

USED FUEL STORAGE AND TRANSPORTATION ISSUE SUMMARY FORM

Issue Number: I-10-02 Revision: 0

I. Problem Statement (Provide a clear, concise description of the issue. Use continuation sheet as required.)

Certain BWR fuel assemblies have experienced crud-induced localized corrosion (CILC) of the fuel cladding. The magnitude of this corrosion varies based on the severity of the conditions that cause the corrosion and the length of exposure to those conditions. The classification of these assemblies with regard to dry storage and transportation is unclear. Clarification of the NRC's position on this matter is necessary so that licensees and CoC holders can implement a safe, consistent, regulatorily compliant approach to dealing with this fuel.

II. Screening Criteria (Provide an explanation as to how the issue meets each of the screening criteria to be considered for generic issue resolution. Use continuation sheet as required.)

1. **Does the proposed issue involve spent fuel storage or transportation and affect multiple 10 CFR 71 or 10 CFR 72 regulated entities?** Yes. There are over 5,000 fuel assemblies in wet storage at a minimum of seven plant sites that are susceptible to CILC and need to be moved to dry storage under 10 CFR 72 and ultimately transported under 10 CFR 71.
2. **Why does the proposed issue warrant generic resolution?** Part 71 and 72 licensees wish to address this fuel with a consistent approach with which NRC concurs.
3. **Why does the issue warrant engagement between the industry and NRC?** Different licensees have used different approaches for dealing with this fuel and the NRC staff position in this regard is not understood or documented.
4. **Why is the issue not already adequately covered by another process?** This issue has unique characteristics that are not addressed in any existing NRC staff review guidance, inspection procedure, or regulatory guide.
5. **What tangible benefits will generic resolution of the issue produce?** A consistent licensee and CoC holder approach to addressing this issue, and a stable, predictable inspection protocol will allow this fuel to be placed into dry storage and ultimately transported without compliance or safety issues arising during or after fuel loading.

III. Success Criteria (Describe the criteria to be used to define success for resolving this issue. Use continuation sheet as required.)

1. Industry documents a generic protocol with which NRC formally concurs regarding how to classify this fuel for storage and transportation.
2. NRC develops inspection guidance and staff review guidance consistent with the agreed-upon protocol.

POC: Are all screening criteria satisfied? Yes _____ No _____

IV. Concurrence (Issues accepted for evaluation require concurrence by NEI and NRC)

For Industry: _____
Print/Sign _____ Date _____

For NRC: _____
Print/Sign _____ Date _____

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V. Closeout (Summarize the reason for rejecting the issue or the satisfaction of the success criteria and the process(es) to be used to resolve the issue)

Closeout Summary

DRAFT

Print/Sign

Date