

# USED FUEL STORAGE AND TRANSPORTATION ISSUE SUMMARY FORM

Issue Number: I-10-04 Revision: 0

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

Holders of 10 CFR 71 and 72 Certificates of Compliance (CoCs) periodically seek NRC review and approval of amendments to their certificates via submittal of amendment requests, referred to here as License Amendment Requests (LARs). In recent years, issues have arisen with regard to the completeness and accuracy of the LAR submittals, resulting in some submittals having to be withdrawn and re-submitted before the NRC technical review could commence. LAR submittal guidance is an attempt to standardize the format and content of LAR submittals for all CoC holders, to the extent practical, in order to better meet NRC's expectations for high-quality submittals and reduce overall LAR review time.

## 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. Essentially all Part 71 and 72 CoC holders periodically seek NRC review and approval of CoC amendments via LARs.
- 2. Why does the proposed issue warrant generic resolution?** The guidance is intended to provide a consistent format and content template for LAR submittals for all CoC holders to use, which reflects NRC's expectations for submittal content and quality as expressed in Standard Review Plans NUREGs-1536, -1567, and -1617, and generic communications such as RIS 2004-20 and RIS 2007-09.
- 3. Why does the issue warrant engagement between the industry and NRC?** Industry is seeking to improve the quality of LARs and thereby reduce the number of requests for supplements, review delays, and numerous administrative and editorial correction RAIs. The NRC has provided feedback on the draft guidance via letter dated January 4, 2010.
- 4. Why is the issue not already adequately covered by another process?** NRC review of this industry guidance was not a formally identified work activity, although initial feedback has been received. This protocol is being used to identify the issue and allow NRC to dedicate resources to support reviewing and providing comments on the next version of the draft guidance.
- 5. What tangible benefits will generic resolution of the issue produce?** NRC review of, and dialogue about industry guidance on LAR submittals will enable the specific problems with LAR submittals to be addressed in the guidance, resulting in higher quality applications, fewer requests for supplements and fewer RAIs.

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

1. Industry issues revised draft LAR submittal guidance via NEI report.
2. NRC reviews and comments on the revised draft guidance.
3. Industry issues final guidance for use by CoC holders and specific licensees.

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