

Comments on NEI 14-03 Revision 1

Comment #	Location	Type	Comment	Action
1.	Page i, Paragraph 3	Substantive	PRM 72-7 has been accepted for rulemaking consideration, but has not yet gone through the rulemaking process and been added to 10 CFR 72.	Reword
2.	Page 1, ALARA Acronym	Editorial	Change to As Low as Reasonably Achievable.	--
3.	Page 2, Baseline Inspection Definition	Substantive	Consider harmonization with NUREG-1927, as the "lead" terminology was removed in the final NUREG-1927, Revision 1.	Harmonize with NUREG-1927 Rev 1 for consistency
4.	Page 3, Dry Storage System Definition	Substantive	The definition should be broader, consistent with the definition in NUREG-1927. Use of terms "canister" vs. "cask" introduces some inconsistencies.	Reword/Harmonize with NUREG-1927 Rev 1 for consistency
5.	Page 4, Lead Component Definition	Substantive	See comment #3	Harmonize with NUREG-1927 Rev 1 for consistency
6.	Page 5, Period of Extended Operation Definition	Substantive	Change to "Pertaining the <u>storage</u> time frame, up to 40 years, after the initial specific license or CoC term <u>that has been authorized in the renewal.</u> "	Reword
7.	Page 8, Paragraph 2, first sentence and second to last sentence	Substantive	Reword, as statement may imply that remediation, repair, and replacement has never had to be done on any SSC.	Reword/Delete
8.	Page 9, Paragraph 2	Editorial	Change 3 rd sentence to "The licensing and design bases for a specific ISFSI license address the facility, location, storage system design..."	Delete "only"
9.	Page 10, Section 1.3	Editorial	NUREG-1536 and NUREG-1567 will change when they are combined	Update NUREG number when combined
10.	Page 11, Paragraph 1, last sentence	Substantive	Statement is misleading, in that inaccessibility is not a criteria for determining whether an SSC must be addressed with an aging management activity.	Reword/Harmonize with NUREG-1927 Rev 1 for consistency
11.	Page 11, Paragraph 2	Substantive	Consider adding a statement that these components are inside the storage cask/canister and maintained	Reword

			in a controlled environment and are not subject to atmospheric environmental effects, however aging effects at relevant exposure temperatures may occur.	
12.	Page 11, Paragraph 3	Substantive	Role of ANL Report in MAPS is overstated. Only portions of ANL system descriptions is ultimately being incorporated.	Reword/Delete
13.	Page 12, Paragraph 1	Editorial	"As of this writing, four 40-year Part 72 specific license renewals..." will need to be updated.	Update
14.	Page 14, Paragraph 1	Editorial	First two sentences will need to be updated, as the status of renewal applications changes.	Update
15.	Page 16, Paragraph 2	Substantive	Suggestion to make a reference to Appendix A of NUREG-1927, "Nonquantifiable Terms."	Add reference
16.	Page 16, Paragraph 3	Editorial	Change "Appendix C" to "Appendix B"	--
17.	Page 16, Paragraph 3, last sentence	Substantive	Would be helpful to list applicable ISGs, RGs, or other guidance, along with their potential use in renewal applications.	Add reference
18.	Page 16, Paragraph 4, first sentence	Editorial	"...design basis documentation." Is inconsistent with glossary and Part 72, which states "design bases."	Keep "design basis" and "design bases" consistent throughout document
19.	Page 16, Paragraph 4, second sentence	Substantive	Some "detailed procedures/calculations" may need to be referenced, to avoid potential RAIs.	Reword
20.	Page 17, Section 2.2.2.3 (a)	Substantive	Clarify that components that have moving parts typically are covered by a maintenance (and testing) program. This would be a basis for not proposing additional aging management activities.	Reword
21.	Page 17, Section 2.2.2.3 (a)	Substantive	It is not clear whether guidance on "active" components is appropriate. Consider reframing to state that the degradation of active components may already be "managed" in the current license.	Reword
22.		Substantive	Add qualifier to last sentence of first paragraph, "as long as the SSCs do not meet either of the scoping criteria in NUREG-1927, Section 2.4.2."	Harmonize with NUREG-1927 Rev 1 for consistency

23.	Page 18, Paragraph 1, first sentence	Substantive	"Identified environments" definition does not account for off-normal conditions. Consider making consistent with NUREG-1927, regarding the range of operating and service conditions.	Reword/ Harmonize with NUREG-1927 Rev 1 for consistency
24.	Page 18, Paragraph 1, first sentence	Substantive	"(for prolonged periods of time)" is a nonquantifiable term.	Reword/Clarify
25.	Page 18, Paragraph 3, second sentence	Substantive	Rather than saying "no aging management is required," consider adding that a TLAA or technical basis could be provided.	Reword
26.	Page 18, Paragraph 4, second sentence	Substantive	Statement is not entirely accurate. 1927 Rev 1, Appendix B has example AMPs and NUREG -1927 Rev 0 had Appendix C and Appendix D that addressed aging effects.	Reword/Harmonize with NUREG-1927 Rev 1 for consistency
27.	Page 19, first paragraph	Substantive	Consider referencing NUREG-1927, Section 3.5 on Time-Limited Aging Analysis Evaluation as last sentence of this paragraph.	Add reference
28.	Page 19, last paragraph	Editorial	Change "Appendix C" to "Appendix B"	--
29.	Page 19, last paragraph	Editorial	"for 3 SSCs," would more accurately be stated as "3 groups of SSCs" (canisters, concrete, fuel assemblies)	Reword/Clarify
30.	Page 20, first sentence	Editorial	Could reference Section 3.6.1 of 1927, rather than Section 3.6	Edit reference
31.	Page 21, Section 2.2.2.8 3 rd bullet	Substantive	The phrase "summary description of the programs," should be better defined to clarify what exactly "summary description" includes. It should include the scope, parameters monitored and inspected, detection of aging effects, and acceptance criteria.	Define/Clarify
32.	Page 21, Section 2.2.2.9 bullets	Editorial	Include in the list of bullets, information from NUREG-1927, Rev. 1, Section 1.4.4, regarding any differences in the scoping evaluation, aging management review, TLAAs, or AMPs for each CoC amendment. This information is reflected in the last sentence of Section 3.2 of NEI 14-03, Rev. 1.	Harmonize with NUREG-1927 Rev 1 for consistency
33.	Page 22, second paragraph	Substantive	Biennial 10 CFR 72.48 reports that are already docketed may be referenced in application and do not need to be submitted with application.	Reword

34.	Page 23, Section 2.2.5.2	Substantive	The term “summary of each AMP” should be defined to clarify what that includes. See Comment 32.	Define/Clarify
35.	Page 23, Section 2.2.5.3	Substantive	Implies NRC will approve an AMP with vague acceptance criteria. Clarify that actionable acceptance criteria should be provided in the application.	Reword
36.	Page 25, Chapter 3 title	Editorial	“Management” is misspelled.	--
37.	Page 25, number 1 in Section 3.1.1 list	Editorial	Suggested edit is to change #1 to “identification of materials and environments.”	--
38.	Page 25, Section 3.1.2	Substantive	Avoid the word “commitment,” as this may have an unintended meaning. The staff does not rely on commitments (which are not enforceable) to reach reasonable assurance.	Edit for clarity
39.	Page 28, Section 3.3 title	Editorial	Keep spelling of “Design Basis” vs. “Design Bases” consistent	--
40.	Page 32, first and second paragraph	Substantive	This section should note that CoC holders should consider different environments or site conditions, in terms of AMP applicability to the general licensees, in the development of the CoC renewal application and the proposed generic AMPs. May reference NUREG-1927 Rev 1, Appendix E.	Reword/Harmonize with NUREG-1927 Rev 1 for consistency
41.	Page 32, Section 3.6.1.1, first paragraph	Substantive	Inaccessibility does not factor into whether an SSC must be addressed with an aging management activity. See comment 11.	Reword/Harmonize with NUREG-1927 Rev 1 for consistency
42.	Page 34, Section 3.6.2.2	General Comment on Section	Discussion regarding surrogate inspections is contrary to the position in NUREG-1927, in which such inspections are acceptable only when the technical basis is supported by substantial OpE. Presently, there is not enough OpE to use surrogate inspections. Suggestion to reference 1927’s position.	Harmonize with NUREG-1927 Rev 1 for consistency
43.	Page 35, Section 3.6.2.2	Substantive	“continual, frequent Inspections” is not an accurate description. Inspection frequency should be determined by the possibility for CISCC and knowledge of the CISCC	Reword

			rate in a given environment. EPRI examined rates in EPRI report 3002002785 Flaw Growth and Flaw tolerance assessment for Dry Cask Storage Canisters. (Reference 29 of this report). A more accurate description would be periodic inspection based on the susceptibility assessment (Reference 28) and the range of possible crack growth rates (Reference 29)	
44.	Page 35, Sections 3.6.2.2-3.6.3	General Comment	Heavily geared toward CISCC example, consider expanding examples to provide <i>general</i> guidance.	Reword/provide other examples
45.	Page 35, Section 3.6.3	General Comment on Section	Speaking 1.5 years into a 5-year ASME task group process. Suggest to speak to what has been previously used/accepted. Last two paragraphs will soon be outdated.	Reword/Update
46.	Page 35, Section 3.6.3	General Comment on Section	Stating that "American Society of Mechanical Engineers (ASME) Section XI is one resource that the NRC has accepted for aging management activities at Part 50 power plants." is inaccurate. Consider inserting a caveat that the Section XI and the code cases that are developed in Section XI have not received a blanket endorsement by the NRC.	Reword/Update
47.	Page 35, Section 3.6.3	General Comment on Section	Other than the broad reference to ASME Section XI for power plants, there is nothing in this section that identifies specific codes or standards that may be appropriate. Instead, the section references a general approach in NUREG-1927 and the ASME Section XI dry storage system inspection code case (N-860) that is currently in development. There are many ASTM Standards for "monitoring and inspection." In short, this section does not provide useful guidance to the licensee or certificate holders.	Reword/Update
48.	Page 36, Section 3.6.4	Editorial	Change "future knowledge is always captured" to "future knowledge will always be captured"	--

49.	Page 37, second bullet under "frequency"	Substantive	Suggest some guidance for determining aging mechanism "timing," in terms of initiation and rate of progression of the aging mechanism or effect.	Reword/Clarify
50.	Page 37	General Comment	More guidance would give licensees a clear, consistent approach on establishing tollgates. (e.g. How to use information on aging mechanism timing to establish frequency)	Reword/Clarify
51.	Page 38, first paragraph, first sentence	Editorial	Change to "No particular action other than performing an assessment and appropriate corrective actions if necessary is required to continue..."	Add "and appropriate corrective actions if necessary"
52.	Page 41, third paragraph	Substantive	See comment 43. CoC holders should also consider different environments or site conditions, in terms of AMP applicability to the general licensees, in the development of the CoC renewal application and the proposed generic AMPs.	Reword/Clarify
53.	Page 41, third paragraph, last sentence	Substantive	When mentioning 10 CFR 72.212 report, suggest addressing timing of the update to the report. Specific guidance was added in NUREG-1927, Rev.1, Appendix E on this topic.	Harmonize with NUREG-1927 Rev 1 for consistency
54.	Page 42, Section 4.3, third bullet	Substantive	See comment 22 on passive vs. active components.	Harmonize with NUREG-1927 Rev 1 for consistency
55.	Page 42, last bullet	Editorial	Suggested edit for clarification. It is unclear what is meant by "inability to readily re-locate the radioactive source."	--
56.	Page 43, second bullet	Substantive	Suggested edit to convey that an inspection of internals may also involve breaching and reestablishing the confinement boundary, particularly for welded canisters.	Reword
57.	Page 45, Section 4.5.1, fourth bullet	Substantive	Consider clarifying how complete reporting of operating experience to the AMID will be verified.	Clarify
58.	Page 46, Section 4.5.3	General Comment	Suggest adding guidance for how tollgates interface with the AMID database.	Clarify
59.	Page 47, first paragraph, last sentence	Substantive	Appears conflicting with Section 4.5.1, which states that only DSS-related OpE should be entered in AMID. Is AMID also for age-related degradation of any passive	Clarify

			component, irrespective of not being DSS-specific and from another industry? Unclear.	
60.	Page 47, second paragraph	General Comment	Suggest avoiding the word “commitment,” as this may have an unintended meaning. The staff does not rely on Commitments (which are not enforceable) to reach reasonable assurance. See comment 39.	--
61.	Page 47, second paragraph	Substantive	Reviewing the ISFSI AMID information prior to performing an AMP inspection seems to be the most logical way to incorporate the ISFSI AMID information into aging management. However, there is no prescribed or recommended interval or trigger to review the ISFSI AMID information. Consider clarifying how this guidance addresses the use of ISFSI AMID so that the information will be reviewed and incorporated into aging management activities in a timely and consistent manner.	Clarify
62.	Page A-2, #7, letter d.	Editorial	Suggest addition “preventive <u>or</u> corrective actions.”	--
63.	Page C-1	Editorial	Tollgate 1 row is cut off.	Extend row