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# PUBLIC SUBMISSION

**Docket:** NRC-2015-0241  
Fuel Retrievability

**Comment On:** NRC-2015-0241-0001  
Fuel Retrievability; Request for Comment on Draft Interim Staff Guidance

**Document:** NRC-2015-0241-DRAFT-0004  
Comment on FR Doc # 2015-26743

10/21/2015

FR 63843

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## Submitter Information

2

**Name:** Stan Day

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## General Comment

The following files provide comments from Connecticut Yankee Atomic Power Company, Maine Yankee Atomic Power Company, and Yankee Atomic Electric Company

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## Attachments

- 20151117 - MY Comments - ISG-2 R2
- 20151117 - YAEC Comments - ISG-2 R2
- 20151117 - CY Comments - ISG-2 R2

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RULES AND DIRECTIVES  
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SUNSI Review Complete  
Template = ADM - 013  
E-RIDS= ADM -03  
Add= E. Wong (ELW3)

# MAINE YANKEE

321 Old Ferry Road, Wiscasset, Maine 04578

November 17, 2015

OMY-15-052

Cindy Bladey, Chief  
Office of Administration, Mail Stop: OWFN 12-H08  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

Maine Yankee Atomic Power Company  
Maine Yankee Independent Spent Fuel Storage Installation  
NRC License Nos. DPR-36 and SFGL-14 (NRC Docket Nos. 50-309 and 72-30)

**Subject:** Comments on Draft ISG-2, Revision 2, "Fuel Retrievability in Spent Fuel Storage Applications" (Docket ID NRC-2015-0241)

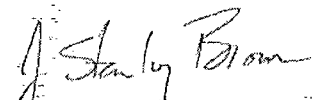
Dear Ms. Bladey:

Maine Yankee Atomic Power Company (Maine Yankee) appreciates the opportunity to provide comments on Draft ISG-2, Revision 2 "Fuel Retrievability in Spent Fuel Storage Applications" (80FR63843).

- Maine Yankee believes that Draft ISG 2, Revision 2 is consistent with a risk-informed, performance based regulatory approach. We support the Draft ISG's position that fuel retrievability should include removal of a canister loaded with spent fuel assemblies from a storage cask/overpack, as well as removal of a cask loaded with spent fuel assemblies from the storage location.
- Maine Yankee has previously commented to the NRC (letter dated March 18, 2013, OMY-13-025, NRC Docket ID 2013-0004) that retrievability can and should be canister based and that any necessary retrieval of spent fuel assemblies stored at sites such as ours is best performed at a future consolidated storage, reprocessing, or repository facility. Spent fuel assembly retrieval at sites designed for these tasks is preferable, because stand-alone Independent Spent Fuel Storage Installations, such as Maine Yankee, no longer possess the capability to retrieve spent fuel assemblies from a dry storage canister.
- Maine Yankee also agrees with the Draft ISG position that in order to verify that the 10 CFR 72.122 retrievability requirements are met by applicants for renewal of an ISFSI license, the NRC staff can rely on the Aging Management Programs and Time-Limited Aging Analyses established under NRC and NEI guidance documents. Industry and site specific operating experience, inspections, and analyses performed during the storage period provide further assurance that the approved design bases will be maintained during the period of extended operation and that fuel retrieval is maintained.
- In conclusion, Maine Yankee supports the comments submitted on the Draft ISG 2, Revision 2 by the Nuclear Energy Institute.

If you have any questions regarding these comments, please do not hesitate to contact me  
(207) 882-1303.

Sincerely,



J. Stanley Brown, P.E.  
ISFSI Manager

CCs:

Mr. Mark Lombard, USNRC  
Ms. Emma Wong, USNRC  
Mr. Dan Dorman, US NRC  
Mr. Ray Powell, USNRC  
Mr. John Nicholson, USNRC  
Mr. John Goshen, USNRC  
Mr. Pat Dostie, State of Maine  
Mr. Jay Hyland, State of Maine  
Mr. Gerry Poulin, Maine Yankee  
Mr. Wayne Norton, Maine Yankee  
Mr. Bob Capstick, Maine Yankee  
Mr. Rod McCullum, NEI  
Mr. Kris Cummings, NEI  
Mr. Tim Smith, Decommissioning Plant Coalition  
Mr. Mike Callahan, Decommissioning Plant Coalition



*YANKEE ATOMIC ELECTRIC COMPANY*  
49 Yankee Road, Rowe, Massachusetts 01367

November 17, 2015  
BYR 2015-035

Cindy Bladey, Chief  
Office of Administration, Mail Stop: OWFN 12-H08  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

Yankee Atomic Electric Company  
Yankee Nuclear Power Station Independent Spent Fuel Storage Installation  
NRC License Nos. DPR-3 and SFGL-13 (NRC Docket Nos. 50-029 and 72-31)

**Subject:** Comments on Draft ISG-2, Revision 2, "Fuel Retrievability in Spent Fuel Storage Applications" (Docket ID NRC-2015-0241)

Dear Ms. Bladey:

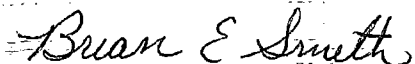
Yankee Atomic Electric Company (YAEC) appreciates the opportunity to provide comments on Draft ISG-2, Revision 2 "Fuel Retrievability in Spent Fuel Storage Applications" (80FR63843).

- YAEC believes that Draft ISG 2, Revision 2 is consistent with a risk-informed, performance based regulatory approach. We support the Draft ISG's position that fuel retrievability should include removal of a canister loaded with spent fuel assemblies from a storage cask/overpack, as well as removal of a cask loaded with spent fuel assemblies from the storage location.
- YAEC has previously commented to the NRC (letter dated March 18, 2013, BYR 2013-016, NRC Docket ID 2013-0004) that retrievability can and should be canister based and that any necessary retrieval of spent fuel assemblies stored at sites such as ours is best performed at a future consolidated storage, reprocessing, or repository facility. Spent fuel assembly retrieval at sites designed for these tasks is preferable, because stand-alone Independent Spent Fuel Storage Installations, such as YAEC, no longer possess the capability to retrieve spent fuel assemblies from a dry storage canister.
- YAEC also agrees with the Draft ISG position that in order to verify that the 10 CFR 72.122 retrievability requirements are met by applicants for renewal of an ISFSI license, the NRC staff can rely on the Aging Management Programs and Time-Limited Aging Analyses established under NRC and NEI guidance documents. Industry and site specific operating experience, inspections, and analyses performed during the storage period provide further assurance that the approved design bases will be maintained during the period of extended operation and that fuel retrieval is maintained.

- In conclusion, YAEC supports the comments submitted on the Draft ISG 2, Revision 2 by the Nuclear Energy Institute.

If there are any questions regarding these comments, please contact me at (413) 424-5261 extension 303.

Respectfully,



Brian Smith  
ISFSI Manager

CCs:

Mr. Mark Lombard, USNRC  
Ms. Emma Wong, USNRC  
Mr. Dan Dorman, US NRC  
Mr. Ray Powell, USNRC  
Mr. John Nicholson, USNRC  
Mr. John Goshen, USNRC  
Mr. Wayne Norton, YAEC  
Mr. Bob Capstick, YAEC  
Mr. Rod McCullum, NEI  
Mr. Kris Cummings, NEI  
Mr. Tim Smith, Decommissioning Plant Coalition  
Mr. Mike Callahan, Decommissioning Plant Coalition



# CONNECTICUT YANKEE ATOMIC POWER COMPANY

HADDAM NECK PLANT  
362 INJUN HOLLOW ROAD • EAST HAMPTON, CT 06424-3099

November 17, 2015  
CY-15-038

Ms. Cindy Bladey, Office of Administration,  
Mail Stop: OWFN-12-H08,  
U.S. Nuclear Regulatory Commission,  
Washington, DC 20555

Connecticut Yankee Atomic Power Company  
Haddam Neck Plant Independent Spent Fuel Storage Installation  
NRC License Nos. DPR-61 and SFGL-21 (NRC Docket Nos. 50-213 and 72-39)

**Subject:** Comments on Draft ISG-2, Revision 2, "Fuel Retrievability in Spent Fuel Storage Applications" (Docket ID NRC-2015-0241)

Dear Ms. Bladey:

Connecticut Yankee Atomic Power Company (CYAPCO) appreciates the opportunity to provide comments on Draft ISG-2, Revision 2 "Fuel Retrievability in Spent Fuel Storage Applications" (80FR63843).

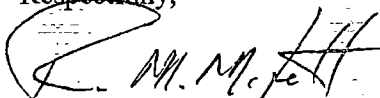
- CYAPCO believes that Draft ISG 2, Revision 2 is consistent with a risk-informed, performance based regulatory approach. We support the Draft ISG's position that fuel retrievability should include removal of a canister loaded with spent fuel assemblies from a storage cask/overpack, as well as removal of a cask loaded with spent fuel assemblies from the storage location.
- CYAPCO has previously commented to the NRC (letter dated March 18, 2013, CY-13-019, NRC Docket ID 2013-0004) that retrievability can and should be canister based and that any necessary retrieval of spent fuel assemblies stored at sites such as ours is best performed at a future consolidated storage, reprocessing, or repository facility. Spent fuel assembly retrieval at sites designed for these tasks is preferable, because stand-alone Independent Spent Fuel Storage Installations, such as CYAPCO, no longer possess the capability to retrieve spent fuel assemblies from a dry storage canister.
- CYAPCO also agrees with the Draft ISG position that in order to verify that the 10 CFR 72.122 retrievability requirements are met by applicants for renewal of an ISFSI license, the NRC staff can rely on the Aging Management Programs and Time-Limited Aging Analyses established under NRC and NEI guidance documents. Industry and site specific operating experience, inspections, and analyses performed during the storage period provide further

assurance that the approved design bases will be maintained during the period of extended operation and that fuel retrieval is maintained.

- In conclusion, CYAPCO supports the comments submitted on the Draft ISG 2, Revision 2 by the Nuclear Energy Institute.

If you have any questions regarding this submittal, please do not hesitate to contact me at (860) 267-6426 ext. 303.

Respectfully,



Bob Mitchell  
ISFSI Manager

CCs:

Mr. Mark Lombard, USNRC  
Ms. Emma Wong, USNRC  
Mr. Dan Dorman, US NRC  
Mr. Ray Powell, USNRC  
Mr. John Nicholson, USNRC  
Mr. John Goshen, USNRC  
Mr. Jeff Semancik, CT DEEP  
Mr. Wayne Norton, Connecticut Yankee  
Mr. Bob Capstick, Connecticut Yankee  
Mr. Rod McCullum, NEI  
Mr. Kris Cummings, NEI  
Mr. Tim Smith, Decommissioning Plant Coalition  
Mr. Mike Callahan, Decommissioning Plant Coalition