



AMERICA'S NUCLEAR SOLUTION

**WCS CISF License Application
Revision 1 Comments**

Wednesday, 1 MARCH 2017

Overview

- RSI Phase Lessons Learned
- Approach to Revision 1
- Scope of Revision 1 Changes
- Summary of Revision 1 Changes
- Approach to RAI Phase



RSI Phase Lessons Learned

- Seek opportunities for direct communication whenever possible
- Two RegCon LL's still informing on our processes.



REGCON Lesson Learned – 1

- ***There Are No Secrets to the Part 72 Licensing Process***
 - Requirements are clearly communicated in
 - 10 CFR Part 72 – entirety of requirements & process
 - Reg. Guide 3.48 – SAR Format and content
 - NUREG 1567 (SRP) & SFST Interim Staff Guidance (ISGs)
 - Criteria for acceptance



REGCON Lesson Learned – 2

- ***Strive For Clarity***

- *Reality*: Two partners with two very different configuration management systems
- *Challenge*: Maintain clarity when describing how two different systems perform same safety functions
- *Task*: Place yourself in the role of the reviewer
- *Goal*: *Ensure clarity prevails in lieu of complexity*



Approach To Revision 1

- Revisions followed RSI Commitments
- Followed the guidance of NUREG-1567 & RG 3.48
- Previous RSI responses unaffected
- Cross Walks
 - Tracking changes in section numbering
 - Chapter numbering remain unaffected
 - Tracking changes in RSI response locations



Scope of Revision 1 Changes

- Revised SAR Chapters
 - 3, 4, 5, 6 & 9
 - Followed the guidance of NUREG-1567 & RG 3.48
 - Previous RSI responses unaffected
- Minor Changes in Other Parts of the Application



Summary of Revision 1 Changes

- Key Changes
 - Revised select SAR chapters
 - Based on responses to RSI's
 - Stricter adherence to NUREG 1567 by following Reg. Guide 3.48
 - Consistency changes throughout
 - E.g., GTCC Language
 - Referencing
 - Applied RSI revisions to additional sections
 - Addressed additional Observations
 - E.g., Observation 1.1 – Modified docket numbers in SAR Table 1-4.
 - Some clarifications and corrections
 - Licensed material
 - Fixed typographical errors



Summary of Revision 1 Changes

- Key Changes
 - New Appendix Chapter H consolidates GTCC discussions
 - as discussed in Nov.
 - Chapter 1 revised “1.2.4” discussion
 - Incorporates changes discussed in August and November
 - Chapter 3 reorganized to clearly define design criteria
 - For facility and support systems



Summary of Revision 1 Changes

- Key Changes
 - Chapter 4 expands discussion of SSC safety classifications
 - Now includes crosswalk demonstrating Subpart F compliance
 - Chapter 5 provides more detailed description of facility operations
 - Chapter 6 focuses on safety-related Waste Mgmt issues
 - Chapter 9 expands on ALARA considerations, WCS' radiation protection program and dose estimates
 - Editorial changes to Tech Specs and proposed license



Approach to RAI Phase

- Follow the processes in SFM-25 and utilize discussions on Draft RAIs and Draft Responses as much as possible
- Seek opportunities to communicate and clarify issues when/where possible





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QUESTIONS?