

October 15, 2003

MEMORANDUM TO: Larry Camper, Deputy Director  
Licensing and Inspection Directorate  
Spent Fuel Project Office, NMSS

THRU: John D. Monninger, Chief /RA/  
Licensing Section  
Licensing and Inspection Directorate  
Spent Fuel Project Office, NMSS

FROM: Christopher M. Regan, Project Manager /RA/  
Licensing Section  
Licensing and Inspection Directorate  
Spent Fuel Project Office, NMSS

SUBJECT: SUMMARY OF SEPTEMBER 17, 2003 PUBLIC MEETING WITH  
GENERAL ELECTRIC REGARDING THE 10 CFR PART 72 LICENSE  
RENEWAL APPLICATION FOR GE-MORRIS (TAC NO. L23091)

On September 17, 2003, NRC staff from the Spent Fuel Project Office and their technical assistance contractors from Advanced Technologies and Laboratories International, Inc., met with representatives of the General Electric Morris Operation (GEMO) at NRC headquarters in Rockville, Maryland. The purpose of the meeting was to discuss the GEMO response to the staff's Request for Additional Information (RAI) for the renewal of the 10 CFR Part 72 license for the storage of spent nuclear fuel. The meeting was publicly noticed on August 25, 2003. Attachment 1 is a list of attendees and Attachment 2 is the meeting agenda.

The NRC staff opened with a general statement on the purpose of the meeting and scope of its existing review. The staff stressed the importance of the license renewal effort and urged GEMO to communicate with the staff if and when any questions should arise recognizing that this review is unique and precedent setting. The staff noted that some preliminary review of the partial GEMO response had been performed and to ensure GEMO understood the level of expectation regarding their response to the remaining RAIs, the staff was prepared to share their findings and concerns with GEMO.

The GEMO staff then presented their current work on responding to the remaining RAIs. The presentation highlighted the process GEMO was using to perform the license renewal review, specifically the scoping and screening of safety related systems structures and components (SSCs) and those whose function supports the operation of safety related SSCs. GEMO described how each of these SSCs are maintained through the site surveillance and maintenance program. The staff noted that GEMO should not omit the identification of aging effects, which is a key step, when determining if a particular maintenance program is applicable and should be considered part of the license renewal review.

The NRC staff and GEMO discussed the licensing implications of removing “receipt” and “transfer” operations from the existing license as part of the amendment application being reviewed concurrently with the license renewal application. Considering the current fuel inventory in the GEMO fuel pool the staff agreed that removal of “receipt” from the license might be acceptable but that the need to maintain the ability to “transfer” fuel remains. GEMO agreed to keep “transfer” in the license and as a result reconsidered the implications for license renewal. Specifically that those SSCs necessary for transfer operations and that were scoped into the aging management review, would consequently be included in the license renewal review.

The NRC reiterated that the basic principle of license renewal is to maintain the current licensing basis (CLB). With this in mind, the facility, as it was originally licensed, but as amended, is what needs to be submitted for license renewal review regardless of the current condition of the plant and its fuel inventory. For example the original license allowed for a fuel inventory with a certain burnup and heat load and consequently had SSCs designed to support that. Even though the inventory now has a much reduced heat load and has over 20 years of cooling time, it is still the original licensed condition and those SSCs necessary to support that license that need to be maintained for license renewal unless the license is amended. GEMO has the option to either amend the license to reflect the current facility condition and pursue this less restrictive amended license for license renewal or continue with renewal of the license as it currently stands. However, if the license is to be amended to reflect the current facility condition and to reduce the scope of the license renewal review, suitable analysis must be submitted to the NRC in support of the amendment. The NRC noted the scheduling implications of such a shift in focus should also be considered should GEMO choose to amend the license at this time.

The staff had the opportunity to question GEMO on some specific concerns with the partial RAI response submitted. RAI’s 1-7, 2-7, 3-8, 4-1, 4-11, 4-13, 5-3, 5-4, and 5-5 were specifically discussed before the meeting needed to be adjourned. In general, GEMO agreed to consider these concerns and revise those RAI responses as necessary when the remaining RAI responses are submitted. Concluding the discussion of the RAI, the staff asked if GEMO would still be able to meet the September 30th deliverable date that had been committed to in their August 8th RAI response. GEMO responded that considering the clarification of the license renewal process by the staff and the remaining work GEMO needed to perform, they were not prepared to commit to the September 30th date but would inform the staff by September 30th if additional time was needed. The staff stated that a telephone conference could be scheduled to discuss the remaining questions on the RAIs.

Attachments: 1. Attendance List  
2. Agenda

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\*See Previous Concurrence

<b>OFC:</b>	SFPO		SFPO		SFPO					
<b>NAME:</b>	CRegan		EZiegler		JMonninger					
<b>DATE:</b>	9/29/03		9/30/03		10/15/03					

**NRC Meeting with GE on the Application for License Renewal  
for the GE Morris Operation Independent Spent Fuel Storage Installation  
September 17, 2003**

**ATTENDEES**

<b>NAME</b>	<b>ORGANIZATION</b>
Christopher Regan	NRC/Spent Fuel Project Office
Bill Brach	NRC/Spent Fuel Project Office
John Monninger	NRC/Spent Fuel Project Office
Kim Hardin	NRC/Spent Fuel Project Office
Chris Bajwa	NRC/Spent Fuel Project Office
Mike Waters	NRC/Spent Fuel Project Office
Chris Brown	NRC/Spent Fuel Project Office
Neil Jensen	NRC/OGC/RFC
Mark Orr	ATL
Mark Notich	ATL
Don Palmrose	ATL
Chris Monetta	GE Nuclear Energy
Ed Secko	GE Morris Operation

**MEETING BETWEEN  
GENERAL ELECTRIC COMPANY  
AND THE NUCLEAR REGULATORY COMMISSION  
GE-MORRIS INDEPENDENT SPENT FUEL STORAGE LICENSE RENEWAL  
September 17, 2003**

**Agenda**

1. Introductions
2. NRC review status (NRC)
3. Discussion of GE Morris Operation response to NRC Request for Additional Information (GE-Morris & NRC)
5. Review schedule/Future meetings (GE-Morris & NRC)
6. Closing remarks