

10 CFR 72.48 Process

SFST Seminar

December 22, 2009

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U.S.NRC

UNITED STATES NUCLEAR REGULATORY COMMISSION

Protecting People and the Environment

10 CFR 72.48 Process

- Applicability
 - Does 72.48 apply to proposed activity?
- Screening
 - Must the proposed activity be evaluated against the eight criteria of 72.48(c)(2)?
 - Does the proposed activity require prior NRC approval?
- Evaluation
 - Does the proposed change meet any of the eight criteria specified for requiring prior NRC approval?

Applicability Determination

72.48 applies to any modification or addition to, or removal from, the facility or spent fuel storage cask design or procedures that results in:

- A change to the facility or cask design as described in the FSAR
- A change to a procedure as described in the FSAR, or
- A change to tests or experiments not described in the FSAR

Applicability Determination (cont.)

- If the proposed activity requires a change to a CoC or License condition, or a Technical Specification; the licensee or vendor must submit an amendment request.
- 72.48 is not applicable if:
FSAR changes do not change the meaning or substance of information presented.

Screening Process

Will implementation of the proposed activity affect:

- A design function of an SSC, as described in the FSAR?
- The performance or method of control of a design function described in the FSAR?
- An evaluation methodology described in the FSAR used in establishing the design bases or in the safety analysis?

Screening Process (cont.)

Will implementation of the proposed activity result in a test or experiment:

- Not described in the FSAR
- Outside the reference bounds of the design bases described in the FSAR, or
- Inconsistent with the analyses or descriptions in the FSAR?

Evaluation Process

A CoC or license amendment is required if the proposed activity results in more than a minimal increase in:

- The frequency of an analyzed accident
- The likelihood of an analyzed malfunction of an important to safety SSC,
- The consequences of an analyzed accident, or
- The consequences of an analyzed malfunction of an important to safety SSC

Evaluation Process (cont.)

A CoC or license amendment is required if the proposed activity creates a possibility for:

- An accident of a different type than analyzed previously, or
- A malfunction of an important to safety SSC with a different result than analyzed previously

Evaluation Process (cont.)

A CoC or license amendment is required if the proposed activity results in:

- A design basis limit for a fission product barrier being exceeded or altered
- A departure from a method of evaluation used in establishing the design bases or in the safety analyses

72.48 Inspections

- Inspection Procedure 60857, “Review of 10 CFR 72.48 Evaluations”
- Region has the lead for inspection of licensee 72.48s, with technical support from SFPO, if necessary
- SFPO has the lead for inspection of vendor 72.48s and those identified at fabricator facilities
- SFPO 72.48 Task Group acts as a focal point to address issues and assists in interpretations

72.48 Task Group

- Comprised of individuals representing technical disciplines, licensing and inspection
- Task Group Charter:
 - Address 72.48 issues
 - Provide for consistency in interpreting 72.48 reviews and evaluations
 - Develop staff guidance for reviewing 72.48 changes
 - Provide recommendations to management on 72.48 matters
 - Provide 72.48 training to other staff members, and
 - Provide Regional support on 72.48 matters

Summary

- Significant design changes can be made under the provisions of 72.48
- Inspections are the primary mechanism for assessing adequacy of 72.48 evaluations
- CoC and license conditions, and Technical Specifications must provide clear requirements for use
- Staff guidance exist in Office Instruction SFST-18 “Part 72 Review Guidance”