NRC INSPECTION MANUAL

INSPECTION PROCEDURE 60801

SPENT FUEL POOL SAFETY
AT PERMANENTLY SHUTDOWN REACTORS

PROGRAM APPLICABILITY: 2561 Appendix A

60801-01 INSPECTION OBJECTIVES

01.01 To verify the safe wet storage of spent fuel at permanently shutdown reactors until the fuel has been moved to dry storage in an Independent Spent Fuel Storage Installation (ISFSI) or otherwise permanently removed from storage in the Spent Fuel Pool (SFP).

01.02 To ascertain whether the neutron-absorbing materials present in the SFP are being adequately managed and maintained.

60801-02 INSPECTION REQUIREMENTS

02.01 <u>SFP Coolant Inventory Control</u>

a. Verify that design, operational, and administrative measures are in place to prevent a substantial reduction in SFP coolant inventory under normal and accident conditions, including Technical Specification (TS) surveillance requirements for the acceptable minimum water level above the top of the irradiated fuel assemblies in the SFP.

b. Inspect the configuration of the SFP, its piping, and interconnected piping systems to determine if there are any potential siphon or drain path(s).

c. Review licensee procedures to ensure that active or passive drain systems are properly maintained and temporary hoses are appropriately controlled.

d. Assess the safety significance of the worst-case inadvertent siphon or drain event. Verify that appropriate compensatory measures, procedures, training, or engineered features have been implemented to address such an event.

02.02 <u>SFP Instrumentation, Alarms, and Leakage Detection</u>

a. Review and evaluate whether the SFP instrumentation, alarms, and leakage detection systems are adequate to assure the safe wet storage of spent fuel. Instrumentation and alarms must include water level, temperature, and area radiation levels.

b. Verify, by direct observation or review of selected records, that the SFP water level instrumentation, calibration, alarm set-points, alarm response procedures, data tracking and trending, and related operator rounds are adequate to satisfy the associated TS requirements and are consistent with the facility's licensing basis.

c. Evaluate the functionality of the SFP leakage detection system(s) and the adequacy of monitoring at potential system leak points (i.e., piping transitions).

d. Evaluate the functionality of the SFP leakage collection systems, associated alarms, level and/or flow instrumentation, and the logging and trending of data.

e. If available, review nearby on-site and off-site groundwater monitoring results and conduct trend analysis, even if within regulatory limits.

02.03 <u>SFP Water Chemistry and Cleanliness Control</u>

a. Verify that the SFP chemistry and cleanliness control programs maintain water purity standards, limits on radionuclide concentration, and minimum boron concentration in accordance with the TS requirements (if applicable).

b. Assess whether the licensee's foreign material exclusion, combustible material control, and SFP chemistry procedures adequately protect the integrity and cooling of the spent fuel and SFP.

02.04 <u>SFP Criticality Safety and Controls</u>

a. Verify that the licensee's criticality controls are consistent with the applicable nuclear criticality safety analyses. These analyses should consider the geometric arrangement of fuel determined by rack configuration, restrictions on fuel placement included in the TS, neutron-absorbing materials, fuel assembly characteristics (e.g., fuel design, initial enrichment, burn-up, and burnable neutron poison loading), soluble boron concentration, and accident conditions that may affect one or more of the preceding characteristics. This assessment should also include heavy load restrictions, worst-case drop analysis, and seismic considerations to prevent adverse geometry reconfiguration.

b. Verify, by direct observation or review of selected records, that the fuel assemblies stored in the SFP satisfy TS requirements. Also, verify that the licensee has identified each assembly placed in the SFP, recorded the parameters and characteristics of each assembly, and maintained a record of each fuel assembly as a controlled document.

c. Evaluate licensee methodologies and surveillance programs to monitor and assess the degradation and deformation of the neutron-absorbing materials in the SFP. If possible, verify by direct observation or review of selected records that the fixed neutron poisons maintained in the SFP storage racks satisfy the parameters credited in the applicable nuclear criticality safety analyses.

d. If applicable, verify by review of selected records that the SFP boron concentration satisfies the TS requirements.

e. Observe the material condition of the SFP walls and associated rebar where boron is in use to ensure there is no exposed boric acid related corrosion.

02.05 SFP Operation and Power Supply

a. Review licensee procedures, drawings, and Post-Shutdown Decommissioning Activities Report (PSDAR) descriptions regarding SFP operation and power supplies in order to determine the expected SFP operational strategy and line-up during decommissioning.

1) Ascertain whether SFP operation is equivalent to that when the system was in operation during reactor power operations. Specifically, verify that: (1) the control of heavy loads near and over the SFP is consistent with the facility licensing basis; (2) fuel handling activities are conducted safely and in accordance with the facility licensing basis and/or the PSDAR, as applicable; and (3) equipment, procedures, and trained personnel are adequate to implement the required strategies to maintain or restore spent fuel cooling.

2) Identify situations where differing operational strategies, system line-ups, etc., which may be outside the original system design and operating parameters, could be detrimental to long-term system operability or safe fuel storage. Assess the reliability of the SFP electrical power supply.

02.06 Problem Identification and Resolution. Verify that the licensee is identifying problems related to SFP activities at an appropriate threshold and entering them into the corrective action program. If applicable, for a sample of problems documented in the corrective action program, verify that the licensee has identified and implemented appropriate corrective actions.

60801-03 INSPECTION GUIDANCE

General Guidance

The primary objective of this Inspection Procedure (IP) is to verify that each licensee maintaining spent fuel in wet storage implements appropriate controls and maintains adequate systems to prevent adverse radiological conditions during decommissioning. This IP applies to all stages of decommissioning from the permanent cessation of reactor operations until the fuel is safely transferred from the SFP to an ISFSI or other licensed fuel storage system. The subsequent decommissioning and dismantlement of the SFP is at the discretion of the licensee and may be governed by other regulations or licensee commitments, including those associated with loading and unloading activities for the ISFSI as required by the chosen fuel storage system Certificate of Compliance, TSs, and Final Safety Analysis Report (FSAR), as applicable.

The inspector is not required to complete all of the inspection requirements listed in this IP, nor is the inspector limited to those inspection requirements listed if additional safety concerns are identified. However, the objectives of this IP shall be met and the initial performance of this inspection shall be commensurate with the staff effort associated with the U.S. Nuclear Regulatory Commission (NRC's) assessment of licensee performance regarding the safety concerns described in Bulletin 94-01, "Potential Fuel Pool Draindown Caused by Inadequate Maintenance Practices at Dresden Unit 1."

In their response to Bulletin 94-01, the licensee should have documented their SFP inventory management and emergency response strategies; addressed radiation protection and spent fuel cooling during abnormal situations; provided information on SFP leakage; and detailed their siphon and draindown evaluations. In the case where a plant has been shutdown for a number of years, spent fuel cooling may no longer be a significant safety issue; therefore, the licensee's emergency response strategy could be focused primarily on minimizing radiation exposure.

During fuel transfers to ISFSIs, close coordination with the Division of Spent Fuel Management in the Office of Nuclear Material Safety and Safeguards (NMSS) is required. As described in IP 60855, “Operation of an Independent Spent Fuel Storage Installation,” other design considerations and regulatory requirements are applicable during this type of fuel transfer. In particular, the safe transportation of spent fuel would be dependent on, in part, a well controlled and managed fuel loading schedule, timely draindown and cooling of spent fuel while in the interim fuel transfer casks, and heavy lift and load pathway considerations. The inspector may use information from IP 60855 or other NMSS IPs as guides, if necessary.

Due to the variance in decommissioning strategies and timelines, subsequent inspections may be less comprehensive, based on the licensee controls and adequacy of structures, systems, and components for maintaining spent fuel integrity and radiation shielding. These latter inspections should correspond to the number of licensee modifications made, the extent of any SFP problems (including leakage) identified, and any completed or planned fuel movements.

This IP balances the relatively low safety significance of a loss of SFP cooling during decommissioning with providing adequate assurance through inspection and verification that spent fuel in wet storage is safely maintained. The inspector should understand the licensee evaluations, assumptions, and acceptance criteria regarding safe spent fuel storage and make conclusions based, in part, on the information provided in the Defueled Safety Analysis Report (DSAR), the Defueled TSs, the PSDAR, and applicable discussions with the NRC staff.

Specific Guidance

03.01 SFP Coolant Inventory Control

The large SFP coolant inventory assures adequate cooling of the stored fuel, provides shielding, mitigates the consequences of the design-basis fuel handling accident, and maintains some of the initial conditions assumed in the criticality safety analysis. A substantial reduction in SFP coolant inventory is prevented by: (1) design features that limit potential drainage and prevent siphoning; (2) reliable operation of the SFP cooling system to limit evaporation of coolant; and (3) capabilities to add make-up water to recover or maintain SFP coolant inventory using permanently installed or portable equipment. Protection against substantial loss of coolant inventory is described in the applicable facility safety analysis report. Design features that protect against drainage are typically included in the TS addressing design features as well as the minimum acceptable level of SFP water above the top of the irradiated fuel assemblies seated in the storage racks. Other potential causes of significant coolant inventory loss include liner leakage, leakage by seals to adjacent volumes that are drained, and excessive evaporation following loss of forced cooling.

The licensee should be knowledgeable of any potential siphon or drain paths and have plans or procedures that can identify, resolve, and minimize the probability of occurrence of an inadvertent or undetected drain or siphon. Procedures should include provisions for addition of make-up water to recover from loss of coolant inventory events, including radiation protection and soluble boron management in cases where the inventory loss is significant. Bulletin 94-01, Information Notice (IN) 88-65, “Inadvertent Drainages of Spent Fuel Pools,” and IN 87-13, “Potential for High Radiation Fields Following Loss of Water from Fuel Pool,” discuss some mechanisms for loss of SFP inventory and the potential consequences of these events.

If applicable, the licensee should have procedures in place to provide for reliable forced cooling of the SFP and to respond to a scenario involving a loss of forced cooling. IN 93-83, “Potential Loss of Spent Fuel Pool Cooling Following a Loss of Cooling Accident (LOCA),” discusses a scenario where recovery of forced SFP cooling may be challenging.

The inspector should walk down and inspect the SFP system (including all accessible points and liner penetrations) for material conditions and integrity; review any repairs conducted on the SFP liner; evaluate system configuration control for permanent and temporary systems connected to the SFP based on field conditions and licensing basis documentation; and ascertain the seismic qualification of the SFP systems. Particular focus should be on the evaluation of system low points, active and passive drain pathways, primary and secondary makeup water supplies, and SFP boundary integrity control.

The inspector should also assess the licensee's training procedures or program to respond to and mitigate a loss of SFP inventory as well as a zirconium fire resulting from a draindown of the SFP. Response actions should be commensurate with safety and maintaining radiation exposure As Low As Reasonably Achievable (ALARA).

03.02 SFP Instrumentation, Alarms, and Leakage Detection

On March 12, 2012, the NRC issued Order EA-12-051, "Order to Modify Licenses with Regard to Requirements for Reliable Spent Fuel Pool Instrumentation,” which requires all operating reactors to have a reliable indication of the SFP water level capable of supporting identification of the following pool water level conditions: (1) level that is adequate to support operation of the normal fuel pool cooling system, (2) level that is adequate to provide substantial radiation shielding for a person standing on the spent fuel pool operating deck, and (3) level where fuel remains covered and actions to implement make-up water addition should no longer be deferred. While most decommissioning facilities will not be subject to this Order, or will have requested that the requirements of the Order be rescinded to reflect the permanently shutdown status of the plant, the inspector should be aware of what portions of the Order, or any associated commitments, may still be in place at facilities that shutdown after March 2012. This information, especially with respect to on-going licensee commitments, should be used when reviewing and verifying the requirements for SFP instrumentation discussed below.

Review and evaluate whether the SFP instrumentation, alarms, and leakage detection systems used during decommissioning are adequate to assure the safe wet storage of spent fuel. This review should include SFP water level and temperature instrumentation, calibration, alarm set points, and alarm response procedures. SFP leakage collection systems, associated alarms, level and/or flow instrumentation, and collection and trending of data should also be evaluated.

The SFP water level instrumentation and alarms must ensure that any significant loss of inventory will be promptly detected by operations personnel. Response to alarm procedures should require a leakage assessment and contingency actions including makeup, cooling, and radiological considerations, as appropriate. The instrumentation and alarms should be periodically calibrated in accordance with facility procedures. Wide-range level instrumentation installed pursuant to Order EA-12-051 should be verified for compliance with order requirements. These requirements ensure additional mitigation capability is in place in the unlikely event in which degrading conditions occur in the SFP.

Similarly, the SFP water temperature instrumentation and alarms must ensure that any sustained loss of forced cooling will be detected promptly to allow recovery actions by operations personnel before the pool reaches saturation conditions. Response to alarm procedures should include an assessment of forced cooling systems as well as contingency actions to recover SFP cooling. The instrumentation and alarms should be periodically calibrated in accordance with facility procedures.

Leakage detection systems must be verified to be functional and routinely monitored. Assess the design and maintenance of the leakage detection system to verify that the system will provide indication of leakage and includes provisions for isolation in the event leakage could exceed makeup system capacity. Operator rounds and control room logs should provide a data set sufficient to identify SFP leakage problems. If installed, a SFP leakage collection system will usually be described in the licensing basis documentation. If this system is alarmed, an instrument check and operability check of the instrumentation and alarms should be performed periodically. If the licensee uses operator rounds to survey the leakage collection volume, review the logged data, and assess the data trend.

Note that operating experience discussed in IN 2004-05, “Spent Fuel Leakage to On-site Groundwater,” described the obstruction of leakage detection lines at a pressurized water reactor due to the accumulation of boric acid, mineral salts, and other contaminants. For facilities lacking SFP leak detection capability, the inspector should also review data from the licensee's environmental monitoring program to determine if there are indications of SFP leakage into the environment. The inspector should communicate with headquarters staff regarding findings involving ground water transport of radiological effluents from the SFP.

03.03 SFP Water Chemistry and Cleanliness Control

Proper maintenance and operation of SFP systems is necessary to maintain water quality and radionuclide concentrations at acceptable levels. Maintenance of water quality is necessary to prevent degradation of the spent fuel and other materials stored in the SFP (e.g., control rod blades, neutron-absorbing materials, and core instrument strings). Proper SFP water treatment programs also prevent the build-up of excessive concentrations of radionuclides.

The primary focus of a SFP water chemistry program should be to protect against inadvertent criticality and prevent an accelerated degradation of spent fuel and SFP liner integrity. SFP water purity, radionuclide concentration, and dissolved boron limits will typically be stated in the TS or docketed commitments. Water purity limits for pH, conductivity, chlorides, fluorides, and sulfates are generally stated in the facility licensing basis, NRC requirements, or American National Standards Institute (ANSI) standards.

The inspector should:

a. Review the results of the licensee's chemical analyses, evaluate the data, and assess identified trends.

b. Verify that standards, reagents, and analytical chemicals are in date and adequately controlled.

c. Verify that analytical equipment used for SFP chemistry analyses are calibrated and meet surveillance requirements.

The inspector should also ascertain whether the licensee has implemented a foreign materials exclusion control program or other housekeeping measure to provide assurance that the inadvertent introduction of foreign materials into the SFP is not adverse to the safe wet storage of spent fuel. These materials could either be chemical or mechanical in nature. Program considerations could include, in part, housekeeping, cleanliness boundaries, and administrative accountability of loose materials.

A tour of the SFP should be performed to ascertain the quality of housekeeping in and about the SFP. Particular attention should be focused on the identification of materials that do not add value to the safe wet storage of spent fuel. These materials could include, but are not limited to:

- heavy materials supported in the SFP from the SFP curb or rail without structural or seismic analysis;

- excessive combustible loading beyond that described in the Fire Hazards Analysis or Fire Protection Plan, as applicable;

- general loose debris within the SFP area that could inadvertently make its way into the SFP, such as clear plastic bags within the pool that could go undetected and reduce spent fuel channel cooling; and

- uncontrolled material in or about the SFP that could chemically or mechanically degrade the fuel, SFP liner, or support systems.

Further guidance regarding the storage of components on the inner sides of the SFP or hanging from the SFP curb or handrail can be found in IN 87-13. "Potential for High Radiation Fields Following Loss of Water from Fuel Pool."

03.04 SFP Criticality Safety and Controls

SFP sub criticality must be maintained in accordance with Title 10 of the Code of Federal Regulations (10 CFR) 50.68, “Criticality Accident Requirements,” and 10 CFR Part 50, Appendix A, “General Design Criteria for Nuclear Power Plants,” General Design Criteria (GDC) 62, “Prevention of Criticality in Fuel Storage and Handling,” in or equivalent regulatory criteria, as applicable. Engineered design features that maintain acceptable geometry to ensure sub criticality will generally involve fuel assembly rack spacing, Bora flex or other permanent neutron absorbers, and physical design features. Administrative considerations may include procedural precautions, instructions, water temperature control, and dual verifications for fuel loading and transfers. Seismic considerations and heavy load handling limitations (including bridge and crane interlocks) will generally be required to preclude a fuel handling event that has the potential for crushing fuel assemblies into a critical geometry.

For reactors that have recently permanently shutdown and entered decommissioning, the inspector should determine if the licensee used a dispersed pattern to store the recently discharged (i.e., hot) fuel assemblies in accordance with IN 2014-14, “Potential Safety Enhancements to Spent Fuel Pool Storage.” Although not an NRC requirement, the storing of spent fuel in more favorable loading configurations by placing fuel in dispersed patterns immediately after core offload and taking action to improve mitigation strategies when the SFP heat load is high may reduce the risk associated with the SFP. If the licensee is using a dispersed pattern, the inspector should ascertain whether the configuration is appropriate given the decay heat load present in the SFP and the associated mitigating strategies available.

A variety of TS requirements and docketed commitments provide the basis for the licensee to conclude that spent fuel storage will preclude criticality. These requirements and commitments could be described in the TS, FSAR, PSDAR, or other licensee documents. Nuclear criticality safety (NCS) analyses are usually documented in the FSARs for power reactors and are the basis for demonstrating compliance with plant TS, compliance with NRC regulations, and an adequate margin to criticality during both normal operating conditions and design-basis events.

In many SFP NCS analyses, neutron-absorbing materials, through the inputs of dimensions and boron-10 (^{10}B) areal density, are credited for maintaining margin to criticality in the SFP. Hence, these materials must be able to perform their safety function during both normal operating conditions and design-basis events. Unidentified or unmitigated degradation or deformation of the credited neutron-absorbing materials may reduce the safety margin, especially when subjected to additional challenges during and following design-basis events. Many licensees use integrated defense-in-depth design features to account for degradation of the neutron-absorbing material. For example, some pressurized-water reactor licensees rely on the soluble boron concentration in the SFP water to maintain a margin to criticality in accordance with the requirements of 10 CFR 50.68.

Recent operating events have raised concerns that some licensees may not have adequate methodologies and surveillance programs to monitor and assess the degradation and deformation of the neutron-absorbing materials in the SFP. The inspector should perform an assessment of the licensee’s NCS or other available SFP analyses that supports the determination that the SFP criticality is being adequately monitored and maintained. The inspector should also verify that appropriate surveillance programs are in place to monitor potential degradation for the neutron absorbers in the SFP.

03.05 SFP Operation and Power Supply

During fuel transfers to independent spent fuel storage installations, the inspection effort should assess licensee control of heavy loads in the vicinity of the SFP. The inspector should review the licensee's plans and analysis for lifting and rigging of heavy loads to verify that the safe load path analysis for any component removal and/or reinstallation is technically sound and consistent with the facility's licensing basis. The inspection should focus on the impact of heavy load lifting operations on the SFP and support systems, and common support systems for any other operating reactor unit(s) at the site. The inspector should review NUREG-0612, "Control of Heavy Loads at Nuclear Power Plants," and assess the adequacy of the licensee controls and procedures. Appropriate instructions, precautions, and prerequisites should be established to assure that TS requirements are met and the worst-case fuel damage and dose generation would not exceed the associated safety and criticality analyses.

If applicable, an assessment should be performed to determine whether the licensee appropriately changed their licensing basis to reflect changes in the worst-case drop analysis. For example, an original FSAR may not have reviewed the consequences of a spent fuel transfer cask drop in or about the vicinity of the SFP. The potential safety consequences of this occurrence could exceed those associated with a spent fuel assembly drop accident.

The inspector should assess the functional operation and design of the SFP crane by obtaining the crane operating procedure in use when the power reactor was in operation, as well as any associated vendor design information or other documentation, and compare this information to the current SFP crane procedure in use during decommissioning. Differences in operation should have been assessed and appropriately justified by the licensee to ensure that the crane is capable of operating within limits during all phases of decommissioning. The inspector should evaluate these changes and ascertain whether the changes were appropriate.

The inspector should assess the functional operation and design of the SFP electrical systems by obtaining the SFP operating procedure from when the power reactor was in operation, as well as vendor system design information, and compare this information to the current SFP operation procedure in use during decommissioning. Differences in operation should have been assessed and appropriately justified by the licensee as a potential 10 CFR 50.59 or defacto modification. The inspector should evaluate these changes to system operation and ascertain whether the changes were appropriate.

03.06 Problem Identification and Resolution. No additional guidance.

60801-04 RESOURCE ESTIMATE

For planning purposes, the initial completion of this procedure is estimated to require 40 onsite inspection hours, with subsequent annual inspections requiring 20 to 40 hours, depending on the stage of decommissioning and level of activity regarding fuel movement at the site.

Note that for all decommissioning inspection activities, the frequency of performance, level of effort needed, and specific inspection requirements to be evaluated and verified vary based on the stage of decommissioning at the facility, the scope of licensee activities, and the overall decommissioning strategy chosen for the plant (i.e., SAFSTOR or DECON). IMC 2561 contains a discussion of the expected inspection frequency and resource estimates during each phase of decommissioning and should be used when planning resources to conduct this inspection.

60801-05 REFERENCES

10 CFR 50.68: Criticality Accident Requirements

Bulletin 94-01: Potential Fuel Pool Draindown Caused by Inadequate Maintenance Practices at Dresden Unit 1

Licensee Site-Specific Final Integrated Plan and NRC Safety Evaluation covering EA-12-051, Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Instrumentation (ADAMS Accession No. ML12056A044).

Technical Letter Report - Spent Fuel Pool Criticality Management Spreadsheet: A Compilation of the Means Used to Meet Sub criticality Requirements for all Operating Domestic Spent Fuel Pools, USNRC, Office of Nuclear Regulatory Research (ADAMS Accession No. ML113550241)

Spent Fuel Criticality Management Database, USNRC, Office of Nuclear Regulatory Research (ADAMS Accession No. ML13212A064)

**Future NRR Generic Letter on Monitoring of Neutron-Absorbing Materials in Spent Fuel Pools

Generic Letter 96-04: Bora flex Degradation in Spent Fuel Pool Storage

Generic Letter 80-113: Control of Heavy Loads

Generic Letter 78-11: Review and Acceptance of Spent Fuel Storage and Handling Applications

Information Notice 14-14: Potential Safety Enhancements to Spent Fuel Pool Storage

Information Notice 14-09: Spent Fuel Storage or Transportation System Misloading

Information Notice 12-13: Bora flex Degradation Surveillance Programs and Corrective Actions in the Spent Fuel Pool

Information Notice 09-26: Degradation of Neutron-Absorbing Materials in the Spent Fuel Pool
Information Notice 04-05: Spent Fuel Leakage to Onsite Groundwater

Information Notice 95-38: Degradation of Bora flex Neutron Absorber in Spent Fuel Pool Storage Racks

Information Notice 93-83: Potential Loss of Spent Fuel Pool Cooling Following a Loss of Cooling Accident (LOCA)

Information Notice 93-70: Degradation of Bora flex Neutron Absorber Coupons

Information Notice 90-33: Sources of Unexpected Occupational Radiation Exposures at Spent Fuel Storage Pools

Information Notice 88-65: Inadvertent Drainages of Spent Fuel Pools

Information Notice 87-43: Gaps in Neutron-Absorbing Material in High-Density Spent Fuel Storage Racks

Information Notice 87-13: Potential for High Radiation Fields Following Loss of Water from Fuel Pool

Information Notice 83-29: Fuel Binding Caused by Fuel Rack Deformation

IE Bulletin 79-24: ANSI/N14.6-1993: For Radioactive Materials - Special Lifting Devices for Shipping Containers Weighing 10,000 Pounds (4500 kg) or More

NUREG-0612: Control of Heavy Loads at Nuclear Power Plants, July 1980

NUREG-1801: Generic Aging Lessons Learned (GALL) Report, Revision 2

Inspection Procedure (IP) 71152: Problem Identification and Resolution

END

ATTACHMENT 1

Revision History for IP 60801

Commitment Tracking Number	Accession Number Issue Date Change Notice	Description of Change	Description of Training Required and Completion Date	Comment / Feedback Resolution Accession Number (Pre-Decisional, Non-Public)
N/A	08/11/1997	Initial issuance.	N/A	N/A
N/A	ML15202A260 01/11/16 CN 16-001	This procedure was updated to address content and format changes, content updates to reflect current SFP operation during decommissioning, as well as to address, in part, issues identified by the OIG in OIG-15-A-06, "Audit of NRC's Oversight of Spent Fuel Pools." Researched commitments for the last four years and found none.	None Required	ML15356A192