



# **Regulatory Perspective on Confirmatory Burnup Measurements for Burnup Credit in Spent Nuclear Fuel Transportation Packages**

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# Overview

- Background
  - Regulations
- Current Staff Guidance
  - ISG 8, Rev. 2
- Guidance Revision Considerations
  - Alternatives to quantitative burnup confirmation measurement

## Background: Regulations

- 10 CFR Part 71, “Packaging and Transportation of Radioactive Material”
  - 71.55(b): subcritical with water leakage
- No U.S. regulation requiring measurement
- 10 CFR Part 72 allows loading of dry storage casks without associated transport package

# Current Staff Guidance

Interim Staff Guidance (ISG-8), Revision 2  
published in 2002

<http://www.nrc.gov/reading-rm/doc-collections/isg/isg-8R2.pdf>

- “Burnup Credit in the Criticality Safety Analyses of PWR Spent Fuel in Transport and Storage Casks”
- Actinide-only based on available validation data
- Fission products to provide additional margin
- Confirmatory burnup measurement consistent with IAEA TS-R-1

## Need for Alternative to Measurement

- Applicants and licensees reluctant to include measurement provision in package operating procedures:
  - Additional time at pool = more personnel exposure
  - More fuel movement = higher probability of fuel handling incident
  - Additional costs
- Approximately 1200 dry storage casks already loaded in U.S.

## **Considerations for Revision 3 – Burnup Measurements**

- NUREG/CR-6955, “Criticality Analysis of Assembly Misload in a PWR Burnup Credit Cask”
- Draft NUREG on information related to spent fuel burnup confirmation
- NRC Office of Research evaluating misload probability

## **Considerations for Revision 3 – Misload Analysis**

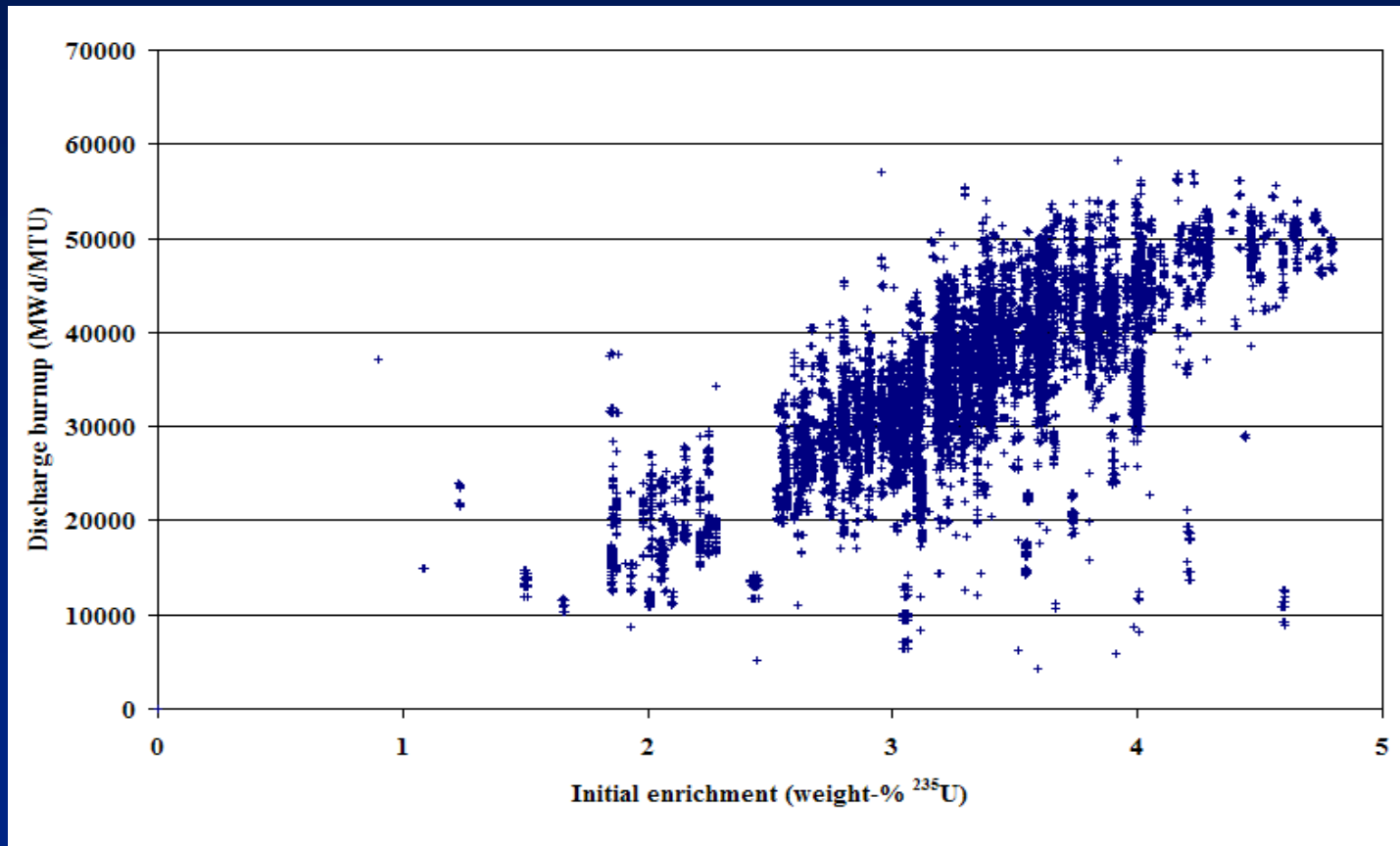
- Potential for misload analysis in lieu of measurement is being considered
  - Sensitivity of a package design can indicate how the package reactivity will respond to a misload
  - Package should be adequately subcritical under scenarios involving a single severely underburned assembly, or multiple moderately underburned assemblies
  - Should include any related code biases and uncertainties, as well as an appropriate administrative margin

## **Considerations for Revision 3 – Misload Analysis**

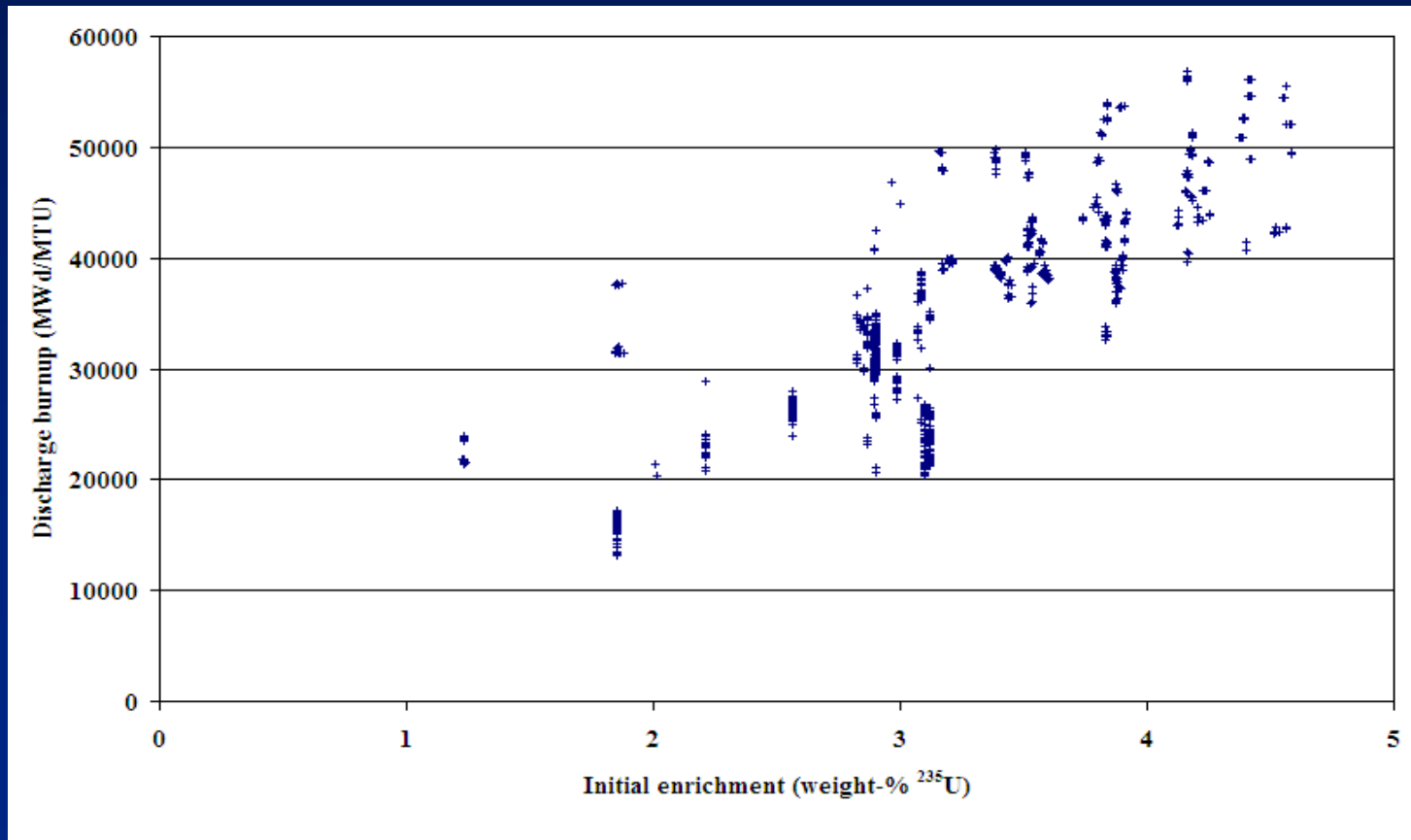
- Should be based on the discharged population intended to be shipped
- Misload analyses would be expected to be coupled with applicable administrative procedures to reduce probability of misload
- Ideally the misload analysis would be generalized for a fuel population, but could be site-specific



# Discharged Fuel Population: All U.S. 15x15s (as of 2002)



# Discharged Fuel Population: Single Pool 15x15s (as of 2002)

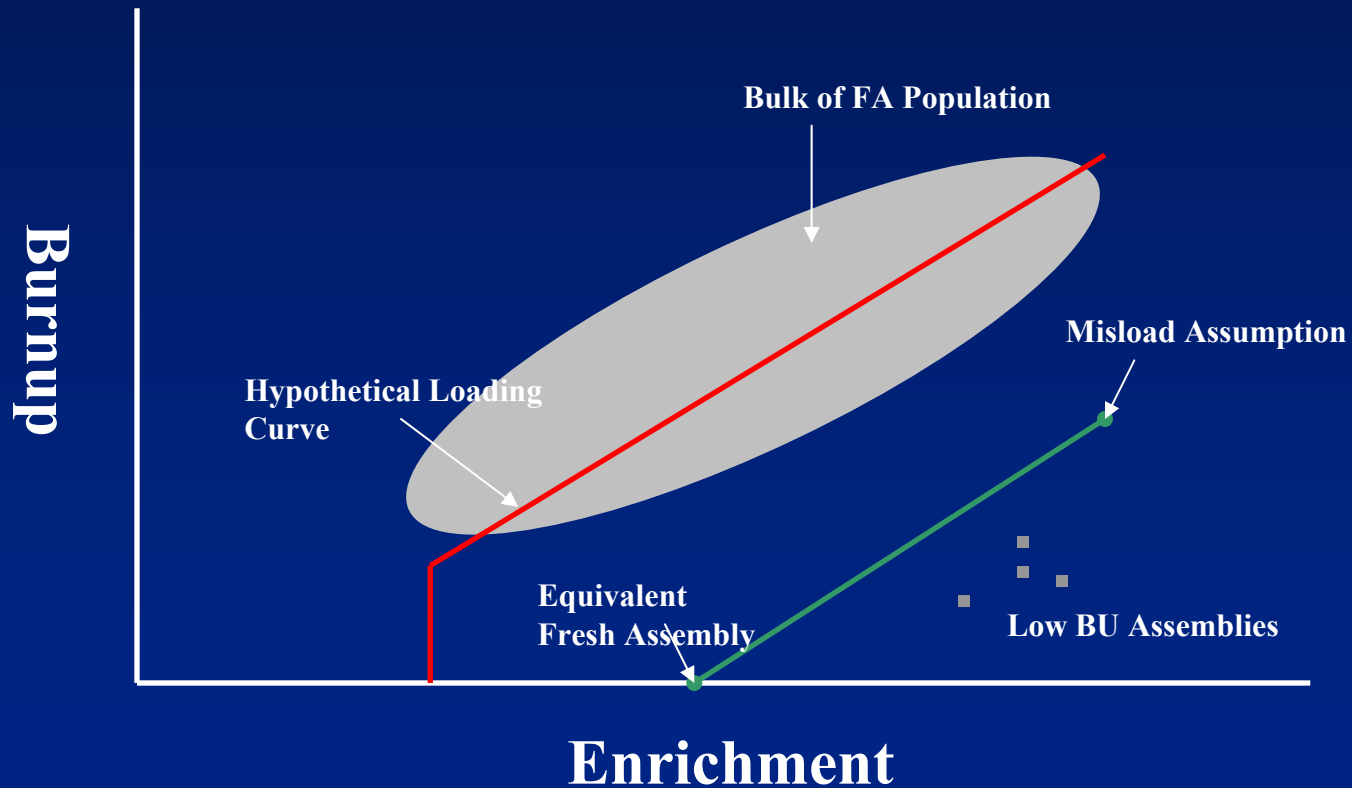


# Administrative Procedures

- No fresh fuel in pool at time of loading
- Full pool audit within 1 year prior to loading
- Qualitative verification that loaded assembly is burned (visual or gross measurement)
- Identification of high reactivity fuel in pool both prior to and after loading
- Assemblies without visible ID must have quantitative measurement
- Others?

# Administrative Procedures

- Based on Discharged Fuel and Misload Analysis Assumptions



## Summary

- NRC working to expand the technical basis for burnup credit to provide alternatives to confirmatory burnup measurements
- Will be seeking feedback from industry and other public stakeholders prior to publishing a revision to ISG-8.

# Questions?