

October 26, 2012

Dr. J. Sam Armijo, Chairman
Advisory Committee on Reactor Safeguards
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

SUBJECT: RESPONSE TO THE ADVISORY COMMITTEE ON REACTOR SAFEGUARDS LETTER, DATED SEPTEMBER 18, 2012, ON DRAFT FINAL INTERIM STAFF GUIDANCE 8, REVISION 3, "BURNUP CREDIT IN THE CRITICALITY SAFETY ANALYSES OF PWR SPENT FUEL IN TRANSPORTATION AND STORAGE CASKS"

Dear Dr. Armijo:

On behalf of the U.S. Nuclear Regulatory Commission (NRC), I am responding to your letter dated September 18, 2012, regarding conclusions and recommendations of the Advisory Committee on Reactor Safeguards (ACRS) on the Draft Final Interim Staff Guidance (ISG)-8, Revision 3, "Burnup Credit in the Criticality Safety Analyses of PWR Spent Fuel in Transportation and Storage Casks." The NRC staff agrees with the conclusions and recommendations in your letter. The NRC published the final ISG in the *Federal Register* on October 3, 2012. I am providing the staff's response to recommendation 3 in your letter.

ACRS Recommendation

We support and encourage the staff efforts to communicate to licensees and certificate holders the importance of systematic development, maintenance, and use of improved cask loading plans and procedures to prevent misloads.

NRC Response

The NRC staff is developing an information notice on spent fuel pool, dry storage cask, and spent fuel transportation package misloads. This notice will communicate examples of recent misload events and highlight to licensees and certificate holders the importance of preventing misloads.

J. S. Armijo

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The NRC staff appreciates the ACRS's comments and recommendations. We look forward to working with the Committee as the staff evaluates future updates to the interim staff guidance.

Sincerely,

/RA by Michael F. Weber for/

R. W. Borchardt
Executive Director
for Operations

cc: Chairman Macfarlane
Commissioner Svinicki
Commissioner Apostolakis
Commissioner Magwood
Commissioner Ostendorff
SECY

J. S. Armijo

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