

Attachment 1

Responses to NRC Comments on Revision 0 of NEI 14-03 (provided January 21, 2015)

NRC Comment #1: Application Format and Content

Industry Response: *The industry agrees with the NRC's view that NEI 14-03 should provide a greater level of detail for renewal application preparers in order to make this guidance a more effective compliment to NUREG-1927. In Revision 0, this topic was addressed in Section 4.2. In Revision 1, the format and content guidance was moved forward and expanded. A new Section 2.0 replaces the previous Section 4.2 and provides a considerably greater level of detail as requested in the NRC's comment.*

NRC Comment #2: Sharing of Operating Experience

Industry Response: *The industry agrees with the NRC's view that NEI 14-03, Revision 0, was not sufficiently clear with respect to ownership of the operating experience clearinghouse and the process by which the clearinghouse owner would proactively push operating experience out to the industry in a manner that would be available to the NRC. To address this concern, NEI has partnered with the Institute of Nuclear Power Operations (INPO) to create the ISFSI Aging Management INPO Database (AMID). This tool will provide the industry with a rigorous approach to the sharing of aging-related dry spent fuel storage operating experience and other relevant information that provides a robust foundation for implementation of the "tollgate" concept also introduced in NEI 14-03. In Revision 1 of NEI 14-03, Section 4.5 (previously Section 3.5) has been revised to provide a detailed description of this tool and how it will be used. We believe that the proactive operating experience sharing program now outlined in NEI 14-03 is fully responsive to the NRC's comment.*

NRC Comment #3: Tollgates

Industry Response: *The industry thanks the NRC for recognizing the value of the tollgate concept and we appreciate the fact that the NRC has also adopted this concept in the proposed revision of NUREG-1927 as well as in the staff's review of license renewal applications for the Calvert Cliffs and Prairie Island ISFSIs. In Revision 1 of NEI 14-03, clarifications and details have been added which we believe are responsive to the NRC's comment and will communicate an understanding of the tollgate concept that is consistent with what is described in the NRC's proposed revision to NUREG-1927.*

NRC Comment #4: Change Control of Aging Management Information

Industry Response: *The industry does not agree with the NRC view that license and CoC conditions are a necessary or effective means of assuring effective AMP or TLAA implementation. To the contrary, we believe that an overreliance on the use of license and CoC conditions encumbers the*

implementation of AMPs and TLAAs in a way that is fundamentally counterproductive to a truly learning approach to aging management – as the time-consuming process of amending license and CoC conditions will make it difficult for the industry to adjust to newly acquired information in a timely manner. Section 2.2.5 of NEI 14-03 has been revised to provide additional clarity on how information is structured between the license or CoC and their supporting documents. This guidance is intended to provide a reasonable approach that will assure effective management of AMPs and TLAAAs while preserving the flexibility necessary to support the learning objective. It should also be noted that this approach is consistent with the criteria proposed in industry Petition for Rulemaking 72-7 which has been accepted by the NRC for consideration in the rulemaking process¹.

NRC Comment #5: Lead System Inspections

Industry Response: The industry understands the NRC's concern about the need for more detail and clarity on the purpose of each inspection, particularly with respect to the use of surrogate inspections applicable for to multiple sites. In Revision 1 of NEI 14-03, the industry has included a clarified understanding of the various storage system inspections that pertain to license and CoC renewal. That clarification includes replacing lead system inspection with three new terms; "pre-application inspection," "baseline inspection," and "lead component;" and describing their proposed use. Also, Section 3.6.2 has been revised to provide additional details including the application of susceptibility criteria derived from a recently completed study by the Electric Power Research Institute (EPRI).

NRC Comment #6: AMP and TLAA Discussions

Industry Response: The industry agrees that some of the terminology used in Revision 0 of NEI 14-03 was confusing. In Revision 1 of NEI 14-03, we have made changes that assure a clear and consistent use of terms to describe AMPs and TLAAAs.

¹ 79 *Federal Register* 41936, July 18, 2014.