

December 15, 2014

Dr. John W. Stetkar
Advisory Committee on Reactor Safeguards
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

SUBJECT: RESPONSE TO ADVISORY COMMITTEE ON REACTOR SAFEGUARDS
RECOMMENDATIONS ON PROPOSED GENERIC LETTER 2015-XX,
“MONITORING OF NEUTRON-ABSORBING MATERIALS IN SPENT FUEL
POOLS”

Dear Dr. Stetkar:

In your letter dated September 15, 2014 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML14252A299), you summarized the views of the Advisory Committee on Reactor Safeguards (ACRS or the Committee) with respect to the proposed Generic Letter (GL) related to monitoring of neutron-absorbing materials in spent fuel pools (SFPs). This GL was reviewed during the 617th meeting of the ACRS on September 4-6, 2014, during which the staff of the U.S. Nuclear Regulatory Commission (NRC) presented the technical background and basis for issuance of the GL. In addition, the Nuclear Energy Institute was invited to present their concerns. The ACRS Metallurgy and Reactor Fuels Subcommittee also had an opportunity to review this GL during a meeting on August 21, 2014. This memorandum contains the NRC staff's responses to the ACRS recommendations. The staff is committed to working closely and cooperatively with the Committee to address ACRS recommendations.

ACRS RECOMMENDATIONS

The ACRS recommendations on the subject GL were as follows:

1. The GL will provide valuable information related to the current status of SFP absorber systems. It should be issued after consideration of recommendation 2.
2. Additional clarity should be provided regarding the level of response required, based on a tiered approach depending on the type of neutron absorber being used and the degree to which the absorber is being credited in the pool criticality analysis.

DISCUSSION

The NRC staff appreciates the support for issuance of this GL. The staff agrees that elimination of unnecessary burden on licensees is appropriate, since the information necessary to demonstrate regulatory compliance will vary from licensee to licensee. The feedback provided during the public comment period and by the ACRS indicated that the language used in the GL was not sufficiently clear. The NRC staff is working to develop language to describe a tiered approach that clearly defines the information that the licensees will be expected to provide. In order to ensure that the proposed language provides sufficient clarity to stakeholders in the

industry and public, the NRC staff is conducting a public meeting to discuss a tiered approach for GL responses.

This tiered approach will be based on several different factors, including the material type, whether it is being credited in the criticality analyses, and the amount of information each licensee has previously submitted to the NRC. As recommended by the ACRS, licensees that do not credit neutron-absorbing materials for criticality safety in their SFPs will only be required to submit a minimal response that affirms this fact. The detailed information request in Appendix A is being revised to identify which items are necessary for each material type to address the applicable safety concerns of the NRC staff. Licensees that have already submitted the information being requested as part of a proposed licensing action may reference the submittal and identify which items remain applicable, rather than reformatting this information into a template suitable for a GL response.

The staff appreciates the comments and recommendations provided by the ACRS. We look forward to continuing to work with the Committee.

Sincerely,

/RA Michael R. Johnson Acting for/

Mark A. Satorius
Executive Director
for Operations

cc: Chairman Macfarlane
Commissioner Svinicki
Commissioner Ostendorff
Commissioner Baran
Commissioner Burns
SECY

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The staff appreciates the comments and recommendations provided by the ACRS. We look forward to continuing to work with the Committee.

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