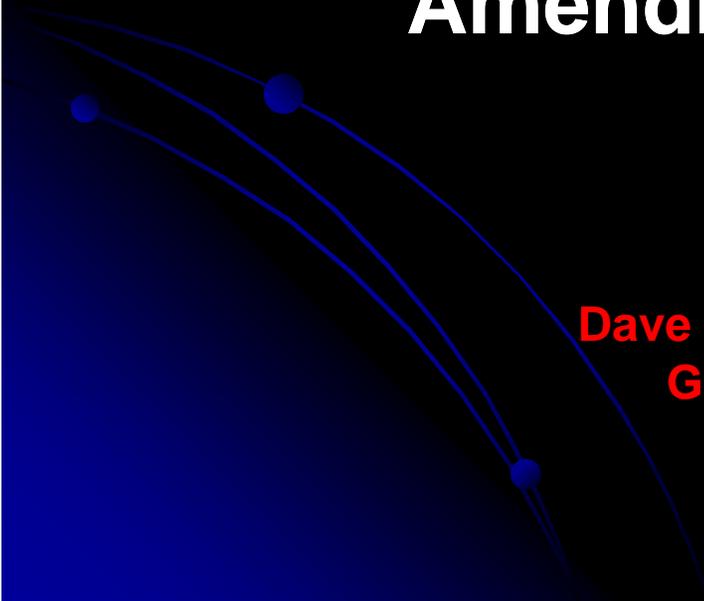


OPERATIONAL EXPERIENCE

Implementing a New CoC Amendment for Dry Storage

**Dave Ellis, Entergy Operations, Inc
Grand Gulf Nuclear Station**



Why Do This?

- To increase the flexibility of the ISFSI due to continuous evolution in the industry

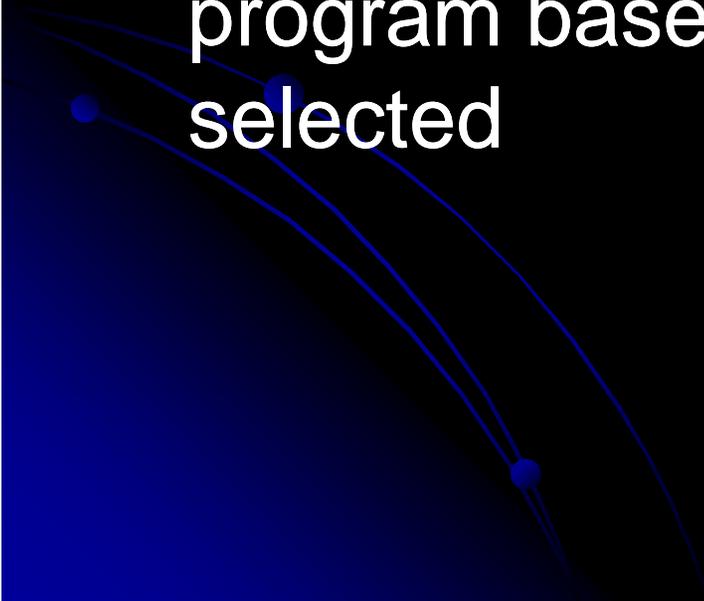
Because:

- Fuel Types can change
 - Heat Load can change
 - Fuel Weights typically will go up
 - Other design considerations
- 

Schedule - CoC

- You must maintain a 5 to 8 year planning horizon in your loading strategy
- New CoC Amendments can take 2 – 4 years
- Certificate Holder must be involved from time fuel is purchased
- Nuclear Engineering must determine before fuel purchase if there will be impairments to licensing the fuel for dry storage.

Schedule - Implementation

- **T-60 - 48 Months** – Notification to Certificate Holder of need for Amendment
 - **T-24 Months** - Order storage system
 - **T-16 Months** – Assess changes to program based on CoC Amendment selected
- 

Schedule - Implementation

- **T-9 Months** – Assessment Complete
- **T-9 Months** – Decision on what changes will be made based on assessment results
- **T-7 Months** - Start changes to programs
- **T-5 Months** – Train on changes and change procedures

Stakeholder Impact Management, Site Staff, and Regulator

- Budget for changes 3 – 5 years in advance
- Management briefings on the WHY
- Proactive regulator (site) briefings on details
- Site staff communication EARLY

Stakeholder Impact – Engineering

- Comparative review of drawings, calcs, assumptions from original licensing of the facility against new FSAR and CoC
 - Heavy Loads
 - Seismic spectra
 - Industry Code changes
 - Heat load effects on SSC
- Component Data Base updates

Stakeholder Impact – Licensing

- 72.212 Evaluation Report will be affected
- Facility FSAR can be affected so don't get tunnel vision on the 72.48 evaluation, everything also needs to pass 50.59 muster

Stakeholder Impact – Training

- Workers that perform ITS functions must be trained
 - Continuing training for the existing cask systems
 - Training on the new cask system to be deployed
- Specific attention needs to be paid to Operations' understanding of multiple/different CoC Tech Specs, and how to determine which cask is governed by what specific CoC Amendment.

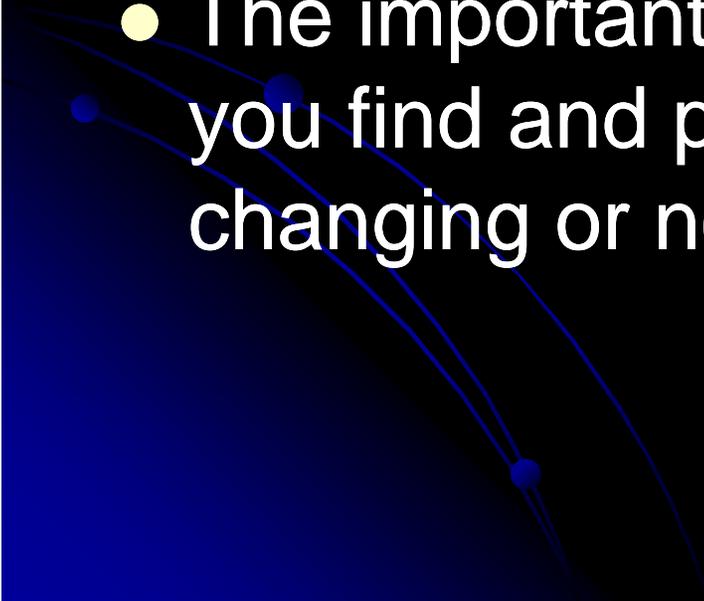
Stakeholder Impact – Operations

- Operations performs the daily cask surveillances
- They also determine operability of the cask system and initiate associated LCOs
- Make sure that they understand the difference between the CoCs and Tech Specs of the different cask systems
- Make sure that OPs procedures address the different surveillance requirements and LCOs. It is **GOOD** to provide the explanation **IN THE PROCEDURE**.

Stakeholder Impact – Procedures

- Procedures need to address all versions of the cask system
 - Independent verification on steps that implement CoC Tech Specs
 - Independent verification on steps that are different for different casks systems
- You should expect that at least 50% of the procedures will have to be changed

Documentation

- Engineering reviews of new FSAR and CoC will find things
 - Some things require changes and some don't
 - The important thing is to document what you find and provide justification for changing or not changing
- 

Documentation

- You may also find errors from previous evaluations or reviews.
- These may affect both existing in-service systems and the proposed new system.
- These should be addressed via the Corrective Action process and in the documentation for the new CoC.

Dry Run Demonstrations or Not?

- The CoCs will specify the Dry Run requirements and they must be done.
- However, it is acceptable to credit dry runs already performed at your site on substantially identical systems and procedures.
- Make sure that your 72.212 evaluation clearly states what was done to satisfy the requirements of the new CoC.
- Sometimes, key processes demonstrated for previous dry runs do not support new procedures in new FSAR or CoC. Partial dry runs of discrete steps may need to be performed and documented

Things you may find along the way

- Errors in the Cask System FSAR – work with the CoC HOLDER
- Procedures described in the CoC that are not described in the FSAR

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