ATTACHMENT A

CONDITIONS FOR SYSTEM USE

CERTIFICATE OF COMPLIANCE

RENEWED AMENDMENT 1

REVISION 1

DOCKET NO. 72-1004

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1.0 INTRODUCTION

This section presents the conditions which a potential user (general licensee) of the standardized NUHOMS® system must comply with, in order to use the system under the general license in accordance with the provisions of 10 CFR 72.210 and 10 CFR 72.212. These conditions have either been proposed by the system vendor, imposed by the NRC staff as a result of the review of the SAR, or are part of the regulatory requirements expressed in 10 CFR 72.212.

1.1 General Requirements and Conditions

1.1.1 Regulatory Requirements for a General License

Subpart K of 10 CFR Part 72 contains conditions for using the general license to store spent fuel at an independent spent fuel storage installation at power reactor sites authorized to possess and operate nuclear power reactors under 10 CFR Part 50 or 10 CFR Part 52. Technical regulatory requirements for the licensee (user of the standardized NUHOMS® system) are contained in 10 CFR 72.212(b).

Under 10 CFR 72.212(b)(5) requirements, the licensee must perform written evaluations, before use, that establish that: (1) conditions set forth in the Certificate of Compliance have been met; (2) cask storage pads and areas have been designed to adequately support the static load of the stored casks; and (3) the requirements of 10 CFR 72.104 “Criteria for radioactive materials in effluent and direct radiation from an ISFSI or MRS,” have been met. In addition, 10 CFR 72.212(b)(6) requires that the licensee review the SAR and the associated SER, before use of the general license, to determine whether or not the reactor site parameters (including earthquake intensity and tornado missiles), are encompassed by the cask design bases considered in these reports.

The requirements of 10 CFR 72.212(b)(8) provide that, as a holder of a Part 50 or Part 52 license, the user, before use of the general license under Part 72, must determine whether activities related to storage of spent fuel involve any unreviewed safety issues, or changes in technical specifications as provided under 10 CFR 50.59. Under 10 CFR 72.212(b)(9), the general license holder shall also protect the spent fuel against design basis threats and radiological sabotage pursuant to 10 CFR 73.55. Other general license requirements dealing with review of reactor emergency plans, quality assurance program, training, and radiation protection program must also be satisfied pursuant to 10 CFR 72.212(b)(10). Records and procedural requirements for the general license holder are described in 10 CFR 72.212(b)(11), (12), (13) and (14).

Without limiting the requirements identified above, site-specific parameters and analyses, identified in the SER, that will need verification by the system user, are as a minimum, as follows:

1. The temperature of 70°F as the maximum average yearly temperature with solar incidence. The average daily ambient temperature shall be 100°F or less (Reference SER Section 2.4.1).

2. The temperature extremes of 125°F with incident solar radiation and -40°F with no solar incidence (Reference SER Section 2.4.1) for storage of the DSC inside the HSM.

3. The horizontal and vertical seismic acceleration levels of 0.25g and 0.17g, respectively (Reference SER Table 2-4).

4. The analyzed flood condition of 15 fps water velocity and a height of 50 feet of water (full submergence of the loaded HSM DSC) (Reference SER Table 2-4).

5. The potential for fire and explosion should be addressed, based on site-specific considerations (See SER Table 2-4 and related SER discussion).

6. The HSM foundation design criteria are not included in the SAR. Therefore, the nominal SAR design or an alternative should be verified for individual sites in accordance with 10 CFR 72.212(b)(5)(ii). Also, in accordance with 10 CFR 72.212(b)(6), the foundation design should be evaluated against actual site parameters to determine whether its failure would cause the standardized NUHOMS® system to exceed the design basis accident conditions.

7. The potential for lightning damage to any electrical system associated with the standardized NUHOMS® system (e.g., thermal performance monitoring) should be addressed, based on site-specific considerations (See SER Table 2.4 and related SER discussion).

8. Any other site parameters or consideration that could decrease the effectiveness of cask systems important to safety.

In accordance with 10 CFR 72.212(b)(5), a record of the written evaluations must be retained by the licensee until spent fuel is no longer stored under the general license issued under 10 CFR 72.210.

1.1.2 Operating and Aging Management Program Procedures and Reporting

Written operating procedures shall be prepared for cask handling, loading, movement, surveillance, and maintenance. The operating procedures suggested generically in the SAR were considered appropriate as discussed in Section 11.0 of the SER and should provide the basis for the user's written operating procedure. The following additional procedure requested by NRC staff in Section 11.1 should be part of the user operating procedures:

If fuel needs to be removed from the DSC, either at the end of service life or for inspection after an accident, precautions must be taken against the potential for the presence of damaged or oxidized fuel and to prevent radiological exposure to personnel during this operation. This can be achieved with this design by the use of the purge and fill valves which permit a determination of the atmosphere within the DSC before the removal of the inner top cover plate and shield plugs, prior to filling the DSC cavity with borated water (see SAR paragraph 5.1.1.9). If the atmosphere within the DSC is helium, then operations should proceed normally with fuel removal either via the transfer cask or in the pool, if available. However, if air is present within the DSC, then appropriate filters should be in place to preclude the uncontrolled release of any potential airborne radioactive particulate from the DSC via the purge-fill valves. This will protect both personnel and the operations area from potential contamination. For the accident case, personnel protection in the form of respirators or supplied air should be considered in accordance with the licensee's Radiation Protection Program.

Each general licensee shall have a program to establish, implement, and maintain written procedures for each aging management program (AMP) described in the Updated Final Safety Analysis Report (UFSAR). The program shall include provisions for changing AMP elements, as necessary, and within the limitations of the approved licensing bases to address new information on aging effects based on inspection findings and/or industry operating experience provided to the general licensee during the renewal period. Each procedure shall contain a reference to the specific aspect of the AMP element implemented by that procedure, and that reference shall be maintained even if the procedure is modified.

The general licensee shall establish and implement these written procedures within 180 days of the effective date of the renewal of the CoC or 180 days of the 20th anniversary of the loading of the first dry storage system at its site, whichever is later. The general licensee shall maintain these written procedures for as long as the general licensee continues to operate Standardized NUHOMS® Horizontal Modular Storage Systems in service for longer than 20 years.

1.1.3 Quality Assurance

Activities at the ISFSI shall be conducted in accordance with a Commission-approved quality assurance program which satisfies the applicable requirements of 10 CFR Part 50, Appendix B, and which is established, maintained, and executed with regard to the ISFSI.

1.1.4 Heavy Loads Requirements

Lifts of the DSC in the TC must be made within the existing heavy loads requirements and procedures of the licensed nuclear power plant. The TC design has been reviewed under 10 CFR Part 72 and found to meet NUREG-0612 and ANSI N14.6. (Reference 8). However, an additional safety review (under 10 CFR 50.59) is required to show operational compliance with NUREG-0612 and/or existing plant-specific heavy loads requirements.

1.1.5 Training Module

A training module shall be developed for the existing licensee's training program establishing an ISFSI training and certification program. This module shall include the following:

1. Standardized NUHOMS® Design (overview);
2. ISFSI Facility Design (overview);
3. Certificate of Compliance conditions (overview);
4. Fuel Loading, Transfer Cask Handling, DSC Transfer Procedures; and
5. Off-Normal Event Procedures.

1.1.6 Pre-Operational Testing and Training Exercise

A dry run of the DSC loading, TC handling and DSC insertion into the HSM shall be held. This dry run shall include, but not be limited to, the following:

1. Functional testing of the TC with lifting yokes to ensure that the TC can be safely transported over the entire route required for fuel loading, washdown pit and trailer loading.

2. DSC loading into the TC to verify fit and TC/DSC annulus seal.

3. Testing of TC on transport trailer and transported to ISFSI along a predetermined route and aligned with an HSM.

4. Testing of transfer trailer alignment and docking equipment. Testing of hydraulic ram to insert a DSC loaded with test weights into an HSM and then retrieve it.

5. Loading a mock-up fuel assembly into the DSC.

6. DSC sealing, vacuum drying, and cover gas backfilling operations (using a mock-up DSC).

7. Opening a DSC (using a mock-up DSC).

8. Returning the DSC and TC to the spent fuel pool.

1.1.7 Special Requirements for First System in Place

The heat transfer characteristics of the cask system will be recorded by temperature measurements of the first DSC placed in service. The first DSC shall be loaded with assemblies, constituting a source of approximately 24 kW. The DSC shall be loaded into the HSM, and the thermal performance will be assessed by measuring the air inlet and outlet temperatures for normal airflow. Details for obtaining the measurements are provided in Section 1.2.8, under “Surveillance.”

A letter report summarizing the results of the measurements shall be submitted to the NRC for evaluation and assessment of the heat removal characteristics of the cask in place within 30 days of placing the DSC in service, in accordance with 10 CFR 72.4.

Should the first user of the system not have fuel capable of producing a 24 kW heat load, or be limited to a lesser heat load, as in the case of BWR fuel; the user may use a lesser load for the process, provided that a calculation of the temperature difference between the inlet and outlet temperatures is performed, using the same methodology and inputs documented in

the SAR, with lesser load as the only exception. The calculation and the measured temperature data shall be reported to the NRC in accordance with 10 CFR 72.4. The calculation and comparison need not be reported to the NRC for DSCs that are subsequently loaded with lesser loads than the initial case. However, for the first or any other user, the process needs to be performed and reported for any higher heat sources, up to 24 kW for PWR fuel and 19 kW for BWR fuel, which is the maximum allowed under the Certificate of Compliance. The NRC will also accept the use of artificial thermal loads other than spent fuel, to satisfy the above requirement.

1.1.8 Surveillance Requirements Applicability

The specified frequency for each Surveillance Requirement is met if the surveillance is performed within 1.25 times the interval specified in the frequency, as measured from the previous performance.

For frequencies specified as “once,” the above interval extension does not apply.

If a required action requires performance of a surveillance or its completion time requires period performance of “once per ...,” the above frequency extension applies to the repetitive portion, but not to the initial portion of the completion time.

Exceptions to these requirements are stated in the individual specifications.

1.2.1 Fuel Specification

Limit/Specification: The characteristics of the spent fuel which is allowed to be stored in the standardized NUHOMS® system are limited by those included in Tables 1-1a and 1-1b.

Applicability: The specification is applicable to all fuel to be stored in the standardized NUHOMS® system.

Objective: The specification is prepared to ensure that the peak fuel rod temperatures, maximum surface doses, and nuclear criticality effective neutron multiplication factor are below the design values. Furthermore, the fuel weight and type ensures that structural conditions in the SAR bound those of the actual fuel being stored.

Action: Each spent fuel assembly to be loaded into a DSC shall have the parameters listed in Tables 1-1a and 1-1b verified and documented. Fuel not meeting this specification shall not be stored in the standardized NUHOMS® system.

Surveillance: Immediately, before insertion of a spent fuel assembly into a DSC, the identity of each fuel assembly shall be independently verified and documented.

Bases: The specification is based on consideration of the design basis parameters included in the SAR and limitations imposed as a result of the staff review. Such parameters stem from the type of fuel analyzed, structural limitations, criteria for criticality safety, criteria for heat removal, and criteria for radiological protection. The standardized NUHOMS® system is designed for dry, horizontal storage of irradiated light water reactor (LWR) fuel. The principal design parameters of the fuel to be stored can accommodate standard PWR fuel designs manufactured by Babcock and Wilcox, Combustion Engineering, and Westinghouse, and standard BWR fuel manufactured by General Electric and is limited for use to these standard designs. The analyses presented in the SAR are based on non-consolidated, zircaloy-clad fuel with no known or suspected gross breaches. (See Tables 12-1a and 1b.)

The physical parameters that define the mechanical and structural design of the HSM and the DSC are the fuel assembly dimensions and weight. The calculated stresses given in the staff's SER are based on the physical parameters given in Tables 1-1a and 1-1b and represent the upper bound.

The design basis for nuclear criticality safety is based on the standard Babcock & Wilcox 15x15/208 pin fuel assemblies with initial enrichments up to 4.0 wt.% U-235, and General Electric 7x7 fuel assemblies with initial enrichments up to 4.0 wt.% U-235, for the standardized NUHOMS®-24P and NUHOMS®-52B designs, respectively. The HSM is designed to permit storage of irradiated fuel such that the irradiated fuel reactivity is

less than or equal to 1.45 wt.% U-235 equivalent unirradiated fuel for the NUHOMS®-24P design, and less than or equal to 4.0 wt.% U-235 initial enrichment fuel for the NUHOMS®-52B design.

The thermal design criterion of the fuel to be stored is that the maximum heat generation rate per assembly be such that the fuel cladding temperature is maintained within established limits during normal and off-normal conditions. Fuel cladding temperature limits were established by the applicant based on methodology in PNL-6189 and PNL-4835 (References 1, 2). Based on this methodology, the staff has accepted that a maximum heat generation rate of 1 kW per assembly is a bounding value for the PWR fuel to be stored, and that 0.37 kW per assembly is a bounding value for the BWR fuel to be stored.

The radiological design criterion is that the gamma and neutron source strength of the irradiated fuel assemblies must be bounded by values of the neutron and gamma ray source strengths used by the vendor in the shielding analysis. The design basis source strengths were derived from a burnup analysis for (1) PWR fuel with 4.0 weight percent U-235 initial enrichment, irradiated to a maximum of 40,000 MWD/MTU, and a post irradiation time of five years; and (2) BWR fuel with 4.0 weight percent U-235 initial enrichment, irradiated to a maximum of 35,000 MWD/MTU, and a post irradiation time of 5 years.

Table 1-1a PWR Fuel Specifications of Fuel to be Stored in the Standardized NUHOMS®-24P DSC(1)

Title or Parameter	Specifications
Fuel	Only intact, unconsolidated PWR fuel assemblies with the following requirements
Physical Parameters	
Assembly Length	See SAR Chapter 3
Nominal Cross-Sectional Envelope	See SAR Chapter 3
Maximum Assembly Weight	See SAR Chapter 3(2)
No. of Assemblies per DSC	≤ 24 intact assemblies
Fuel Cladding	Zircaloy-clad fuel with no known or suspected gross cladding breaches
Thermal Characteristics	
Decay Heat Power per Fuel Assembly	≤ 1.0 kW (this value is maximum for any given assembly, and may not be averaged for all 24 assemblies)
Radiological Characteristics	
Burnup	≤ 40,000 MWD/MTU
Post Irradiation Time	≥ 5 years
Maximum Initial Enrichment	≤ 4.0 wt. % U-235
Maximum Initial Uranium Content	≤ 472 kg/assembly
Maximum Initial Equivalent Enrichment	≤ 1.45 wt. % U-235(3)
Neutron Source Per Assembly	≤ 2.23E8 n/sec with spectrum bounded by that in Chapter 7 of SAR
Gamma Source Per Assembly	≤ 7.45E15 photon/sec with spectrum bounded by that in Chapter 7 of SAR

(1) The limiting fuel specifications listed above must be met by every individual fuel assembly to be stored in the standardized NUHOMS®-24P system. Any deviation constitutes an Unanalyzed Condition and Violation of the Certificate of Compliance.

(2) Design valid for fuel weights up to 762.8 kg (1,682 lb).

(3) Determined by the PWR fuel criticality acceptance curve shown in Figure 1.1.

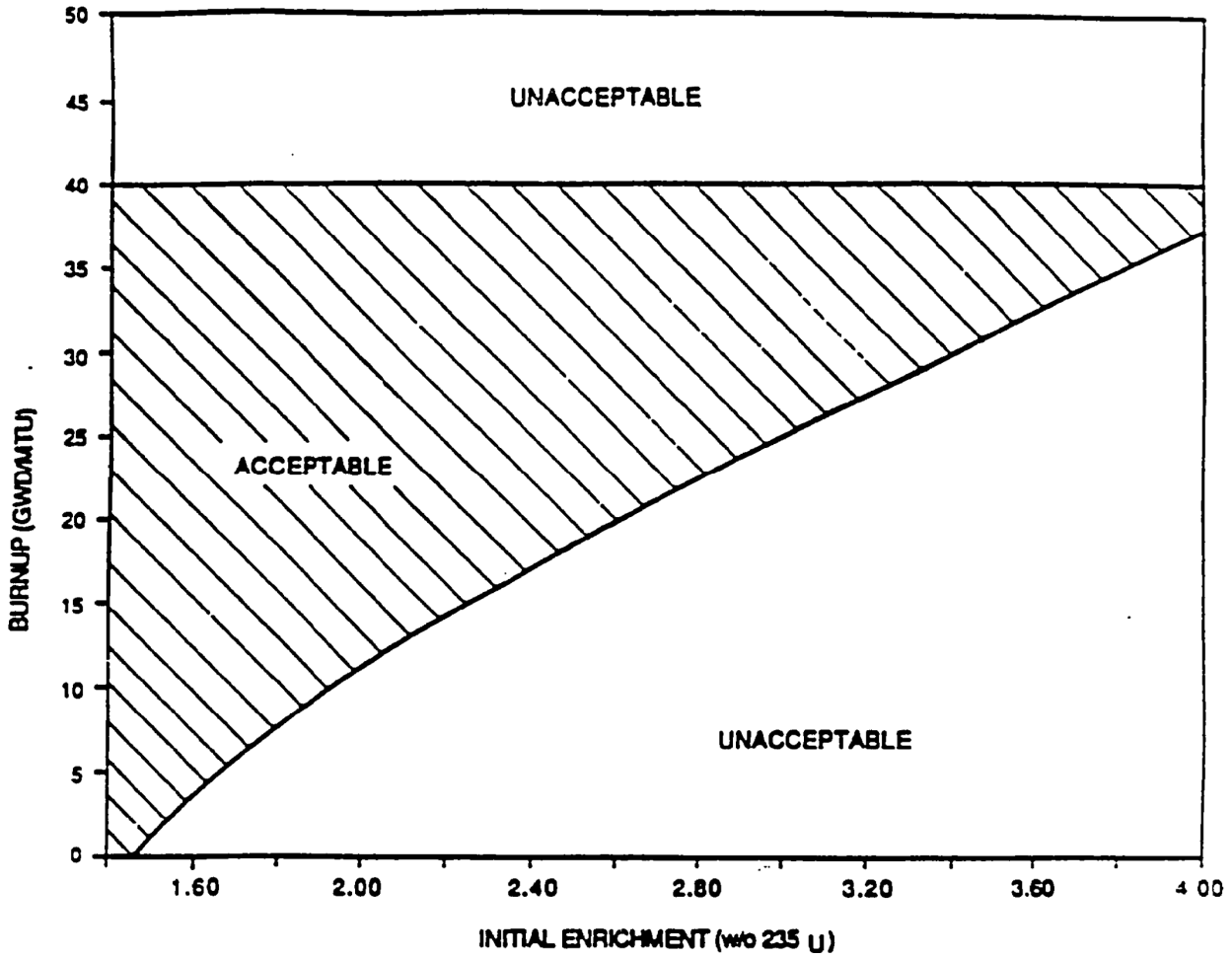

Figure 1.1

PWR Fuel Criticality Acceptance Curve

Table 1-1b BWR Fuel Specifications of Fuel to be Stored in the Standardized NUHOMS®-52B DSC(1)

Title or Parameter	Specifications
Fuel	Only intact, unconsolidated BWR fuel assemblies with the following requirements
Physical Parameters	
Assembly Length	See SAR Chapter 3
Nominal Cross-Sectional Envelope	See SAR Chapter 3
Maximum Assembly Weight · (w/fuel channels)	See SAR Chapter 3
No. of Assemblies per DSC	≤ 52 intact channeled assemblies
Fuel Cladding	Zircaloy-clad fuel with no known or suspected gross cladding breaches
Thermal Characteristics	
Decay Heat Power per Fuel Assembly	≤ 0.37 kW (this value is maximum for any given assembly, and may not be averaged for all 52 assemblies)
Radiological Characteristics	
Burnup	≤ 35,000 MWD/MTU
Post Irradiation Time	≥ 5 years
Maximum Initial Enrichment	≤ 4.0 wt. % U-235 (DSC with 0.75% borated neutron absorber plates)
Maximum Initial Uranium Content	≤ 198 kg/assembly
Neutron Source Per Assembly	≤ 1.01E8 n/sec with spectrum bounded by that in Chapter 7 of SAR
Gamma Source Per Assembly	≤ 2.63E15 photon/sec with spectrum bounded by that in Chapter 7 of SAR

(1) The limiting fuel specifications listed above must be met by every individual fuel assembly to be stored in the standardized NUHOMS®-52B system. Any deviation constitutes an Unanalyzed Condition and Violation of the Certificate of Compliance.

1.2.2 DSC Vacuum Pressure During Drying

Limit/Specification:

Vacuum Pressure:	≤ 3 mm Hg
Time at Pressure:	≥ 30 minutes following stepped evacuation
Number of Pump-Downs:	2

Applicability: This is applicable to all DSCs.

Objective: To ensure a minimum water content.

Action: If the required vacuum pressure cannot be obtained:

1. Confirm that the vacuum drying system is properly installed.
2. Check and repair, or replace, the vacuum pump.
3. Check and repair the system as necessary.
4. Check and repair the seal weld between the inner top cover plate and the DSC shell.

Surveillance: No maintenance or tests are required during normal storage. Surveillance of the vacuum gauge is required during the vacuum drying operation.

Bases: A stable vacuum pressure of ≤ 3 mm Hg further ensures that all liquid water has evaporated in the DSC cavity, and that the resulting inventory of oxidizing gases in the DSC is well below the 0.25 volume%.

1.2.3 DSC Helium Backfill Pressure

Limit/Specifications:

Helium 2.5 psig ± 2.5 psig backfill pressure (stable for 30 minutes after filling).

Applicability: This specification is applicable to all DSCs.

Objective: To ensure that: (1) the atmosphere surrounding the irradiated fuel is a non-oxidizing inert gas; (2) the atmosphere is favorable for the transfer of decay heat.

Action: If the required pressure cannot be obtained:

1. Confirm that the vacuum drying system and helium source are properly installed.
2. Check and repair or replace the pressure gauge.
3. Check and repair or replace the vacuum drying system.
4. Check and repair or replace the helium source.
5. Check and repair the seal weld on DSC top shield plug.

If pressure exceeds the criterion, release a sufficient quantity of helium to lower the DSC cavity pressure.

Surveillance: No maintenance or tests are required during the normal storage. Surveillance of the pressure gauge is required during the helium backfilling operation.

Bases: The value of 2.5 psig was selected to ensure that the pressure within the DSC is within the design limits during any expected normal and off-normal operating conditions.

1.2.4 DSC Helium Leak Rate of Inner Seal Weld

Limit/Specification:

≤ 1.0×10^{-4} atm • cubic centimeters per second (atm • cm^3/s) at the highest DSC limiting pressure.

Applicability: This specification is applicable to the inner top cover plate seal weld of all DSCs.

Objective:

1. To limit the total radioactive gases normally released by each canister to negligible levels. Should fission gases escape the fuel cladding, they will remain confined by the DSC confinement boundary.
2. To retain helium cover gases within the DSC and prevent oxygen from entering the DSC. The helium improves the heat dissipation characteristics of the DSC and prevents any oxidation of fuel cladding.

Action: If the leak rate test of the inner seal weld exceeds 1.0×10^{-4} (atm • cm^3/s):

1. Check and repair the DSC drain and fill port fittings for leaks.
2. Check and repair the inner seal weld.
3. Check and repair the inner top cover plate for any surface indications resulting in leakage.

Surveillance: After the welding operation has been completed, perform a leak test with a helium leak detection device.

Bases: If the DSC leaked at the maximum acceptable rate of 1.0×10^{-4} atm • cm^3/s for a period of 60 years, about 189,600 cc of helium would escape from the DSC. This is about 3.25% of the 5.83×10^6 cm^3 of helium initially introduced in the DSC. This amount of leakage would have a negligible effect on the inert environment of the DSC cavity. (Reference: American National Standards Institute, ANSI N14.5-1987, “For Radioactive Materials-Leakage Tests on Packages for Shipment,” Appendix B3).

1.2.5 DSC Dye Penetrant Test of Closure Welds

Limit/Specification:

All DSC closure welds except those subjected to full volumetric inspection shall be dye penetrant tested in accordance with the requirements of the ASME Boiler and Pressure Vessel Code Section III, Division 1, Article NB-5000 (Reference 8.3 of SAR). The liquid penetrant test acceptance standards shall be those described in Subsection NB-5350 of the Code.

Applicability: This is applicable to all DSCs. The welds include inner and outer top and bottom covers, and vent and syphon port covers.

Objective: To ensure that the DSC is adequately sealed in a redundant manner and leak tight.

Action: If the liquid penetrant test indicates that the weld is unacceptable:

1. The weld shall be repaired in accordance with approved ASME procedures.
2. The new weld shall be re-examined in accordance with this specification.

Surveillance: During DSC closure operations. No additional surveillance is required for this operation.

Bases: Article NB-5000 Examination, ASME Boiler and Pressure Vessel Code, Section III, Division 1, Sub-Section NB (Reference 8.3 of SAR).

1.2.6 DSC Top End Dose Rates

Limit/Specification: Dose rates at the following locations shall be limited to levels which are less than or equal to:

a. 200 mrem/hr at top shield plug surface at centerline with water in cavity.

b. 400 mrem/hr at top cover plate surface at centerline without water in cavity.

Applicability: This specification is applicable to all DSCs.

Objective: The dose rate is limited to this value to ensure that the DSC has not been inadvertently loaded with fuel not meeting the specifications in Section 1.2.1 and to maintain dose rates as low as reasonably achievable during DSC closure operations.

Action:

a. If specified dose rates are exceeded, the following actions should be taken:

   1. Confirm that the spent fuel assemblies placed in DSC conform to the fuel specifications of Section 1.2.1

   2. Visually inspect placement of top shield plug. Re-install or adjust position of top shield plug if it is not properly seated.

   3. Install additional temporary shielding.

b. Submit a letter report to the NRC within 30 days summarizing the action taken and the results of the surveillance, investigation and findings. The report must be submitted using instructions in 10 CFR 72.4 with a copy sent to the administrator of the appropriate NRC regional office.

Surveillance: Dose rates shall be measured before seal welding the inner top cover plate to the DSC shell and welding the outer top cover plate to the DSC shell.

Basis: The basis for this limit is the shielding analysis presented in Section 7.0 of the SAR.

1.2.7 HSM Dose Rates

Limit/Specification:

Dose rates at the following locations shall be limited to levels which are less than or equal to:

a. 400 mrem/hr at 3 feet from the HSM surface.

b. Outside of HSM door on center line of DSC 100 mrem/hr.

c. End shield wall exterior 20 mrem/hr.

Applicability: This specification is applicable to all HSMs which contain a loaded DSC.

Objective: The dose rate is limited to this value to ensure that the cask (DSC) has not been inadvertently loaded with fuel not meeting the specifications in Section 1.2.1 and to maintain dose rates as-low-as-is-reasonably achievable (ALARA) at locations on the HSMs where surveillance is performed, and to reduce off-site exposures during storage.

Action:

a. If specified dose rates are exceeded, the following actions should be taken:
   1. Ensure that the DSC is properly positioned on the support rails.
   2. Ensure proper installation of the HSM door.
   3. Ensure that the required module spacing is maintained.
   4. Confirm that the spent fuel assemblies contained in the DSC conform to the specifications of Section 1.2.1.
   5. Install temporary or permanent shielding to mitigate the dose to acceptable levels in accordance with 10 CFR Part 20, 10 CFR 72.104(a), and ALARA.

b. Submit a letter report to the NRC within 30 days summarizing the action taken and the results of the surveillance, investigation and findings. The report must be submitted using instructions in 10 CFR 72.4 with a copy sent to the administrator of the appropriate NRC regional office.

Surveillance The HSM and ISFSI shall be checked to verify that this specification has been met after the DSC is placed into storage and the HSM door is closed.

Basis: The basis for this limit is the shielding analysis presented in Section 7.0 of the SAR. The specified dose rates provide as-low-as-is-reasonably-achievable on-site and off-site doses in accordance with 10 CFR Part 20 and 10 CFR 72.104(a).

1.2.8 HSM Maximum Air Exit Temperature

Limit/Specification: Following initial DSC transfer to the HSM or the occurrence of accident conditions, the equilibrium air temperature difference between ambient temperature and the vent outlet temperature shall not exceed 100°F for ≥ 5 year cooled fuel, when fully loaded with 24 kW heat.

Applicability: This specification is applicable to all HSMs stored in the ISFSI. If a DSC is placed in the HSM with a heat load less than 24 kW, the limiting difference between outlet and ambient temperatures shall be determined by a calculation performed by the user using the same methodology and inputs documents in the SAR and SER.

Objective: The objective of this limit is to ensure that the temperatures of the fuel cladding and the HSM concrete do not exceed the temperatures calculated in Section 8 of the SAR. That section shows that if the air outlet temperature difference is less than or equal to 100°F (with a thermal heat load of 24 kW), the fuel cladding and concrete will be below the respective temperature limits for normal long-term operation.

Action: If the temperature rise is greater than that specified, then the air inlets and exits should be checked for blockage. If the blockage is cleared and the temperature is still greater than that specified, the DSC and HSM cavity may be inspected using video equipment or other suitable means. If environmental factors can be ruled out as the cause of excessive temperatures, then the fuel bundles are producing heat at a rate higher than the upper limit specified in Section 3 of the SAR and will require additional measurements and analysis to assess the actual performance of the system. If excessive temperatures cause the system to perform in an unacceptable manner and/or the temperatures cannot be controlled to acceptable limits, then the cask shall be unloaded. The cask may be unloaded into the spent fuel pool, if one is available. If a spent fuel pool is not available, alternate means shall be employed to reduce cask temperatures.

Surveillance: The temperature rise shall be measured and recorded daily following DSC insertion until equilibrium temperature is reached, 24 hours after insertion, and again on a daily basis after insertion into the HSM or following the occurrence of accident conditions. If the temperature rise is within the specifications or the calculated value for a heat load less than 24 kW, then the HSM and DSC are performing as designed to meet this specification and no further maximum air exit temperature measurements are required. Air temperatures must be measured in such a manner as to obtain representative values of inlet and outlet air temperatures.

Basis: The specified temperature rise is selected to ensure the fuel clad and concrete temperatures are maintained at or below acceptable long-term storage limits.

1.2.9 Transfer Cask Alignment with HSM

Limit/Specification:

The cask must be aligned with respect to the HSM so that the longitudinal centerline of the DSC in the transfer cask is within ±1/8 inch of its true position when the cask is docked with the HSM front access opening.

Applicability: This specification is applicable during the insertion and retrieval of all DSCs.

Objective: To ensure smooth transfer of the DSC from the transfer cask to HSM and back.

Action: If the alignment tolerance is exceeded, the following actions should be taken:

a. Confirm that the transfer system is properly configured.

b. Check and repair the alignment equipment.

c. Confirm the locations of the alignment targets on the transfer cask and HSM.

Surveillance: Before initiating DSC insertion or retrieval, confirm the alignment. Observe the transfer system during DSC insertion or retrieval to ensure that motion or excessive vibration does not occur.

Basis: The basis for the true position alignment tolerance is the clearance between the DSC shell, the transfer cask cavity, the HSM access opening, and the DSC support rails inside the HSM.

1.2.10 DSC Handling Height Outside the Spent Fuel Pool Building

Limit/Specification:
1. The loaded TC/DSC shall not be handled at a height greater than 80 inches outside the spent fuel pool building.
2. In the event of a drop of a loaded TC/DSC from a height greater than 15 inches, the DSC and TC shall be inspected for damage and evaluated for further use.

Applicability: The specification applies to handling the TC, loaded with the DSC, on route to, and at, the storage pad.

Objective:
1. To preclude a loaded TC/DSC drop from a height greater than 80 inches.
2. To maintain spent fuel integrity, according to the spent fuel specification for storage, continued confinement integrity, and DSC functional capability, after a tip-over or drop of a loaded DSC from a height greater than 15 inches.

Surveillance: In the event of a loaded TC/DSC drop accident, the system will be inspected and evaluated for future use.

Basis: The NRC evaluation of the TC/DSC drop analysis concurred that drops up to 80 inches, of the DSC inside the TC, can be sustained without breaching the confinement boundary, preventing removal of spent fuel assemblies, or causing a criticality accident. This specification ensures that handling height limits will not be exceeded in transit to, or at the storage pad. Acceptable damage may occur to the TC, DSC, and the fuel stored in the DSC, for drops of height greater than 15 inches. The specification requiring inspection of the DSC following a drop of 15 inches or greater ensures that the spent fuel will continue to meet the requirements for storage, the DSC will continue to provide confinement, and the TC will continue to provide its design functions of DSC transfer and shielding.

1.2.11 Transfer Cask Dose Rates

Limit/Specification:

Dose rates from the transfer cask shall be limited to levels which are less than or equal to:

a. 200 mrem/hr at 3 feet with water in the DSC cavity.

b. 500 mrem/hr at 3 feet without water in the DSC cavity.

Applicability: This specification is applicable to the transfer cask containing a loaded DSC.

Objective: The dose rate is limited to this value to ensure that the DSC has not been inadvertently loaded with fuel not meeting the specifications in Section 1.2.1 and to maintain dose rates as-low-as-is-reasonably achievable during DSC transfer operations.

Action: If specified dose rates are exceeded; place temporary shielding around affected areas of transfer cask and review the plant records of the fuel assemblies which have been placed in DSC to ensure they conform to the fuel specifications of Section 1.2.1. Submit a letter report to the NRC within 30 days summarizing the action taken and the results of the surveillance, investigation and findings. The report must be submitted using instructions in 10 CFR 72.4 with a copy sent to the administrator of the appropriate NRC regional office.

Surveillance: The dose rates should be measured as soon as possible after the transfer cask is removed from the spent fuel pool.

Basis: The basis for this limit is the shielding analysis presented in Section 7.0 of the SAR.

1.2.12 Maximum DSC Removable Surface Contamination

Limit/Specification:

2,200 dpm/100 cm^2 for beta-gamma sources
220 dpm/100 cm^2 for alpha sources.

Applicability: This specification is applicable to all DSCs.

Objective: To ensure that release of non-fixed contamination above accepted limits does not occur.

Action: If the required limits are not met:

a. Flush the DSC/transfer cask annulus with demineralized water and repeat surface contamination surveys of the DSC upper surface.

b. If contamination of the DSC cannot be reduced to an acceptable level by this means, direct surface cleaning techniques shall be used following removal of the fuel assemblies from the DSC and removal of the DSC from the transfer cask.

c. Check and replace the DSC/transfer cask annulus seal to ensure proper installation and repeat canister loading process.

Surveillance: Following placement of each loaded DSC/transfer cask into the cask decontamination area, fuel pool water above the top shield plug shall be removed and the top region of the DSC and cask shall be decontaminated. A contamination survey of the upper 1 foot of the DSC and cask shall be taken. In addition, contamination surveys shall be taken on the inside surfaces of the TC after the DSC has been transferred into the HSM. If the above surface contamination limit is exceeded, the TC shall be decontaminated.

Basis: This non-fixed contamination level is consistent with the requirements of 10 CFR 71.87(i) and 49 CFR 173.443, which regulate the use of spent fuel shipping containers. Consequently, these contamination levels are considered acceptable for exposure to the general environment. This level will also ensure that contamination levels of the inner surfaces of the HSM and potential releases of radioactive material to the environment are minimized.

1.2.13 TC/DSC Lifting Heights as a Function of Low Temperature and Location

Limit/Specification:

1. No lifts or handling of the TC/DSC at any height are permissible at DSC basket temperatures below -20°F inside the spent fuel pool building.
2. The maximum lift height of the TC/DSC shall be 80 inches if the basket temperature is below 0°F but higher than -20°F inside the spent fuel pool building.
3. No lift height restriction is imposed on the TC/DSC if the basket temperature is higher than 0°F inside the spent fuel pool building.
4. The maximum lift height and handling height for all transfer operations outside the spent fuel pool building shall be 80 inches and the basket temperature may not be lower than 0°F.

Applicability: These temperature and height limits apply to lifting and transfer of all loaded TC/DSCs inside and outside the spent fuel pool building. The requirements of 10 CFR Part 72 apply outside the spent fuel building. The requirements of 10 CFR Part 50 apply inside the spent fuel pool building.

Objective: The low temperature and height limits are imposed to ensure that brittle fracture of the ferritic steels, used in the TC trunnions and shell and in the DSC basket, does not occur during transfer operations.

Action: Confirm the basket temperature before transfer of the TC. If calculation or measurement of this value is available, then the ambient temperature may conservatively be used.

Surveillance: The ambient temperature shall be measured before transfer of the TC/DSC.

Bases: The basis for the low temperature and height limits is ANSI N14.6-1986 paragraph 4.2.6 which requires at least 40°F higher service temperature than nil ductility transition (NDT) temperature for the TC. In the case of the standardized TC, the test temperature is -40°F; therefore, although the NDT temperature is not determined, the material will have the required 40°F margin if the ambient temperature is 0°F or higher. This assumes the material service temperature is equal to the ambient temperature.

The basis for the low temperature limit for the DSC is NUREG/CR-1815. The basis for the handling height limits is the NRC evaluation of the structural integrity of the DSC to drop heights of 80 inches and less.

1.2.14 TC/DSC Transfer Operations at High Ambient Temperatures

Limit/Specification:

1. The ambient temperature for transfer operations of a loaded TC/DSC shall not be greater that 100°F (when cask is exposed to direct insolation).
2. For transfer operations when ambient temperatures exceed l00°F up to 125°F, a solar shield shall be used to provide protection against direct solar radiation.

Applicability: This ambient temperature limit applies to all transfer operations of loaded TC/DSCs outside the spent fuel pool building.

Objective: The high temperature limit (100°F) is imposed to ensure that:

1. The fuel cladding temperature limit is not exceeded,
2. The solid neutron shield material temperature limit is not exceeded, and
3. The corresponding TC cavity pressure limit is not exceeded.

Action: Confirm what the ambient temperature is and provide appropriate solar shade if ambient temperature is expected to exceed 100°F.

Surveillance: The ambient temperature shall be measured before transfer of the TC/DSC.

Bases: The basis for the high temperature limit is PNL-6189 (Reference 1) for the fuel clad limit, the manufacturer's specification for neutron shield, and the design basis pressure of the TC internal cavity pressure.

1.2.15 Boron Concentration in the DSC Cavity Water (24-P Design Only)

Limit/Specification:

The DSC cavity shall be filled only with water having a boron concentration equal to, or greater than 2,000 ppm.

Applicability: This limit applies only to the standardized NUHOMS®-24P design. No boration in the cavity water is required for the standardized NUHOMS®-52B system since that system uses fixed absorber plates.

Objective: To ensure a subcritical configuration is maintained in the case of accidental loading of the DSC with unirradiated fuel.

Action: If the boron concentration is below the required weight percentage concentration (gm boron/10^6 gm water), add boron and re-sample, and test the concentration until the boron concentration is shown to be greater than that required.

Surveillance: Written procedures shall be used to independently determine (two samples analyzed by different individuals) the boron concentration in the water used to fill the DSC cavity.

1. Within 4 hours before insertion of the first fuel assembly into the DSC, the dissolved boron concentration in water in the spent fuel pool, and in the water that will be introduced in the DSC cavity, shall be independently determined (two samples chemically analyzed by two individuals).
2. Within 4 hours before flooding the DSC cavity for unloading the fuel assemblies, the dissolved boron concentration in water in the spent pool, and in the water that will be introduced into the DSC cavity, shall be independently determined (two samples analyzed chemically by two individuals).
3. The dissolved boron concentration in the water shall be reconfirmed at intervals not to exceed 48 hours until such time as the DSC is removed from the spent fuel pool or the fuel has been removed from the DSC.

Bases: The required boron concentration is based on the criticality analysis for an accidental misleading of the DSC with unburned fuel, maximum enrichment, and optimum moderation conditions.

1.2.16 Provision of TC Seismic Restraint Inside the Spent Fuel Pool Building as a Function of Horizontal Acceleration and Loaded Cask Weight

Limit/Specification:

Seismic restraints shall be provided to prevent overturning of a loaded TC during a seismic event if a certificate holder determines that the horizontal acceleration is 0.40 g or greater and the fully loaded TC weight is less than 190 kips. The determination of horizontal acceleration acting at the center of gravity (CG) of the loaded TC must be based on a peak horizontal ground acceleration at the site, but shall not exceed 0.25 g.

Applicability: This condition applies to all TCs which are subject to horizontal accelerations of 0.40 g or greater.

Objective: To prevent overturning of a loaded TC inside the spent fuel pool building.

Action: Determine what the horizontal acceleration is for the TC and determine if the cask weight is less than 190 kips.

Surveillance: Determine need for TC restraint before any operations inside the spent fuel pool building.

Bases: Calculation of overturning and restoring moments.

1.3 Surveillance and Monitoring

The NRC staff is requiring the following surveillance frequency for the HSM.

1.3.1 Visual Inspection of HSM Air Inlets and Outlets (Front Wall and Roof Birdscreen)

Limit/Surveillance: A visual surveillance of the exterior of the air inlets and outlets shall be conducted daily. In addition, a close-up inspection shall be performed to ensure that no materials accumulate between the modules to block the air flow.

Objective: To ensure that HSM air inlets and outlets are not blocked for more than 40 hours to prevent exceeding the allowable HSM concrete temperature or the fuel cladding temperature

Applicability: This specification is applicable to all HSMs loaded with a DSC loaded with spent fuel.

Action: If the surveillance shows blockage of air vents (inlets or outlets), they shall be cleared. If the screen is damaged, it shall be replaced.

Basis: The concrete temperature could exceed 350°F in the accident circumstances of complete blockage of all vents if the period exceeds approximately 40 hours. Concrete temperatures over 350°F in accidents (without the presence of water or steam) can have uncertain impact on concrete strength and durability. A conservative analysis (adiabatic heat case) of complete blockage of all air inlets or outlets indicates that the concrete can reach the accident temperature limit of 350°F in a time period of approximately 40 hours.

1.3.2 HSM Thermal Performance

Surveillance: Verify a temperature measurement of the thermal performance, for each HSM, on a daily basis. The temperature measurement could be any parameter such as (1) ·a direct measurement of the HSM temperatures, (2) a direct measurement of the DSC temperatures, (3) a comparison of the inlet and outlet temperature difference to predicted temperature differences for each individual HSM, or (4) other means that would identify and allow for the correction of off-normal thermal conditions that could lead to exceeding the concrete and fuel clad temperature criteria. If air temperatures are measured, they must be measured in such a manner as to obtain representative values of inlet and outlet air temperatures. Also due to the proximity of adjacent HSM modules, care must be exercised to ensure that measured air temperatures reflect only the thermal performance of an individual module, and not the combined performance of adjacent modules.

Action: If the temperature measurement shows a significant unexplained difference, so as to indicate the approach of materials to the concrete or fuel clad temperature criteria, take appropriate action to determine the cause and return the canister to normal operation. If the measurement or other evidence suggests that the concrete accident temperature criteria (350°F) has been exceeded for more than 24 hours, the HSM must be removed from service unless the licensee can provide test results in accordance with ACI-349, appendix A.4.3, demonstrating that the structural strength of the HSM has an adequate margin of safety. If the HSM is removed from service, one option is to unload the cask into the spent fuel pool. If a spent fuel pool is not available, alternate means shall be employed to reduce cask temperatures.

Basis: The temperature measurement should -be of sufficient scope to provide the licensee with a positive means to identify conditions which threaten to approach temperature criteria for proper HSM operation and allow for the correction of off-normal thermal conditions that could lead to exceeding the concrete and fuel clad temperature criteria.

Table 1.3.1

Summary of Surveillance and Monitoring Requirements

Surveillance or Monitoring	Period	Reference Section
1. Fuel Specification	PL	1.2.1
2. DSC Vacuum Pressure During Drying	L	1.2.2
3. DSC Helium Backfill Pressure	L	1.2.3
4. DSC Helium Leak Rate of Inner Seal Weld	L	1.2.4
5. DSC Dye Penetrant Test of Closure Welds	L	1.2.5
6. DSC Top End Dose Rates	L	1.2.6
7. HSM Dose Rates	L	1.2.7
8. HSM Maximum Air Exit Temperature	24 hrs	1.2.8
9. TC Alignment with HSM	S	1.2.9
10. DSC Handling Height Outside Spent Fuel Pool Building	AN	1.2.10
11. Transfer Cask Dose Rates	L	1.2.11
12. Maximum DSC Surface Contamination	L	1.2.12
13. TC/DSC Lifting Heights as a Function of Low Temperature and Location	L	1.2.13

Legend

PL	Prior to loading
L	During loading and prior to movement to HSM pad
24 hrs	Time following DSC insertion into HSM
S	Prior to movement of DSC to or from HSM
AN	As necessary
D	Daily (24 hour frequency)

Table 1.3.1

Summary of Surveillance and Monitoring Requirements (Continued)

Surveillance or Monitoring	Period	Reference Section
14. TC/DSC Transfer Operations at High Ambient Temperatures	L	1.2.14
15. Boron Concentration in DSC Cavity Water (24-P Design Only)	PL	1.2.15
16. Provision of TC Seismic Restraint Inside the Spent Fuel Pool Building as a Function of Horizontal Acceleration and Loaded Cask Weight	PL	1.2.16
17. Visual Inspection of HSM Air Inlets and Outlets	D	1.3.1
18. HSM Thermal Performance	D	1.3.2

Legend

PL	Prior to loading
L	During loading and prior to movement to HSM pad
24 hrs	Time following DSC insertion into HSM
S	Prior to movement of DSC to or from HSM
AN	As necessary
D	Daily (24 hour frequency)

References

1. Levy, I.S., et al., “Recommended Temperature Limits for Dry Storage of Spent Light Water Reactor Zircaloy-Clad Fuel Rods in Inert Gas,” Pacific Northwest Laboratory Report, PNL-6189, May 1987.

2. Johnson, A.B., Jr., and E.R. Gilbert, “Technical Basis for Storage of Zircaloy-Clad Spent Fuel in Inert Gases,” PNL-4835, September 1983.