

**10 CFR 71/72 DSTF ISSUES MATRIX**  
**Updated 2/6/2008**

ISSUE NO.	PRIORITY	STATUS	ISSUE DESCRIPTION	REMARKS	ACTION
1	High	Open	<b>Burnup Credit:</b> ISG-8 does not allow fission product credit, making BUC methodology limited. SFST method is different than NRR.	Vendor applications are in review and have been approved with limited burnup credit	NEI to prepare white paper and meet with NRC and industry. Revise ISG-8.
2	High	Open	<b>Burnup Measurements:</b> ISG-8 recommends measuring burnup on a sampling basis to increase confidence in reactor records. Industry does not believe this is necessary.	Evaluate safety benefit of BU measurements and recommend guidance change, as appropriate (EPRI input)	NEI to prepare white paper and meet with NRC and industry. Revise ISG-8.
3	High	Open	<b>High Burnup Fuel:</b> ISG-11, Rev 3 does not provide guidance for transportation of HBU fuel. ISG-19 addresses criticality concern during accident with various options.	NRC trying to obtain addition experimental data.	NEI to prepare white paper and meet with NRC and industry. Revise ISG-11.
4	High	Open	<b>General Licensee authority:</b> The issue is whether or not a general licensee can apply a newer amendment to a cask loaded under an older amendment.	NRC OGC ruled that this is not an acceptable practice. Draft RIS issued 1/08.	Meet with NRC during comment period and provide written comments.
5	Medium	Open	<b>Damaged Fuel:</b> Definition in ISG-1, Rev. 2 offers flexibility. However, may be difficult to implement. Need to ensure fuel previously loaded as intact for storage can be transported without re-packaging. Possible issue with stress corrosion cracking of guide tubes and the use of visual inspections for fuel classification.	Inspection report for Catawba identified possible issues with stress corrosion cracking and visual inspections. NRC may issue RIS.	Industry to discuss with NRC.

**10 CFR 71/72 DSTF ISSUES MATRIX**  
**Updated 2/6/2008**

ISSUE NO.	PRIORITY	STATUS	ISSUE DESCRIPTION	REMARKS	ACTION
6	Low	Open	<b>Moderator Exclusion:</b> 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.	SFST submitted a paper to the commission recommending rulemaking. Vendor has application under review using ISG-19	Commission disapproved SFST recommendation for rulemaking. No further action at this time.
7	Medium	Open	<b>72.48 Guidance:</b> Based on experience, NEI guidance on malfunctions, consequences, and methods of evaluation may need updating.	Guidance is being revised. Industry has met and will meet with NRC near end of process to discuss changes. NRC stated in RIS 2006-22 that they will work with NEI to revise guidance.	NEI and industry are working on a revision to NEI 96-07. NRC will provide a letter to NEI with their thoughts for the revision.
8	Low	Open	<b>Risk Informed regulations and review guidance:</b> Cask loading PRAs need to be used to risk inform regulations and guidance.	EPRI has additional work in this area for transportation	NEI to organize industry
9	Medium	Open	<b>Canister leakage testing (ISG-18):</b> The NRC staff is revising ISG-18 to capture lessons learned from recent reviews and to make the guidance more clear.	NRC issued draft ISG 1/08.	NEI preparing comment letter from industry.
10	Medium	Open	<b>Part 72 Rulemaking:</b> SECY-06-0152 endorses rulemaking effort to address CoC and GL terms and conditions	Industry will provide input on proposed rule changes.	NRC to create rule changes and issue in draft.

**10 CFR 71/72 DSTF ISSUES MATRIX**  
**Updated 2/6/2008**

ISSUE NO.	PRIORITY	STATUS	ISSUE DESCRIPTION	REMARKS	ACTION
11	Low	Open	<b>SRP Updates:</b> NRC needs to update SRPs to incorporate ISGs.	NRC has a contractor working on the project. Completion will be sometime in 2008.	NRC action. Industry to review and comment on proposed revisions
12	Low	Open	<b>Reg Guide Updates:</b> NRC needs to update RGs 3.48, 3.61 and 3.62 to match SRP format.	Need to discuss plan with NRC. Currently using SRPs where RGs are the correct guidance for industry	No current plans to update these RGs
13	Med	Open	<b>Foreign Material:</b> Guidance is necessary on how to address foreign material in DPCs for transportation.	Foreign material, possibly on fuel assemblies, may enter DPCs during loading for dry storage	Industry to discuss with NRC