

## PrairieIslandISFSIPem Resource

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**From:** John Greeves [greevesj@aol.com]  
**Sent:** Friday, August 14, 2015 4:11 PM  
**To:** Pickens, Terry A  
**Cc:** Sampson, Michele; Csontos, Aladar; Nguyen, John-Chau  
**Subject:** [External\_Sender] Re: High Burnup Spent Fuel License Condition

Sounds good to me.

Sent from my iPhone

On Aug 14, 2015, at 2:19 PM, Pickens, Terry A <[Terry.A.Pickens@xcelenergy.com](mailto:Terry.A.Pickens@xcelenergy.com)> wrote:

While discussing the Toll Gate language this morning on an internal call we identified one concern. That is in 2.a(ii) where it says “intended functions(s)” – as that term is **defined** in NRC regulations. After looking the term is not defined in regulation. We would like to suggest changing it to “intended function(s)” – as that term is **used** in NRC regulation.

### **Revised Language**

2.a –

- (i) Evaluate information obtained from the destructive (DE) and non-destructive (NDE) examination of the fuel placed into storage in the HDRP along with other available sources of information **and provide the evaluation to NRC with simultaneous copies to PIIC.**
- (ii) If the aggregate of this information indicates that the high burnup fuel assemblies will not perform “intended function(s)” – as that term is used in NRC regulations – NSPM will submit a License Amendment Request to NRC with its proposed actions to address the issues indicated by the evaluation and to continue safe storage of high burnup fuel.
- (iii) If the aggregate of this information confirms the ability of the high burnup fuel assemblies to continue to perform intended function(s) for the remainder of the period of extended operations, subsequent assessments may be cancelled.

2.b - If by January 1, 2033 it becomes evident that the HDRP DE of the fuel will not be completed in time to support the assessment required by Toll Gate 2.a, NSPM will submit a License Amendment Request to the NRC outlining its plans to obtain evidence to demonstrate that the fuel performance acceptance criteria 1-4 in element 6 will continue to be met. This License Amendment Request will be submitted to the NRC for approval no later than December 31, 2033. The evaluation using this evidence will be completed by 2038.

**Terry Pickens**

**Xcel Energy | Responsible By Nature**

**Director, Nuclear Regulatory Policy**

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**From:** Sampson, Michele [<mailto:Michele.Sampson@nrc.gov>]

**Sent:** Thursday, August 13, 2015 4:22 PM

**To:** [Greevesj@aol.com](mailto:Greevesj@aol.com); Pickens, Terry A; Csontos, Aladar

**Cc:** Nguyen, John-Chau

**Subject:** High Burnup Spent Fuel License Condition

The NRC has proposed a license condition to require the evaluation report generated in the HBU Toll Gate to be sent to the NRC. Based on the edits to the Toll Gate, the proposed license condition would be revised as follows:

NSPM shall submit the evaluations related to high burnup fuel performance specified in the toll gates in the “High Burnup Fuel Aging Management Program” in Appendix A, Rev. X, of the Supplement to the License Renewal Application (MLXXXXXXXXXX) to serve as confirmation that the high burnup fuel continues to meet the requirements in 10 CFR 72.122(h), “Confinement barriers and systems” and 72.122(i), “Retrievability”.

- a. The first evaluation shall be provided in a letter to the NRC (submitted pursuant to 10 CFR 72.4) by April 4, 2028 (see Section A3.5 Toll Gate 1).
- b. An additional evaluation shall be provided in a letter to the NRC (submitted pursuant to 10 CFR 72.4) by April 4, 2038 (see Section A3.5 Toll Gate 2).

Thank you,

Michele Sampson

Chief, Spent Fuel Licensing Branch

Division of Spent Fuel Management

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**From:** John Greeves

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Tracking Status: None  
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