

NEI Dry Storage Task Force Thoughts and Insights

Everett Redmond II, Ph.D.
Nuclear Energy Institute
June 23, 2010

Dry Cask Licensing Process

- Technology evolving
- Review times may be lengthy
- The approval process requires rulemaking
 - No exigent or emergency amendment process and difficult to correct administrative errors in an approved amendment
 - Often requires exemption process to be used
- General licensees may use any approved amendment listed in §72.214

Challenges

- Efficiency of review process
- Regulatory predictability during reviews
- Multiple active CoC amendments apply to one ISFSI for the same storage technology
 - Unusual process for plant operators and others accustomed to one Part 50 license and TS

Part 72 CoC Renewal

- When a CoC is renewed, all amendments are simultaneously renewed
- How are new requirements incorporated into each previously approved amendment (e.g., aging management) for user implementation?

Suggestions for Improvement Short-Term

- Increase NRC and CoC holder staff face-to-face interactions on technical issues
- Improve quality of documents
 - LAR guidance document
- Streamline information in CoCs going forward to reduce the need for amendments
- NRC-NEI FAQ process

Suggestions for Improvement Long-Term

- Propose that CoC amendments fully encompass all previous amendments
- Permit CoC issuance and/or amendments without rulemaking
 - Need to preserve public participation in the process