CONDITIONS FOR CASK USE AND

TECHNICAL SPECIFICATIONS

DOCKET NO. 72-1007

CERTIFICATE OF COMPLIANCE NO. 1007

AMENDMENT 4

RENEWAL

Attachment

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1.0 INTRODUCTION

This section presents the conditions with which a potential user (licensee) of the Ventilated Storage Cask (VSC-24) system must comply to use the system under a general license issued according to the provisions of 10 CFR 72.210 and 72.212. These conditions have either been proposed by the system vendor, imposed by the U.S. Nuclear Regulatory Commission (NRC) staff as a result of the review of the Final Safety Analysis Report (FSAR), or are part of the regulatory requirements expressed in 10 CFR 72.212.

1.1 General Requirements and Conditions

1.1.1 Regulatory Requirements

Regulatory requirements define a number of technical and administrative conditions for system use. Technical regulatory requirements for the licensee (user of the VSC-24 system) are contained in 10 CFR 72.212(b).

Section 72.212(b) requires that the licensee perform written evaluations, before use, establishing that: (1) conditions set forth in the Certificate of Compliance (CoC) have been met; (2) cask storage paths 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 effluents and direct radiation from an ISFSI or MRS," have been met. It also requires that the licensee review the FSAR and the associated SERs, before use of the general license, to determine whether or not the reactor site parameters (including earthquake intensity and tornado missiles) are encompassed in the cask design bases considered in these reports.

Site-specific parameters and analyses that need verification by the system user are as follows:

1. The temperature of 75 °F as the maximum average yearly temperature, without solar incidence;

2. The steady-state temperature extremes of 100 °F (average daily temperature) with incident solar radiation and minus 40 °F with no solar incidence;

3. The "accident" short-term temperature extreme of 125 °F with incident solar radiation;

4. The horizontal and vertical seismic acceleration levels of 0.25g and 0.17g, respectively.

5. The analyzed flood condition of 17.7 fps water velocity and full submergence of the loaded ventilated concrete cask (VCC); and

6. The potential for fire and explosion should be addressed, based on site-specific considerations.

According to 10 CFR 72.212(b), 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 Procedures

Written operating procedures shall be prepared for cask handling, loading, movement, surveillance, and maintenance. The operating procedures suggested generically in the FSAR are considered appropriate and should provide the basis for the user's written operating procedures. The following additional written procedures shall also be developed as part of the user operating procedures:

1. A procedure shall be developed for cask unloading, assuming damaged fuel. If fuel needs to be removed from the multi-assembly sealed basket (MSB), either at the end of service life or for inspection after an accident, precautions must be taken against the potential for the presence of oxidized fuel and to prevent radiological exposure to personnel during this operation. This activity can be achieved by the use of the valves to permit a determination of the atmosphere within the MSB before the removal of the structural and shield lids. If the atmosphere within the MSB is helium, then operations should proceed normally, with fuel removal, either via the transfer cask or in the pool. However, if air is present within the MSB, then appropriate filters should be in place to permit the flushing of any potential airborne radioactive particulate from the MSB, via the valves. This action 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.

2. A procedure shall be developed for the documentation of the characterizations performed to select spent fuel to be stored in the MSB. This procedure shall include a requirement for independent verification of each fuel assembly selection.

3. A procedure shall be developed for two independent determinations (two samples analyzed by different individuals) of the boron concentration in the water of the spent fuel pool and that used to fill the MSB cavity.

4. In preparing written operating procedures for handling the MSB over the VCC, the user shall include a consideration for reducing the likelihood of fracturing the ceramic tiles at the bottom of the VCC as the MSB is lowered into position.

1.1.3 Quality Assurance

Activities at the independent spent fuel storage installation (ISFSI) shall be conducted in accordance with the requirements of 10 CFR Part 50, Appendix B.

1.1.4 Heavy Loads Requirements

Lifts of the MSB in the MSB transfer cask (MTC) must be made within the existing heavy loads requirements and procedures of the licensed nuclear power plant. The MTC design has been reviewed under 10 CFR Part 72 and found to meet NUREG-0612 and ANSI 14.6. 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. Other spent fuel transfer systems, for loading the MSB and VCC within reactor fuel buildings, may be suitable for use in accordance with 10 CFR Part 50 operating licenses.

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. VSC-24 Design (overview);
2. ISFSI Facility Design (overview);
3. Certificate of Compliance Conditions (overview);
4. Fuel Loading, MTC Handling, MSB Lowering Procedures; and
5. Off-Normal Event Procedures.

1.1.6 Training Exercise

A dry run of the MSB loading, MTC handling, and MSB lowering shall be held. This dry run shall include, but not be limited to, the following:

1. Moving an MSB and MTC into and out of the pool;
2. Loading a fuel assembly;
3. MSB sealing and cover gas backfilling operations (using a mock-up MSB);
4. Lowering the MSB into the concrete cask;
5. Returning the MSB to the fuel pool; and
6. Opening an MSB (using a mock-up MSB).

1.1.7 Requirement for First Cask in Place

The following measurements are required for the first VSC placed in service:

The first MSB shall be loaded with 24 spent fuel assemblies, constituting a heat source of up to 24 kW, and then the MSB shall be loaded into the VCC to measure the cask thermal performance by measuring the air inlet and outlet temperatures for normal air flow, according to the specification in Section 1.2.3. The purpose of the test is to measure the heat removal performance of the VSC system and establish base-line data (FSAR Section 9.1.3). A letter report summarizing the results of the test and evaluation shall be submitted to NRC within 30 days of placing the cask in service in accordance with 10 CFR 72.4.

Should the first user of the system not have spent fuel capable of producing a 24 kW heat load, the user may use a lesser load for the test, 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 SER and FSAR, with the lesser load as the only exception. The calculation and the measured temperature data shall be reported in accordance with 10 CFR 72.4. The calculation and comparison need not be reported for casks that are subsequently loaded with lesser heat sources than the test case. However, for the first or any other user, the process needs to be reported for any higher heat sources, up to 24 kW, which is the maximum allowed under this Certificate of Compliance. The use of artificial thermal loads other than spent fuel to satisfy the above requirement is acceptable.

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 periodic 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 Technical Specifications, Functional and Operational Limits

1.2.1 Fuel Specification

Limit/Specification:

The characteristics of the spent fuel allowed to be stored in the VSC-24 system are restricted to those included in Tables 1 and 1-a.

Applicability: The specification is applicable to all fuel to be stored in the VSC-24 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 FSAR bound those of the actual fuel being stored.

Action: Each spent fuel assembly to be loaded into an MSB shall have the parameters listed in Tables 1 and 1-a independently verified and documented. Fuel not meeting this specification shall not be stored in the VSC-24 system.

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

Table 1

Characteristics of Spent Fuel to Be Stored in the VSC-24 System

Fuel (see Note 1)	Only intact, unconsolidated pressurized water reactor (PWR) fuel assemblies meeting the requirements listed below.
Class/Type	B&W, Mark B, 15 x 15, with and without burnable poison rod assemblies (BPRAs) or thimble plug assemblies (TPAs); CE/Exxon 15 x 15, with and without poison clusters or plugging clusters; CE 16 x 16; Westinghouse PWR 17x 17, with and without BPRAs or TPAs; Westinghouse PWR 15 x 15; and Westinghouse PWR 14 x 14, with and without BPRAs or TPAs.
Fuel Cladding (see Note 2)	Zircaloy-4 clad fuel with no known or suspected gross cladding failures
Decay Power Per Assembly (see Note 3)	Less than or equal to 1 kW
Maximum Burnup	Less than or equal to 45,000 MWd/MTU
Post Irradiation Time	Greater than or equal to 5 years. Varies with assembly burnup and initial enrichment, as shown in FSAR Table 5.5-1.
Maximum Initial Enrichment	Less than or equal to 4.2 weight percent ^{235}U
Assembly Weight	Less than or equal to 1585 lb (720.5 kg)
Number of Assemblies per VSC	24

Note 1: High cobalt assemblies (i.e., assemblies with solid stainless steel or stainless steel clad rods in fuel locations, which contain 46.7 to 250 grams of initial cobalt within the fuel zone) must not be loaded into the 12 fuel sleeves located around the perimeter of the MSB.

Note 2: Failed BPRAs or TPAs may be loaded provided that they do not contain Silver-indium-cadmium or hafnium poison material. BPRAs containing these materials must have intact fuel cladding, with no known or suspected defects beyond hairline cracks and pinhole leaks.

Note 3: For casks loaded after the effective date of the renewal of the CoC (and its amendments), the maximum decay power per assembly is limited to 0.625 kW to preclude possible zinc-zircaloy interactions.

Table 1-a - Fuel Assembly Class Characterization Parameters
(Page 1 of 2)

Parameter	Fuel Assembly Class			
	B&W 15x15	W 14x14	W 15x15	W 17x17
Assembly Pin Pitch	1.44272 cm	1.41224 cm	1.43002 cm	1.25984 cm
Fuel Density	≤ 96% theoretical	≤ 96% theoretical	≤ 96% theoretical	≤ 96% theoretical
Fuel Pellet Diameter	from 0.92202 cm to 0.94996 cm	from 0.86360 cm to 0.94234 cm	from 0.89408 cm to 0.93980 cm	from 0.75946 cm to 0.82804 cm
Fuel Clad Material	zircaloy	zircaloy	zircaloy	zircaloy
Fuel Clad Outer Diameter	≤ 1.10236 cm	≤ 1.08712 cm	≤ 1.08712 cm	≤ 0.96012 cm
Fuel Clad Thickness	≥ 0.06604 cm	≥ 0.05588 cm	≥ 0.05842 cm	≥ 0.05588 cm
Guide Tube Material	zircaloy	zircaloy	zircaloy	zircaloy
Guide Tube Outer Diameter	≤ 1.36 cm	≤ 1.37414 cm	≤ 1.4 cm	≤ 1.24 cm
Guide Tube Thickness	≤ 0.045 cm	≤ 0.04318 cm	≤ 0.06 cm	≤ 0.06 cm
Instrument Tube Material	zircaloy	zircaloy	zircaloy	zircaloy
Instrument Tube Outer Diameter	≤ 1.26 cm	≤ 1.37414 cm	≤ 1.4 cm	≤ 1.24 cm
Instrument Tube Thickness	≤ 0.07 cm	all	≤ 0.06 cm	≤ 0.06 cm
Active Fuel Length	≤ 370.84 cm	≤ 373.0 cm	≤ 370.0 cm	≤ 371.0 cm
Guide Bar Effective Diameter [see Note 1]	not applicable	not applicable	not applicable	not applicable
Control Component Rodlets Allowed in Guide Tubes	yes	yes	no	yes
Control Component Rodlet Clad Material	zircaloy or stainless steel	zircaloy or stainless steel	not applicable	zircaloy or stainless steel
Control Component Rodlet Outer Diameter	≤ 1.1176 cm	all	not applicable	≤ 0.9779 cm
Control Component Rodlet Fill Material	any non-hydrogen bearing material	any non-hydrogen bearing material	not applicable	any non-hydrogen bearing material

Note 1:

The guide bars may have either a rectangular or circular cross section. The guide bar effective diameter corresponds to the diameter of a circular region having an area equal to the actual guide bar cross-sectional area.

Table 1-a - Fuel Assembly Class Characterization Parameters
(Page 2 of 2)

	Fuel Assembly Class			
	CE 15x15A	CE 15x15B	CE 15x15C	CE 16x16
Assembly Pin Pitch	1.397 cm	1.397 cm	1.397 cm	1.28524 cm
Fuel Density	≤ 96% theoretical	≤ 96% theoretical	≤ 96% theoretical	≤ 96% theoretical
Fuel Pellet Diameter	from 0.888 cm to 0.912 cm	from 0.888 cm to 0.912 cm	from 0.888 cm to 0.912 cm	from 0.81534 cm to 0.83566 cm
Fuel Clad Material	zircaloy	zircaloy	zircaloy	zircaloy
Fuel Clad Outer Diameter	≤ 1.062 cm	≤ 1.062 cm	≤ 1.062 cm	≤ 0.98044 cm
Fuel Clad Thickness	≤ 0.0508 cm	≤ 0.0508 cm	≤ 0.0508 cm	≤ 0.06096 cm
Guide Tube Material	not applicable	zircaloy	zircaloy	zircaloy
Guide Tube Outer Diameter	not applicable	≤ 1.06934 cm	≤ 1.06934 cm	≤ 2.54 cm
Guide Tube Thickness	not applicable	≤ 0.02032 cm	≤ 0.02032 cm	≤ 0.1778 cm
Instrument Tube Material	zircaloy	zircaloy	zircaloy	not applicable
Instrument Tube Outer Diameter	≤ 1.06934 cm	≤ 1.06934 cm	≤ 1.06934 cm	not applicable
Instrument Tube Thickness	≤ 0.08509 cm	≤ 0.08509 cm	≤ 0.08509 cm	not applicable
Active Fuel Length	≤ 336.0 cm	≤ 336.0 cm	≤ 336.0 cm	≤ 385.0 cm
Guide Bar Effective Diameter [see Note 1]	≤ 1.2006 cm	≤ 1.2006 cm	≤ 1.2006 cm	not applicable
Control Component Rodlets Allowed in Guide Tubes	not applicable	yes	yes	no
Control Component Rodlet Clad Material	not applicable	zircaloy or stainless steel	zircaloy or stainless steel	not applicable
Control Component Rodlet Outer Diameter	not applicable	all	all	not applicable
Control Component Rodlet Fill Material	not applicable	any non-hydrogen bearing material	any non-hydrogen bearing material	not applicable

Note 1: The guide bars may have either a rectangular or circular cross section. The guide bar effective diameter corresponds to the diameter of a circular region having an area equal to the actual guide bar cross-sectional area.

1.2.2 Maximum Permissible MSB Leak Rate

Limit/Specification:

Less than or equal to 1.0×10^{-4} standard cubic centimeters per second (scc/sec) at 0.5 atm differential pressure.

Applicability: MSB inner seal (shield lid weld) confinement boundary.

Objective:

1. To limit the total radioactive doses normally released by each cask to negligible levels. Should fission gases escape the fuel cladding, they will remain confined by the MSB confinement boundary.

2. To retain helium cover gases within the MSB and prevent oxygen from entering the MSB. The helium improves the heat dissipation characteristics of the VSC and prevents any oxidation of fuel cladding.

Action: The leak rate shall be checked using calibrated instruments and written procedures. Procedures should be prepared to ANSI N14.5 (standard for leak testing of shipping cask) or equivalent. If the leak rate exceeds 10^{-4} scc/sec, the leak point must be found and repaired. The confinement boundary of the MSB itself may be easily repaired, since the field welding is performed only on the MSB outer surface.

Surveillance: The MSB shall be tested after the inner seal weld (shield lid weld) has been completed. The MSB will be pressurized with helium to 1.5 atm and a hand-held sniffer may be used (per manufacturer's instructions) to determine a leak rate. If the rate is within the limit, additional testing and surveillance are not required, since there are no normal or accident conditions that will breach the structural integrity and leak tightness of the MSB.

1.2.3 Maximum Permissible Air Outlet Temperature

Limit/Specification:

The equilibrium air temperature at the outlet of a fully loaded VSC (24 kW) shall not exceed ambient by more than 110 °F.

Applicability: This temperature limit applies to all VSCs stored in the ISFSI. If a cask is placed in service with a heat load less than 24 kW, the limiting temperature difference between outlet and ambient shall be determined by a calculation performed by the user using the same methodology and inputs documented in the FSAR.

Objective: The objective of this limit is to ensure that the temperatures of the fuel cladding and the VSC concrete do not exceed the temperatures calculated in Section 4.0 of the FSAR. That section shows that if the air temperature increase (for 24kW) is below 110 °F (expected to be 89 °F for normal operation), the fuel cladding and concrete will be below both their temperature criteria for normal operation and the maximum heat load transient (125 °F ambient, full solar and full thermal load). An additional objective of the temperature measurements is to confirm the thermal performance of the cask and provide base-line data.

Action: If an air temperature rise of greater than 110 °F, or greater than predicted, is observed for any VSC placed in service, the first action should be to check all inlet and outlet ducts for airflow blockage. If environmental factors can be ruled out as the cause of the excessive cask temperatures, this condition indicates that the fuel assemblies may be producing heat at a rate higher than specified in Section 2.0 of the FSAR. If fuel assemblies meeting the fuel specification in Section 1.2.1 have been loaded into the cask and the temperature difference is greater than 110 °F, or that predicted for less heat loads, then this condition is not addressed in the FSAR and will require additional measurements and analysis to determine that the actual performance of the cask is within the limits analyzed in the FSAR. If the excessive temperatures cause the cask to perform in an unacceptable manner, or the temperatures cannot be controlled to within

acceptable criteria, the cask shall be unloaded and a letter report shall be submitted to NRC within 30 days.

Surveillance: The ambient temperature and cask outlet air temperatures for the first VSC shall be measured and recorded daily for a period of 1 week after the VSC has been placed in service. The ambient temperature and cask outlet temperatures for the rest of the VSCs shall be measured and recorded upon placement in service and at intervals not to exceed 48 hrs until the cask has reached thermal equilibrium. After reaching thermal equilibrium, thermal performance of each cask shall be verified on a daily basis in accordance with specification 1.3.4.

1.2.4 Maximum External Surface Dose Rate

Limit/Specification:

The external surface average dose rate from all types of radiation will be less than 100 mrem/hr on the sides and 200 mrem/hr on the top. Dose rates at the air inlets and outlets will be below 350 mrem/hr and 100 mrem/hr, respectively.

Applicability: This dose rate limit shall apply to the entire external surface of the VCC, except the bottom surface.

Objective: The external dose rate is limited to this value, to ensure that the cask has not been inadvertently loaded with fuel not meeting the specifications in Section 2.0 of the FSAR, to provide verification for plant personnel that radiation levels are acceptably low, and to satisfy the 10 CFR 72.104 dose rate limit of 25 mrem per year at the ISFSI controlled area boundary.

Action: If the measured dose rates are above those values listed above, correct fuel loading shall be verified. If correct fuel is loaded, specific analyses must demonstrate compliance with 10 CFR Part 20 and 10 CFR Part 72 radiation protection requirements, or appropriate action must be taken to comply with the acceptable limits. A letter report, summarizing the action taken and the results of investigation conducted to determine the cause of the high dose rates, shall be submitted to the NRC within 30 days. 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 external surface dose rate shall be measured after loading the MSB in the VCC and before transfer to the storage pad. The side dose rate shall be measured at a distance of 5 feet from the bottom of the VCC and at four equally spaced radial locations. The top dose rate shall be measured at the VCC lid center and the VCC outer lid edge. The dose rate measurement shall account for the effects of background radiation on the absolute dose rate measurements.

1.2.5 Maximum MSB Removable Surface Contamination

Limit/Specification:

10^{-4} µCi/cm^2 gamma-beta

10^{-5}µCi/cm^2 alpha

Applicability: MSB external surface.

Objective: Keep removable surface contamination level low enough so that offsite doses will be below 1 mrem, even in the event that contamination became loose and behaved as a particulate or gaseous release.

Action: If the limit is exceeded, the MSB exterior shall be washed by flushing the MSB-MTC gap with water, or other suitable decontamination solution, and additional contamination surveys taken until the limit is met.

Surveillance: Contamination surveys shall be taken on the MSB exterior, within 6 inches of the top of the MSB. Contamination surveys shall be taken on the MTC interior and bottom exterior surfaces after the MSB has been transferred to the VCC. The contamination surveys for removable surface contamination shall be conducted after the loaded MSB is removed from the pool and before the VSC is moved to the storage pad.

1.2.6 Boron Concentration in the MSB Cavity Water

Limit/Specification:

The MSB cavity shall be filled only with water having a boron concentration equal to, or greater than, the concentration specified as a function of assembly initial enrichment for each assembly class as shown in Figures 2 through 9 when loading or unloading the MSB.

Applicability: This specification is applicable to the loading and unloading of all MSBs.

Objective: To ensure a subcritical configuration is maintained in the case of accidental loading of the MSB 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 in the spent fuel pool and that used to fill the MSB cavity.

1. Within 4 hours before insertion of the first fuel assembly into the MSB, the dissolved boron concentration in water in the spent fuel pool and in the water that will be introduced into the MSB cavity shall be independently determined (two samples chemically analyzed by two individuals).

2. Within 4 hours before flooding the MSB cavity for unloading the fuel assemblies, the dissolved boron concentration in water in the spent fuel pool and in the water that will be introduced into the MSB cavity shall be independently determined (two samples chemically analyzed by two individuals).

3. The dissolved boron concentration shall be reconfirmed at intervals not to exceed 48 hours until such time as the MSB is removed from the spent fuel pool or the fuel is removed from the MSB.

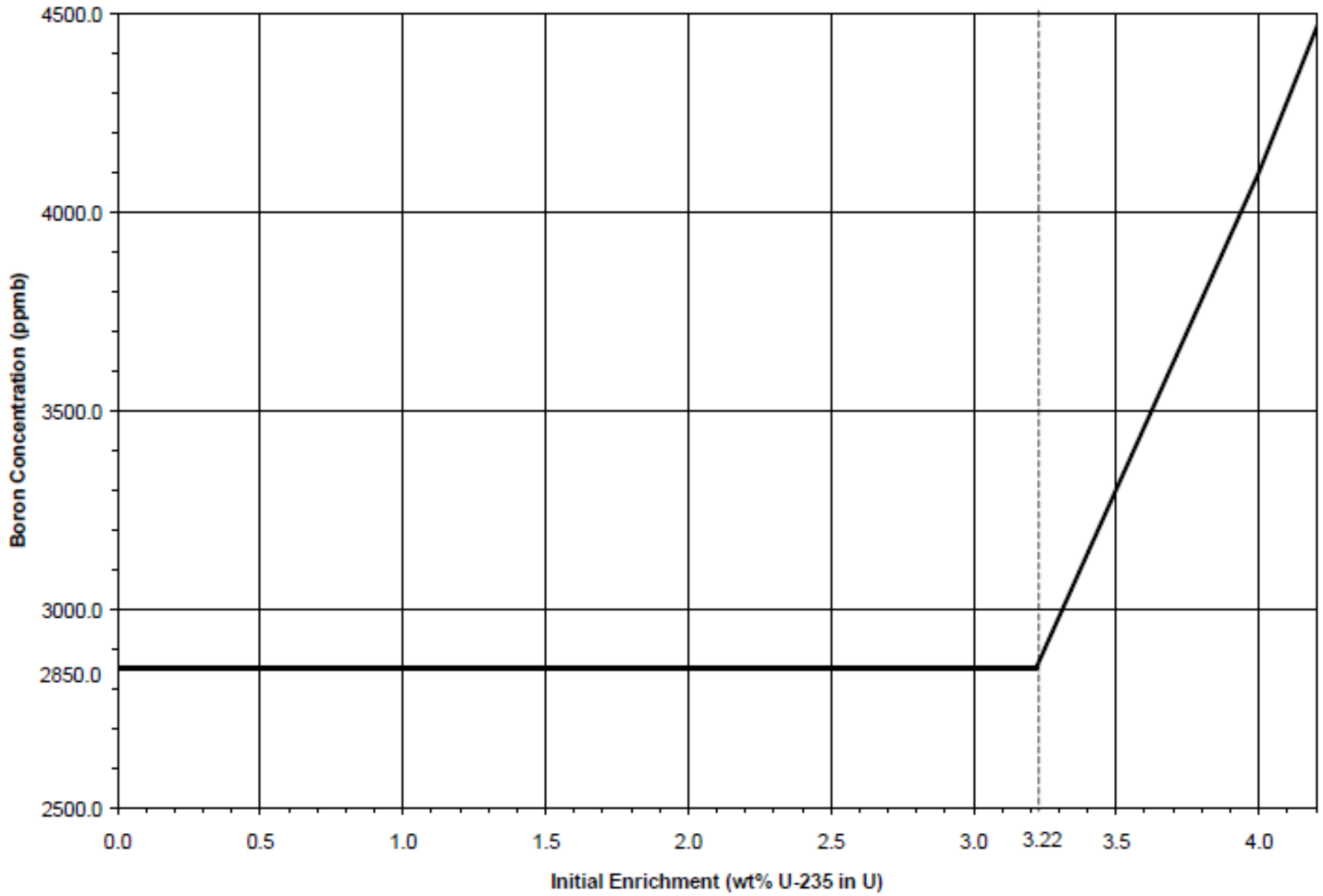

Figure 2 - B&W 15x15 Assembly Class Minimum Required Soluble Boron

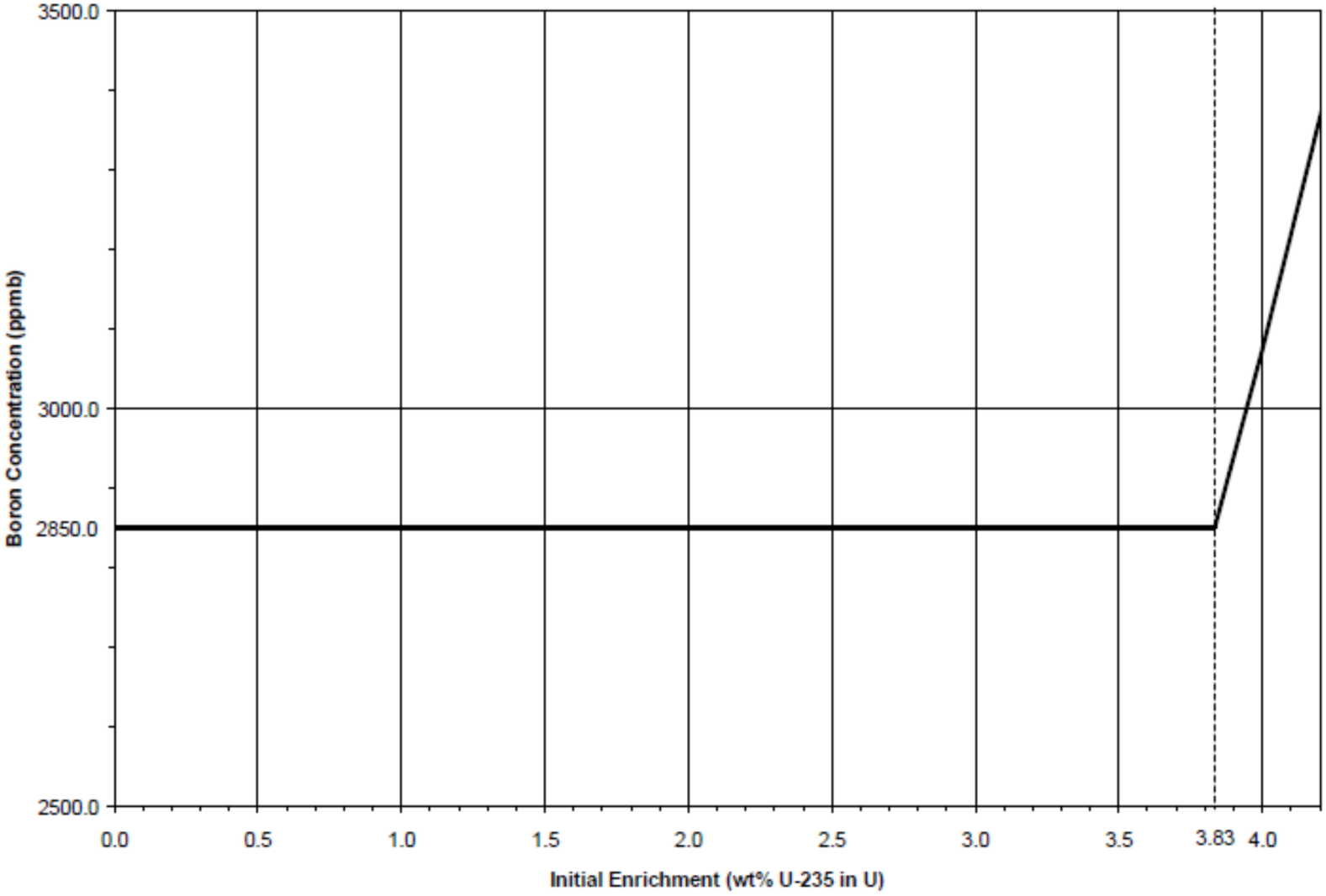

Figure 3 - W 14x14 Assembly Class Minimum Required Soluble Boron

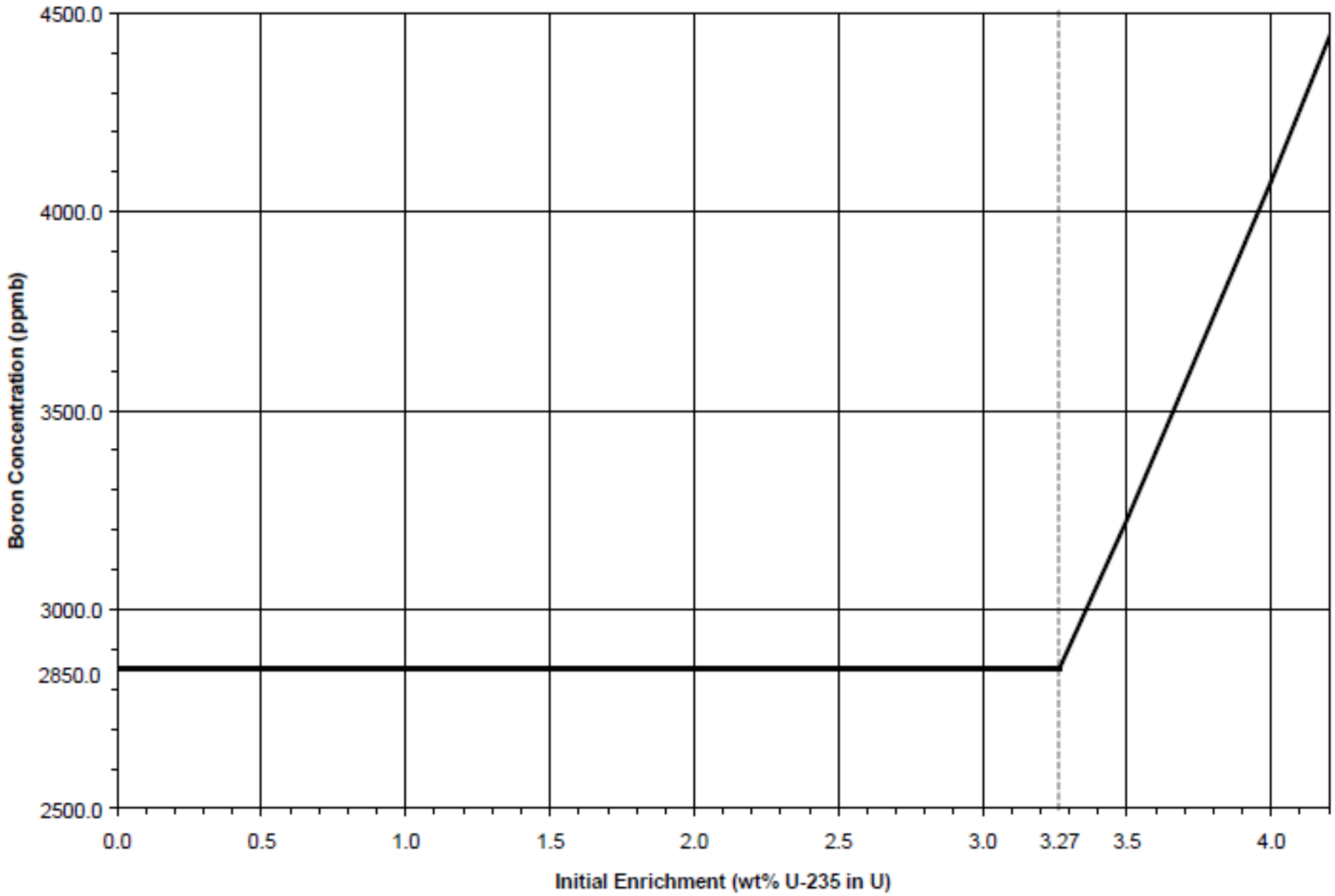

Figure 4 - W 15x15 Assembly Class Minimum Required Soluble Boron

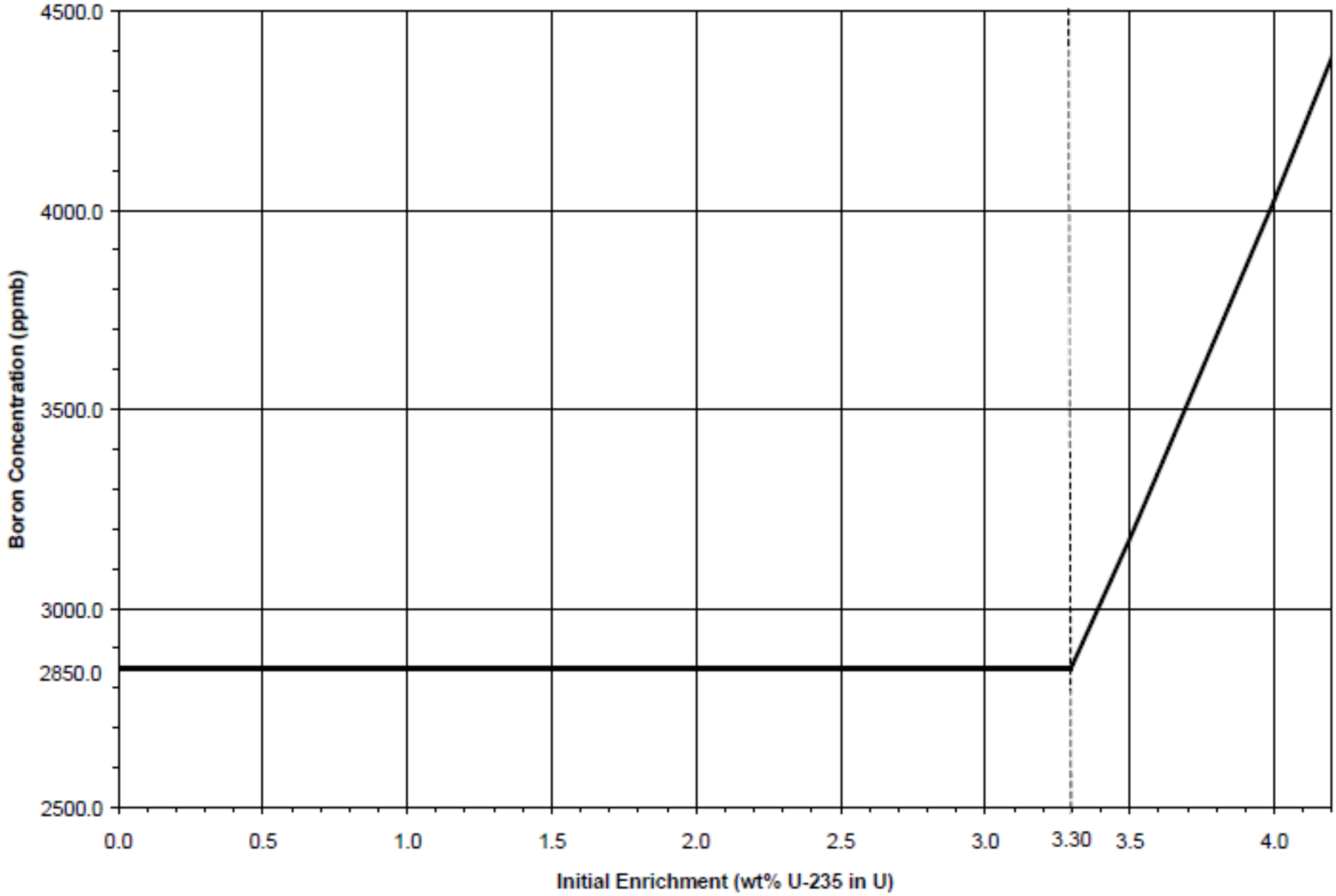

Figure 5 - W 17x17 Assembly Class Minimum Required Soluble Boron

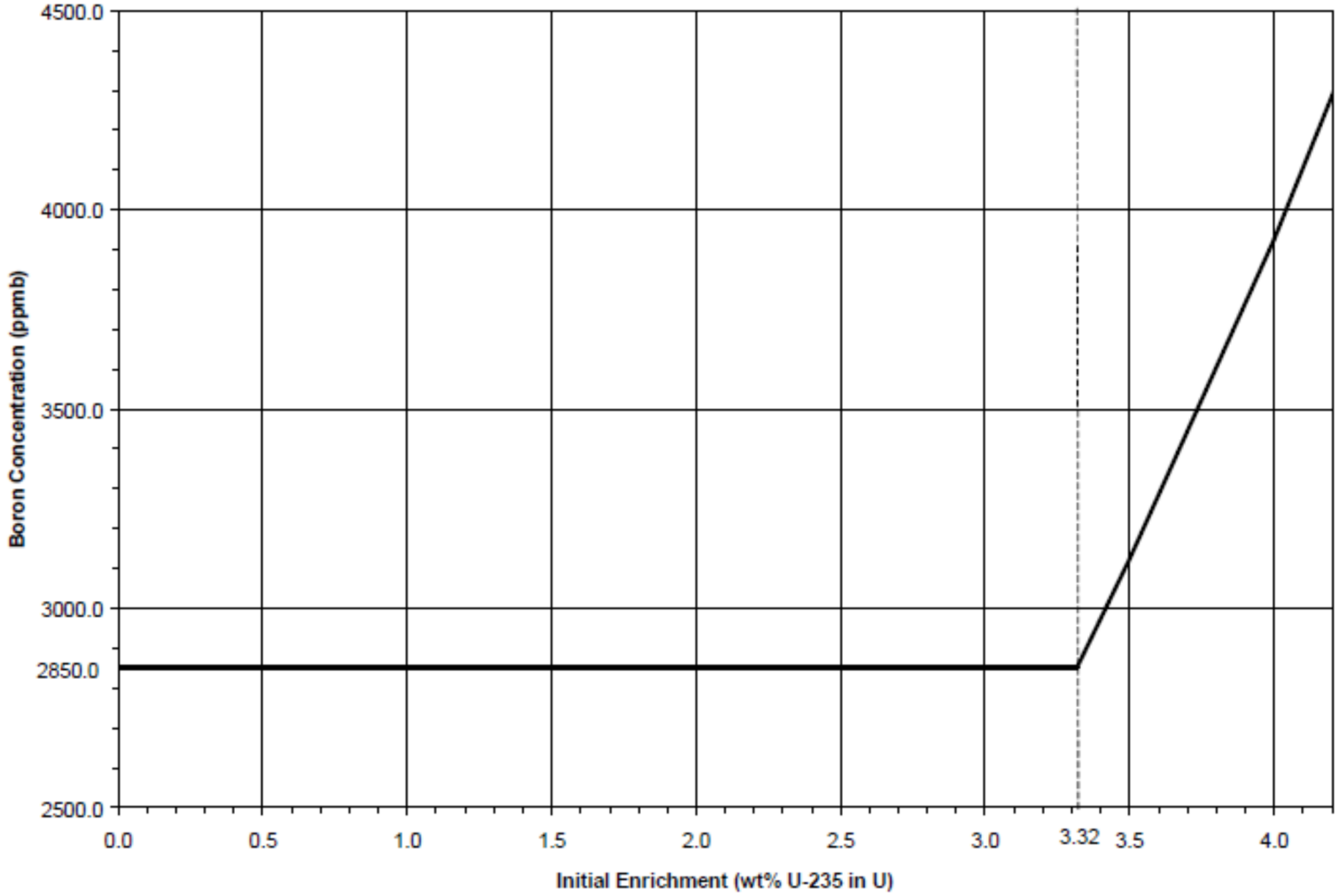

Figure 6 - CE 15x15A Assembly Class Minimum Required Soluble Boron

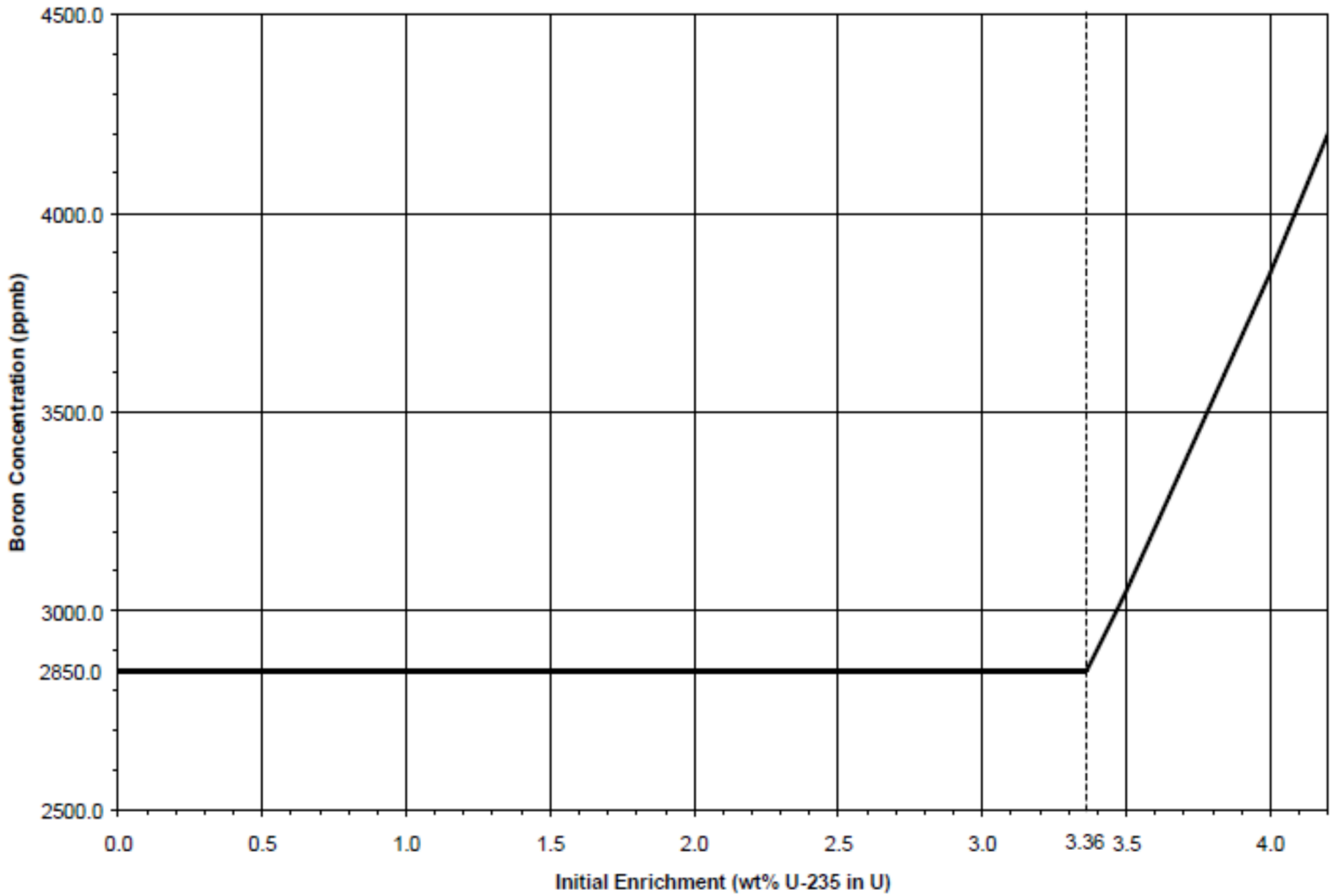

Figure 7 - CE 15x15B Assembly Class Minimum Required Soluble Boron

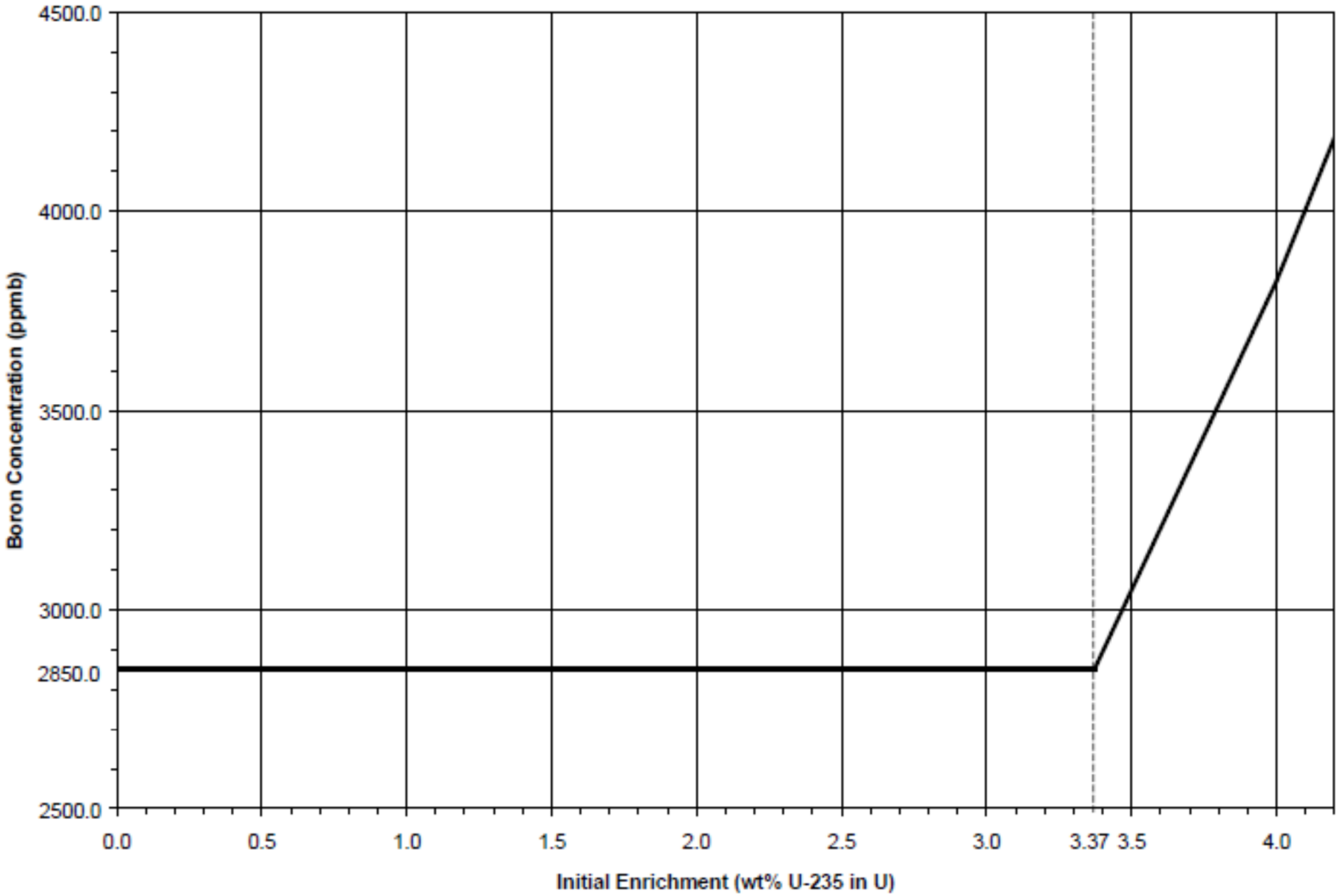

Figure 8 - CE 15x15C Assembly Class Minimum Required Soluble Boron

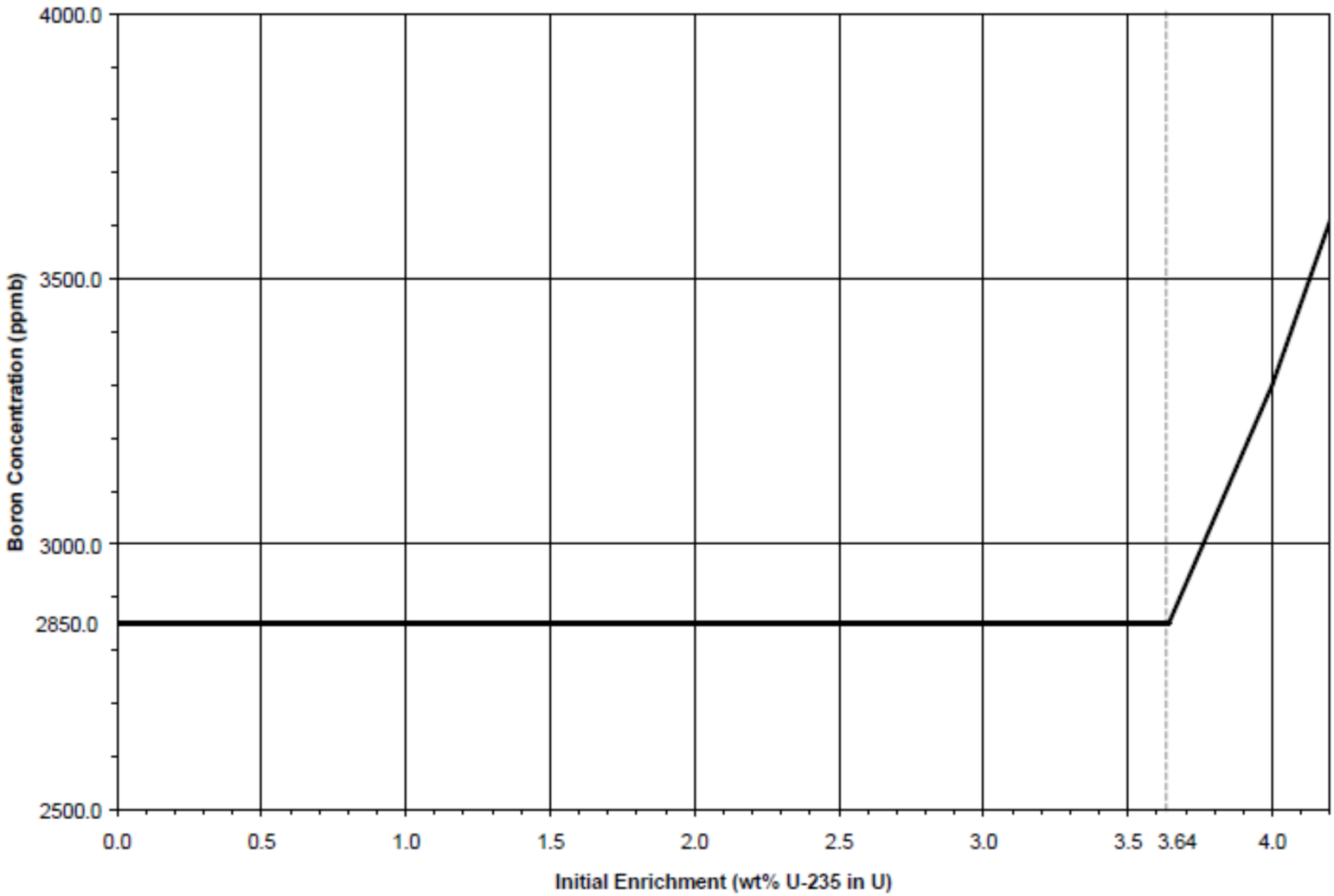

Figure 9 - CE 16x16 Assembly Class Minimum Required Soluble Boron

1.2.7 MSB Vacuum Pressure During Drying

Limit/Specification:

Vacuum Pressure: Less than or equal to 3 mm Hg

Time at Pressure: Greater than or equal to 30 min.

Number of Pump-Downs: 2

Applicability: This specification is applicable to all MSBs.

Objective: To ensure a minimum water content.

Action: Once the required vacuum pressure specification is obtained, perform helium backfill to 22.1 psia ± 0.5 psia, and repeat evacuation.

If the required vacuum pressure cannot be obtained:

1. Check and repair, or replace, the vacuum pump;
2. Check and repair the vacuum tubing as necessary; or
3. Check and reseal the shield lid fitting(s).

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

1.2.8 MSB Helium Backfill Pressure

Limit/Specifications:

Helium 14.5 psia ± 0.5 psia backfill pressure (stable for 30 minutes after filling).

Applicability: This specification is applicable to all MSBs.

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; and (3) the MSB does not become over-pressurized.

Action: If the required pressure cannot be obtained:

1. Check and repair or replace the pressure gauge;
2. Check and repair or replace the pressure tubes, connections, and valves;
3. Check and repair or replace the helium source; and
4. Check and repair the welds on MSB structural lid.

If pressure exceeds the criterion:
Release a sufficient quantity of helium to lower the 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.

1.2.9 Non-Destructive Examination of Shield and Structural Lid Seal Welds

Limit/Specification:

The MSB pressure boundary shield lid, structural lid and valve cover plate closure welds shall be liquid penetrant tested (PT) in accordance with the requirements of the ASME Boiler and Pressure Vessel Code, Section III, Division 1, Article NC-5000 (1986 edition, 1988 addenda). The PT acceptance standards shall be as described in Subsection NC-5350.

In addition, the MSB structural lid-to-shell weld shall be examined by ultrasonic testing (UT) in accordance with the criteria defined in the "Guideline Requirements for the Time-of-Flight Diffraction Ultrasonic Examination of the VSC-24 Structural Lid to Shell Weld," VMSB-98-001, latest version.

The specified PT and UT examinations shall begin no sooner than two hours after completion of the weld to be examined.

Applicability: For all MSBs, the PT examination is applicable to:

1. Root and final weld surfaces between the shield lid and shell, and between the structural lid and shell; and

2. Final weld surfaces between the structural lid and shield lid, and between the valve cover plates and structural lid.

The confirmatory UT examination is applicable to the completed MSB structural lid-to-shell weld.

Objective: To ensure that the MSB is adequately sealed and leak-tight, and to confirm the integrity of the structural lid-to-shell weld.

Action: If the PT examination indicates that a weld is unacceptable:

1. The weld shall be repaired in accordance with Article NC-4000 Fabrication and Installation, ASME Boiler and Pressure Vessel Code, Section III - Division 1, Subsection NC (1986 edition, 1988 addenda); and

2. The repaired weld shall be re-examined in accordance with the requirements of this specification.

If indications are found as a result of the UT examination:

1. Evaluate the flaw proximity per ASME Section XI, IWA-3300 (1989 edition);

2. Compare each flaw to the flaw screening criteria below:

Acceptable Flaw Depth (for lengths less than or equal to 0.7 inches)	Acceptable Flaw Depth (for lengths greater than 0.7 inches)
0.37 inches	0.16 inches

3. If a flaw is unacceptable, perform further flaw-specific evaluations (i.e., linear-elastic fracture mechanics or elastic-plastic fracture mechanics) per VMSB-98-001, latest revision, to determine whether the flaw is acceptable for continued operation; or

4. Repair the weld in accordance with Article NC-4000 Fabrication and Installation, ASME Boiler and Pressure Vessel Code, Section III - Division 1, Subsection NC (1986 edition, 1988 addenda); and

5. Re-examine the repaired weld in accordance with this specification.

Surveillance: During MSB closure operations.

1.2.10 [DELETED]

1.2.11 Placement of the VSC on the Storage Pad

Limit/Specification:

Each VSC shall be placed in a storage array with at least 15-ft ± 1 ft, center-to-center, spacings.

Applicability: This specification applies to all VSCs.

Objective: To provide easy access between casks, and to meet the thermal analysis.

Action: The center-to-center spacing shall be measured upon placement.

1.2.12 Average Ambient Temperature

Limit/Specification:

The yearly average ambient temperature shall be 75 °F, or less. Yearly average temperature is to be determined as follows, or by equivalent methodology. Yearly average may be hourly, daily, or monthly average temperatures added together and divided by 8760, 365, or 12, respectively.

The average daily ambient temperature shall be 100 °F, or less.

Applicability: This specification applies to every site where the VSC will be deployed.

Objective: To ensure that the long-term ambient conditions are bounded by the analysis.

Action: The yearly average ambient temperature is to be determined from suitable site data, Federal or local government agency data, or other sources. Based on information in the FSAR, all United States power plant sites should be bounded by the value of 75 °F.

1.2.13 Minimum Temperature for Moving the Loaded MSB

Limit/Specification:

A VCC containing a loaded MSB shall only be moved at ambient temperatures of 0 °F or above, coincident with a structural lid-to-shell weld temperature of 30 °F or above.

Objective: To conform with design basis criteria for brittle fracture.

Action: Confirm before moving the VCC containing the loaded MSB that the ambient temperature is at 30 °F or above.

If the ambient is less than 30 °F but 0 °F or greater, confirm that the structural lid-to-shell weld is at 30 °F or above. Physical measurement should be used to determine the structural lid-to-shell weld temperature. Alternately, calculations similar to those presented in Chapter 4 of the FSAR may be used for the specific fuel to determine the minimum MSB shell temperature for any particular ambient condition.

Surveillance: The temperatures shall be determined before movement of the loaded MSB.

1.2.14 Minimum Temperature for Lifting the MTC

Limit/Specification:

The MTC containing a loaded MSB shall only be moved at ambient temperatures of 40 °F or above.

Objective: To conform to the design criteria for brittle failure.

Action: Confirm that the ambient temperature is 40 °F or above before movement of the MTC containing a loaded MSB.

Surveillance: The MTC ambient temperature shall be determined before movement of the MTC containing a loaded MSB.

1.2.15 MSB Handling Height

Specification:

1. The loaded VCC shall not be handled at a height greater than 60 inches.

2. In the event of a drop of a loaded VCC from a height greater than 18 inches: (a) fuel in the MSB shall be returned to the reactor spent fuel pool; (b) the MSB shall be removed from service and evaluated for further use; and (c) the VCC shall be inspected for damage.

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

Objective:

1. To preclude a loaded VCC drop from a height of greater than 60 inches.

2. To maintain spent fuel integrity, according to the spent fuel specification for storage, continued containment integrity, and VCC functional capability, after a tipover or drop of a loaded VCC from a height greater than 18 inches.

Surveillance: In the event of a loaded VCC drop accident, the system will be returned to the reactor fuel handling building. After the fuel has been returned to the reactor spent fuel pool, the MSB and the VCC will be inspected and evaluated for future use.

1.3 Surveillance Requirements

Surveillances required to implement the requirements of a number of specifications were included as part of the specifications in the previous sections. Additional surveillances, required for normal operation and after accident conditions, are described below. Table 2 summarizes all the surveillance requirements, including those discussed in previous sections.

1.3.1 Visual Inspection of Air Inlets and Outlets

Surveillance: A visual surveillance of the wire mesh screens covering the air inlets and outlets shall be conducted daily.

Action: If the surveillance shows signs of degradation, breach of the screens or other possible sources of blockage such as insect infestation, a close-up inspection of the air inlets and outlets shall be conducted to determine possible blockage and removal if present.

1.3.2 Exterior VCC Surface Inspection

Surveillance: The VCC exterior surface shall also be inspected annually for any damage (chipping, spalling, etc.).

Action: Any defects larger than one-half inch in diameter (or width) and deeper than one-quarter of an inch shall be repaired by re-grouting, according to the grout manufacturer's recommendations.

1.3.3 Interior VCC Surface Inspection

Surveillance: The VCC interior surfaces and MSB exterior surfaces of the first VSC unit placed in service at each site shall be inspected, to identify potential air flow blockage and material degradation after every 5 years in service.

Action: Results of the surveillance shall be documented, and a letter report, summarizing the findings, shall be submitted to the NRC within 30 days. The report must be submitted using instructions in 10 CFR 72.4 with a copy sent to administration of the appropriate regional office.

1.3.4 Cask Thermal Performance

Surveillance: Verify a temperature measurement of the thermal performance, for each cask, on a daily basis.

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 cask to normal operation. If the measurement or other evidence suggests that the VCC concrete accident temperature criteria (350 °F) has been exceeded for more than 24 hours, the VCC 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 VCC has an adequate margin of safety.

Table 2

Summary of Surveillance Requirements

	Surveillance	Period	Reference Section
1.	Air Outlet Temperature	L, AN	1.2.3
2.	Weld Leak Testing	L	1.2.2
3.	Weld Non-Destructive Examination	L	1.2.9
4.	Dose Rates	L	1.2.4
5.	MSB Surface Contamination	L	1.2.5
6.	Vacuum Pressure	L	1.2.7
7.	MSB Helium Backfill Pressure	L	1.2.8
8.	Boron Concentration	PL	1.2.6
9.	VCC, MSB Surveillance (off-normal)	AN	1.2.15
10.	Air Inlet and Outlet Surveillance	D	1.3.1
11.	Cask Exterior (normal)	Y	1.3.2
12.	Cask Interior	AN	1.3.3
13.	Cask Thermal Performance	D	1.3.4

Legend

L During or within 24 hours of loading and before movement to storage pad.
PL Before loading and unloading.
D Daily -- At least once per 24 hours.
W Weekly -- At least once per 7 days.
M Monthly -- At least once per 31 days.
Y Yearly -- At least once per 366 days.
AN As necessary/as required.