

TSTF

**TECHNICAL SPECIFICATIONS TASK FORCE**  
*A JOINT OWNERS GROUP ACTIVITY*

April 19, 2013

TSTF-13-04  
PROJ0753

Secretary  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001  
ATTN: Rulemakings and Adjudications Staff

**DOCKETED  
USNRC**

April 22, 2013 (9:00 a.m.)

OFFICE OF THE SECRETARY  
RULEMAKINGS AND  
ADJUDICATIONS STAFF

**SUBJECT:** Technical Specifications Task Force (TSTF) Comments on February 5, 2013  
Federal Register Notice Petition for Rulemaking, "Spent Fuel Cask Certificate  
of Compliance Format and Content"  
**Docket ID NRC-2012-0266**

The Joint Owners Group Technical Specifications Task Force (TSTF) is pleased to provide the following comments on the subject Petition for Rulemaking. The TSTF is a jointly funded activity of the Pressurized Water Reactor Owners Group (PWROG) and the Boiling Water Reactor Owners' Group (BWROG) that serves as the focal point for industry interaction with the Nuclear Regulatory Commission (NRC) on generic technical, regulatory, and compliance issues related to nuclear power plant Technical Specifications.

The TSTF agrees with and supports the proposed changes described in the Petition for Rulemaking submitted by the Nuclear Energy Institute, and in particular, the addition of specific criteria for the format and content to be included in a spent fuel storage cask Certificate of Compliance (CoC).

On July 22, 1993, the NRC published in the Federal Register their "Final Policy Statement on Technical Specifications Improvements for Nuclear Power Reactors" (58FR39132). The Policy Statement published four criteria to be used to determine those requirements appropriate for inclusion in the Technical Specifications for operating reactors. This Policy Statement described the conditions which led to this action:

[S]ince 1969, there has been a trend towards including in Technical Specifications not only those requirements derived from the analyses and evaluation included in the safety analysis report but also essentially all other Commission requirements governing the operation of nuclear power reactors. This extensive use of Technical Specifications is due in part to a lack of well-defined criteria (in either the body of the rule or in some other regulatory document) for what should be included in Technical Specifications. This has contributed to the volume of Technical Specifications and to the several-fold increase, since 1969, in the number of license amendment applications to effect changes

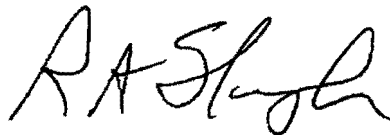


to the Technical Specifications. It has diverted both staff and licensee attention from the more important requirements in these documents to the extent that it has resulted in an adverse but unquantifiable impact on safety."

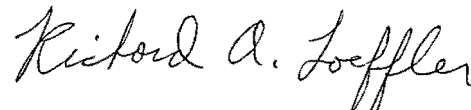
The TSTF believes that the situation described in the Policy Statement regarding plant Technical Specifications has occurred with dry cask system Technical Specifications and, as concluded in the Policy Statement, has resulted in an adverse impact on safety. The criteria proposed in the petition are consistent with the criteria published in the Policy Statement and appropriate for a dry cask system.

The TSTF strongly encourages the NRC to adopt the petition and revise the regulations in order to focus the CoC and the contained Technical Specifications on safety significant issues, thereby improving nuclear safety.

Should you have any questions, please do not hesitate to contact us.



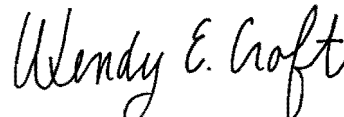
Robert Slough (PWROG/W)



Richard A. Loeffler (BWROG)



Otto W. Gustafson (PWROG/CE)



Wendy E. Croft (PWROG/B&W)

## Speiser, Herald

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**From:** Brian Mann [brian.mann@excelservices.com]  
**Sent:** Sunday, April 21, 2013 6:10 PM  
**To:** RulemakingComments Resource  
**Subject:** TSTF-13-04 Support for NEI Dry Cask Petition, Docket ID NRC-2012-0266  
**Attachments:** TSTF-13-04 Support for NEI Dry Cask Petition.pdf

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**Docket ID NRC-2012-0266**

### **Brian D. Mann**

Vice President of Industry Programs  
EXCEL Services Corporation  
Main (301) 984-4400  
Direct (240) 880-0490  
Mobile (804) 339-7034  
E-mail: [brianm@excelservices.com](mailto:brianm@excelservices.com)  
[www.excelservices.com](http://www.excelservices.com)  
[www.nukapedia.com](http://www.nukapedia.com)