Nuclear Energy Institute

Industry Perspective on Other Issues

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Overview of Presentation

- Provide Industry perspective on a few key issues from the issues matrix
  - Issue 3 – Damaged fuel definition
  - Issue 4 – Control of cask licensing basis
  - Issue 10 – Risk informing Part 72 rules and guidance
  - Issue 12 – 72.48 guidance
- Request NRC update on SECY 06-152
  - Scope and need for rule changes

Issue 3: Damaged Fuel Definition

- Three existing documents governing damaged fuel:
  - COC Definitions (1999 - present)
  - NEI Protocol (2000)
  - ISG-1, Revision 1 (2002)
  - ANSI N14.33 (2005)
- CoC definitions are what the cask users must comply with
- Consensus on the definition needs to reached and incorporated into CoCs
- Care must be taken by CoC holders and SFST not to cause transportability issues for previously loaded DPCs when modifying the Part 71 CoCs
  - The CoC version in effect at the time of shipping applies
- Industry must be able to ship DPCs already loaded for storage

Issue 4: Control of Cask Licensing Basis

- Cask components are delivered to licensees certified to a specific CoC amendment and FSAR revision, as updated
- The CoC and FSAR applicable to licensed cask hardware does not have to be updated after cask deployment absent a safety issue
- The regulations do not prohibit licensees from choosing to update the licensing basis for previously deployed casks
  - Relief from unnecessary burden of an ongoing surveillance requirement
  - Preference for consistency across all casks under the same CoC
- CoC holders should be consulted as necessary by the licensees in updating the cask's licensing basis
- Document via 72.48 and revision to 72.212 evaluation report

Issue 10: Risk Informing Rules and Guidance

- NRC PRA shows risk of canister-based dry spent fuel storage is extremely low
  - EPRI PRA yielded similar results for bolted cask design
- While performed for a particular plant and cask design, the activities are essentially the same for any canister-based system
  - Canister welding, inspection, testing
  - Draining, drying and helium backfill
  - Heavy load handling, canister transfer and on-site transport
- Off-site consequences negligible even for beyond-design-basis breach of canister confinement boundary

Issue 10: Risk Informing Rules and Guidance

- There are opportunities to use this PRA to risk inform SFST review guidance and/or rules now. Example:
  - Rule and guidance for content of CoCs and TS are thin, making what goes into CoCs and TS too subjective.
  - Contents and design features in CoC go well beyond what is necessary to be controlled by NRC, based on risk, and not consistent with Part 50 TS
  - Should be risk-informed
  - Develop new rule or more detailed guidance for cask TS and CoC content
  - Create rule similar to §50.36 and/or revise NUREG-1745

Issue 12: 72.48 Guidance

- NEI has initiated an effort to update the 50.59 guidance based on lessons learned since 2001
- NEI DSTF will participate
- DSTF focus will be toward more customization of 72.48 guidance based on lessons learned and uniqueness of Part 72 versus Part 50
- Experience-based input from NRC inspections will be useful
- NRC point of contact desirable

Issue 36: Part 72 Rule Changes

- SECY 06-0152
  - NRC discuss need and plans