



NUCLEAR ENERGY INSTITUTE

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Mr. E. William Brach
Director
Spent Fuel Project Office
U.S. Nuclear Regulatory Commission
Mailstop O6 F18
Washington, DC 20555-0001

Dear Mr. Brach:

Since the issuance of 10 CFR part 72, subpart K, in 1990, seven fuel storage casks have been approved for use under general license, and a number of additional cask designs are currently being considered for approval. Each fuel storage cask general license application and Certificate of Compliance (CoC) has included Technical Specifications. However, there was no effort to develop a consistent standard for fuel storage cask technical specifications, and the technical specifications for each fuel storage cask design were unique and inconsistent in the level of detail and types of controls applied.

On April 20-21, 1999, the NRC SFPO held a workshop to discuss spent fuel standard technical specifications. Presentations by the industry and the SFPO staff recognized the need to develop a consistent set of standard technical specifications for all certified fuel storage casks. In order to make effective use of the industry and staff resources NEI committed to develop a draft set of Standard Technical Specifications. NEI established a Dry Storage Standard Technical Specification Issue Task Force comprised of cask users and vendors. Enclosed is draft NEI 99-06 Rev. A, *Standard Improved Technical Specifications and Application of Selection Criteria for Fuel Storage Casks*, September 1999.

The purpose of this document is to propose a single set of Improved Technical Specifications (ITS) for fuel storage casks approved by general license under 10 CFR Part 72, subpart K. Each specification proposed in the current version of the ITS for each fuel storage cask design is evaluated against the criteria discussed.

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A standard set of fuel storage cask ITS is proposed containing the requirements which meet one or more of the criteria. The requirements are formatted to maximize standardization and consistency and to meet the unique operational needs of a fuel storage system. The specifications which do not meet any of the criteria are discussed, with particular emphasis on the appropriate location for the requirement and what administrative controls should govern revision of the requirement.

Once the SFPO has had an opportunity to review NEI 99-06 Rev. A, the industry would like to schedule a briefing to discuss the draft's purpose, application and implementation.

Please contact Alan Nelson at (202) 739-8110 or by e-mail (apn@nei.org) if you have any questions and to schedule a briefing.

Sincerely,



Lynnette Hendricks

APN:lrh
Enclosure