#### **USNRC** Meeting With

**NAC International** 

November 19, 2001 1:30 pm NRC HQ

## Agenda

- 1. NAC UMS Proposed Amendment 3 Review
- 2. Expectations for Standard Technical Specification Implementation

#### NAC UMS Proposed Amendment 3 Review

NAC Amendment Request Received July 12, 2001

Amendment Requested Implementation of Standard Technical Specifications (STS) and Enhanced Design Features for NAC-UMS

NAC Amendment Request Withdrawn by NAC November 1, 2001

Preliminary NRC Staff Acceptance Review Identified Several Significant Deficiencies with NAC Submittal

#### **Examples of Deficiencies**

Storage of High Burnup Fuel Not Adequately Justified (Shielding, Thermal)

New 100-ton Transfer Cask Not Adequately Justified (Structural, Thermal)

Standard Technical Specification Methodology Discussions Incomplete

NRC Rules of Engagement Allow for 1 RAI Only

Submittal Quality Needs to be High to Meet 1 RAI Requirement

# Standard Technical Specifications Methodology Reviews

Expectations of Standard Technical Specification Implementations:

Submittals Follow Standard Format and Content for STS in NUREG-1745 or Justify an Alternative

Requirements Relocated from the Technical Specifications into the SAR will have Comprehensive Methodology Discussions in the SAR

Ensures Future 72.48's will be Done Under an NRC-Approved Methodology

### Key Aspects that Define a Methodology:

Inputs and Assumptions, Including Models, for Analyses and any Sub-Analyses (Perhaps a Table Would Provide Clarity?)

Algorithm/Code Used and Benchmarking

Limits and Acceptance Criteria for the Methodology/Analysis

Limitations or Restrictions on the Methodology

Qualification of Personnel performing the Analysis/Methodology (GL 83-11, Supplement 1)

Methodologies Should be Clearly Described in Separate Sections, and Should be Clearly Labeled as "Methodologies" in the SAR

A Section May Be Desired to List Deviations Allowed Without NRC Approval