

# Industry Perspective on Retrievability

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# Industry Message

- Canister based Retrievability:
  - Consistent with a risk-informed, performance based approach.
  - Will reduce unnecessary personnel dose, cost and risk by minimizing the number of dry storage systems.
  - Improve safety by reducing need for repackaging/unloading for non-safety related purposes.

# Technical Basis for Industry Position

- Focus on the dry storage system to perform safety function with cladding as defense-in-depth.
- Alternative basis for ensuring safety:
  - System confinement boundary prevents moderator intrusion and radiological release after closure
  - Fuel basket/internals provides gross material geometric control. Reduced reactivity due to fissile material depletion and creation of fission products ensures sub-criticality.
- NUREG/CR-7203 demonstrates that credible scenarios for normal and off-normal conditions, loss of fuel rod integrity has a negligible effect on safety performance.

# Conforming Changes in Corollary Guidance

- ISG-1, Revision 2
- Inspection Procedures
  - IP-60854, IP-60855,
- ISG-3, Post Accident Recovery
- NUREG-1927, Revision 1
- NUREG-1536/NUREG-1567

# Other Regulatory Improvements Needed

- PRM 72-7
  - Safety focused criteria for CoC and TS Content
  - Application of backfit rule to CoC holders
- Endorsement of NEI 12-04 on 72.48 process

## Summary

- Revised basis for retrievability is a good application of risk-informed, performance based regulatory approach.
- No reduction in public health and safety.
- Reliance on the package design versus the system contents is a firmer regulatory and technical basis.
- Reduces the risk of needing to repackage for non-safety related reasons