

Format and Content of CoC Renewal Applications

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Meeting to Obtain Stakeholder Input on Potential
Changes to Guidance for Renewal of Spent Fuel Dry
Cask Storage System Licenses and Certificates of
Compliance

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Outline

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- Background
 - Application Format – General
 - FSAR Format
 - TLAAs and AMPs across Amendments
 - Renewal of only certain Amendments
 - Amending CoCs Post-Renewal
 - Discussion Topics
 - Acronym List

Background

- None of the listed topics/issues are addressed in NUREG-1927
- Staff currently plans to add a new section to NUREG-1927 regarding the mechanics of renewals
 - Staff also plans to develop internal office instructions specific to renewal reviews
- Staff is considering developing separate format and content guidance for renewals

Application Format

- **Staff recommends making the application as clear as possible**
 - How is application structured?
 - Where are different amendments described?
 - Where are AMPs described (for each amendment)?
 - Where are TLAAAs described (for each amendment)?
 - How are changes shown? (See slide 6.)
- **Clearer structure ↔ Quicker review**

Application Format (cont'd)

- If there is not a consolidated FSAR that combines/addresses all of the amendments under that CoC, what should the CoC holder submit as part of the license application?
 - If there is not already a consolidated FSAR, the applicant should develop one as part of the renewal application.
 - The applicant should explain what is different in each amendment from the main body of the consolidated FSAR.
- **Clearer structure = Quicker review**

FSAR Format

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- Different amendments should be clearly marked
 - And differences between amendments, like different materials or design bases, should be clearly discussed
 - 10 CFR 72.48 changes should be clearly marked as such
 - Changes from the previous FSAR, associated with the renewal application, should be clearly marked as such

TLAAs and AMPs Across Amendments

- If there are different DCSS materials, or different environments (e.g., above ground, vs underground systems), etc., described in different CoC amendments, aging management activities (including AMPs and TLAAs) would need to be specified for each individual amendment
 - ...for a CoC renewal that encompasses CoC amendments that each may have different design basis, the certificate holder will have to address how the TLAA applies to each CoC amendment covered by the CoC).

(76 FR 8884, Response to Comment #21)

Renewal of Only Certain Amendments

- Can a CoC holder request that only certain amendments be renewed?
 - The CoC holder has the flexibility to only request renewal of certain amendments, if it wishes
- **If amendments are not renewed:**
 - Upon expiration, casks loaded under that amendment would need to be removed from service
 - Staff would need to consider backfit in terms of the canisters that were already loaded to the amendment

Amending CoCs Post-Renewal

- For amendment applications submitted in the same time period as the renewal application/review
 - Should include TLAAAs and AMPs (in effect, a mini renewal application), or
 - The renewal application could address the proposed amendment
- Any amendment applications submitted after the renewal application should include TLAAAs and AMPs (in effect, a mini renewal application)
 - The amendment application would either:
 - Need to show that the materials/SSCs (in the amendment) are already included in the AMPs; or,
 - If there are new materials, then the amendment would need to include new AMPs to address aging effects of those materials.

Amending CoCs Post-Renewal (cont'd)



- Staff could include a condition in the renewal CoC that all future amendments would need to address aging management; or
- Staff could set criteria for what changes can be included in an amendment vs. what constitutes a new CoC, and set a limitation that any proposed post-renewal amendments would be considered a new application/CoC.
- Preference - not cut off amendments after the renewal, as systems should keep up with the newest technology and make improvements in materials and design

Discussion Topics

- Should we develop guidance on format and content of renewal applications?
- Should the guidance clarify - CoC holder request for renewal of only some amendments?
- Amendment applications during or after the renewal application include TLAAAs and AMPs
- Recommendation: if there is not already a consolidated FSAR, the applicant should develop one as part of the renewal application.

Acronym List

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- AMP = Aging Management Program
 - CFR = Code of Federal Regulations
 - CoC = Certificate of Compliance
 - DCSS = Dry Cask Storage System
 - FSAR = Final Safety Analysis Report
 - SOC = Statements of Consideration
 - TLAA = Time-Limited Aging Analysis
 - TS = Technical Specifications