

Certificate of Compliance Renewal Generic Questions/Issues

Industry Perspective

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Desired outcomes

- **Identify and discuss unique issues for CoC renewal**
- **Determine path forward to resolve questions**

CoC renewals will occur soon, need generic resolution for unique aspects

- Existing renewal experience only for site specific licenses
- First CoC renewal application in 2012
- Many more will follow
- NRC technical guidance (NUREG-1927) is applicable
- Aspects of 10 CFR Part 72 general license are unique
 - Multiple amendments
 - Multiple licensees
 - Future fabricated casks may or may not be deployed for CoC
- Several generic questions must be resolved to assure an efficient and effective renewal process

Generic question (1)

Can a CoC holder request only certain amendments to be renewed, or would their request for CoC renewal always include all of the amendments?

- **Industry recommendation:**
 - **NRC previously stated that all amendments are renewed when CoC is renewed¹; however**
 - **Should permit amendment approval to be independently granted**
 - **Each amendment stands on its own**

Generic question (2)

Can NRC issue a renewal such that new systems (e.g. future fabricated casks) could no longer be loaded to a particular amendment? Could this be a streamlined renewal process?

- **Industry recommendation:**
 - **The basis for the questions is not understood. The design basis is not being “reapproved”, the review is based on design standards in effect at time CoC was approved.¹**
 - **The renewal is only focused on whether the aging management program ensures regulatory compliance for the renewal term ²**
 - **NRC has other processes if cask design has safety concerns**

Generic question (3)

What does the CoC holder submit as the most recently updated FSAR, if multiple amendments each have different versions of the FSAR? What about licensees that may operate to different FSAR versions?

- **Industry recommendation:**

- **Only latest FSAR of latest amendment is sufficient**
- **Only submit a new stand-alone Renewal SAR chapter for renewal that**
 - **Addresses all the systems for renewal (e.g. amendments)**
 - **Provides TLAA¹ and AMP² for these systems**
 - **Renewal SAR chapter plus cask FSAR (for licensee, CoC holder) combine to form licensing basis**

Generic question (4)

Can the system's lead canister inspection be generically qualified, i.e. does not need to be performed at each site?

- **Industry recommendation:**
 - **Yes¹, provided it is bounding**

Related question: If a system under a different amendment, or even CoC, or a site-specific license, can be shown to be bounded materially by a lead cask inspection, can that fulfill the requirement for the lead-cask inspection?

- **Industry recommendation:**
 - **Yes, this should be acceptable if the other design's lead cask inspection can be demonstrated to be applicable**

Generic question (5)

Can aging management programs be developed to indicate some actions, e.g. monitoring, that only apply to specific site conditions?

- **Industry recommendation:**
 - **Yes, site conditions need to be specified**

Generic question (6)

How will aging management provisions be clear that they are not needed until x years after systems are loaded?

- **Industry recommendation:**
 - **Should be explicitly stated in CoC¹**
 - **Depending on amendment, aging management program may differ in the specifics**

Additional question identified

- 7. After CoC renewal, does a general licensee need to revise their 72.212 report? - Yes**
- 8. How exactly do the terms stated in 72.212(a)(3) work?¹**
- 9. What is the standard format for a CoC's license renewal application? – Renewal SAR chapter meeting NUREG-1927**
- 10. What is the process to issue license renewal? - Direct final rule**
- 11. How are exemptions handled during license renewal?**

A process is needed to answer questions

- **NRC indicated a forthcoming RIS¹**
 - Durable long-term resolution of questions
 - References to guidance and regulations
 - Outline for submittal packages
 - Common questions and answers
 - Lessons learned from license renewals
- **Develop FAQ process**
 - Near-term resolution of questions
 - Consistency in dealing with questions
 - On-going and responsive for future questions arising during a CoC renewal application

Conclusions

- **CoC renewals will occur soon, with unique questions/issues**
- **Generic resolution of questions needed for an effective and efficient renewal process**
- **A process is needed to achieve timely resolution**