# Enclosure 3 (presentations)



#### COMMISSION DIRECTION

SRM COMSECY 07-0032 directed staff to:

"...amend Part 72 to allow a licensee to apply changes for a Certificate of Compliance (CoC) amendment to a previously loaded cask without express NRC approval, while still ensuring that such action protects public health and safety."

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#### Existing Requirements Under PART 72 Subpart K

- General licensees are allowed to load empty casks meeting the technical specifications of an amendment to a CoC listed in 10 CFR 72.214
- Does not explicitly allow for general licensees to apply a later amendment to the previously loaded casks

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#### POTENTIAL REGULATORY SOLUTION

- Similar to existing process under Part 72 Subpart K
- Add provision in 10 CFR 72.212 to allow general licensees to adopt NRC approved amendments to previously loaded casks
- Process for general licensees:

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- Determine the applicability of a codified amendment to loaded casks -
- Meet the requirements listed in 10 CFR 72.212(b)(2) through (10) .
- Notify and register the cask with NRC -



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# ISSUES IDENTIFIED IN THE COMMISSION PAPER SECY-06-0152

- Initial & Renewal Terms for a Part 72 CoC
- "Reapproval" versus "Renewal" for a Part 72 CoC

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- · General License storage term
- General License Renewal term (aging)
- Consistency between Part 72 regulations (General License/Specific License/CoC

# CoC INITIAL & RENEWAL TERMS

- .. Up to 40 years
- Will be required to justify that design and support/operational programs are suitable for the requested term
- Staff will develop regulatory guidance to address the necessary additional analyses or measures

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#### "REAPPROVAL" VS. "RENEWAL" TERMINOLOGY

- Change "Reapproval" to "Renewal" for a Part 72 CoC
- Verbiage is consistent with that used for the specific license
- Certificates will be extended based on the original design standards unless there are clearly identified safety concerns with the existing storage casks
- Differences will be addressed in the SOC

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#### GENERAL LICENSE STORAGE TERM

- Specify that the license for storage of spent fuel in each cask terminates when the particular CoC for that cask design expires (e.g., up to 40 years)
- Eliminate the conflict of interpretations for the start and end of storage license term for an individual cask
- Eliminate the need to track the individual cask at each site
- Consistent with the proposed revisions to the CoC approval and renewal

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#### GENERAL LICENSE RENEWAL TERM (AGING)

- Add conditions to "manage the effect of aging" to both the initial and renewal terms of CoC
- Consistent with that required for both Surry and H. B. Robinson site-specific license renewals

# CONSISTENCY BETWEEN GENERAL & SPECIFIC LICENSE TERMS

- 40-year initial and renewal terms for specific ISFSI terms
- Codify a technical approach consistent with that applied in granting of 40-year exemptions for the Surry and H. B. Robinson specific ISFSI license renewals

**Classification of Fuel With Top Nozzle Stress Corrosion Cracking** NRC/NEI DSTF Meeting February 29, 2008 H Oley Nelson, NEI



















# Inspections

Fuel Assembly Lifted Approximately 4 ft

- High Magnification Camera
- Inspect For Indications of Corrosion
- Inspection Only Valid For 90 Days





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Anchors

- Tie Rods
- Fuel Assemblies are "Modified"

**Under 50.59** 

Alternate Methods For Reinforcing Top Nozzle

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Anchors

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- Design Similar to Mandrels on Thimble Grip Handling Tool
- Typically Installed 8 per Fuel Assembly
- Secures Top Adapter Plate to Guide Tubes
- Load Test Anchors
- Allows Use of Top Nozzle Spent Fuel Handling Tool

NEI





# Alternate Methods For Reinforcing Top Nozzle

### Tie Rods

Secure Top Nozzle to Bottom Nozzle via
 Rod Through Instrument Tube

Allows Use of Top Nozzle Spent Fuel
 Handling Tool

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# Storage & Transport SAR Compliance Top Nozzle Not Reinforced

- Fuel is Retrievable by Normal Means, i.e., Crane and Grappie
- No Impact on Fuel-Specific or System-Related Safety Functions (Configuration and Confinement)
- No Storage or Transport SAR Issues

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- Fuel is Retrievable by Normal Means, i.e.,
  Crane and Grapple
- SARs Do Not Describe How Top Nozzle is Attached to Fuel Assembly
- No Impact on Fuel-Specific or System-Related Safety Functions (Configuration and Confinement)

No Storage or Transport SAR Issues

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# **General Overview**

- The 72.48 process provides site operations with a path to disposition foreign material (FM) in a Dual Purpose Canister (DPC)
- Both decommissioned and operating plants have performed safety evaluations to address FM in DPC's
- Although this issue affects only a small percentage of the DPC's it is representative of a large number of sites and DPC system designs.
- What process is appropriate to assure that the FM is acceptable for transport under 10CFR71?

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