November 28, 2001

MEMORANDUM TO:	Charles L. Miller, Deputy Director Licensing and Inspection Directorate Spent Fuel Project Office, NMSS
FROM:	Rebecca Karas, Project Engineer /S/ /RA/ Licensing Section Spent Fuel Project Office, NMSS
SUBJECT:	SUMMARY OF NOVEMBER 19, 2001, MEETING WITH NAC INTERNATIONAL REGARDING NAC'S PROPOSED AMENDMENT 3 TO CERTIFICATE OF COMPLIANCE NO. 1015

On November 19, 2001, staff from the U.S. Nuclear Regulatory Commission's (NRC) Office of Nuclear Material Safety and Safeguards met with representatives from NAC International to exchange information on NAC's proposed Amendment 3 to Certificate of Compliance No. 1015. The proposed amendment would incorporate enhanced design features and Standard Technical Specifications. Attachment 1 is the attendance list. Attachment 2 are the handouts provided by NRC staff. The meeting was noticed on October 31, 2001.

NRC staff discussed concerns with NAC's proposed Amendment 3, which was withdrawn by NAC on November 1, 2001. NRC staff also discussed the expectations for an application to implement Standard Technical Specifications (STS), especially related to discussions of analysis methodologies in the SAR. NRC staff also discussed the current lack of guidance on methodology reviews, given that NAC's application would be the first implementation of STS. NRC staff mentioned that reviews of STS implementation would be done on a case by case basis, and that the expectations for methodology discussions detailed in the attached slides would be revised as needed, as NRC staff build an experience base for this type of application.

NAC then discussed their plans for reapplying to the NRC for Amendment 3 to Certificate of Compliance No. 1015. NAC's current plan is to split the application into one for the enhanced design features and one for STS implementation. NAC expressed a willingness to work with NRC staff to address the concerns raised in the meeting.

NAC had no current estimated date for re-submittal of the enhanced design features portion of the request, but stated they would keep NRC staff informed of the planned submittal date. NAC also suggested they submit a portion of the STS submittal for one discipline (criticality, structural, etc.) for an initial NRC review so that any generic NRC comments could then be incorporated into a complete submittal later. NRC staff agreed this approach would be desirable, given this is a first-time application for STS.

No proprietary information was disseminated, and no regulatory decisions were requested or made.

Docket No.: 72-1015

Attachments: 1. Attendance List 2. NRC slides

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