

Considerations for CoC Renewals, and GL Implementation of AMPs

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Meeting to Obtain Stakeholder Input on Potential
Changes to Guidance for Renewal of Spent Fuel Dry
Cask Storage System Licenses and Certificates of
Compliance

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Outline

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- Background
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 - Storage Terms and CoC Expiration Dates
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Background

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- Only 1 of the listed topics/issues is addressed in NUREG-1927
 - Staff currently plans to add a new section to NUREG-1927 regarding specific aspects of CoC renewals
 - Staff also plans to develop internal office instructions specific to renewal reviews

Where AMPs Reside

- The AMPs should be included in the CoC/TS for GL Implementation
 - 10 CFR 72.240(e), “In approving the renewal of the design of a spent fuel storage cask, the NRC may revise the CoC to include terms, conditions, and specifications that will ensure the safe operation of the cask during the renewal term, including but not limited to, terms, conditions, and specifications that will require the implementation of an AMP.”
 - 76 FR 8875, Response to H, “AMP requirements will be reflected in the terms, conditions and technical specifications of the renewed CoC and thus made applicable to the general licensee per § 72.212(b).”
 - NUREG-1927, p20, “According to 10 CFR 72.212(b)(7) and 10 CFR 72.240, the NRC would make the AMA applicable to the general licensee by adding the appropriate condition or technical specification requirement to the renewed CoC.”

General Licensee Implementation And Responsibilities



- General licensees should develop procedures to implement the AMPs
 - NUREG-1927, p20, “The DCSS user (not the CoC holder) would ordinarily carry out such an AMA.”
- The regulations require that general licensees update their §72.212 evaluations for new conditions, etc.
 - The general licensee shall “perform written evaluations... which establish that the cask... will conform to the terms, conditions and specifications of a CoC....” (§72.212 (b)(5)(i))
 - In the 72.212 report, the GL can include rationale for not implementing an AMP that is not applicable for their site

Reviewing Coincident Renewal and Amendment Applications



- Staff is considering:
 - Review the amendment first, with the renewal request delayed
 - Review the renewal first
 - Review simultaneously, with coordination between the renewal review team, and the amendment review team

When Does Aging Management Begin?

- Aging management activities begin at the end of the initial storage term for each DCSS
 - “The general license for the storage of spent fuel in each cask... shall commence upon the date that the particular cask is first used by the general licensee to store spent fuel....” (§72.212(a)(3))
 - “It is the NRC’s position that the ...clock starts when the loaded cask has been deployed in the ISFSI.” (76 FR 8885, Response to Comment #29)

Storage Terms and CoC Expiration Dates

- The storage term
 - Depends on when DCSS is loaded
 - Determines number of years of storage for that system
 - The general license for the storage of spent fuel in each cask terminates when the cask's CoC expires (§72.212(a)(3))
- For any cask placed into service during the final renewal term of a CoC, ...the general license for that cask shall terminate after a storage period not to exceed the length of the term certified by the cask's Certificate of Compliance (§72.212(a)(3))

General License Storage Terms

- Initial + successive renewal terms \neq term of GL
- GL term is determined by the term in the CoC in effect at the time the cask is placed into service
- GL shall not be longer than the term in effect at the time the cask is placed into service
- If CoC is renewed, GL will terminate at the expiration of the CoC

(76 FR 8880, Response to Comment #5)

Discussion Topics

1. AMPs in CoC/TS
2. GL implementation as update to §72.212 evaluation
3. Coincident renewal & amendment applications
4. When does aging management begin?
5. Storage terms

Acronym List

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- AMA = Aging Management Activity
 - AMP = Aging Management Program
 - DCSS = Dry Cask Storage System
 - CFR = Code of Federal Regulations
 - CoC = Certificate of Compliance
 - GL = General License (or General Licensee)
 - ISFSI = Independent Spent Fuel Storage Installation
 - SSC = Structures, Systems and Components
 - TS = Technical Specifications