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To: "Meraj Rahimi" <MXR2@nrc.gov>
Date: 11/7/05 7:31AM
Subject: Issues Matrix

Meraj,

Attached is an updated issues matrix. It has been modified as follows:

Item 3 has been revised to recognize that ANSI 14.33 has been issued.

Item 27 regarding 10 CFR 72.13 has been added at the request of a licensee.

Item 28 regarding how to handle tornado missiles was added by me as industry internal item to discuss and reach consensus.

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10 CFR 71/72 DSTF ISSUES MATRIX

ISSUE NO.	PRIORITY	STATUS	ISSUE DESCRIPTION	STATUS
1	H	Open	Criticality Control (RIS 2005-05): Part 50 and Part 72 requirements apply during cask loading in pool. Requirements overlap and NRC (NRR and SFPO) burnup credit methods are not consistent.	NEI responded to RIS 7/25/05. NRC responded to NEI letter 10/3/05.
1a	H	Open	Criticality Accident Requirements: §72.124(c): Regulations provide exemptions from monitoring when fuel is under water and in "storage configuration" During cask preparation (out of pool but before in "storage configuration"), no exemption applies and monitoring is required.	
2	H	Open	Burnup Measurements: ISG-8 recommends measuring burnup on a sampling basis to increase confidence in reactor records. Industry does not believe this is necessary.	
3	H	Open	Damaged Fuel: Definition in ISG-1, Rev. 1 is very broad and difficult to implement. Need a definition generated with industry participation before implementation. ISG is not the appropriate process. Need to ensure fuel previously loaded as intact for storage can be transported without re-packaging.	ANSI N14.33 issued.
4	H	Open	Control of Cask Licensing Basis: a) backfit of changes to ongoing TS (cask surveillance) to previously deployed casks. b) Backward and forward compatibility of hardware. c) Removal of information from SAR/CoC that applies to previously deployed casks and/or site-specific licensee who incorporated the information by reference.	
5	M	Open	ISG Process: Certain issues addressed in ISGs should be addressed in a more structured guidance process, such as a Regulatory Guide, to allow front-end industry participation and independent backfit evaluation by NRC (CRGR). Examples: ISG-1 and -11.	
6	M	Open	CoC Noncompliance: What process governs if licensee discovers noncompliance with CoC after cask is in storage? There is no NOED process in Part 72.	

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ISSUE NO.	PRIORITY	STATUS	ISSUE DESCRIPTION	STATUS
7	L	Open	Burnup Credit: ISG-8 does not allow fission product credit, making BUC methodology limited. SFPO method is different than NRR. Except for geometry, methods should be the same.	Tracking item
8	L	Open	Moderator Exclusion: 71.55(b) does not permit moderator exclusion by design for normal conditions outside of limited exceptions (i.e., entire cask designs cannot be excepted from moderator intrusion). Regulations (per ISG-19) permit moderator exclusion for accident conditions. Seems contradictory.	
9	L	Open	High Burnup Fuel: ISG-11, Rev 3 does not provide guidance for transportation of HBU fuel.	Tracking item
10	L	Open	Cask Technical Specifications (NUREG-1745): Level of detail in cask TS and CoCs (e.g., fuel parameters) is not commensurate with risk. Fuel parameter change process in NUREG-1745 is not consistent with regulations.	
11	L	Open	Risk Informing regulations and review guidance: Cask loading PRA needs to be issued.	
12	L	Open	Part 71 QA Program (RIS 2004-18): Some Part 50 licensees who use Part 71-certified packages under a previously approved QA program (i.e., their Appendix B program) are required to have their Part 50 QA programs separately approved under Part 71. NRC issues a Form 311 indicating their approval under Part 71. The Part 50 QA program can be modified by the licensee under 10 CFR 50.54 without prior NRC approval provided the commitments in the program are not reduced. There is no such provision in Part 71 and renewal is required every 5 (now 10) years. These rules appear to conflict.	
13	L	Open	72.48 Guidance: Based on experience since 4/01, NEI guidance on malfunctions, consequences, and methods of evaluation may need updating and more customizing for casks. For example, casks do not typically have single failure criteria requirements and often accidents have no offsite dose consequences.	

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ISSUE NO.	PRIORITY	STATUS	ISSUE DESCRIPTION	STATUS
14	L	Open	Licensee 72.48 Processing: a) What are GL obligations (i.e., timing, actions) for processing CoC holder 72.48s? b) What's required if GL does not adopt? c) What is effective date for CoC holder-issued 72.48s on GLs (e.g., operating changes)? d) What is CoC holder 72.48 deletes or modifies information incorporated by reference by an SL and SL does not want to change?	
15	New	Open	Computational Modeling Software (ISG-21): Follow up on comment letter from NEI dated 8/11/05.	Need priority. NEI submitted comments 8/11/05
16	New	Open	Retrievability: NRC is developing an ISG on this issue. Industry needs to review and comment.	Need priority
17	New	Open	Amendment Applications: There are a variety of difference formats for amendment applications (i.e., with or without SAR markups). Should industry develop guidance?	Need priority
18	New	Open	SRP Updates: NRC needs to update SRPs to incorporate ISGs.	Need priority
19	New	Open	Reg Guide Updates: NRC needs to update RGs 3.48, 3.61 and 3.62 to match SRP format.	Need priority
20	New	Closed	Review Schedules: Include front and back end activities in total review schedule.	Need priority
21	New	Open	Part 72 License Renewal: Modify rule to extend license renewal period beyond 20 years.	Need priority
22	New	Open	Use of RG 1.91 for ISFSI Licensing: The 1 psig overpressure value for missiles may not be appropriate for use in ISFSI licensing.	Need priority
23	New	Open	CoC Amendments: Rulemaking is required for all Part 72 CoC amendments. This is an unnecessarily burdensome process. Results in exemptions as a normal licensing process.	Need priority
24	New	Open	GSI-196, BORAL Degradation: NRC recently identified BORAL blistering as a generic safety issue. What effects, if any, does the blistering have on the design function of the BORAL?	Need priority
25	New	Open	Fuel Cladding Integrity Analysis: Cask designers have not historically analyzed fuel cladding integrity. Fuel material data is limited. Guidance in ISG-12 only addresses buckling.	Need priority

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ISSUE NO.	PRIORITY	STATUS	ISSUE DESCRIPTION	STATUS
26	New	Open	DOE Standardized Canister: DOE proposes to use a standard fuel canister that will be compatible with the waste package at YM.	Need priority
27	New	Open	10CFR72.13: Some sections may not be appropriately listed.	Need priority
28	New	Open	Tornado Missiles: How do general licensees compare site-specific missiles against generic missiles? By spectrum or missile by missile comparison?	Need priority