

Submittal of NEI 12-04, Guidelines for 10 CFR 72.48 Implementation, Revision 0
Attachment 1 - DISPOSITION OF RECOMMENDED IMPROVEMENTS TO 72.48 GUIDANCE

This table documents the changes in guidance to implement 10 CFR 72.48 that are incorporated into NEI 12-04 (i.e. differences with NEI 96-07, Appendix B, which is endorsed by the NRC in Regulatory Guide 3.72). The changes were a result of addressing recommended improvements identified by CoC holders and licensees, and by the NRC¹, prior to and during development of revised guidance. Each change in guidance that has been incorporated into NEI 12-04 is summarized, along with the associated recommended improvement to NEI 96-07, Appendix B, and the section of NEI 12-04 that contains the change.

	Section	Improvement/Changes incorporated into NEI 12-04	Recommendation to improve NEI 96-07, Appendix B
1	General, Appendix A	Improved document structure and flow of guidance. Reorganized and renumbered sections, and in some cases relocated guidance from one section to another. Removed superfluous and redundant information. Moved existing examples (that were previously located throughout NEI 96-07 Appendix B) applying specific areas of the guidance into Appendix A.	Improve usability by better organizing guidance.
2	General	Deleted 10 CFR 72.48 rule language as this is available on NRC's webpage.	Improve usability by deleting the repetition of the rule.
3	General	Ensured that guidance remains consistent with the Statements of Consideration for 10 CFR 72.48 (64FR53582).	Ensure guidance is consistent with the SOC.
4	2.2.3, 3.2, and 4.6	Included a more detailed discussion on the relationship of 72.48 and the 72.212 Report in Section 2.2.3, included a definition of the 72.212 Report in Section 3.2, and included discussion of modification of a 72.212 report in Section 4.6. Guidance on the relationship of 72.48 and 72.212 is consistent with NRC RIS 2012-05. Other areas of the guidance were updated to be consistent with the improved definition.	Clarify the relationship of 72.48 and 72.212. A definition for 72.212 Report is needed.
5	3	Reviewed and modified, deleted or added as necessary definitions in Section 3 to ensure that there is a complete set of definitions and that they are consistent with 10 CFR 72.48, and NEI 96-07 <i>Guidelines to Implement 50.59</i> .	Definitions in guidance should be complete, and consistent with 10 CFR 72.48 and guidance on 50.59.
6	3.4 and 4.7	Added a new Definition 3.4 to define <i>adoption</i> . Clarified Section 4.7 and other areas of the guidance (Sections 2.1.1, 2.1.4.1, and 2.1.5) consistent with the new definition. Other areas	A definition for <i>adoption</i> is needed.

¹ NRC Meeting March 28, 2011, Presentation by R. Wharton, NRC, "NRC Suggestions for Revising NEI 96-07, Appendix B, "Guidelines for 10 CFR 72.48 Implementation", ML111150129

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		of guidance were updated consistent with the new definition.	
7	3.6 and 4.2	Revised Sections 3.6 and 4.2 of the guidance to improve clarity on the relationship of the Part 50 Maintenance Rule and 10 CFR72.48. A paragraph has been added to Section 4.2 to provide guidance on performing a one-time 72.48 screening for recurring maintenance.	Improved clarity on the relationship of the Part 50 Maintenance Rule and 10 CFR 72.48 is needed.
8	3.13	Clarified the definition of FSAR for each of the regulated entities, in Definition 3.13. Other areas of the guidance were updated to be consistent with the improved definition.	Clarity on the definition of UFSAR is needed.
9	3.15	Added a new Definition 3.15 to define <i>implementation</i> . Other areas of the guidance were updated to be consistent with the new definition.	A definition for <i>implementation</i> is needed.
10	3.17, 5.1.5 and 6.8	Definition 3.17 was improved to provide clarity on the definition of "method of evaluation", including adding examples more relevant to storage casks. The definition remains consistent with the definition in NEI 96-07 for guidance on 50.59. Guidance in Sections 5.1.5 and 6.8 have been revised to provide more detail and clarity on applying the definition of "method of evaluation", and is consistent with NEI 96-07, Appendix E. Appendix B of NEI 12-04 also includes examples of applying the definition of "method of evaluation".	Improved clarity on the definition of method of evaluation, and its application is needed.
11	4	Revised Section 4 substantially to improve clarity on guidance for applicability determination.	Improved clarity on applicability guidance determination is needed
12	4.3, 4.6 and Appendix A	Revised Sections 4.3 and 4.6 to clarify when editorial and administrative changes, including those in the 72.212 Report and implementing procedures would not require a 72.48 review. Added more examples of editorial/administrative changes to Appendix A.	Improved clarity on editorial/administrative changes is needed.
13	5 and 6	Improved clarity of Sections 5 and 6 on performing a 72.48 screening of un-linked changes and documentation of the screening.	Clarify whether un-linked changes can be addressed in a single 72.48 review.

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	Section	Improvement/Changes incorporated into NEI 12-04	Recommendation to improve NEI 96-07, Appendix B
14	5.1.1	Revised Section 5.1.2 substantially to improve guidance on determining "adverse effects" during a 72.48 screening. Clarified Section 1.3 consistent with the use of "adverse effect".	Improved clarity on the meaning of "adverse effects" on how it is applied for a 72.48 review is needed.
15	6.7	Clarified Section 6.7 and updated table of examples of a design basis limit for a fission product barrier.	Improved clarity on design basis limit for a fission product barrier is needed.
16	6.8	Corrected Section 6.8 to clarify when changes to a method of evaluation (MOE) discussed in the FSAR, but not explicitly approved in a Topical Report or SER, can be performed.	Correction to guidance on evaluating changes to MOE when there is no Topical Report or SER, and NRC confirmed through alternate method, is needed.
17	Figure 1	Updated Figure 1 to better reflect the applicability determination process.	Figures need to be updated to more accurately reflect the 72.48 process.
18	Figure 3	Added note to Figure 3 to clarify the 60-day notification by licensees.	Clarity on the 60-day notification by licensees is needed.
19	Appendix A	Improved clarity of existing examples (from NEI 96-07 Appendix B).	Improve examples.
20	Appendix B	Added Appendix B to provide examples of full 72.48 reviews of realistic activities for Part 72 casks and ISFSIs. Some of these examples were developed based upon actual 72.48 reviews.	More realistic examples of 72.48 reviews that are actually performed are needed. Consider modeling examples after recent 72.48 inspection reports (Helium Leak Test - ML092180140, Light weight transfer cask – ML063130354, and Re-designed dry shielded canister – ML053070583).