MCP-3754
		Revision*: 6
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INTEC	Management Control Procedure	For Additional Info: http://EDMS
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*The current revision can be verified on EDMS.

1. PURPOSE

To maintain an accurate database of oil and gas infrastructure near the Fort St. Vrain (FSV) Independent Spent Fuel Storage Installation (ISFSI) and to determine the impact of changes in this infrastructure on the license basis documents.

2. SCOPE

The presence of oil and gas infrastructure near the FSV ISFSI represents a potential explosion hazard as described in the FSV ISFSI Safety Analysis Report (SAR). The FSV Technical Specifications require monitoring the oil and gas infrastructure within 1/2 mile of the ISFSI and evaluating changes to such infrastructure. Infrastructure is monitored outside this 1/2 mile limit where such infrastructure affects bounding safety analyses.

3. RESPONSIBILITIES

Performer	Responsibilities
ISFSI Manager	The ISFSI Manager is responsible for the overall performance of this program and to ensure compliance with the FSV ISFSI Technical Specifications.
Regulatory Compliance	Regulatory Compliance is responsible for action item tracking, maintaining the Oil and Gas database, reviewing changes to oil and gas infrastructure, updating the SAR, and preparing other reports to the NRC.
Systems Engineer	The Systems Engineer is responsible to evaluate changes to the Oil and Gas Database that affect the ISFSI design basis.

4. INSTRUCTIONS

4.1 Reviewing Industrial Activity

- 4.1.1 ISFSI Manager: Initiate periodic review of industrial activity in the vicinity of the ISFSI.
- 4.1.2 Regulatory Compliance: Access the Colorado Oil and Gas Conservation Commission (COGCC) electronic database on the internet as necessary.
- 4.1.3 ISFSI Manager: As needed, perform field surveys or inspections or contact soil and natural gas infrastructure owners and operators or pipeline locators for updates to oil and gas infrastructure configuration.

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4.2 Maintaining the FSV Oil and Gas Database

NOTE 1: *The Oil and Gas Database consists of DWG-509706, “Oil and Gas Infrastructure Near FSV ISFSI,” and LST-278, “FSV Oil & Gas Database,” and other documents listed in LST-278. The database may be supplemented with Licensing Evaluations used to provide qualitative comparisons of oil and gas infrastructure to the hazard analyses of bounding cases.*

NOTE 2: *Activities such as infrastructure renaming; infrastructure ownership changes; gas well maintenance; pipeline maintenance; gas well deepening, refracing, recompletion, commingling, etc. are activities associated with existing infrastructure and are not considered to be changes to oil and gas infrastructure. No changes to the database are required for these activities.*

4.2.1 Update the database at least every six months (TS 5.5.3.3).

4.2.2 Regulatory Compliance: For changes of oil and gas infrastructure within one-half mile of the FSV ISFSI:

4.2.2.1 Prepare a licensing evaluation to document the qualitative comparison of the oil and gas infrastructure changes 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. (TS 5.5.3.2)

NOTE: *The licensing evaluation for changes bounded by existing safety analyses may be transmitted to DOE for approval with the transmittal of the periodic review of the industrial activity.*

4.2.2.2 Submit the licensing evaluation to NE-ID Facility Director for approval. (TS 5.1.6)

4.2.2.3 Submit the licensing evaluation to the ISFSI Safety Review Committee for review. (TS 5.2.1.4.b)

4.2.2.4 Prepare a description of all changes affecting the description in the SAR to be included in the update report for the FSV Safety Analysis Report. (TS 5.5.3.4.b)

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4.2.3 For changes of oil and gas infrastructure within one-half mile of the FSV ISFSI that are not bounded by 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:

4.2.3.1 Systems Engineer: Prepare a new analysis which conservatively models the gas release, migration, dispersion, and detonation, and the resulting damage to the Modular Vault Dry Store.

4.2.3.2 Submit the new analysis to the ISFSI Safety Review Committee for their approval. (TS 5.2.1.4.b)

4.2.3.3 Regulatory Compliance: Prepare transmittal to DOE, with the objective of NE-ID Facility Director approval and submittal to NRC within 60 days of identifying new infrastructure that adversely affects a bounding natural gas hazard analysis. (TS 5.1.6, 5.5.3.4a)

4.3 Reporting Industrial Activity

NOTE: *If no change to the oil and gas database is needed as a result of the review of industrial activity, reporting to the NE-ID Facility Director that no change is needed to the database is sufficient documentation of the periodic requirement to update the database.*

4.3.1 Regulatory Compliance: Prepare a report to the NE-ID Facility Director, describing the results of the review of industrial activity, including any impacts on the oil and gas database and any license basis documents, in the vicinity of the FSV ISFSI.

5. RECORDS

NOTE 1: *Periodic reviews of industrial activity (including oil and gas activity) are maintained as records by the correspondence control program.*

NOTE 2: *The file codes and records transmittals for the database (DWG-509706 and LST-278) and safety analyses are controlled in accordance with the management controls for controlled drawings, controlled documents, and engineering analyses.*

6. DEFINITIONS

None

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7. REFERENCES

None

8. APPENDIXES

Appendix A, Procedure Basis

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Appendix A

Procedure Basis

Step	Basis	Source Document	Citation
4.2.2.2, 4.2.2.3, 4.2.3.2, 4.2.3.3	The Facility Director must review and concur with all FSV ISFSI evaluations prepared pursuant to ... TS 5.5.3.2	FSV TS 5.1.6	
4.2.2.2, 4.2.2.3	The Safety Review Committee must provide oversight of FSV operation by performing reviews of: b. Evaluations performed pursuant to ... TS 5.5.3.2.	FSV TS 5.2.1.4.b	
4.1, 4.2	The licensee must establish and maintain a database of all natural gas and oil infrastructure within one-half mile of the FSV ISFSI.	FSV TS 5.5.3.1	
Note at 4.2, 4.2.2.1	The database must 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.	FSV TS 5.5.3.2	
4.1.1, Note at 4.3	The licensee must ensure the database is updated at least once every six months.	FSV TS 5.5.3.3	

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4.2.2.4, 4.2.3.3	For any new natural gas or oil infrastructure plan or completed installation within one-half mile of the ISFSI, the licensee must submit a report describing the new infrastructure and a summary of the hazard analysis to the Director, Office of Nuclear Material Safety and Safeguards and the Regional Administrator, Region IV: 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 SNM-2504 B. With the periodic SAR Update report 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.	FSV TS 5.5.3.4	
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