

1. Industry is still pushing "below 1.0×10^{-6} " sequences as good enough. "... *credible range*."
2. Industry believes NUREG-1353 was a regulatory close out of some issues. It was a scoping study to determine if high-density racks posed a concern. Backfit rule said no - even though engineering judgement at that time, and today, would indicate yes. With the current total value of 1.2×10^{-5} per R-yr, the NUREG-1353 study would have resulted in a value/impact ratio of \$5,355 per averted person rem, a factor of six between then (2.0×10^{-6} per R-yr) and today.
3. The staff should determine if the Industry proposal to go to ***EITHER*** a single-failure proof handling system ***OR*** do the load drop and consequence analysis for a decommissioned plant will become a commitment.
4. With respect to heavy loads, there continued to be raised the question of the non-safety related aspect of the spent fuel pool. The credible spent fuel pool accident is failure of a single fuel bundle and the building air treatment system is designed for that. Otherwise it is unclear as to whether the handling systems would have come under the NUREG-0612 guidelines, or how these guidelines may have been implemented. Also, at the time of time of NUREG-0612, it was postulated that "hot fuel" only existed for 10 to 20% of a R-yr. Would this have affected the consequence analyses? Or interpretation?
5. The Industry value of *100 lifts per year* will be used in any further quantification of the load drop event, and discussed in a revised report.
6. To re-quantify the load drop event, the staff has three options:
 - a. Based on Industry commitment (either as is - would needs to be defined for the envelope) or given Item 3 (also needs to be defined), assign a qualitative risk-reduction to "*drop*" sequence.
 - b. Attempt to quantify the risk reduction, multiplier of current value.
 - c. Attempt to update the NUREG-0612 fault trees and re-quantify. Difficult without nuclear power plant specific crane data. Issue is what is failure (drop a load) probability of a single-failure proof handling system - including human error (for example, failure to follow safe load path, rigging, overload, etc.)? NUREG-0612 found 1.0×10^{-4} to 4.0×10^{-7} per R-yr. What from Industry or experience would changes the values?

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