

License Process Conference Issues and Actions

Everett L. Redmond II, Ph.D.

Nuclear Energy Institute
September 16, 2010



NUCLEAR
ENERGY
INSTITUTE

Objectives

- **Provide Industry's input on issues and actions arising from the June 2010 NRC-SFST Licensing Process Conference**
- **Define and prioritize short-term and long-term actions**
- **Define a path forward**

Issues

- **CoC/TS Content**
- **72.48 Guidance and Implementation**
- **NRC/Industry FAQ Process**
- **RAI/LAR Process**
- **Aging Management and CoC Renewals**
- **Rulemaking for CoC Amendments**
- **NRC-Licensee Communication**

Short Duration Items

Priority	Action
<p>S1A (CoC/TS)</p>	<p>NRC and Industry adopt a standard practice of ensuring compliance with proposed CoC and TS requirements can be demonstrated <u>before</u> the item is approved in the licensing action.</p>
<p>S1B (Communication)</p>	<p>Review recent operating events to derive lessons learned and modify communication protocol between NRC and various dry cask storage industry groups (e.g. NEI, user groups).</p>
<p>S2 (FAQ)</p>	<p>Create a quick turnaround FAQ process to seek and receive NRC answers to Industry questions. Model from existing FAQ process used with another agency department. Use as RIRP resolution path, as appropriate.</p>
<p>S3A (72.48)</p>	<p>Revise NEI 96-07 guidance for implementing the existing rule based on experience to date.</p>
<p>S3B (72.48)</p>	<p>Assess benefits of consistent 72.48 training between NRC and Industry. Share Industry training material with NRC.</p>
<p>S4 (RAI/LAR)</p>	<p>Revise and issue NEI 09-03 considering NRC input, new NRC RAI procedure, and outcome of Item S1A.</p>

Long Duration Items

Priority	Action
L1A (CoC/TS Criteria)	Industry and NRC develop criteria for determining what items belong in the CoC/TS (including specific licenses), and where they belong in the documents.
L1B (CoC Renewal)	Industry and NRC identify and resolve issues relating to CoC renewals prior to first renewal (e.g., how aging management programs will be incorporated into all amendments during CoC renewals).
L2 (72.48)	NRC and industry consider proposal from Licensing Process Conference to include specific criteria in the 72.48 rule and other options for modifying the 72.48 rule.
L3 (Part 72 Rule)	Industry and NRC interact to identify advantages and disadvantages of current process of performing rulemaking for each CoC amendment to inform NRC development of the technical basis for a rule change.

Path Forward

Each action item agreed to be pursued in principle should be processed per the RIRP, and resolved per that protocol, when appropriate