

**Enclosure 6 to E-48527**

**Evaluation Forms for CoC 1004 TS Section 2 Items**

CoC Condition/Technical Specification Evaluation Form

CoC Condition/TS Identifier:        TS-2.1       

\* All LCOs also require an Applicability, Condition(s), Required Action(s), Completion Time(s), Surveillance Requirement(s), and Frequency(ies). Refer to NUREG-1745 for additional guidance.

\*\* In performing the risk insight evaluation above, the evaluator should think about subsequent changes to a relocated CoC requirement. Specifically, ask the question “what is the likelihood and worst possible consequences of a future change to this requirement in the less-conservative direction”?

<b>Requirement</b>	<b>TS 2.0: Functional and Operating Limits</b>																				
	<p><b>2.1 Fuel to be Stored in the Standardized NUHOMS System</b></p> <p>The spent nuclear fuel to be stored in the Standardized NUHOMS® System is specific to each DSC model as listed below and shall meet all the requirements of the applicable Fuel Specification Tables, including the cross-referenced figures and tables listed in their applicable Fuel Specification Tables.</p> <p><b><u>DSC MODEL Applicable Fuel Specification</u></b></p> <table style="width: 100%; border-collapse: collapse;"> <tr><td style="width: 30%;">24P</td><td>Table 1-1a</td></tr> <tr><td>52B</td><td>Table 1-1b</td></tr> <tr><td>61BT</td><td>Table 1-1c and Table 1-1j</td></tr> <tr><td>32PT</td><td>Table 1-1e</td></tr> <tr><td>24PHB</td><td>Table 1-1i</td></tr> <tr><td>24PTH</td><td>Table 1-1l</td></tr> <tr><td>61BTH</td><td>Table 1-1t</td></tr> <tr><td>32PTH1</td><td>Table 1-1aa</td></tr> <tr><td>69BTH</td><td>Table 1-1gg</td></tr> <tr><td>37PTH</td><td>Table 1-1ll</td></tr> </table> <p>DSC models are listed in the CoC. If the model number has a variant which specifically has certain limitations, then those are specifically called out in the TS. Information concerning the fuel types, dose rate limits, or other technical specifications applies to all variants if they are not explicitly mentioned in the CoC or technical specifications. An example is the 24PTH DSC. In this case, 24PTH is the model number. The 24PTH-S, -L and -S-LC are variants with specific limitations, which are called out in the TS.</p>		24P	Table 1-1a	52B	Table 1-1b	61BT	Table 1-1c and Table 1-1j	32PT	Table 1-1e	24PHB	Table 1-1i	24PTH	Table 1-1l	61BTH	Table 1-1t	32PTH1	Table 1-1aa	69BTH	Table 1-1gg	37PTH
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<b>CoC Body Certified Design</b>	<b>Section I. Technology</b>	<b>No</b>																			
	<b>Section II. Design Features</b>	<b>No</b>																			
<b>Appendix A - Inspections, Tests, and Evaluations</b>		<b>No</b>																			
<b>Appendix B. Technical Specifications</b>	<b>Section 1 Definitions, Use and Application</b>	<b>No</b>																			
	<b>Section 2 Approved Contents (Selection Criteria)</b>	<b>A1</b>	<b>Yes. Specific contents are identified in the referenced tables.</b>																		
		<b>A2</b>	<b>Yes. Specific contents are identified in the referenced tables.</b>																		
		<b>A3</b>	<b>No</b>																		
	<b>Section 3 Limiting Conditions for Operation (LCOs)* and Surveillance</b>	<b>L1</b>	<b>No</b>																		
<b>L2</b>		<b>No</b>																			

## CoC Condition/Technical Specification Evaluation Form

	Requirements (SRs) (Selection Criteria)	L3	No
	Section 4 Administrative Controls		No
Risk Insight**: Will removing this requirement from the CoC/TS result in...	A significant increase in the probability or consequences of an accident previously evaluated in the cask FSAR?		Yes The fuel specification requirements in the tables referenced in this TS are key to safe storage.
	The possibility of a new or different kind of accident being created compared to those previously evaluated in the FSAR?		Yes The fuel specification requirements in the tables referenced in this TS are key to safe storage.
	A Significant reduction in the margin of safety for ISFSI or cask operation?		Yes The fuel specification requirements in the tables referenced in this TS are key to safe storage.
Evaluation Summary			Retain in TS Appendix B since it meets the criteria for inclusion in Section 2 – Approved Contents.

## CoC Condition/Technical Specification Evaluation Form

CoC Condition/TS Identifier: TS-2.1.1

\* All LCOs also require an Applicability, Condition(s), Required Action(s), Completion Time(s), Surveillance Requirement(s), and Frequency(ies). Refer to NUREG-1745 for additional guidance.

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<b>Requirement</b>		<b>TS 2.1.1: Each of the DSC models listed above may be stored inside an HSM model in accordance with LCO 3.1.4.</b>	
<b>CoC Body Certified Design</b>	<b>Section I. Technology</b>	<b>No</b>	
	<b>Section II. Design Features</b>	<b>No</b>	
<b>Appendix A - Inspections, Tests, and Evaluations</b>		<b>No</b>	
<b>Appendix B. Technical Specifications</b>	<b>Section 1 Definitions, Use and Application</b>	<b>No</b>	
	<b>Section 2 Approved Contents (Selection Criteria)</b>	<b>A1</b>	<b>No</b>
		<b>A2</b>	<b>Yes</b> This reference to LCO 3.1.4 provides a necessary indication of which DSC models can be stored in which HSM model.
		<b>A3</b>	<b>No</b>
	<b>Section 3 Limiting Conditions for Operation (LCOs)* and Surveillance Requirements (SRs) (Selection Criteria)</b>	<b>L1</b>	<b>No</b>
		<b>L2</b>	<b>No</b>
		<b>L3</b>	<b>No</b>
	<b>Section 4 Administrative Controls</b>	<b>No</b>	
<b>Risk Insight**: Will removing this requirement from the CoC/TS result in...</b>	<b>A significant increase in the probability or consequences of an accident previously evaluated in the cask FSAR?</b>	<b>No</b>	
	<b>The possibility of a new or different kind of accident being created compared to those previously evaluated in the FSAR?</b>	<b>Yes</b> If a DSC is loaded in a non-authorized and non-analyzed HSM, it may create a new type of accident that has not been evaluated.	
	<b>A Significant reduction in the margin of safety for ISFSI or cask operation?</b>	<b>Yes</b> The margin of safety could be reduced, particularly in terms of shielding and thermal safety effectiveness, if the DSC model has not been analyzed and approved for storage in a particular HSM model.	

**CoC Condition/Technical Specification Evaluation Form**

<b>Evaluation Summary</b>	<b>Retain in TS Appendix B since it meets the criteria for inclusion in Section 2 – Approved Contents.</b>
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CoC Condition/Technical Specification Evaluation Form

CoC Condition/TS Identifier: TS-2.2.1 and 2.2.2

\* All LCOs also require an Applicability, Condition(s), Required Action(s), Completion Time(s), Surveillance Requirement(s), and Frequency(ies). Refer to NUREG-1745 for additional guidance.

\*\* In performing the risk insight evaluation above, the evaluator should think about subsequent changes to a relocated CoC requirement. Specifically, ask the question “what is the likelihood and worst possible consequences of a future change to this requirement in the less-conservative direction”?

<b>Requirement</b>		<b>TS 2.0 Functional and Operating Limits Violations</b>	
		2.2.1 The affected fuel assemblies shall be placed in a safe condition.	
		2.2.2 Notify the NRC Operations Center per the requirements of 10 CFR 72.75.	
<b>CoC Body Certified Design</b>	<b>Section I. Technology</b>	<b>No</b>	
	<b>1. Section II. Design Features</b>	<b>No</b>	
<b>Appendix A - Inspections, Tests, and Evaluations</b>		<b>No</b>	
<b>Appendix B. Technical Specifications</b>	<b>Section 1 Definitions, Use and Application</b>	<b>No</b>	
	<b>Section 2 Approved Contents (Selection Criteria)</b>	<b>A1</b>	<b>Yes. Related to a violation of TS 2.1</b>
		<b>A2</b>	<b>Yes. Related to a violation of TS 2.1</b>
		<b>A3</b>	<b>No</b>
	<b>Section 3 Limiting Conditions for Operation (LCOs)* and Surveillance Requirements (SRs) (Selection Criteria)</b>	<b>L1</b>	<b>No</b>
		<b>L2</b>	<b>No</b>
		<b>L3</b>	<b>No</b>
<b>Section 4 Administrative Controls</b>	<b>No</b>		
<b>A significant increase in the probability or consequences of an accident previously evaluated in the cask FSAR?</b>	<b>For 2.2.1: Yes; placing the fuel in a safe condition is key to safe storage.</b>		
<b>The possibility of a new or different kind of accident being created compared to those previously evaluated in the FSAR?</b>	<b>For 2.2.1: Yes; placing the fuel in a safe condition is key to safe storage.</b>		
<b>A Significant reduction in the margin of safety for ISFSI or cask operation?</b>	<b>For 2.2.1: Yes; placing the fuel in a safe condition is key to safe storage.</b>		

**CoC Condition/Technical Specification Evaluation Form**

<b>Evaluation Summary</b>	<b>Retain in TS Appendix B since these meet the criteria for inclusion in Section 2 – Approved Contents related to TS 2.1 and give the actions to be taken for functional and operating limit violations.</b>
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CoC Condition/Technical Specification Evaluation Form

CoC Condition/TS Identifier: TS-2.2.3

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<b>Requirement</b>		<b>TS 2.0 Functional and Operating Limits Violations</b>	
		<b>2.2.3 Within 30 days, submit a separate report which describes the cause of the violation and the actions taken to restore compliance and prevent recurrence.</b>	
<b>CoC Body Certified Design</b>	<b>Section I. Technology</b>	<b>No</b>	
	<b>Section II. Design Features</b>	<b>No</b>	
<b>Appendix A - Inspections, Tests, and Evaluations</b>		<b>No</b>	
<b>Appendix B. Technical Specifications</b>	<b>Section 1 Definitions, Use and Application</b>	<b>No</b>	
	<b>Section 2 Approved Contents (Selection Criteria)</b>	<b>A1</b>	<b>No</b>
		<b>A2</b>	<b>No</b>
		<b>A3</b>	<b>No</b>
	<b>Section 3 Limiting Conditions for Operation (LCOs)* and Surveillance Requirements (SRs) (Selection Criteria)</b>	<b>L1</b>	<b>No</b>
		<b>L2</b>	<b>No</b>
		<b>L3</b>	<b>No</b>
<b>Section 4 Administrative Controls</b>		<b>No</b>	
<b>Risk Insight**: Will removing this requirement from the CoC/TS result in...</b>	<b>A significant increase in the probability or consequences of an accident previously evaluated in the cask FSAR?</b>	<b>No</b>	
	<b>The possibility of a new or different kind of accident being created compared to those previously evaluated in the FSAR?</b>	<b>No</b>	
	<b>A Significant reduction in the margin of safety for ISFSI or cask operation?</b>	<b>No</b>	



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<b>Evaluation Summary</b>	<b>Delete this notification requirement as it is not required since TS 2.2.2 provides notification requirements according to 10 CFR 72.75 (although this TS 2.2.3 requirement gives a shorter timeframe of 30 days versus the 60 day written follow-up reporting required by 10 CFR 72.75(g)). This duplicate reporting requirement is confusing and unnecessary.</b>
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