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September 24, 2015

Mr. Mark Lombard
Director
Division of Spent Fuel Management
Office of Nuclear Material Safety and Safeguards
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Subject: Submittal of NEI 14-03, *Guidance for Operations-Based Aging Management for Dry Cask Storage*, Revision 1, dated September 2014

Reference: Letter Mark D. Lombard to Rodney J. McCullum, *Response to September 23, 2014, Nuclear Energy Institute Submittal: NEI 14-03, Guidance for Operations-Based Aging Management for Dry Cask Storage*, dated January 21, 2015 (ML14266A224)

Project Number: 689

Dear Mr. Lombard:

On behalf of the nuclear industry, the Nuclear Energy Institute (NEI)¹, is pleased to submit to the U.S. Nuclear Regulatory Commission (NRC) the attached NEI 14-03, *Format, Content and Implementation Guidance for Dry Cask Storage Operations-Based Aging Management*, Revision 1, dated September 2014. This revision addresses the comments we received from the NRC on Revision 0 in the letter referenced above and updates NEI 14-03 to assure that it provides guidance to industry preparers of dry storage license and CoC renewal applications that is consistent with the draft guidance NRC is proposing for its staff reviewers of these applications in draft Revision 1 NUREG 1927 "Standard Review Plan for Renewal of Spent Fuel Dry Cask Storage System Licenses and Certificates of Compliance" dated July 7, 2015, and the industry's comments on that draft guidance submitted on August 21, 2015. Accordingly, we request that the

¹ The Nuclear Energy Institute (NEI) is the organization responsible for establishing unified industry policy on matters affecting the nuclear energy industry, including the regulatory aspects of generic operational and technical issues. NEI's members include all entities licensed to operate commercial nuclear power plants in the United States, nuclear plant designers, major architect/engineering firms, fuel cycle facilities, nuclear materials licensees, and other organizations and entities involved in the nuclear energy industry.

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NRC review NEI 14-03 for endorsement in conjunction with the NRC's final issuance of the revised NUREG 1927.

In serving as a complementary component of the regulatory framework to NUREG-1927, NEI 14-03 fulfills the need for industry guidance in the areas described in NUREG-1927 Sections 3.0, "Aging Management Review," 1.4.4, "Application Content," and 1.4.6 "Amendment Applications Submitted During the Renewal Review or After the Renewal is Issued." NEI 14-03, Revision 1, proposes a forward-looking, operations-based learning approach to aging management for DCS SSCs that builds on the lessons learned from the industry's considerable experience with reactor SSC aging management.

We would like to especially thank the NRC for providing feedback on the industry's proposed approach in the referenced letter. In that letter, the NRC indicated that Revision 0 of NEI 14-03 "provided significant value" and was supportive of "our common goal of creating an operations-focused approach to aging management," but concluded that some aspects of NEI 14-03 required further discussion before the guidance could be considered for endorsement. To facilitate this discussion, the NRC offered comments in six specific areas. These comments were, indeed, the subject of considerable discussion in a number of public meetings conducted during the first half of this year. This dialogue has significantly informed the development of Revision 1 of NEI 14-03. In Attachment 1 to this letter, we have provided a specific response to each of NRC's six overarching comments. The revised NEI 14-03 is included as Attachment 2.

We appreciate the NRC's willingness to work with the industry in an open and collaborative manner in the consideration of the guidance. We look forward to continuing the ongoing dialogue to assure the timely completion of the updated NUREG-1927 and corresponding endorsement of NEI 14-03. If you have any questions, please feel free to contact me or Kris Cummings (202.739.8131; kwc@nei.org).

Sincerely,



Rod McCullum

Attachments

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