## NAC International

To:

1-301-492-3446

From:

Sue Mountan - smountan@nacintl.com

Subject:

SFST Licensing Conference Proposed Discussion Topics

Message:

Mr. Lesar:

Please see the attached letter from Anthony L. Patko.

**Sue Mountan NAC International** 678/328-1277

smountan@nacintl.com

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## **NAC International**

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April 27, 2010

Mr. Michael T. Lesar, Chief Rulemaking and Directives Branch (RDB) Office of Administration Mail Stop: TWB-05-B01M U.S. Nuclear Regulatory Commission Washington, DC 20555-0001

Subject:

Proposed Discussion Topics for the Spent Fuel Storage and Transportation

Licensing Conference – June 23-24, 2010

Dear Mr. Lesar:

NAC International (NAC) appreciates the opportunity to provide input to the discussion topics for the Spent Fuel Storage and Transportation Licensing Conference scheduled for June 23-24, 2010.

Please consider the following input for topics to be addressed and discussed at the above conference:

- Regulatory and technical specification "creep" by expanding limitations
  - o Helium leak testing of base metal (lid)
  - Mechanical testing of neutron absorber
- Risk informed regulating/decision making for Part 71 and Part 72
  - o Generic issue resolution protocol
  - o NEI's role as liaison between NRC and Industry
  - o Requirement for analysis of secondary impact
- RAI Process
  - o Nexus to safety for RAIs
  - o Methods of communicating RAIs
  - o Facilitating the RAI process
  - o Second RAI only to address responses to first RAI (not original submittal – unless there is a clear nuclear safety issue)
- Rules of Engagement
  - o Acceptance Review
  - o Communication with applicant during the LAR process
  - o Number of RAI cycles
  - Extending technical review beyond changes



Mr. Michael T. Lesar U.S. Nuclear Regulatory Commission April 27, 2010 Page 2

If you need further information on the above topics, please contact me via my direct line at 678-328-1274 or via e-mail at <a href="mailto:tpatko@nacintl.com">tpatko@nacintl.com</a>.

Sincerely,

Anthony L. Patko

Director, Licensing

Engineering