

August 18, 2016

Rodney J. McCullum
Senior Director, Used Fuel and Decommissioning Programs
Nuclear Energy Institute
1201 F Street NW, Suite 1100
Washington, DC 20004

SUBJECT: RESPONSE TO SEPTEMBER 2015, NUCLEAR ENERGY INSTITUTE
SUBMITTAL: NEI 14-03, "FORMAT, CONTENT AND IMPLEMENTATION
GUIDANCE FOR DRY CASK STORAGE OPERATIONS-BASED AGING
MANAGEMENT," REVISION 1

Dear Mr. McCullum:

In response to your letter dated September 24, 2015, staff from the Office of Nuclear Material Safety and Safeguards, Division of Spent Fuel Management completed its review of Nuclear Energy Institute (NEI) 14-03, "Format, Content and Implementation Guidance for Dry Cask Storage Operations-Based Aging Management," Revision 1 (Agencywide Document Access Management System Accession No. ML15272A332). NEI requested that the U.S. Nuclear Regulatory Commission (NRC) endorse this guidance, which the NRC intends to do if the comments found in Enclosure 1 are adequately resolved.

The staff finds that Revision 1 reflects the extensive collaboration between the NRC and stakeholders to substantially address the comments the staff provided on NEI 14-03, Revision 0 in the letter dated January 21, 2015 (ML15013A201). For example, the staff recognizes the great amount of progress made in developing a framework for sharing operating experience via the new Aging Management Institute of Nuclear Power Operations (INPO) Database. This is considered a key element to ensuring the effectiveness of aging management activities and has the potential to be a powerful resource during the periodic reviews, or "tollgates," to assess the effectiveness of aging management programs. Also, NEI 14-03 largely reflects an understanding of the appropriate degree of change control that licensees would have over aging management programs – an understanding developed out of several recent productive public interactions between NRC and the industry.

To address other aspects of NEI 14-03 that require additional discussion before the guidance can be considered for endorsement, the staff suggests a public meeting, either via teleconference or in-person. In its review of NEI 14-03, Revision 1, the staff has developed several comments to provide greater clarity to staff guidance related to dry cask storage aging management and to better harmonize this document with NUREG-1927, Revision 1, "Standard Review Plan for Renewal of Specific Licenses and Certificates of Compliance for Dry Storage of Spent Nuclear Fuel". A tabulated list of the comments can be found in Enclosure 1.

If you have questions regarding our comments, please contact John Wise. He can be reached at (301) 415-8085. If you are interested in discussing the review in a public teleconference or in-person meeting, please propose a date/time and Dr. Wise will coordinate the meeting. We look forward to continuing this constructive dialog.

Sincerely,

/RA/

Mark Lombard, Director
Division of Spent Fuel Management
Office of Nuclear Material Safety
and Safeguards

Enclosure:

1. Comments on NEI 14-03 Revision 1

cc: Kristopher Cummings, NEI

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Mark Lombard, Director
Division of Spent Fuel Management
Office of Nuclear Material Safety
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Enclosure:

1. Comments on NEI 14-03 Revision 1

cc: Kristopher Cummings, NEI

ADAMS Pkg No.:ML16180A018 Letter: ML16180A021 Enclosure: ML16180A023

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