

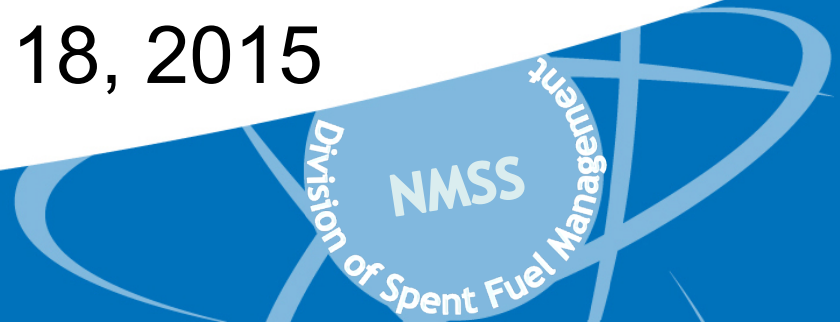


# Perspectives on CoC Renewals



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# Outline

- Background
- In Process Certificate of Compliance (CoC) Renewals
- Issues for CoC Renewals
- Anticipated CoC User Implementation
- Conclusions

# Background

- Completed 6 site specific renewals
  - 4 were completed before NUREG-1927, Rev 0 was issued
  - 1 while Rev 0 was in development
- 1 currently in progress
  - NUREG-1927, Rev. 1 draft

# In Progress CoC Renewals

- VSC-24 (CoC 1007), nearing completion
- Standardized NUHOMS<sup>®</sup> (CoC 1004)
  - Original + Amendments 1-11, 13
  - Amendment 14 review is currently in progress

# Issues for CoC Renewals

- Lead System Inspection
- Conditions
- Multiple Amendments
- Format in 72.214
- Environmental Assessments (EAs) for rulemaking

# Lead System Inspection

- CoC holder responsible for demonstrating that storage of spent fuel has not adversely affected SSCs important to safety
  - Lead system inspection
  - Should be performed before submittal of the renewal application - inspection results part of the justification for renewal

# Lead System Inspection (cont'd)

- Unlike specific-license applicants, CoC holder is responsible for demonstration for systems at multiple environments and locations
  - CoC holder may not own the deployed DSSs at general-licensed ISFSI sites
  - CoC holder may not have authority to conduct such inspections at general-licensed ISFSI sites.

# Lead System Inspection (cont'd)

- VSC-24 CoC holder submitted results
- Standardized NUHOMS<sup>®</sup> submitted some information
  - Standardized NUHOMS<sup>®</sup> renewal review staff will be meeting with 1927, Rev. 1 staff to determine recommendations for path forward



# Conditions

- Conditions for VSC-24 informed by Calvert Cliffs and Prairie Island site specific renewals
- Conditions for Standardized NUHOMS® will be informed by:
  - VSC-24, Calvert Cliffs and Prairie Island site specific renewals
  - 1927, Rev. 1 draft for comment

# Sample Conditions

- Authorization Under Renewed CoC
- Operating Procedures for Systems in Service Longer than 20 years
- Notification of AMP Implementation
- Limits on AMP Element Changes
- 72.212 Evaluations for Renewed CoC Use
- Corrosion Evaluation for Renewed CoC Use
- FSAR Update for Renewed CoC Use
- Amendments for Renewed CoC Use
- Additional Design Conditions for Renewed CoC

# Multiple Amendments

- Each amendment will have a new CoC and associated Technical Specifications
- Updated CoC form will be used
  - Renewed Effective Date
  - Renewed Expiration Date
  - Original Effective and Expiration Dates
  - Also has revision number and revision effective date

# Format in 72.214

- 72.214, List of approved Spent Fuel Storage Casks
- Want to be clear
  - Keep history
  - Show renewal

# Current Format in 72.214

Certificate Number: 1004.

Initial Certificate Effective Date: January 23, 1995.

Amendment Number 1 Effective Date: April 27, 2000.

...

Amendment Number 13 Effective Date: May 24, 2014.

SAR Submitted by: Transnuclear, Inc.

SAR Title: Final Safety Analysis Report ...

Docket Number: 72–1004.

Certificate Expiration Date: January 23, 2015.

# Proposed Format

Certificate Number: 1004.

Initial Certificate Effective Date: January 23, 1995.

Amendment Number 1 Effective Date: April 27, 2000.

...

Amendment Number 13 Effective Date: May 24, 2014.

SAR Submitted by: Transnuclear, Inc.

SAR Title: Final Safety Analysis Report ...

Docket Number: 72–1004.

**Original** Certificate Expiration Date: January 23, 2015.

**Renewed** Certificate Expiration Date: January 23, **2035**.

# EAs

- As part of the rulemaking process to add CoCs to 72.214, an Environmental Assessment is performed and published in the *Federal Register*
- Currently, fairly similar across amendments
- New EA will be developed for CoC renewals

# Anticipated CoC

## User Implementation

- Each CoC user will need to update their 72.212 evaluation to reflect the renewal
- Lead system inspection (possible)
- Aging management program
- Other new (renewal) conditions



# Conclusions

- CoC Renewals informed by completed and in-progress site specific renewals
- CoC Renewals informed by NUREG-1927, Rev. 1 development
- Some specific issues associated with CoC renewals that are not present for site specific renewals
  - Differences for lead system inspection, multiple amendments, implementation, rulemaking, etc.

# Abbreviations and Acronyms

- AMP = Aging Management Program
- CoC = Certificate of Compliance
- DSS = Dry storage systems
- EA = Environmental Assessment
- FSAR = Final Safety Analysis Report
- ISFSI = Independent Spent Fuel Storage Installation
- SAR = Safety Analysis Report
- SSC = Systems, structures and components
- TS = Technical Specifications

- For further information or questions:

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