



NUCLEAR ENERGY INSTITUTE

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May 14, 2010

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

Subject: Nuclear Energy Institute Suggested Topics for Discussion for SFST Licensing Process Conference, 75 *Federal Register* 9452 (March 2, 2010)

Project Number: 689

The Nuclear Energy Institute (NEI)¹, on behalf of the nuclear energy industry, is pleased to provide suggested topics for discussion at the U.S. Nuclear Regulatory Commission's (NRC) Spent Fuel Storage and Transportation Licensing Process Conference scheduled for June 23-24, 2010. For ease of consideration, the suggested topics, provided in the attachment, are grouped into two categories: topics that could be addressed in the near future and topics requiring a long-term (multi-year) effort.

Industry commends the NRC for hosting the conference and providing an early opportunity for public input, and we look forward to having a productive discussion at the conference.

Please do not hesitate to contact me at 202-739-8122 or elr@nei.org if you have any questions.

Sincerely,

Everett L. Redmond II

Attachment

- c: Ms. Vonna Ordaz, U.S. Nuclear Regulatory Commission
- Mr. Douglas Weaver, U.S. Nuclear Regulatory Commission
- Mr. Raymond Lorson, U.S. Nuclear Regulatory Commission
- Mr. Eric Benner, U.S. Nuclear Regulatory Commission
- Mr. Alexander Marion, Nuclear Energy Institute
- Mr. Steven Kraft, Nuclear Energy Institute

¹ 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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**Suggested Topics for Discussion at the
NRC Licensing Process Conference on June 23-24, 2010**

Topics that could be addressed in the near future

- Developing a framework for communication between NRC regional inspectors, NRC headquarter offices, dry storage vendors, and general licenses when generic issues arise
- Consistency and predictability of requirements and inspection criteria for ISFSI construction and dry runs throughout NRC Regions and Headquarters
- Schedule expectations for CoC amendments once the technical review is complete
- Clarify the regulatory requirements pertaining to compliance with a dry storage FSAR and a transportation SAR
- Development of criteria that govern the content of dry cask storage CoCs and Technical Specifications
- Ensuring that the language used in CoC and Technical Specifications facilitates verbatim compliance
- Improvements in the area of 72.48 guidance including the definition of "approved methodology"
- Development of criteria for the scope of RAIs in a licensing action relative to changes submitted
- Threshold criteria for the inclusion of new/additional analyses in an FSAR or requirements in a CoC during an amendment process when such analyses or requirements were previously not required
- Guidance as to the level of technical detail in an FSAR/SAR (currently factors such as the technical discipline, applicant and NRC staff, may significantly influence the level of technical detail in an FSAR/SAR)
- The use of topical reports in dry storage and transportation licensing actions (e.g. timing, priority, implementation)
- NEI generic issue resolution protocol and possible new FAQ process
- Discuss the logistics of the CoC renewal process
- NRC expectations and guidance regarding providing paper copies of submittals to NRC and marking proprietary documents, particularly calculations and drawings, where only portions may be proprietary

Topics requiring a long term effort

- Part 72 criteria for dry cask storage and transportation CoCs and Technical Specifications
- Revisions to Part 72 regulations to streamline certification process and to harmonize the relationship between various certificate amendments
- Addition of provisions in Part 72 for correction of administrative errors in published CoCs and a process to allow for exigent amendments
- Consistency of manufacturing requirements for dual purpose hardware in Part 72 and Part 71 CoCs, FSAR, and SARs