

Industry Perspective on Technical Issues

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Topics of Discussion

- Process for New Issues
- Regulatory Issue Resolution Protocol (RIRP)
- Examples of Successes
- Observations on Key Technical Issues
- Summary

Process for New Technical Issues

- Technical issue based on scientific evidence
- Creates efficiencies by addressing issues generically
- Minimizes the use of RAIs to address generic issues

Regulatory Issue Resolution Protocol (RIRP)

- Details contained in NEI 10-03 (draft)
 1. Does the proposed issue affect multiple 10 CFR 71 and/or 10 CFR 72 regulated entities?
 2. Does the proposed issue warrant generic resolution?
 3. Does the issue warrant engagement between industry and the NRC
 4. Will generic resolution produce tangible benefits?
 5. Is this issue already addressed by another process?
 - Need “yes” to 1-4, “no” to 5 to enter RIRP process

Examples of Successes

- Top Nozzle Stress Corrosion Cracking (pilot)
 - Issue closed through RIS 2013-11 (RIRP 10-01)
- CISCC (pilot)
 - Established conservative growth rates for CISCC
 - Working on susceptibility criteria for lead canister inspections
- Update to 72.48 guidance
 - Submitted NEI 12-04 for NRC endorsement

Observations on Key Technical Issues

- High Burnup Fuel/Cladding Integrity
 - Large margin to 400°C (Demo project)
 - Limited hydride reorientation
 - High Burnup Demo will provide data
- CISCC
 - Decades (if not longer) before cracking initiates and grows
 - Inspections to date have found limited or no chlorides and no observation of cracking
 - EPRI Susceptibility Criteria will provide guidance for identifying lead canister(s)/site(s)

Summary

- RIRP process can be more effectively used to manage generic issues that don't meet criteria for other NRC processes (GSI, RIS, etc).
- Industry and NRC have successfully addressed issues through the RIRP process.
- RIRP process allows emerging issues to have an established process with an agreed upon schedule and milestones.