# Used Fuel Storage and Transportation Frequently Asked Questions (UFS&T-FAQ)

Form Revision A, 09/12

**UFS&T-FAQ Number: 12-01**

**UFS&T-FAQ Title: Most recently updated FSAR for CoC Renewal**

**UFS&T-FAQ Identification and Screen Section**

(Requestor to Complete)

| | | | |
|---|---|---|---|
| Licensee/CoC Holder: | NEI | Date Submitted: | 9/10/12 |
| Licensee/CoC holder Contact: M. Nichol | | Phone: 202-739-8031 | E-mail: mrn@nei.org |
| NRC Contact: | | Phone: | E-mail: |

| | |
|---|---|
| Potentially relevant existing UFS&T-FAQ numbers: | None |
| This question involves: (check all that apply) | Cask Design Basis ☒, 72.212 ☐, 72.48 ☐, 72.240 ☒, ISFSI Design Basis ☐, Storage ☒, Transportation ☐, Other ☐ |

**Question, including background description and applicable reference(s):**

What does the CoC holder submit as the most recently updated FSAR, if multiple amendments each have different versions of the FSAR? How are different versions of the FSAR used by licensees handled?

10 CFR 72.240(c) states: "*The application must be accompanied by a safety analysis report (SAR). The SAR must include the following:*

*(1) Design bases information as documented in the most recently updated final safety analysis report (FSAR) as required by §72.248;*

*(2) Time-limited aging analyses that demonstrate that structures, systems, and components important to safety will continue to perform their intended function for the requested period of extended operation; and*

(3) *A description of the AMP for management of issues associated with aging that could adversely affect structures, systems and components important to safety.*"

**Draft Proposed Response:**

It is sufficient for the CoC holder to only submit the latest FSAR of the latest amendment to meet the requirement of 10 CFR 72.240(c)(1). If there are differences in the design bases between the latest FSAR submitted by the CoC holder, and the design bases in any other FSAR in use, then these differences would need to be identified and described by the CoC holder and submitted to the NRC along with the latest FSAR. This approach will provide the requisite design bases information. Since the design bases of

other FSAR versions would mostly provide duplicate information, submission of more than one full version of the FSAR would increase demands on resources without providing any value. NRC also has access to all other versions of the FSAR for previous amendments, and versions that would be used by licensees, which are on the docket.

One approach that is recommended for submitting a CoC renewal is to develop a new SAR chapter specifically for the renewal term. This renewal SAR chapter would contain the information required by 10 CFR 72.240(c)(2)and(3). The renewal SAR chapter would also include an evaluation of all CoC amendments and the various FSAR versions in use, would document the differences in design bases, if any, and would ensure that the time limited aging analyses and aging management program are sufficiently robust to address all design bases in use. Once the CoC renewal is granted by the NRC, the renewal SAR chapter would be appended to all FSAR versions in use.

Additional pages attached? Yes ☐ No ☒

**Screening Results:**

1. Is the question sufficiently generic? (Does it affect more than one CoC/ISFSI without consideration or evaluation of site specific information?) Yes ☒ No ☐
2. The question does not involve any unresolved enforcement actions or allegations, or situations covered by other NRC regulatory processes (e.g. Generic Issues process, Bulletin, Generic Letter). The UFS&T-FAQ process may be used to address generic aspects of issues encountered during inspections, questions arising during application reviews, and 72.48 reviews. Yes ☒ No ☐
3. Would the resolution of the question provide clarification of the <u>existing</u> regulations, NRC policy, NRC position and/or regulatory guidance? The UFST&T-FAQ cannot result in new or different requirements, NRC policy, position and/or interpretation of the regulations, where rulemaking, Commission rulings, and/or guidance development processes are appropriate. Clarity from the resolution of the UFS&T-FAQ could be incorporated into future new or revised guidance if deemed appropriate. Yes ☒ No ☐

| <u>FAQ Accepted:</u><br>Industry Panel: Yes ☒ No ☐<br>NRC Panel: Yes ☐ No ☐ | (NEI to complete)<br>Date entered into FAQ Log | By: |
|---|---|---|

**UFS&T-FAQ Number:** **12-01**

**UFS&T-FAQ Title:** **Most recently updated FSAR for CoC Renewal**

**Updated:**_____

**UFS&T-FAQ Evaluation and Resolution Section**

(To be Completed by both Industry and NRC Panel)

**Proposed Final Resolution of UFS&T-FAQ**

| |
|---|
| (*If Industry Panel and NRC Panel do not concur, include both Panels' proposed resolutions here*) |

| |
|---|
| Issue discussed at meeting of both NRC/NEI Question Panels: Date<br>Issue Panels: Concur ☐ Do Not Concur ☐ |

**Approval of Resolution of UFS&T-FAQ**

| | |
|---|---|
| (*NRC/NMSS/DSFST Deputy Director or Director comments on Proposed Final Resolution. If Proposed final resolution is rejected, provide rationale here*). | |
| Approved by:<br>(NRC/NMSS/DSFST Deputy Director if Panels Concur; NRC/NMSS/DSFST Director if Panels do not Concur) | Date: |

**Closure of UFS&T-FAQ**

| |
|---|
| UFS&T-FAQ closed in tracking system and UFS&T-FAQ database updated: Date: |

# Used Fuel Storage and Transportation Frequently Asked Questions (UFS&T-FAQ)

Form Revision A, 09/12

**UFS&T-FAQ Number: 12-02**

**UFS&T-FAQ Title: CoC renewal application inspections**

**UFS&T-FAQ Identification and Screen Section**

(Requestor to Complete)

| | | | |
|---|---|---|---|
| Licensee/CoC Holder: | NEI | Date Submitted: | 9/10/12 |
| Licensee/CoC holder Contact: M. Nichol | | Phone: 202-739-8031 | E-mail: mrn@nei.org |
| NRC Contact: | | Phone: | E-mail: |

| | |
|---|---|
| Potentially relevant existing UFS&T-FAQ numbers: | None |
| This question involves: (check all that apply) | Cask Design Basis ☒, 72.212 ☐, 72.48 ☐, 72.240 ☒, ISFSI Design Basis ☐, Storage ☒, Transportation ☐, Other ☐ |

**Question, including background description and applicable reference(s):**

Can inspections for the CoC renewal application (e.g. lead canister inspection, interior of concrete overpack or horizontal storage module (HSM), and HSM support structures) be generically qualified? i.e., they do not need to be performed at each site. Can inspections performed under a different amendment, or even different CoC or site-specific license, qualify as the CoC renewal application inspections?

NUREG-1927, *Standard Review Plan for Renewal of Spent Fuel Dry Cask Storage System Licenses and Certificates of* Compliance, Appendix E provides guidance for performing CoC/license renewal application inspections. These inspections include: lead canister inspection, interior of concrete overpack or HSM, and HSM support structure.

**Draft Proposed Response:**

Inspections for the CoC renewal application (e.g. lead canister inspection, interior of concrete overpack or horizontal storage module (HSM), and HSM support structures) can be generically qualified. This approach would need to demonstrate that the inspection(s) being credited for the CoC renewal application inspection are applicable. Credit of inspections of other amendments, CoCs or site-specific licenses is also permissible provided they are appropriately justified and demonstrated to be applicable. Even if other inspections are credited for the CoC renewal application inspections, the CoC holder must demonstrate that the inspections sufficiently represent the design bases of all variations of systems

included in the CoC renewal application, including all amendments and various FSAR versions in use.

"Applicable" and "sufficiently representative" are key terms in demonstrating that the CoC renewal inspections (whether crediting other inspections or being specifically performed for the CoC renewal) are sufficient to meet the guidance in NUREG-1927.

To determine if an inspection is "applicable", the CoC holder must demonstrate that the system inspected and the system being renewed, with credit of the other system's inspection, have design bases that contain the same characteristics that are important in the time limited aging analyses. For example, if an aging mechanism is dependent upon the material of the canister, then the material of the inspected canister, and the material in the CoC renewal crediting the inspection, must perform similarly in the aging analysis (i.e. if both are SS-304L, then they would behave similarly in the aging analysis and the inspection would be "applicable"; however, if the inspected canister is SS-316L and the CoC renewal canister is SS-304L, then they would not behave similarly in the aging analysis and the inspected canister would not be "applicable".) Similar considerations should be given to the environment of the canisters in storage. For example, if a prior inspection to be credited was performed in a typically dry arid atmosphere with negligible salt concentration in air, then this inspection would likely not be applicable to canisters located in a humid atmosphere that also contains a relatively high salt concentration in air.

To determine if the set of inspections credited and/or performed for the CoC renewal application are "sufficiently representative", the CoC renewal applicant would need to determine the range of design bases and storage conditions that are included in the CoC renewal application. Inspections should be performed that cover the full range of canister design bases and storage conditions. Extrapolation of inspections is permissible if adequately justified.

Additional pages attached? Yes ☐ No ☒

**Screening Results:**

1. Is the question sufficiently generic? (Does it affect more than one CoC/ISFSI without consideration or evaluation of site specific information?) Yes ☒ No ☐
2. The question does not involve any unresolved enforcement actions or allegations, or situations covered by other NRC regulatory processes (e.g. Generic Issues process, Bulletin, Generic Letter). The UFS&T-FAQ process may be used to address generic aspects of issues encountered during inspections, questions arising during application reviews, and 72.48 reviews. Yes ☒ No ☐
3. Would the resolution of the question provide clarification of the <u>existing</u> regulations, NRC policy, NRC position and/or regulatory guidance? The UFST&T-FAQ cannot result in new or different requirements, NRC policy, position and/or interpretation of the regulations, where rulemaking, Commission rulings, and/or guidance development processes are appropriate. Clarity from the resolution of the UFS&T-FAQ could be incorporated into future new or

| | | |
|---|---|---|
| revised guidance if deemed appropriate. Yes ☒ No ☐ | | |
| FAQ Accepted:<br>Industry Panel: Yes ☒ No ☐<br>NRC Panel: Yes ☐ No ☐ | (NEI to complete)<br>Date entered into FAQ Log | By: |

**UFS&T-FAQ Number:** **12-02**

**UFS&T-FAQ Title:** **CoC renewal application inspections**

**Updated:**_____

**UFS&T-FAQ Evaluation and Resolution Section**

(To be Completed by both Industry and NRC Panel)

**Proposed Final Resolution of UFS&T-FAQ**

| |
|---|
| (*If Industry Panel and NRC Panel do not concur, include both Panels' proposed resolutions here*) |

| |
|---|
| Issue discussed at meeting of both NRC/NEI Question Panels: Date<br>Issue Panels: Concur ☐ Do Not Concur ☐ |

**Approval of Resolution of UFS&T-FAQ**

| | |
|---|---|
| (*NRC/NMSS/DSFST Deputy Director or Director comments on Proposed Final Resolution. If Proposed final resolution is rejected, provide rationale here*). | |
| Approved by:<br>(NRC/NMSS/DSFST Deputy Director if Panels Concur; NRC/NMSS/DSFST Director if Panels do not Concur) | Date: |

**Closure of UFS&T-FAQ**

| |
|---|
| UFS&T-FAQ closed in tracking system and UFS&T-FAQ database updated: Date: |

# Used Fuel Storage and Transportation Frequently Asked Questions (UFS&T-FAQ)

Form Revision A, 09/12

**UFS&T-FAQ Number: 12-03**

**UFS&T-FAQ Title: Licensee actions following NRC approval of the CoC renewal application**

**UFS&T-FAQ Identification and Screen Section**

(Requestor to Complete)

| | | | |
|---|---|---|---|
| Licensee/CoC Holder: | NEI | Date Submitted: | 9/10/12 |
| Licensee/CoC holder Contact: M. Nichol | | Phone: 202-739-8031 | E-mail: mrn@nei.org |
| NRC Contact: | | Phone: | E-mail: |

| | |
|---|---|
| Potentially relevant existing UFS&T-FAQ numbers: | None |
| This question involves: (check all that apply) | Cask Design Basis ☒, 72.212 ☐, 72.48 ☐, 72.240 ☒, ISFSI Design Basis ☐, Storage ☒, Transportation ☐, Other ☐ |

**Question, including background description and applicable reference(s):**

After the NRC approves a CoC renewal, what actions do the licensees using the CoC, and amendments, need to take? How do licensees handle exemptions, site versions of the FSAR (i.e. modified through 10 CFR 72.48), and the site documentation of compliance with 10 CFR 72.212?

10 CFR 72.240 defines the responsibilities of the CoC holder in the CoC renewal process; however, it does not define responsibilities for the licensee that uses the systems included in the CoC renewal, including amendments. 10 CFR 72.7 permits exemptions for licensees using the CoC, and amendments, and 10 CFR 72.48 permits licensees using the CoC, and amendments, to make some types of changes to the design described the FSAR. 10 CFR 72.212 defines the responsibilities for licensees using a CoC, and amendments, to meet the requirements for general license use.

Specifically, 10 CFR 72.212(b)(11) states: "*…The licensee shall comply with the terms, conditions of the CoC and, for those casks to which the licensee has applied the changes of an amended CoC, the terms, conditions, and specifications of the amended CoC, including but not limited to, the requirements of any AMP put into effect as a condition of the NRC approval of a CoC renewal application in accordance with §72.214.*" (emphasis added)

**Draft Proposed Response:**

After NRC approves a CoC renewal, a licensee using the CoC, including amendments, must ensure compliance with 10 CFR 72.212(b)(11), which requires compliance with any requirements of the AMP in the NRC approval of the CoC renewal. To document the licensee's compliance with the AMP for the CoC renewal, the licensee should update the evaluation required under 10 CFR 72.212(b)(5). It is recognized that not all licensees using the CoC, and amendments, will have systems in storage whose term is nearing the end of the initial license term. Therefore, licensees are not required to update these evaluation under 10 CFR 72.212(b)(5) immediately, but are expected to update the evaluation in a timely manner. For licensees with systems that have exceeded the initial storage term during the NRC review of the CoC renewal application, this should not be more than 90 days following the NRC approval of the CoC renewal. For other licensees with systems that have not reached the initial storage term when the NRC approves the CoC renewal application, this should not be later than 90 days prior to the first cask reaching the end of the initial storage term.

In performing the 10 CFR 72.212(b)(5) evaluations, the licensee will consider how any site exemptions and changes to the FSAR made under 10 CFR 72.48 impact the time limited aging analyses and aging management plan described in the approved CoC renewal SAR. Licensees should perform an evaluation to determine which parts of the TLAA and AMP apply to their site. Licensees should also determine if changes are needed to the AMP and whether these changes are permitted under 10 CFR 72.48, or whether an exemption should be sought under 10 CFR 72.7.

Additional pages attached? Yes ☐ No ☒

**Screening Results:**

1. Is the question sufficiently generic? (Does it affect more than one CoC/ISFSI without consideration or evaluation of site specific information?) Yes ☒ No ☐
2. The question does not involve any unresolved enforcement actions or allegations, or situations covered by other NRC regulatory processes (e.g. Generic Issues process, Bulletin, Generic Letter). The UFS&T-FAQ process may be used to address generic aspects of issues encountered during inspections, questions arising during application reviews, and 72.48 reviews. Yes ☒ No ☐
3. Would the resolution of the question provide clarification of the <u>existing</u> regulations, NRC policy, NRC position and/or regulatory guidance? The UFST&T-FAQ cannot result in new or different requirements, NRC policy, position and/or interpretation of the regulations, where rulemaking, Commission rulings, and/or guidance development processes are appropriate. Clarity from the resolution of the UFS&T-FAQ could be incorporated into future new or revised guidance if deemed appropriate. Yes ☒ No ☐

| <u>FAQ Accepted:</u><br>Industry Panel: Yes ☒ No ☐<br>NRC Panel: Yes ☐ No ☐ | (NEI to complete)<br>Date entered into FAQ Log | By: |
|---|---|---|

**UFS&T-FAQ Number:_____12-03____**

**UFS&T-FAQ Title:__Licensee actions following NRC approval of the CoC renewal application___**

**Updated:_____**

**UFS&T-FAQ Evaluation and Resolution Section**

(To be Completed by both Industry and NRC Panel)

**Proposed Final Resolution of UFS&T-FAQ**

| |
|---|
| (*If Industry Panel and NRC Panel do not concur, include both Panels' proposed resolutions here*) |

| |
|---|
| Issue discussed at meeting of both NRC/NEI Question Panels: Date<br>Issue Panels: Concur ☐ Do Not Concur ☐ |

**Approval of Resolution of UFS&T-FAQ**

| | |
|---|---|
| (*NRC/NMSS/DSFST Deputy Director or Director comments on Proposed Final Resolution. If Proposed final resolution is rejected, provide rationale here*). | |
| Approved by:<br>(NRC/NMSS/DSFST Deputy Director if Panels Concur; NRC/NMSS/DSFST Director if Panels do not Concur) | Date: |

**Closure of UFS&T-FAQ**

| |
|---|
| UFS&T-FAQ closed in tracking system and UFS&T-FAQ database updated: Date: |

# Used Fuel Storage and Transportation Frequently Asked Questions (UFS&T-FAQ)

Form Revision A, 09/12

**UFS&T-FAQ Number: 12-04**

**UFS&T-FAQ Title: Applicability of aging management to cask storage term**

**UFS&T-FAQ Identification and Screen Section**

(Requestor to Complete)

| | | | |
|---|---|---|---|
| Licensee/CoC Holder: | NEI | Date Submitted: | 9/10/12 |
| Licensee/CoC holder Contact: M. Nichol | | Phone: 202-739-8031 | E-mail: mrn@nei.org |
| NRC Contact: | | Phone: | E-mail: |

| | |
|---|---|
| Potentially relevant existing UFS&T-FAQ numbers: | None |
| This question involves: (check all that apply) | Cask Design Basis ☒, 72.212 ☐, 72.48 ☐, 72.240 ☒, ISFSI Design Basis ☐, Storage ☒, Transportation ☐, Other ☐ |

**Question, including background description and applicable reference(s):**

How will the time between cask loading and the point at which aging management provisions are needed be clearly specified?

Once the CoC renewal application is approved, the aging management plan (AMP) will become part of the cask design bases (i.e. part of the FSAR). However, the AMP is based upon the renewal term, and would not be necessary for the initial term. Clarification of this is needed to ensure that the AMP is not unnecessarily applied to all casks during the initial term.

10 CFR 72.240(e) states: *"In approving the renewal of the design of a spent fuel storage cask, 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, including but not limited to, terms, conditions, and specifications that will require the implementation of an AMP."*

**Draft Proposed Response:**

To ensure clarity that the aging management provisions approved as part of the CoC renewal are only applicable to the renewal term, and are not applicable to the initial term, a statement to that effect should be included in the CoC. This approach is indicated in 10 CFR 72.240(e), and could be added by the NRC. However, to ensure clarity for compliance with the CoC conditions for the renewal term, the CoC holder should submit a proposed modification to the CoC. The NRC would review the proposed

modification to the CoC to incorporate terms of the aging management provisions and adopt the proposed modification as appropriate. In general, any added terms, conditions, or specifications added to the CoC related to the CoC renewal term should not be overly prescriptive or detailed. An example of an appropriate modification to the CoC is as follows:

*"Conditions*
.
.
*XX. Aging Management*
*Aging management provisions for the ZZZZ system begin when the system storage term reaches YY years."*

Additional pages attached? Yes ☐ No ☒

**Screening Results:**

1. Is the question sufficiently generic? (Does it affect more than one CoC/ISFSI without consideration or evaluation of site specific information?) Yes ☒ No ☐
2. The question does not involve any unresolved enforcement actions or allegations, or situations covered by other NRC regulatory processes (e.g. Generic Issues process, Bulletin, Generic Letter). The UFS&T-FAQ process may be used to address generic aspects of issues encountered during inspections, questions arising during application reviews, and 72.48 reviews. Yes ☒ No ☐
3. Would the resolution of the question provide clarification of the existing regulations, NRC policy, NRC position and/or regulatory guidance? The UFST&T-FAQ cannot result in new or different requirements, NRC policy, position and/or interpretation of the regulations, where rulemaking, Commission rulings, and/or guidance development processes are appropriate. Clarity from the resolution of the UFS&T-FAQ could be incorporated into future new or revised guidance if deemed appropriate. Yes ☒ No ☐

| FAQ Accepted: | (NEI to complete) | |
|---|---|---|
| Industry Panel: Yes ☒ No ☐<br>NRC Panel: Yes ☐ No ☐ | Date entered into FAQ Log | By: |

**UFS&T-FAQ Number:_____12-04____**

**UFS&T-FAQ Title:__Applicability of aging management to cask storage term_____**

**Updated:_____**

**UFS&T-FAQ Evaluation and Resolution Section**

(To be Completed by both Industry and NRC Panel)

**Proposed Final Resolution of UFS&T-FAQ**

| |
|---|
| (*If Industry Panel and NRC Panel do not concur, include both Panels' proposed resolutions here*) |

| |
|---|
| Issue discussed at meeting of both NRC/NEI Question Panels: Date<br>Issue Panels: Concur ☐ Do Not Concur ☐ |

**Approval of Resolution of UFS&T-FAQ**

| | |
|---|---|
| (*NRC/NMSS/DSFST Deputy Director or Director comments on Proposed Final Resolution. If Proposed final resolution is rejected, provide rationale here*). | |
| Approved by:<br>(NRC/NMSS/DSFST Deputy Director if Panels Concur; NRC/NMSS/DSFST Director if Panels do not Concur) | Date: |

**Closure of UFS&T-FAQ**

| |
|---|
| UFS&T-FAQ closed in tracking system and UFS&T-FAQ database updated: Date: |

# Used Fuel Storage and Transportation Frequently Asked Questions (UFS&T-FAQ)

Form Revision A, 09/12

**UFS&T-FAQ Number: 12-05**

**UFS&T-FAQ Title: Independent renewal of CoC amendments**

**UFS&T-FAQ Identification and Screen Section**

(Requestor to Complete)

| | | | |
|---|---|---|---|
| Licensee/CoC Holder: | NEI | Date Submitted: | 9/10/12 |
| Licensee/CoC holder Contact: M. Nichol | | Phone: 202-739-8031 | E-mail: mrn@nei.org |
| NRC Contact: | | Phone: | E-mail: |

| | |
|---|---|
| Potentially relevant existing UFS&T-FAQ numbers: | None |
| This question involves: (check all that apply) | Cask Design Basis ☒, 72.212 ☐, 72.48 ☐, 72.240 ☒, ISFSI Design Basis ☐, Storage ☒, Transportation ☐, Other ☐ |

**Question, including background description and applicable reference(s):**

Can a certificate of compliance (CoC) renewal application request only certain amendments to be renewed, or would the application for CoC renewal always include all of the amendments?

The NRC Statements of Consideration for 2011 Final Rulemaking for 10 CFR Part 72 on license and certificate of compliance terms (Federal Register Notice 76FR8872, Section II.W) states:
*"When the NRC renews a CoC, all amendments to that CoC are simultaneously renewed as well?*
*Section 72.214 lists one expiration date for each CoC. Amendments under a CoC may have different effective dates; however, they share the same certificate number and docket number. Therefore, when the NRC renews a CoC, all amendments to that CoC are renewed as well."*

**Draft Proposed Response:**

Consistent with the NRC statements of consideration, a CoC renewal application must include all amendments. Further, the NRC approval of a CoC renewal application would include all amendments, such that all amendments would share the same expiration date. If review of the time limited aging analysis and aging management plan is prolonged due to one of the amendments, continued use of the CoC would be permitted by 10 CFR 72.240(b) until the application for renewal has been determined by the NRC.

| |
|---|
| In a rare occasion, there may be a situation where the NRC finds the TLAA and AMP acceptable for all but a few design conditions (e.g. one of the amendments). In this situation, if the NRC would not approve the TLAA and AMP for these conditions for the full renewal term, these design conditions could adopt a shorter storage term than the full renewal term. If a shorter storage term (than the renewal term) for specific conditions is adopted, this would be clearly identified in the TLAA and AMP in the FSAR, and may also need to be identified in the CoC. |

| |
|---|
| Additional pages attached? Yes ☐ No ☒ |

**Screening Results:**

1. Is the question sufficiently generic? (Does it affect more than one CoC/ISFSI without consideration or evaluation of site specific information?) Yes ☒ No ☐
2. The question does not involve any unresolved enforcement actions or allegations, or situations covered by other NRC regulatory processes (e.g. Generic Issues process, Bulletin, Generic Letter). The UFS&T-FAQ process may be used to address generic aspects of issues encountered during inspections, questions arising during application reviews, and 72.48 reviews. Yes ☒ No ☐
3. Would the resolution of the question provide clarification of the <u>existing</u> regulations, NRC policy, NRC position and/or regulatory guidance? The UFST&T-FAQ cannot result in new or different requirements, NRC policy, position and/or interpretation of the regulations, where rulemaking, Commission rulings, and/or guidance development processes are appropriate. Clarity from the resolution of the UFS&T-FAQ could be incorporated into future new or revised guidance if deemed appropriate. Yes ☒ No ☐

| <u>FAQ Accepted:</u><br>Industry Panel: Yes ☒ No ☐<br>NRC Panel: Yes ☐ No ☐ | (NEI to complete)<br>Date entered into FAQ Log | By: |
|---|---|---|

**UFS&T-FAQ Number:** **12-05**

**UFS&T-FAQ Title:** **Independent renewal of CoC amendments**

**Updated:**_____

**UFS&T-FAQ Evaluation and Resolution Section**

(To be Completed by both Industry and NRC Panel)

**Proposed Final Resolution of UFS&T-FAQ**

| |
|---|
| (*If Industry Panel and NRC Panel do not concur, include both Panels' proposed resolutions here*) |

| |
|---|
| Issue discussed at meeting of both NRC/NEI Question Panels: Date<br>Issue Panels: Concur ☐ Do Not Concur ☐ |

**Approval of Resolution of UFS&T-FAQ**

| | |
|---|---|
| (*NRC/NMSS/DSFST Deputy Director or Director comments on Proposed Final Resolution. If Proposed final resolution is rejected, provide rationale here*). | |
| Approved by:<br>(NRC/NMSS/DSFST Deputy Director if Panels Concur; NRC/NMSS/DSFST Director if Panels do not Concur) | Date: |

**Closure of UFS&T-FAQ**

| |
|---|
| UFS&T-FAQ closed in tracking system and UFS&T-FAQ database updated: Date: |

**Used Fuel Storage and Transportation FAQ Log – Update 9/10/2012**

| UFS&T-FAQ # | Title | Date Initiated | Initiator | Current Status | Next Action Due |
|---|---|---|---|---|---|
| 12-01 | Most recently updated FSAR for CoC Renewal | 9/10/2012 | NEI: M. Nichol | Screening | NRC Panel Screen - by {2 weeks after transmittal} |
| 12-02 | CoC Renewal application inspections | 9/10/2012 | NEI: M. Nichol | Screening | NRC Panel Screen - by {2 weeks after transmittal} |
| 12-03 | Licensee actions following NRC approval of the CoC renewal application | 9/10/2012 | NEI: M. Nichol | Screening | NRC Panel Screen - by {2 weeks after transmittal} |
| 12-04 | Applicability of aging management to cask storage terms | 9/10/2012 | NEI: M. Nichol | Screening | NRC Panel Screen - by {2 weeks after transmittal} |
| 12-05 | Independent renewal of CoC amendments | 9/10/2012 | NEI: M. Nichol | Screening | NRC Panel Screen - by {2 weeks after transmittal} |