



NUCLEAR ENERGY INSTITUTE

**Everett L. Redmond II**

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USED FUEL STORAGE AND  
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December 22, 2009

Mr. Ata Istar  
Structural Mechanics and Materials Branch  
Division of Spent Fuel Storage and Transportation  
Office of Nuclear Material Safety and Safeguards  
U.S. Nuclear Regulatory Commission  
Washington, DC 20005-0001

**Subject:** Nuclear Energy Institute Comments on Draft NUREG-1927, "Standard Review Plan for Renewal of Independent Spent Fuel Storage Installation Licenses and Dry Cask Storage System Certificates of Compliance," 74 *Federal Register* 51339, October 6, 2009

**Project Number: 689**

Dear Mr. Istar:

The Nuclear Energy Institute (NEI),<sup>1</sup> on behalf of the nuclear energy industry, is pleased to comment on the U.S. Nuclear Regulatory Commission's (NRC) Division of Spent Fuel Storage and Transportation (SFST) Draft NUREG-1927, "Standard Review Plan for Renewal of Independent Spent Fuel Storage Installation Licenses and Dry Cask Storage System Certificates of Compliance." The industry and NEI have reviewed the draft standard review plan (SRP) and have developed detailed comments, which are provided in the attachment to this letter.

Industry commends SFST for preparing this draft guidance in preparation for Independent Spent Fuel Storage Installation license and dry cask storage system Certificate of Compliance renewals. Providing guidance in this area should improve the efficiency of the renewal process, and providing an opportunity for public comment helps assure a sound and predictable regulatory process.

During the review of this draft guidance, it was noted that there are numerous references to Interim Staff Guidances (ISGs). While the content in the ISGs may be appropriate to reference within this

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<sup>1</sup> NEI is the organization responsible for establishing unified nuclear industry policy on matters affecting the nuclear energy industry. NEI's members include all utilities licensed to operate commercial nuclear power plants in the United States, nuclear plant designers, major architect/engineering firms, fuel fabrication facilities, nuclear material licensees, and other organizations and individuals involved in the nuclear energy industry.

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document, NEI does not believe it is appropriate to use an ISG as a reference. An ISG should be interim guidance with a relatively short lifespan until the appropriate staff review guidance is revised. By referencing an ISG in a newly developed guidance document, rather than incorporating the ISG or referencing another Standard Review Plan, the NRC is institutionalizing the specific ISG and increasing the likelihood of document configuration control problems in the future. Therefore, industry recommends that the NRC incorporate the appropriate portion of the ISGs into this SRP or reference to the "Standard Review Plan for Spent Fuel Dry Storage Systems at a General License Facility," NUREG-1536.

Please do not hesitate to call or email me (202-739-8122, elr@nei.org) if you have any questions.

Sincerely,



Everett L. Redmond II

Attachment

c: Mr. E. William Brach, U.S. Nuclear Regulatory Commission  
Ms. Vonna Ordaz, U.S. Nuclear Regulatory Commission  
Mr. Raymond Lorson, U.S. Nuclear Regulatory Commission  
Mr. Douglas Weaver, U.S. Nuclear Regulatory Commission  
Mr. Douglas Walters, Nuclear Energy Institute  
Mr. Steven Kraft, Nuclear Energy Institute