



10 CFR 72.48 – Capturing Experience and Seeking Improvements

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Purpose

- Discuss operating experience with implementation of 10 CFR 72.48 *to solicit feedback on*
 - effectiveness,
 - predictability and
 - transparency
- Why are we looking at this
 - NEI Dry Storage Forum Panel Discussions;
 - Past 72.48 implementation experiences;
 - Perceived concerns related to some Technical Specification requirements

10 CFR 72.48

- Provides criteria by which changes to spent fuel storage facilities can be made without requiring a license amendment.
- Fashioned after the approach used in 10 CFR 50.59.
- Generally works well but some recent experience suggests improvements can be achieved
- Two apparent options - enhance the current process, or consider developing a new rule

Enhance Implementation of the Current Rule

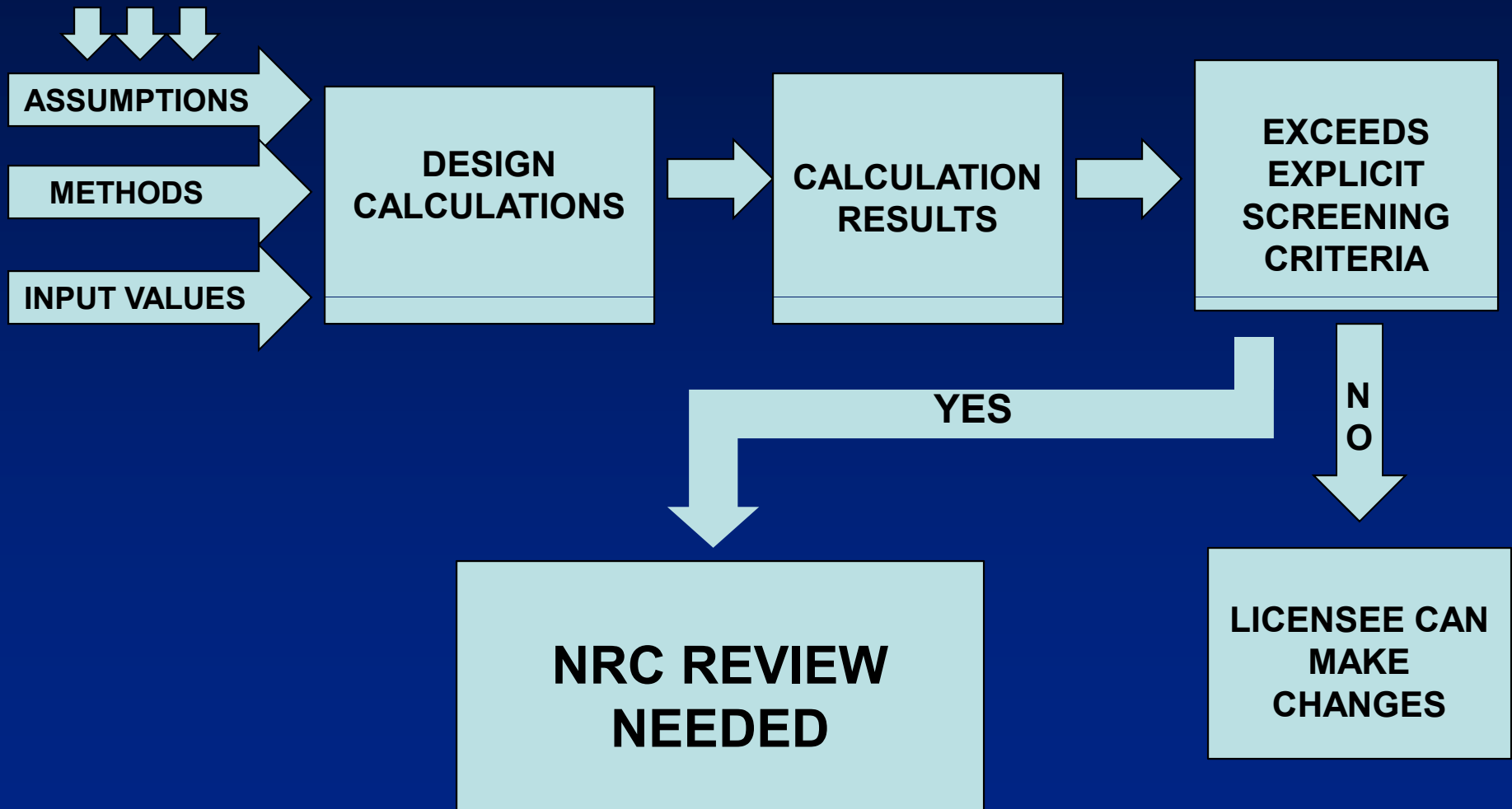
- Revise NRC or NEI Guidance
- Enhance NRC/Industry Inspection and Oversight
- Public Workshops and Conferences

Revise the Current Rule

- Consider development of
 - Specific screening criteria and acceptance limits related to the system design; and,
 - To develop specific criteria for making changes to activities related to provide assurance that design objectives are implemented.

Revise the Current Rule Design Adequacy

STANDARD REVIEW GUIDE
INTERIM STAFF GUIDANCE
INDUSTRY WIDE STANDARDS



Revise the Current Rule - Design Implementation

- **FABRICATION METHODS**
- **OPERATING PROCEDURES**
- **QA PROGRAM**
- **TESTING VERIFICATION**
- **CODES AND STANDARDS**

**SUMBIT TO NRC FOR NON-
TECHNICAL REVIEW**

Discussion/Comment

- Develop List of Pro/Cons
- Comments

Conclusion/Summary

- Next Steps