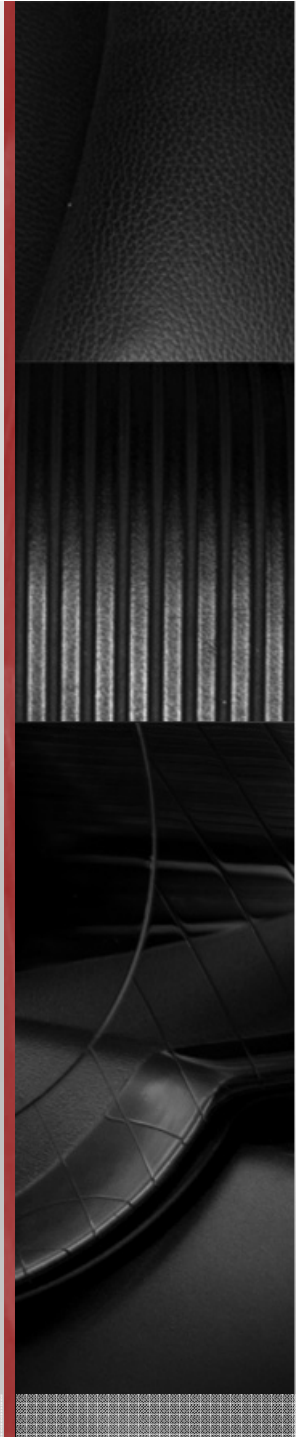


Certificate of Compliance Renewal for Generically Certified Dry Storage Systems

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Dry Storage License Renewals

- First generic CoC renewal application May 2013
- Current experience only with site-specific ISFSI license renewals.
- Staff guidance for review of renewals focuses heavily on technical issues regarding aging management (NUREG -1927).
- Term of renewal is up to 40 years.
- Renewal of the Generic CoC means:
 - the loaded systems can continue to be used with up to 60 years of storage; and
 - additional systems already certified can continue to be loaded under that CoC.



Technical Aspects of Generic CoC Renewal

- Requires aging management program for Structures, Systems, and Components (SSC).
 - Generic qualification of the system for longer license periods.
 - Site-specific actions based on site-specific conditions may be required and added as conditions of renewal (72.240(e)). (e.g. Marine Environment Sites)
- No concerns for fuel assembly confined in an inert atmosphere.
- The functions of the SSC should not be impaired.
 - Confinement
 - Shielding/Radiation Protection
 - Heat Removal
 - Structural Integrity (canister and over pack)
 - Criticality (does not appear to be a concern due to inert atmosphere)
- Continued confidence that a loaded system can be used for another 40 years.
- Renewal not intended to address extended long term storage.



Administrative Aspects of Generic CoC Renewal

- Most storage systems in use have between 5 and 10 current amendments valid for loading that will all expire on the same date.
 - Applicants should have the option to renew all or some of the amendments and each will be updated with the new expiration date for the CoC.
 - Aging management programs may have to be addressed on an amendment by amendment basis due to differences in the certified equipment.
 - After renewal of the CoC, additional amendments will be processed in accordance with current standard practices.



Administrative Aspects of Generic CoC Renewal

- Some certified systems are no longer being deployed for storage (e.g. VSC-24 and HI-STAR 100) but they will require CoC renewal for continued use on an ISFSI.
 - Applications for CoC renewals that only address continued use of systems may require less Staff resources (only PM/Materials reviewers).
 - Would not require the NRC to endorse loading additional systems.
 - Applicant should have the option for choosing such a renewal.



Administrative Aspects of Generic CoC Renewal

- 72.240(c)(1), “The application must be accompanied by a ... most recently updated FSAR” – Not all applicants keep a consolidated FSAR.
 - When the cask is loaded the licensing basis for that cask (CoC and FSAR) is fixed.
 - The FSAR revision that corresponds to that amendment continues as the design basis for that amendment.



Administrative Aspects of Generic CoC Renewal

- 72.240(e), “In ... renewal...the NRC may revise the CoC to include terms, conditions, and specifications that will ensure the safe operation of the cask during the renewal term...that will require the implementation of an AMP.”
 - If Aging Management Program requirements are added to the CoC as Conditions it should be clear when the user needs to begin implementing such programs.



Summary

- There may be additional administrative challenges for generic CoC renewal.
- First Generic CoC Renewal to be submitted Spring 2013;
Request NRC/NEI-Industry meeting for 2nd quarter of 2012.
- Guidance in NUREG-1927 may need to be updated to reflect specific issues of generic CoC renewal.