

November 16, 2015

MEMORANDUM TO: Michele Sampson, Acting Deputy Director  
Division of Spent Fuel Management  
Office of Nuclear Material Safety  
and Safeguards

FROM: Eliza Mitchell, Project Manager **/RA/**  
Inspections and Operations Branch  
Division of Spent Fuel Management  
Office of Nuclear Material Safety  
and Safeguards

SUBJECT: SUMMARY OF THE OCTOBER 29, 2015, PUBLIC MEETING ON  
THE DRAFT INTERIM STAFF GUIDANCE (ISG) 2, REVISION 2:  
FUEL RETRIEVABILITY UNDER 10 CFR PART 72

The Nuclear Regulatory Commission (NRC) staff met with the public on October 29, 2015, at the Nuclear Regulatory Commission Headquarters in Rockville, Maryland. A summary of the meeting (Enclosure 1) and participants list (Enclosure 2) is enclosed. The draft guidance document was issued for public comments on October 21, 2015 (See Agencywide Documents Access and Management System (ADAMS) Accession No. ML15239A695). The public comment period will end November 20, 2015. Additionally, the Advisory Committee on Reactor Safeguards (ACRS) meeting that was previously scheduled for November 20, 2015 will be rescheduled in the near future.

Enclosures:  
1. Meeting Summary  
2. Attendance Lists

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(301) 415-8521

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**ADAMS ACCESSION NO.: Package ML15317A259**

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## U.S. Nuclear Regulatory Commission (NRC) Public Meeting Summary

**Title:** Public Meeting on the Draft Interim Staff Guidance (ISG) 2, Revision 2:  
Fuel Retrievability under 10 CFR Part 72

**Date and Time of Meeting:** October 29, 2015, 1:00 PM to 3:00 PM

**Location:** Nuclear Regulatory Commission  
One White Flint North, Commissioner's Hearing Room  
11555 Rockville Pike  
Rockville, MD 20852

**Category:** Category 3 meeting

**Purpose:** Public meeting to discuss the draft ISG 2 Revision 2 (ADAMS Accession No. ML15239A695) on fuel retrievability as it relates to storage under 10 CFR Part 72.

**General Details:** The meeting began at approximately 1:00 pm EST and concluded at approximately 2:30 pm EST. The meeting was facilitated by Lance Rakovan, NRC, and was available via a webinar and a call-in number. There were approximately 42 participants (see Enclosure 2 for a list and breakdown of participants). A presentation was given by Emma Wong, NRC, and Kristopher Cummings, National Energy Institute (NEI), and a copy of the presentations can be found in ADAMS Accession Number ML15296A472 and ML15308A009, respectively. After the conclusion of the presentations, there was an opportunity to ask several rounds of questions or make comments.

**Public Participation:** During the meeting, there were several comments and observations made. Some of the more noteworthy comments and observations that pertained to the subject of retrievability were:

- A commenter inquired about the meaning of the word 'ready' in ready retrieval. The NRC staff discussed that the phrase ready retrieval means that the system is designed for retrieval and that not all the equipment would need to be on site.
- A commenter inquired about whether a site would need to continue to demonstrate the capability for ready retrievability past the initial demonstration or if the continued maintenance of design-basis of the system would be sufficient. The NRC staff discussed that the initial demonstration of retrievability would be sufficient, if the design basis of the system was maintained throughout the storage periods and the technical specifications (TSs) includes aging management programs.
- A commenter inquired that in the draft ISG there is a section that mentions TSs. The commenter then inquired whether this means that there would be a new TS required specifically for ready retrievability. The NRC staff discussed that for existing TSs for certificates of compliance (CoC) for dry cask storage systems or specific licenses licensees would need to maintain the TSs of the current design-basis that would be related to complying with the retrievability requirement.

- A commenter inquired about transporting canisters that are not intact. The NRC staff discussed that the canisters would be inspected by the licensee and the condition evaluated before the canisters are placed into a transportation over pack. If the canister's condition that does not comply with the transportation CoC, then the licensee would need to evaluate the condition and make necessary adjustments to maintain compliance to ensure transportability. This evaluation and changes may need to be approved by the NRC before any further actions could be taken by the licensee. Additionally, there was another comment from the NRC staff that the canister may also be able to be repaired to meet the conditions for the transportation CoC.
- A comment was made by the NRC staff on NEI's presentation on "Conforming Changes in Corollary Guidance." The NRC staff clarified that the current practices to protect cladding against gross rupture would still be maintained due to other regulatory requirements (i.e., Title 10 of the *Code of Federal Regulations* 72.122(h)(1)).
- A commenter inquired about scientific evidence for the robustness of the cladding. The NRC staff mentioned that the document, Mechanical Fatigue Testing of High Burn-up Fuel for Transportation Applications (ADAMS Accession number ML15139A389) was referenced in the slides.
- A commenter inquired about the draft ISG-2 Rev. 2 and the reference to IAEA SSG-15 in the draft. The commenter noted that in the IAEA SSG-15 the fuel must be recoverable in accident conditions and in the NRC regulations this is not a requirement. The NRC staff asked this to be submitted as a formal comment to be considered.
- A commenter made an inquiry that did not relate to retrievability about the weight of the transportation packages and transportability in the U.S. This is for the Department of Energy and Department of Transportation to determine the infrastructure and proposed routes.

#### **Next Steps:**

- The NRC will address formal public comments on the Draft ISG-2, Rev. 2 received from the public comment period which ends on November 20, 2015.

#### **Additional References:**

- Public Meeting announcement, ADAMS Accession number ML15299A256
- NRC Presentation, "Spent Fuel Retrievability," ADAMS Accession number ML15296A472
- Presentation, "Industry Perspective on Retrievability," ADAMS Accession number ML15308A009

**Public Meeting on Draft ISG-2 Rev. 2: Fuel Retrievalability**  
**Nuclear Regulatory Commission**  
**October 29, 2015**  
**Meeting Attendees and Affiliation**

Emma	Wong	NRC
Patricia	Silva	NRC
Mark	Lombard	NRC
Meraj	Rahimi	NRC
Kristina	Banovac	NRC
Anthony	Hsia	NRC
Briana	Bollinger	NRC
Lee	Brookhart	NRC
Zhian	Li	NRC
Darrell	Dunn	NRC
Sheiba	Tafazzoli	NRC
Bob	Capstick	3 Yankees
Norma	Garcia-Santos	NRC
Donna	Gilmore	Cox
Randall	Granaas	SCE
Carlyn	Greene	UXC
Luis	Hinojosa	Holtec
Elaine	Hiruo	Platts
John	Kessler	J Kessler Associates
Yung	Liu	ANL
Zita	Martin	TVA
Lisa	Matis	Tetrattech
William	Nutt	ANL
Terry	Pickens	Xcel Energy
Wendy	Reed	NRC
Bhasker	Tripathi	NRC
Keith	Waldrop	EPRI
John	Wise	NRC
John Chau	Nguyen	NRC

Suzanne	Leblang	Entergy
Adam	Levin	AHL Consulting
Stefan	Anton	Holtec
Paul	Plante	3 Yankees
Matt	Keene	Duke Energy
Robert	Eungen	NOUT RB
Jana	Bcogman	NASH
Tae	Ahn	NRC
Banad	Jagannath	NRC
Ricardo	Torres	NRC