



NUCLEAR ENERGY INSTITUTE

**Lynette Hendricks**  
DIRECTOR  
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January 6, 2000

Mr. E. William Brach  
Director  
Spent Fuel Project Office  
U.S. Nuclear Regulatory Commission  
One White Flint North  
11555 Rockville Pike  
Rockville, MD 20852-2738

Dear Mr. Brach:

On behalf of the industry, I want to extend our appreciation to you for hosting the NRC NEI Joint Spent Fuel Cask Workshop, December 17, 1999. Feedback from the industry was extremely positive. The success of the workshop was due to support from NMSS senior management and your staff. The industry and the NRC recognize the crucial need to address priority issues related to certifying dry cask storage systems and licensing of on-site storage.

A key session in the workshop was a NRC/industry executive panel with representatives from the NRC, NEI, licensees, vendors, and fabricators. The purpose of the panel was to discuss key issues, status, priorities, and schedules. The industry agreed to evaluate issues identified by the industry and the Spent Fuel Project Office (SFPO). Enclosed for your review is a collation of the industry and SFPO priority issues. Resolution of these issues will require sufficient allocation of both industry and NRC resources. In order to make the most effective use of limited resources a clear description of the issue and issue resolution approach should be agreed upon. Once this has been completed coordination of issue resolution should have a clear path. We request that the SFPO provide an issue description for each of the issues identified. An issue identification worksheet is enclosed.

**We agree that continued dialog is essential. In this regard we are planning to meet with the SFPO staff on January 14, 2000. The enclosed collation of issue priorities should be the basis of our discussions. Meetings are also being planned to discuss standard technical specifications (later this month), and the cask licensing process (February time frame).**

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**Once again, thank you for your efforts on the NRC/NEI Joint Dry Storage Workshop. We look forward to continuing the dialogue between the industry and the NRC to resolve generic issues. Please contact me at (202) 739-8109 or by e-mail (lhx@nei.org), or Alan Nelson at (202) 739-8110 or e-mail (apn@nei.org), if we can be of further assistance to you or your staff on these matters.**

**Sincerely,**

**Lynnette Hendricks**

**Enclosures**

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**NRC/NEI JOINT WORKSHOP  
SPENT FUEL CASK  
ISSUE PRIORITIZATION  
December 17, 1999**

A Generic Issues Panel comprised of representatives from the NRC, utilities, vendor/designers, and fabricators included: Bill Brach, Director Spent Fuel Project Office, NMSS, NRC, Thomas J. Palmisano, Site Vice President, Consumers Power, Ken Culp, Spent Fuel Management, Duke Power, Dr. Kris Singh, President, Holtec International, Lewis Detter, Manager Quality Assurance, Precision Components Corp.

**General Observations and Recommendations**

- The industry identified a number of generic issues – first tier (top priority), second tier, and third tier (low priority). Resolution of these issues will require sufficient allocation of both industry and NRC resources. In order to make the most effective use of limited resources a clear description of the issue and issue resolution approach should be agreed upon.
- The NRC and the industry should bring the following issues underway to closure:
  - ISG - 1 Damaged Fuel, "Industry Fuel Classification Protocol"  
To be resubmitted based on NRC comments dated October 4, 1999
  - ISG - 4 Cask Closure Weld Inspection (NEI letter dated January 4, 2000)

The panel discussed spent fuel cask key issues, sub-issues, status and priorities.

**First Tier Issues (top priority)**

- High burnup (NRC- generic issue/industry priority)
  - Cladding Temperature Limits (NRC – ISG under development/industry priority)
- Thermal modeling (NRC – Generic issue)
- ISG – 5 Confinement Evaluation (industry priority)
  - Characterization of cask contents – preferential loading (NRC – ISG In Planning)
- Burnup credit (NRC – generic issue/industry priority)
  - High capacity basket (industry priority)
- Cask licensing and amendment processes (joint workshop consensus)
  - Smart CoCs
- 72.48 implementation

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- **Standard Technical Specifications**
- **License renewal (NRC – Generic issue/industry priority)**

### **Second Tier Issues**

- **Seismic (NRC – Generic issue/industry second tier)**
  - **Equivalent – Static Evaluation of cask Stability During a Design Basis Earthquake (NRC – ISG under development)**
- **Communication lead times (joint workshop consensus)**
- **Pool contents storage issues (joint workshop consensus)**
- **Minimum burnup CofC (joint workshop consensus)**
- **Shipping and storage only casks (joint workshop consensus)**
- **Approval of Neutron Absorber materials for Spent Fuel Storage and Transport (NRC – ISG in draft)**
- **Heavy Loads (NRC – ISG under development)**
- **PRA's for Storage and Transportation (NRC – Generic Issue)**

### **Third Tier Issues (lower priority or need issue clarification)**

- **Coatings (NRC – ISG in draft)**
- **Definition of Real Individual under 10 CFR 71.104 (NRC – ISG in draft)**
- **Supplemental Shielding (Berms) (NRC – ISG in draft)**
- **Amendments to Previously Approved Packages (10 CFR 71.13), (NRC – ISG in planning) Note: request issue clarification**
- **Coverage of The Active Fuel Regions by Neutron Poisons (NRC – ISG in draft) Note: request issue clarification**
- **Puncture Testing of Fresh Fuel Packages (NRC – ISG in planning) Note: request issue clarification**

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**NRC/NEI JOINT WORKSHOP  
SPENT FUEL CASK  
ISSUE IDENTIFICATION  
WORKSHEET**

**Issue:**

- First Tier**
- Second Tier**
- Third Tier**

**Issue Description:**

**Issue Resolution Approach:**

**Proposed schedule and milestones:**