

June 15, 2010

Dr. Said Abdel-Khalik, Chairman
Advisory Committee on Reactor Safeguards
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

SUBJECT: RESPONSE TO THE ADVISORY COMMITTEE ON REACTOR SAFEGUARDS
LETTER DATED MAY 17, 2010, ON REVISED STANDARD REVIEW PLAN FOR
SPENT FUEL DRY STORAGE SYSTEMS (NUREG-1536)

Dear Dr. Abdel-Khalik:

On behalf of the U.S. Nuclear Regulatory Commission (NRC), I am responding to your letter dated May 17, 2010, regarding recommendations of the Advisory Committee on Reactor Safeguards (ACRS) on the Revision 1C of NUREG-1536, "Standard Review Plan (SRP) for Spent Fuel Dry Storage Systems at a General Licensee Facility." The NRC staff agrees with the recommendations in your letter as discussed below.

ACRS Recommendation 1

The staff should remove the discussion of burnup credit from NUREG-1536 and refer to Spent Fuel Project Office Interim Guidance (ISG) -8, Revision 2, "Burnup Credit in the Criticality Safety Analysis of PWR Spent Fuel in Transport and Storage Casks."

NRC Response

The NRC staff agrees. The text in Section 7.5.5, "Burnup Credit," has been removed and replaced with a reference to the current revision of ISG-8. The staff is currently reviewing and plans to issue an updated ISG-8 to enhance future guidance on the use of "Burnup Credit."

ACRS Recommendation 2

The revised version of NUREG-1536 should be issued after the above recommendation is implemented.

NRC Response

The NRC staff agrees and is proceeding with issuing NUREG-1536, Revision 1.

ACRS Recommendation 3

Guidance in ISG-8, Revision 2, for supplementary measurements to verify and adjust plant burnup records prior to granting burnup credit should be reconsidered.

NRC Response

The NRC staff agrees. The staff plans to issue a future revision to ISG-8 based, in part, on input from the Office of Nuclear Regulatory Research which is studying the potential for, and consequences associated with the misload of a PWR fuel assembly into a spent fuel transportation cask. The revision to ISG-8 will be presented to the ACRS prior to implementation.

The NRC staff and I appreciate the comments and recommendations provided by the ACRS. We look forward to continue working with the Committee as the staff evaluates future updates to our standard review plans and staff guidance.

Sincerely,

/RA by Michael F. Weber for/

R. W. Borchardt
Executive Director
for Operations

cc: Chairman Jaczko
Commissioner Svinicki
Commissioner Apostolakis
Commissioner Magwood
Commissioner Ostendorff
SECY

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