

November 5, 2015

MEMORANDUM TO: Kevin Hsueh, Chief
Licensing Processes Branch
Division of Policy and Rulemaking
Office of Nuclear Reactor Regulation

FROM: Joseph J. Holonich, Senior Project Manager /RA/
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SUBJECT: SUMMARY OF SEPTEMBER 10, 2015, MEETING WITH THE
NUCLEAR ENERGY INSTITUTE ON THE PROPOSED GENERIC
LETTER, "MONITORING OF NEUTRON-ABSORBING MATERIALS
IN SPENT FUEL POOLS"

On September 10, 2015, staff from the U.S. Nuclear Regulatory Commission (NRC) met with representatives from the Nuclear Energy Institute (NEI) and industry. The purpose of the meeting was to discuss, with NEI, the industry, and other public stakeholders, proposed ideas to help streamline the response process for the proposed generic letter (GL), "Monitoring Of Neutron-Absorbing Materials in Spent Fuel Pools." Pertinent meeting information including a list of attendees can be found in the Agencywide Documents Access and Management System (ADAMS) under package Accession No. ML15236A029.

In their opening remarks, the NRC staff stated that it was considering revisions to the GL as a result of comments regarding the GL burden upon licensees. Continuing, the NRC staff reported that once the revision was complete, the final GL would be put into the process for issuance. This process includes a review by the Office of Management and Budget that could take up to 90 days. This, the NRC staff noted, would potentially mean an issuance date in January 2016 for the GL.

The NRC staff also stated that this meeting was a step in establishing a common understanding of what a good response would be to the GL. The NRC staff emphasized that they wanted to avoid a situation where multiple sets of requests for additional information are necessary. In its view, the NRC staff indicated that the goals for this meeting were to make progress on establishing a common understanding regarding how to respond to the GL and to have a good dialogue.

The NEI representatives provided opening remarks that indicated licensees were looking to gain a better understanding of what they had to do in order to respond to the GL. The NEI representatives stated that its guidance under development would include background and history that would provide additional clarification on how to respond to the GL. By having the guidance, NEI indicated licensees would have a consistent approach to the information and level of detail that they could provide in response to the GL, and when they would need to go back to vendors to retrieve information.

In completing their opening remarks, the NEI representatives said they would be discussing a case study for a plant that credits Boral® at the meeting. A copy of the NEI case study can be found in the ADAMS package referenced earlier.

During the discussions of the case study, a question was asked about how much effort a plant would have to exert to collect information identified in the GL. The point was made that to collect, analyze, and review data on thousands of panels was not a small job. Thus, the question was what level of effort was needed to be expended and level of detail to be provided if there was no degradation.

In response, the NRC staff noted that the GL requested any information that plants had readily available on-site. However, the GL did not require plants to acquire information they did not readily have available on-site. Also, the NRC staff stated that it was still valuable to know which plants do not know certain parameters. Thus, the NRC staff suggested that the responses to the GL state that plants do not have the requested information after a reasonable effort was expended to locate the requested information, where applicable.

As part of this discussion, it was agreed that developing a set of frequently asked questions (FAQs) that were in the public domain would help clarify the GL. As part of this effort, the NRC agreed to develop a FAQ to address materials credited for subcriticality in the spent fuel pool that are not explicitly discussed in the GL.

Another question that arose during the discussion of the case study was what was meant by the term, "nominal as-built areal density" in the GL. The industry stated that nominal was considered a design term while as-built was what they have installed in the plant. The NRC agreed to develop a FAQ to clarify what is meant by these two terms.

A third question that arose during the discussion was what how the term "life of the spent fuel pool" should be defined. The NEI representatives recommended that the "life of the spent fuel pool" be defined to last until the end of the operating life of the plant. The NRC staff believed the 'life of the spent fuel pool' lasts through the period fuel is to be stored in the spent fuel pool, even if the plant has stopped operating. It was agreed NEI would develop a FAQ and proposed response that the NRC staff would consider.

The meeting adjourned with the agreement that a future meeting would be scheduled to continue the discussions.

The action items that came from the meeting include:

- 1) The NRC staff will prepare a FAQ on how to address material not included in the GL.
- 2) The NRC staff will prepare a FAQ clarifying what "nominal as-built areal density" means.
- 3) NEI will propose a FAQ defining the term "life of a spent fuel pool".
- 4) The NRC and NEI will schedule a second meeting to continue the discussions.

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ADAMS Accession Nos.: ML15254A193 (Summary); ML15236A027 (Notice); ML15236A029 (Pkg.);

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