



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

March 26, 2015

Mr. Gary C. Park, Chairman  
Standards Committee  
Nuclear Inservice Inspection  
Section XI, ASME Boiler & Pressure  
Vessel Code  
Ideal Solutions LLC  
P.O. Box 8733  
Cedar Rapids, IA 52408

Dear Mr. Park:

On behalf of the U.S. Nuclear Regulatory Commission (NRC), I am requesting that the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code Section XI standards committee take the actions necessary to establish Code rules for the inservice inspection of dry storage systems for spent nuclear fuel. Specifically, I am requesting the development of the following requirements for metallic pressure-retaining storage canisters and transfer casks:

- Examination and inspection, including
  - applicable techniques
  - sampling / frequency protocol
  - demonstration methodology
  - qualification standards
- Acceptance standards, including
  - flaw evaluation procedures
  - corrosion/degradation assessment methodologies

The NRC licenses the storage of spent nuclear fuel for an initial term of up to 40 years. Regulations permit storage licenses (or *certificates* for storage system designs) to be renewed for an additional 40 years provided that activities are developed to manage component aging. To date, the NRC has evaluated aging management activities using power reactor inspection criteria in the ASME Code and other standards to the extent practical as a surrogate for specific standards for dry storage systems. However, the reactor standards are not fully applicable to spent nuclear fuel storage systems.

It is our preference that consensus inspection requirements for spent fuel dry storage systems be developed by ASME. ASME's expertise and consensus standards approach offers the most effective and efficient means to establish an inspection framework. If the proposed ASME Code

requirements are found acceptable by the NRC, they will be referenced in our guidance or regulations. NRC staff will fully support and participate in this effort. We appreciate your consideration of our request.

Sincerely,

**/RA/**

Mark D. Lombard, Director  
Division of Spent Fuel Management  
Office of Nuclear Material Safety  
and Safeguards

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Sincerely,

**/RA/**

Mark D. Lombard, Director  
Division of Spent Fuel Management  
Office of Nuclear Material Safety  
and Safeguards

ADAMS Accession No: **ML15083A020**

<b>OFC</b>	DSFM/SFLB/LA	DSFM/RMB/TR	DSFM/RMB/BC	DSFM/D
<b>NAME</b>	MDeBose	JWise	ACsontos	MLombard
<b>DATE</b>	3/2/2015	3/2/2015	3/19/2015	3/26/15

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