E-49513 Enclosure 7
Evaluation Forms for CoC 1004 TS Tables and Figures

CoC Condition/TS Identifier:

(Form #77) Revision 0

- **TS Table 1-1a, PWR Fuel Specifications for Fuel to be Stored in the Standardized NUHOMS®-24P DSC**

*** 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"?**

Requirement			**TS Table 1-1a, PWR Fuel Specifications for Fuel to be Stored in the Standardized NUHOMS®-24P DSC**
CoC Body Certified Design	**Section I. Technology**		**No**
	Section II. Design Features		**No**
Appendix A - Inspections, Tests, and Evaluations			**No**
Appendix B. Technical Specifications	**Section 1 Definitions, Use and Application**		**No**
	Section 2 Approved Contents (Selection Criteria)	**A1**	**The following items in Table 1-1a are required per Criterion A1 and shall be retained:** • **Fuel (type of spent fuel)** • **Number of assemblies per DSC (condition of spent fuel)** • **Maximum planar average initial fuel enrichment** • **Assembly average burnup** • **Decay heat (maximum heat designed to be dissipated)**
		A2	**The following items in Table 1-1a are required per Criterion A2 and shall be retained:** • **Neutron fuel source (shielding function)** • **Gamma source (shielding function)** • **BPRA Cooling time – Minimum (shielding function)**
		A3	**No**
	Section 3 Limiting Conditions for Operation (LCOs)* and Surveillance Requirements (SRs) (Selection Criteria)	**L1**	**No**
		L2	**No**
		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 (for A1 and A2 items)**

	The possibility of a new or different kind of accident being created compared to those previously evaluated in the FSAR?	**Yes (for A1 and A2 items)**
	A Significant reduction in the margin of safety for ISFSI or cask operation?	**Yes (for A1 and A2 items)**
Evaluation Summary		**The A1 and A2 items to be maintained are summarized above.** **The fuel qualification tables will be deleted from the Technical Specifications, although the minimum fuel assembly cooling time will be retained as a global parameter. The fuel qualification tables will be placed in the UFSAR to maintain the history of the analysis method and to indicate the burnup and enrichment combinations considered to determine the bounding source term, but the cooling times will not be treated as a requirement. An exhaustive fuel qualification is performed to determine bounding source terms as documented in the UFSAR. Fuel assembly decay heat is determined by the Licensee, and HSM dose rates are verified by a one-time measurement as a part of the TS ITE.** **The following characteristics will be moved from the Technical Specifications to the UFSAR:** • **Fuel cladding** • **Maximum assembly and BPRA length** • **Nominal Cross-Sectional Envelope** • **Maximum assembly and BPRA weight** **If the Licensee has fuel that does not meet the maximum assembly weight or length limits or cross-sectional envelope, acceptability will be determined per 10 CFR 72.48.**

CoC Condition/TS Identifier:

(Form #78) Revision 0

- **TS Table 1-1b, BWR Fuel Specifications for Fuel to be Stored in the Standardized NUHOMS®-52B DSC**

*** 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"?**

<table>
<tr><td colspan="2">Requirement</td><td colspan="2">TS Table 1-1b, BWR Fuel Specifications for Fuel to be Stored in the Standardized NUHOMS®-52B DSC</td></tr>
<tr><td rowspan="2">CoC Body Certified Design</td><td>Section I. Technology</td><td colspan="2">No</td></tr>
<tr><td>Section II. Design Features</td><td colspan="2">No</td></tr>
<tr><td colspan="2">Appendix A - Inspections, Tests, and Evaluations</td><td colspan="2">No</td></tr>
<tr><td rowspan="7">Appendix B. Technical Specifications</td><td>Section 1
Definitions, Use and Application</td><td colspan="2">No</td></tr>
<tr><td rowspan="3">Section 2
Approved Contents (Selection Criteria)</td><td>A1</td><td>The following items in Table 1-1b are required per Criterion A1 and shall be retained:
• Fuel (type of spent fuel)
• Number of assemblies per DSC (condition of spent fuel)
• Maximum lattice average initial fuel enrichment
• Assembly average burnup
• Decay heat (maximum heat designed to be dissipated)</td></tr>
<tr><td>A2</td><td>The following items in Table 1-1b are required per Criterion A2 and shall be retained:
• Neutron source (shielding function)
• Gamma source (shielding function)</td></tr>
<tr><td>A3</td><td>No</td></tr>
<tr><td rowspan="3">Section 3
Limiting Conditions for Operation (LCOs)* and Surveillance Requirements (SRs) (Selection Criteria)</td><td>L1</td><td>No</td></tr>
<tr><td>L2</td><td>No</td></tr>
<tr><td>L3</td><td>No</td></tr>
<tr><td>Section 4
Administrative Controls</td><td colspan="2">No</td></tr>
<tr><td>Risk Insight**: Will removing this requirement from the CoC/TS result in…</td><td>A significant increase in the probability or consequences of an accident previously evaluated in the cask FSAR?</td><td colspan="2">Yes (for A1 and A2 items)</td></tr>
</table>

	The possibility of a new or different kind of accident being created compared to those previously evaluated in the FSAR?	**Yes (for A1 and A2 items)**
	A Significant reduction in the margin of safety for ISFSI or cask operation?	**Yes (for A1 and A2 items)**
Evaluation Summary		**The A1 and A2 items to be maintained are summarized above.** **The fuel qualification table (Table 1-2b) will be deleted from the Technical Specifications, although the minimum fuel assembly cooling time will be retained as a global parameter. The fuel qualification table will be placed in the UFSAR to maintain the history of the analysis method and to indicate the burnup and enrichment combinations considered to determine the bounding source term, but the cooling times will not be treated as a requirement. An exhaustive fuel qualification is performed to determine bounding source terms as documented in the UFSAR. Fuel assembly decay heat is determined by the Licensee, and HSM dose rates are verified by a one-time measurement as a part of the TS ITE.** **The following characteristics will be moved from the Technical Specifications to the UFSAR:** • **Fuel cladding** • **Maximum assembly length** • **Nominal Cross-Sectional Envelope** • **Maximum assembly weight** **If the Licensee has fuel that does not meet the maximum assembly weight or length limits or cross-sectional envelope, acceptability will be determined per 10 CFR 72.48.**

CoC Condition/TS Identifier:

(Form #79) Revision 0

- **TS Table 1-1c, BWR Fuel Specification for Fuel to be Stored in the Standardized NUHOMS®-61BT DSC**
- **TS Table 1-1j, BWR Fuel Specification for Damaged Fuel to be Stored in the Standardized NUHOMS®-61BT DSC**

*** 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"?**

Requirement			**TS Table 1-1c and Table 1-1j, BWR Fuel Specifications for Fuel (Intact and Damaged) to be Stored in the Standardized NUHOMS ® -61BT DSC**
CoC Body Certified Design	**Section I. Technology**		**No**
	Section II. Design Features		**No**
Appendix A - Inspections, Tests, and Evaluations			**No**
Appendix B. Technical Specifications	**Section 1 Definitions, Use and Application**		**No**
	Section 2 Approved Contents (Selection Criteria)	**A1**	**The following items in Table 1-1c and Table 1-1j are required per Criterion A1 and shall be retained:** • **Fuel design (type of spent fuel)** • **Fuel damage (condition of the spent fuel)** • **Channels (type of spent fuel)** • **Maximum burnup by group** • **Minimum cooling time by group** • **Maximum lattice average initial enrichment** • **Minimum initial assembly average enrichment** • **Maximum decay heat**
		A2	**The following item in Table 1-1c is required per Criterion A2 and shall be retained:** • **Minimum B-10 content in poison plates (criticality function)**
		A3	**No**
	Section 3 Limiting Conditions for Operation (LCOs)* and Surveillance Requirements (SRs) (Selection Criteria)	**L1**	**No**
		L2	**No**
		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 (for A1 and A2 items)**

	The possibility of a new or different kind of accident being created compared to those previously evaluated in the FSAR?	**Yes (for A1 and A2 items)**
	A Significant reduction in the margin of safety for ISFSI or cask operation?	**Yes (for A1 and A2 items)**
Evaluation Summary		**The A1 and A2 items to be maintained are summarized above.** **The fuel qualification tables will be deleted from the Technical Specifications, although the minimum fuel assembly cooling time will be retained as a global parameter, which will appear in the respective fuel specification table. The fuel qualification tables will be placed in the UFSAR to maintain the history of the analysis method and indicate the burnup and enrichment combinations considered to determine the bounding source term, but *the cooling times will not be treated as a requirement*. An exhaustive fuel qualification is performed to determine bounding source terms as documented in the UFSAR. Fuel assembly decay heat is determined by the Licensee, and HSM dose rates are verified by a one-time measurement as a part of the TS ITE.** **Details and instructions to Licensees for performing Fuel Qualification for burnup/enrichment combinations not considered in the UFSAR will be included in the BASES. The notes associated with the FQTs will be included in the instructions to Licensees, as needed.** **The following characteristics will be moved from the Technical Specifications to the UFSAR:** • **Fuel cladding** • **Maximum assembly length** • **Maximum assembly width (excluding channels)** • **Maximum assembly weight** • **Maximum initial uranium content** **If the Licensee has fuel that does not meet the maximum uranium content or assembly weight limits, acceptability will be determined per 10 CFR 72.48.**

CoC Condition/TS Identifier:

(Form #80) Revision 0

- **TS Table 1-1d, BWR Fuel Assembly Design Characteristics for the NUHOMS -61BT DSC**

*** 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"?**

Requirement			TS Table 1-1d, BWR Fuel Assembly Design Characteristics for the NUHOMS -61BT DSC
CoC Body Certified Design	Section I. Technology		No
	Section II. Design Features		No
Appendix A - Inspections, Tests, and Evaluations			No
Appendix B. Technical Specifications	Section 1 Definitions, Use and Application		No
	Section 2 Approved Contents (Selection Criteria)	A1	No
		A2	No
		A3	No
	Section 3 Limiting Conditions for Operation (LCOs)* and Surveillance Requirements (SRs) (Selection Criteria)	L1	No
		L2	No
		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?		No
	The possibility of a new or different kind of accident being created compared to those previously evaluated in the FSAR?		No
	A Significant reduction in the margin of safety for ISFSI or cask operation?		No

Evaluation Summary	**Table 1-1d will be moved from the Technical Specifications to the SAR:** • **GE Designations (e.g., GE1, GE2, GE3)** • **Maximum unirradiated length** • **Nominal width (excluding channels)** • **Fissile material type** • **Number of fuel rods** • **Number of water holes** **If the Licensee has fuel that does not meet the conditions listed above, acceptability will be determined per 10 CFR 72.48.**

CoC Condition/TS Identifier:

(Form #81) Revision 0

- **TS Table 1-1e, PWR Fuel Specifications for Fuel to be Stored in the NUHOMS®-32PT DSC**

*** 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"?**

Requirement			**TS Table 1-1e, PWR Fuel Specifications for Fuel to be Stored in the NUHOMS®-32PT DSC**
CoC Body Certified Design	**Section I. Technology**		**No**
	Section II. Design Features		**No**
Appendix A - Inspections, Tests, and Evaluations			**No**
Appendix B. Technical Specifications	**Section 1 Definitions, Use and Application**		**No**
	Section 2 Approved Contents (Selection Criteria)	**A1**	**The following items in Table 1-1e are required per Criterion A1 and shall be retained:** • **Fuel assembly class (type of spent fuel)** • **Reconstituted fuel assemblies (condition of the spent fuel)** • **Fuel damage (condition of the spent fuel)** • **Failed fuel (condition of spent fuel)** • **Control Components (type of spent fuel)** • **Number of intact assemblies (condition of spent fuel)** • **Number and location of damaged assemblies (condition of spent fuel)** • **Number and location of failed assemblies (condition of spent fuel)** • **Maximum planar average enrichment** • **Allowable heat load zoning configurations (maximum heat designed to be dissipated)**
		A2	**No**
		A3	**No**
	Section 3 Limiting Conditions for Operation (LCOs)* and Surveillance Requirements (SRs) (Selection Criteria)	**L1**	**No**
		L2	**No**
		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 (for A1 items)**
	The possibility of a new or different kind of accident being created compared to those previously evaluated in the FSAR?	**Yes (for A1 items)**
	A Significant reduction in the margin of safety for ISFSI or cask operation?	**Yes (for A1 items)**
Evaluation Summary		**The A1 items to be maintained are summarized above.** **The fuel qualification tables will be deleted from the Technical Specifications, although the minimum fuel assembly cooling time will be retained as a global parameter, which will appear in the respective fuel specification table. The fuel qualification tables will be placed in the UFSAR to maintain the history of the analysis method and indicate the burnup and enrichment combinations considered to determine the bounding source term, but *the cooling times will not be treated as a requirement*. An exhaustive fuel qualification is performed to determine bounding source terms as documented in the UFSAR. Fuel assembly decay heat is determined by the Licensee, and HSM dose rates are verified by a one-time measurement as a part of the TS ITE.** **Details and instructions to Licensees for performing Fuel Qualification for burnup/enrichment combinations not considered in the UFSAR will be included in the BASES. The notes associated with the FQTs will be included in the instructions to Licensees, as needed.** **The following characteristics will be moved from the Technical Specifications to the UFSAR:** • **Maximum assembly plus CC weight** **If the Licensee has fuel that does not meet the maximum assembly weight limits, acceptability will be determined per 10 CFR 72.48.**

CoC Condition/TS Identifier:

(Form #82) Revision 0

- **TS Table 1-1f, PWR Fuel Assembly Design Characteristics for the NUHOMS®-32PT DSC**
- **TS Table 1-1m, PWR Fuel Assembly Design Characteristics for the NUHOMS®-24PTH DSC**
- **TS Table 1-1bb, PWR Fuel Assembly Design Characteristics for the NUHOMS®-32PTH1 DSC**
- **TS Table 1-1nn, PWR Fuel Assembly Design Characteristics for the 37PTH DSC**

*** 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"?**

Requirement			TS Tables for PWR Fuel Assembly Design Characteristics for NUHOMS® DSCs
CoC Body Certified Design	Section I. Technology		No
	Section II. Design Features		No
Appendix A - Inspections, Tests, and Evaluations			No
Appendix B. Technical Specifications	Section 1 Definitions, Use and Application		No
	Section 2 Approved Contents (Selection Criteria)	A1	No
		A2	No
		A3	No
	Section 3 Limiting Conditions for Operation (LCOs)* and Surveillance Requirements (SRs) (Selection Criteria)	L1	No
		L2	No
		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?		No
	The possibility of a new or different kind of accident being created compared to those previously evaluated in the FSAR?		No
	A Significant reduction in the margin of safety for ISFSI or cask operation?		No

Evaluation Summary	**The information in these tables will be moved from the Technical Specifications to the UFSAR:** **32PT, 24PTH, and 32PTH1:** • **Maximum unirradiated assembly + CC length** • **Fissile material type** • **Maximum uranium content (MTU/assembly)** • **Maximum number of fuel rods** **37PTH:** • **Maximum unirradiated length** • **Maximum number of fuel rods** **If the Licensee has fuel that does not meet the conditions in the applicable table, acceptability will be determined per 10 CFR 72.48.**

CoC Condition/TS Identifier:

(Form #83) Revision 0 (no NRC questions – no changes made)

- **TS Table 1-1g, Table 1-1g1, Table 1-1g2 and Table 1-1g3, Maximum Planar Average Enrichment, Number of PRAs and Minimum Soluble Boron Loading for the NUHOMS®-32PT DSC**
- **TS Table 1-1p, Table 1-1q and Table 1-1q1, Maximum Planar Average Initial Enrichment v/s Neutron Poison Requirements for the NUHOMS®-24PTH DSC**
- **TS Table 1-1v through 1-1x, Maximum Fuel Assembly Lattice Average Enrichment v/s Minimum B-10 Requirements for the 61BTH DSC**
- **TS Table 1-1cc, Table 1-1dd, and Table 1-1dd1, Maximum Planar Average Initial Enrichment v/s Neutron Poison Requirements for 32PTH1 DSC**
- **TS Table 1-1jj and 1-1kk, BWR Fuel Assembly Lattice Average Initial Enrichment vs Minimum B-10 Requirements for the NUHOMS -69BTH DSC Poison Plates (Intact and Damaged Fuel)**
- **TS Table 1-1oo and Table 1-1pp, Maximum Planar Average Enrichment for the 37PTH DSC**

*** 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"?**

Requirement			TS Tables for • Maximum Planar Average Enrichment, Number of PRAs and Minimum Soluble Boron Loading, or • Maximum Planar Average Initial Enrichment v/s Neutron Poison Requirements, or • Maximum Fuel Assembly Lattice Average Enrichment v/s Minimum B-10 Requirements, or • Lattice Average Initial Enrichment vs Minimum B-10 Requirements, or • Maximum Planar Average Enrichment for NUHOMS® DSCs
CoC Body Certified Design	Section I. Technology		No
	Section II. Design Features		No
Appendix A - Inspections, Tests, and Evaluations			No
Appendix B. Technical Specifications	Section 1 Definitions, Use and Application		No
	Section 2 Approved Contents (Selection Criteria)	A1	Yes
		A2	No
		A3	No
	Section 3 Limiting Conditions for Operation (LCOs)* and Surveillance Requirements (SRs) (Selection Criteria)	L1	No
		L2	No
		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 possibility of a new or different kind of accident being created compared to those previously evaluated in the FSAR?	**Yes**
	A Significant reduction in the margin of safety for ISFSI or cask operation?	**Yes**
Evaluation Summary		**All of these fuel assembly parameters are required per Criterion A1 and shall be retained.**

CoC Condition/TS Identifier:

(Form #84) Revision 0 (no NRC questions – no changes made)

- **TS Table 1-1h, Specification for the NUHOMS®-32PT Poison Plates and PRAs**
- **TS Table 1-1k, B10 Specification for the NUHOMS®-61BT Poison Plates**
- **TS Table 1-1r, B10 Specification for the NUHOMS®-24PTH Poison Plates**
- **TS Table 1-1ff, B10 Specification for the NUHOMS®-32PTH1 Poison Plates**
- **TS Table 1-1rr, B10 Specification for the NUHOMS®-37PTH Poison Plates**
- **TS Table 1-1ss, B-10 Specification for the NUHOMS®-37PTH PRAs**

*** 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"?**

Requirement			TS Tables for Specification for the NUHOMS® DSC Poison Plates and/or PRAs
CoC Body Certified Design	Section I. Technology		No
	Section II. Design Features		No
Appendix A - Inspections, Tests, and Evaluations			No
Appendix B. Technical Specifications	Section 1 Definitions, Use and Application		No
	Section 2 Approved Contents (Selection Criteria)	A1	No
		A2	Yes The B-10 areal density and/or the number of PRAs in each DSC are key parameters required to provide reasonable assurance that the cask safety function of sub-criticality will be maintained.
		A3	No
	Section 3 Limiting Conditions for Operation (LCOs)* and Surveillance Requirements (SRs) (Selection Criteria)	L1	No
		L2	No
		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?		No

	The possibility of a new or different kind of accident being created compared to those previously evaluated in the FSAR?	**No**
	A Significant reduction in the margin of safety for ISFSI or cask operation?	**Yes** **The margin of safety would be reduced or eliminated if the B-10 areal density were reduced lower than the minimum requirements used in the criticality analyses.**
Evaluation Summary		**The B-10 areal density and the number of PRAs in each DSC are required per Criterion A2 and shall be retained.**

CoC Condition/TS Identifier:

(Form #85) Revision 0

- **TS Table 1-1i, PWR Fuel Specifications for Fuel to be Stored in the Standardized NUHOMS®-24PHB DSC**

*** 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"?**

Requirement			**TS Table 1-1i, PWR Fuel Specifications for Fuel to be Stored in the Standardized NUHOMS®-24PHB DSC**
CoC Body Certified Design	**Section I. Technology**		**No**
	Section II. Design Features		**No**
Appendix A - Inspections, Tests, and Evaluations			**No**
Appendix B. Technical Specifications	**Section 1 Definitions, Use and Application**		**No**
	Section 2 Approved Contents (Selection Criteria)	**A1**	**The following items in Table 1-1i are required per Criterion A1 and shall be retained:** • **Fuel class (type of spent fuel)** • **Maximum Number of Irradiated Stainless Steel Rods in Reconstituted Assemblies per DSC (type and condition of the spent fuel)** • **Maximum Number of Irradiated Stainless Steel Rods per Reconstituted Assembly (type and condition of the spent fuel)** • **Maximum Number of Reconstituted Assemblies per DSC with Low Enriched Uranium Oxide Rods (type and condition of the spent fuel)** • **Fuel damage (condition of the spent fuel)** • **Control Components (type of spent fuel)** • **Number of intact assemblies (condition of spent fuel)** • **Number and location of damaged assemblies (condition of spent fuel)** • **Maximum planar average enrichment** • **Allowable heat load zoning configurations (maximum heat designed to be dissipated)** • **Total Decay heat per DSC (maximum heat designed to be dissipated)** • **Decay heat Limits by zone (maximum heat designed to be dissipated)**
		A2	**The following items in Table 1-1i are required per Criterion A2 and shall be retained:** • **Minimum boron loading (criticality function)** • **Minimum Cooling Time for CCs (shielding function)**
		A3	**No**

	Section 3 Limiting Conditions for Operation (LCOs)* and Surveillance Requirements (SRs) (Selection Criteria)	L1	No
		L2	No
		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 (for A1 and A2 items)
	The possibility of a new or different kind of accident being created compared to those previously evaluated in the FSAR?		Yes (for A1 and A2 items)
	A Significant reduction in the margin of safety for ISFSI or cask operation?		Yes (for A1 and A2 items)
Evaluation Summary			The A1and A2 items to be maintained are summarized above. The fuel qualification tables will be deleted from the Technical Specifications, although the minimum fuel assembly cooling time will be retained as a global parameter, which will appear in the respective fuel specification table. The fuel qualification tables will be placed in the UFSAR to maintain the history of the analysis method and indicate the burnup and enrichment combinations considered to determine the bounding source term, but *the cooling times will not be treated as a requirement*. An exhaustive fuel qualification is performed to determine bounding source terms as documented in the UFSAR. Fuel assembly decay heat is determined by the Licensee, and HSM dose rates are verified by a one-time measurement as a part of the TS ITE. Details and instructions to Licensees for performing Fuel Qualification for burnup/enrichment combinations not considered in the UFSAR will be included in the BASES. The notes associated with the FQTs will be included in the instructions to Licensees, as needed. The following characteristics will be moved from the Technical Specifications to the UFSAR: • Maximum Assembly Length (with and without CCs) • Fuel cladding • Nominal Cross-Sectional Envelope • Maximum assembly plus CC weight • Maximum Initial Uranium Loading per assembly If the Licensee has fuel that does not meet the maximum assembly weight limits, acceptability will be determined per 10 CFR 72.48.

CoC Condition/TS Identifier:

(Form #86) Revision 0

- **TS Table 1-1l, PWR Fuel Specifications for the Fuel to be Stored in the NUHOMS®-24PTH DSC**

*** 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"?**

Requirement			**TS Table 1-1l, PWR Fuel Specifications for the Fuel to be Stored in the NUHOMS®-24PTH DSC**
CoC Body Certified Design	**Section I. Technology**		**No**
	Section II. Design Features		**No**
Appendix A - Inspections, Tests, and Evaluations			**No**
Appendix B. Technical Specifications	**Section 1 Definitions, Use and Application**		**No**
	Section 2 Approved Contents (Selection Criteria)	**A1**	**The following items in Table 1-1l are required per Criterion A1 and shall be retained:** • **Fuel class (type of spent fuel)** • **Fuel damage (condition of the spent fuel)** • **Failed fuel (condition of the spent fuel)** • **Partial Length Shield Assembles – maximum burnup and decay heat and minimum cooling time (type of spent fuel)** • **Maximum Number of Irradiated Stainless Steel Rods in Reconstituted Assemblies per DSC (type and condition of the spent fuel)** • **Maximum Number of Irradiated Stainless Steel Rods per Reconstituted Assembly (type and condition of the spent fuel)** • **Maximum Number of Reconstituted Assemblies per DSC with Unlimited Number of Low Enriched UO2 Rods and/or Unirradiated Stainless Steel Rods and/or Zr Rods or Zr Pellets (type and condition of the spent fuel)** • **Control Components (type of spent fuel)** • **Number of intact assemblies (condition of spent fuel)** • **Number and location of damaged assemblies (condition of spent fuel)** • **Number and location of failed assemblies (condition of spent fuel)** • **Allowable heat load zoning configurations (maximum heat designed to be dissipated)** • **Maximum planar average enrichment** • **Decay heat (maximum heat designed to be dissipated)**

		A2	**The following items in Table 1-1l are required per Criterion A2 and shall be retained:** • **Minimum boron loading (criticality function)**
		A3	**No**
	Section 3 Limiting Conditions for Operation (LCOs)* and Surveillance Requirements (SRs) (Selection Criteria)	**L1**	**No**
		L2	**No**
		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 (for A1 and A2 items)**
	The possibility of a new or different kind of accident being created compared to those previously evaluated in the FSAR?		**Yes (for A1 and A2 items)**
	A Significant reduction in the margin of safety for ISFSI or cask operation?		**Yes (for A1 and A2 items)**

Evaluation Summary	**The A1and A2 items to be maintained are summarized above.** **The fuel qualification tables will be deleted from the Technical Specifications, although the minimum fuel assembly cooling time will be retained as a global parameter, which will appear in the respective fuel specification table. The fuel qualification tables will be placed in the UFSAR to maintain the history of the analysis method and indicate the burnup and enrichment combinations considered to determine the bounding source term, but *the cooling times will not be treated as a requirement*. An exhaustive fuel qualification is performed to determine bounding source terms as documented in the UFSAR. Fuel assembly decay heat is determined by the Licensee, and HSM dose rates are verified by a one-time measurement as a part of the TS ITE.** **Details and instructions to Licensees for performing Fuel Qualification for burnup/enrichment combinations not considered in the UFSAR will be included in the BASES. The notes associated with the FQTs will be included in the instructions to Licensees, as needed.** **The following characteristics will be moved from the Technical Specifications to the UFSAR:** • **Nominal Assembly Width for Intact and Damaged Fuel Only** • **Maximum assembly plus CC weight** **If the Licensee has fuel that does not meet the nominal assembly width or maximum assembly +CC weight limits, acceptability will be determined per 10 CFR 72.48.**

CoC Condition/TS Identifier:

(Form #87) Revision 0

- **TS Table 1-1n, Thermal and Radiological Characteristics for Control Components Stored in the NUHOMS®-24PTH DSC and 24PHB DSCs**
- **TS Table 1-1ee, Thermal and Radiological Characteristics for Control Components Stored in the NUHOMS®-32PT and NUHOMS®-32PTH1 DSCs**
- **TS Table 1-1qq, Characteristics of Control Components for the 37PTH DSC**

*** 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"?**

Requirement			**TS Tables for Thermal and Radiological Characteristics for Control Components Stored in the NUHOMS® DSCs**
CoC Body Certified Design	**Section I. Technology**		**No**
	Section II. Design Features		**No**
Appendix A - Inspections, Tests, and Evaluations			**No**
Appendix B. Technical Specifications	**Section 1 Definitions, Use and Application**		**No**
	Section 2 Approved Contents (Selection Criteria)	**A1**	**No**
		A2	**Yes** **The following item is required per Criterion A2 and shall be retained:** **• Maximum gamma source (shielding function)**
		A3	**No**
	Section 3 Limiting Conditions for Operation (LCOs)* and Surveillance Requirements (SRs) (Selection Criteria)	**L1**	**No**
		L2	**No**
		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 (for A2 item)**

	The possibility of a new or different kind of accident being created compared to those previously evaluated in the FSAR?	**Yes (for A2 item)**
	A Significant reduction in the margin of safety for ISFSI or cask operation?	**Yes (for A2 item)**
Evaluation Summary		**The control component maximum gamma source is required per Criterion A2 (shielding function) and shall be retained.** **The control component decay heat is low compared to the fuel and shall be deleted from each table. This approach is also consistent with deleting the fuel qualification tables from the technical specifications.**

CoC Condition/TS Identifier:

(Form #88) Revision 0

- **TS Table 1-1t, BWR Fuel Specification for the 61BTH DSC**

*** 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"?**

Requirement			**TS Table 1-1t, BWR Fuel Specification for the 61BTH DSC**
CoC Body Certified Design	**Section I. Technology**		**No**
	Section II. Design Features		**No**
Appendix A - Inspections, Tests, and Evaluations			**No**
Appendix B. Technical Specifications	**Section 1 Definitions, Use and Application**		**No**
	Section 2 Approved Contents (Selection Criteria)	**A1**	**The following items in Table 1-1t are required per Criterion A1 and shall be retained:** • **Fuel class (type of spent fuel)** • **Fuel damage (condition of the spent fuel)** • **Failed fuel (condition of the spent fuel)** • **Requirements for reconstituted fuel (type of spent fuel)** • **Number of intact assemblies (condition of spent fuel)** • **Number and location of damaged and failed fuel assemblies (condition of spent fuel)** • **Channels (type of spent fuel)** • **Heat load zoning requirements (maximum heat designed to be dissipated)** • **Maximum lattice average initial enrichment** • **Maximum pellet enrichment** • **Decay heat per canister (maximum heat designed to be dissipated)**
		A2	**The following item in Table 1-1t is required per Criterion A2 and shall be retained:** • **Minimum B-10 content in poison plates (criticality function)**
		A3	**No**
	Section 3 Limiting Conditions for Operation (LCOs)* and Surveillance Requirements (SRs) (Selection Criteria)	**L1**	**No**
		L2	**No**
		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 (for A1 and A2 items)**
	The possibility of a new or different kind of accident being created compared to those previously evaluated in the FSAR?	**Yes (for A1 and A2 items)**
	A Significant reduction in the margin of safety for ISFSI or cask operation?	**Yes (for A1 and A2 items)**
Evaluation Summary		**The A1 and A2 items to be maintained are summarized above.** **The fuel qualification tables will be deleted from the Technical Specifications, although the minimum fuel assembly cooling time will be retained as a global parameter, which will appear in the respective fuel specification table. The fuel qualification tables will be placed in the UFSAR to maintain the history of the analysis method and indicate the burnup and enrichment combinations considered to determine the bounding source term, but *the cooling times will not be treated as a requirement*. An exhaustive fuel qualification is performed to determine bounding source terms as documented in the UFSAR. Fuel assembly decay heat is determined by the Licensee, and HSM dose rates are verified by a one-time measurement as a part of the TS ITE.** **Details and instructions to Licensees for performing Fuel Qualification for burnup/enrichment combinations not considered in the UFSAR will be included in the BASES. The notes associated with the FQTs will be included in the instructions to Licensees, as needed.** **The following characteristics will be moved from the Technical Specifications to the UFSAR:** • **Maximum uranium content** • **Maximum assembly weight** **If the Licensee has fuel that does not meet the maximum uranium content or assembly weight limits, acceptability will be determined per 10 CFR 72.48.**

CoC Condition/TS Identifier:

(Form #89) Revision 0

- **TS Table 1-1u, BWR Fuel Assembly Design Characteristics for the 61BTH DSC**

*** 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"?**

Requirement			TS Table 1-1u, BWR Fuel Assembly Design Characteristics for the 61BTH DSC
CoC Body Certified Design	Section I. Technology		No
	Section II. Design Features		No
Appendix A - Inspections, Tests, and Evaluations			No
Appendix B. Technical Specifications	Section 1 Definitions, Use and Application		No
	Section 2 Approved Contents (Selection Criteria)	A1	No
		A2	No
		A3	No
	Section 3 Limiting Conditions for Operation (LCOs)* and Surveillance Requirements (SRs) (Selection Criteria)	L1	No
		L2	No
		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?		No
	The possibility of a new or different kind of accident being created compared to those previously evaluated in the FSAR?		No
	A Significant reduction in the margin of safety for ISFSI or cask operation?		No

Evaluation Summary	**Table 1-1u will be moved from the Technical Specifications to the SAR:** • **Detailed Fuel Design (e.g., GE1, GE2, GE3)** • **Maximum unirradiated length** • **Fissile material type** • **Maximum number of fuel rods** **If the Licensee has fuel that does not meet the conditions listed above, acceptability will be determined per 10 CFR 72.48.**

CoC Condition/TS Identifier:

(Form #90) Revision 0

- **TS Table 1-1aa, PWR Fuel Specification for the Fuel to be Stored in the NUHOMS®-32PTH1 DSC**

*** 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"?**

Requirement			**TS Table 1-1aa, PWR Fuel Specification for the Fuel to be Stored in the NUHOMS®-32PTH1 DSC**
CoC Body Certified Design	**Section I. Technology**		**No**
	Section II. Design Features		**No**
Appendix A - Inspections, Tests, and Evaluations			**No**
Appendix B. Technical Specifications	**Section 1 Definitions, Use and Application**		**No**
	Section 2 Approved Contents (Selection Criteria)	**A1**	**The following items in Table 1-1aa are required per Criterion A1 and shall be retained:** • **Fuel class (type of spent fuel)** • **Reconstituted fuel assemblies (condition of the spent fuel)** • **Fuel damage (condition of the spent fuel)** • **Failed fuel (condition of spent fuel)** • **Control Components (type of spent fuel)** • **Number of intact assemblies (condition of spent fuel)** • **Number and location of damaged assemblies (condition of spent fuel)** • **Number and location of failed assemblies (condition of spent fuel)** • **Maximum planar average enrichment** • **Allowable heat load zoning configurations (maximum heat designed to be dissipated)** • **Decay heat per DSC (maximum heat designed to be dissipated)**
		A2	**The following items in Table 1-1aa are required per Criterion A2 and shall be retained:** • **Minimum boron loading (criticality function)**
		A3	**No**
	Section 3 Limiting Conditions for Operation (LCOs)* and Surveillance Requirements (SRs) (Selection Criteria)	**L1**	**No**
		L2	**No**
		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 (for A1 and A2 items)**
	The possibility of a new or different kind of accident being created compared to those previously evaluated in the FSAR?	**Yes (for A1 and A2 items)**
	A Significant reduction in the margin of safety for ISFSI or cask operation?	**Yes (for A1 and A2 items)**
Evaluation Summary		**The A1and A2 items to be maintained are summarized above.** **The fuel qualification tables will be deleted from the Technical Specifications, although the minimum fuel assembly cooling time will be retained as a global parameter, which will appear in the respective fuel specification table. The fuel qualification tables will be placed in the UFSAR to maintain the history of the analysis method and indicate the burnup and enrichment combinations considered to determine the bounding source term, but *the cooling times will not be treated as a requirement*. An exhaustive fuel qualification is performed to determine bounding source terms as documented in the UFSAR. Fuel assembly decay heat is determined by the Licensee, and HSM dose rates are verified by a one-time measurement as a part of the TS ITE.** **Details and instructions to Licensees for performing Fuel Qualification for burnup/enrichment combinations not considered in the UFSAR will be included in the BASES. The notes associated with the FQTs will be included in the instructions to Licensees, as needed.** **The following characteristics will be moved from the Technical Specifications to the UFSAR:** • **Maximum assembly plus CC weight** **If the Licensee has fuel that does not meet the maximum assembly weight limits, acceptability will be determined per 10 CFR 72.48.**

CoC Condition/TS Identifier:

(Form #91) Revision 0

- **TS Table 1-1gg, BWR Fuel Specification for the Fuel to be Stored in the NUHOMS -69BTH DSC**

*** 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"?**

Requirement			**TS Table 1-1gg, BWR Fuel Specification for the Fuel to be Stored in the NUHOMS -69BTH DSC**
CoC Body Certified Design	**Section I. Technology**		**No**
	Section II. Design Features		**No**
Appendix A - Inspections, Tests, and Evaluations			**No**
Appendix B. Technical Specifications	**Section 1 Definitions, Use and Application**		**No**
	Section 2 Approved Contents (Selection Criteria)	**A1**	**The following items in Table 1-1gg are required per Criterion A1 and shall be retained:** • **Fuel class (type of spent fuel)** • **Fuel damage (condition of the spent fuel)** • **Maximum Number of irradiated stainless steel rods in reconstituted assemblies per DSC (condition of spent fuel)** • **Maximum Number of irradiated stainless steel rods per reconstituted fuel assembly (condition of spent fuel)** • **Maximum Number of reconstituted assemblies per DSC with unlimited number of low enriched UO2 rods or Zr rods or Zr pellets or unirradiated stainless steel rods (condition of spent fuel)** • **Number of intact assemblies (condition of spent fuel)** • **Number and location of damaged assemblies (condition of spent fuel)** • **Channels (type of spent fuel)** • **Allowable heat load zoning configurations /decay heat limits (maximum heat designed to be dissipated)** • **Maximum lattice average initial enrichment** • **Maximum pellet enrichment** • **Decay heat per DSC (maximum heat designed to be dissipated)**
		A2	**The following item in Table 1-1gg is required per Criterion A2 and shall be retained:** • **Minimum B-10 concentration in poison plates (criticality function)**
		A3	**No**
	Section 3 Limiting Conditions for Operation (LCOs)* and Surveillance	**L1**	**No**
		L2	**No**

	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 (for A1 and A2 items)**
	The possibility of a new or different kind of accident being created compared to those previously evaluated in the FSAR?		**Yes (for A1 and A2 items)**
	A Significant reduction in the margin of safety for ISFSI or cask operation?		**Yes (for A1 and A2 items)**
Evaluation Summary			**The A1 and A2 items to be maintained are summarized above.** **The fuel qualification tables will be deleted from the Technical Specifications, although the minimum fuel assembly cooling time will be retained as a global parameter, which will appear in the respective fuel specification table. The fuel qualification tables will be placed in the UFSAR to maintain the history of the analysis method and indicate the burnup and enrichment combinations considered to determine the bounding source term, but *the cooling times will not be treated as a requirement*. An exhaustive fuel qualification is performed to determine bounding source terms as documented in the UFSAR. Fuel assembly decay heat is determined by the Licensee, and HSM dose rates are verified by a one-time measurement as a part of the TS ITE.** **Details and instructions to Licensees for performing Fuel Qualification for burnup/enrichment combinations not considered in the UFSAR will be included in the BASES. The notes associated with the FQTs will be included in the instructions to Licensees, as needed.** **The following characteristics will be moved from the Technical Specifications to the UFSAR:** • **Fissile material type** • **Maximum uranium content** • **Maximum assembly weight (including channels)** **If the Licensee has fuel that does not meet the maximum uranium content or assembly weight limits, acceptability will be determined per 10 CFR 72.48.**

CoC Condition/TS Identifier:

(Form #92) Revision 0

- **TS Table 1-1ii, BWR Fuel Assembly Design Characteristics for the NUHOMS -69BTH DSC**

*** 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"?**

Requirement			**TS Table 1-1ii, BWR Fuel Assembly Design Characteristics for the NUHOMS -69BTH DSC**
CoC Body Certified Design	**Section I. Technology**		**No**
	Section II. Design Features		**No**
Appendix A - Inspections, Tests, and Evaluations			**No**
Appendix B. Technical Specifications	**Section 1 Definitions, Use and Application**		**No**
	Section 2 Approved Contents (Selection Criteria)	**A1**	**No**
		A2	**No**
		A3	**No**
	Section 3 Limiting Conditions for Operation (LCOs)* and Surveillance Requirements (SRs) (Selection Criteria)	**L1**	**No**
		L2	**No**
		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?**		**No**
	The possibility of a new or different kind of accident being created compared to those previously evaluated in the FSAR?		**No**
	A Significant reduction in the margin of safety for ISFSI or cask operation?		**No**

Evaluation Summary	**Table 1-1ii will be moved from the Technical Specifications to the SAR:** • **Initial Design or Reload Fuel Designation (e.g., GE1, GE2, GE3)** • **Maximum unirradiated length** **If the Licensee has fuel that does not meet the conditions listed above, acceptability will be determined per 10 CFR 72.48.**

CoC Condition/TS Identifier:

(Form #93) Revision 0

- **TS Table 1-1ll, PWR Fuel Specification for the 37PTH DSC**

*** 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"?**

Requirement			**TS Table 1-1ll, PWR Fuel Specification for the 37PTH DSC**
CoC Body Certified Design	**Section I. Technology**		**No**
	Section II. Design Features		**No**
Appendix A - Inspections, Tests, and Evaluations			**No**
Appendix B. Technical Specifications	**Section 1 Definitions, Use and Application**		**No**
	Section 2 Approved Contents (Selection Criteria)	**A1**	**The following items in Table 1-1ll are required per Criterion A1 and shall be retained:** • **Fuel class (type of spent fuel)** • **Fuel damage (condition of the spent fuel)** • **Requirements for reconstituted fuel (type of spent fuel)** • **Number of intact assemblies (condition of spent fuel)** • **Number and location of damaged assemblies (condition of spent fuel)** • **Heat load zoning requirements (maximum heat designed to be dissipated)** • **Maximum planar average enrichment** • **Decay heat per canister (maximum heat designed to be dissipated)**
		A2	**The following items in Table 1-1ll are required per Criterion A2 and shall be retained:** • **Control component source (shielding function)** • **Minimum boron loading (criticality function)**
		A3	**No**
	Section 3 Limiting Conditions for Operation (LCOs)* and Surveillance Requirements (SRs) (Selection Criteria)	**L1**	**No**
		L2	**No**
		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 (for A1 and A2 items)**
	The possibility of a new or different kind of accident being created compared to those previously evaluated in the FSAR?	**Yes (for A1 and A2 items)**
	A Significant reduction in the margin of safety for ISFSI or cask operation?	**Yes (for A1 and A2 items)**
Evaluation Summary		**The A1 and A2 items to be maintained are summarized above.** **The fuel qualification tables will be deleted from the Technical Specifications, although the minimum fuel assembly cooling time will be retained as a global parameter, which will appear in the respective fuel specification table. The fuel qualification tables will be placed in the UFSAR to maintain the history of the analysis method and indicate the burnup and enrichment combinations considered to determine the bounding source term, but *the cooling times will not be treated as a requirement*. An exhaustive fuel qualification is performed to determine bounding source terms as documented in the UFSAR. Fuel assembly decay heat is determined by the Licensee, and HSM dose rates are verified by a one-time measurement as a part of the TS ITE.** **Details and instructions to Licensees for performing Fuel Qualification for burnup/enrichment combinations not considered in the UFSAR will be included in the BASES. The notes associated with the FQTs will be included in the instructions to Licensees, as needed.** **The following characteristics will be moved from the Technical Specifications to the UFSAR:** • **Fissile material type** • **Maximum uranium content** • **Maximum assembly weight** **If the Licensee has fuel that does not meet the maximum uranium content or assembly weight limits, acceptability will be determined per 10 CFR 72.48.**

CoC Condition/TS Identifier:

(Form #94) Revision 0

- **TS Table 1-2a and Table 1-2c, PWR Fuel Qualification Tables for the Standardized NUHOMS -24P DSC**
- **TS Table 1-2b, BWR Fuel Qualification Table for the Standardized NUHOMS® -52B DSC**
- **TS Table 1-2n, Table 1-2o and Table 1-2p, PWR Fuel Qualification Tables for the NUHOMS®- 24PHB DSC**
- **TS Table 1-2q, BWR Fuel Qualification Table for NUHOMS® -61BT DSC**
- **TS Table 1-3a through 1-3p, PWR Fuel Qualification Tables**
- **TS Table 1-4a through Table 1-4i, Fuel Qualification Tables for the 61BTH DSC**
- **TS Table 1-6a and Table 1-6b, Fuel Qualification Tables for BWR FAs of a NUHOMS®-61BT DSC Contained in an OS197L TC**
- **TS Table 1-6c and Table 1-6d, Fuel Qualification Tables for FAs of a NUHOMS®-32PT DSC Contained in an OS197L TC**
- **TS Table 1-7a through Table 1-7m, BWR Fuel Qualification Tables for the NUHOMS -69BTH DSC**

*** 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"?**

Requirement			**TS Fuel Qualification Tables for Standardized NUHOMS® DSCs**
CoC Body Certified Design	**Section I. Technology**		**No**
	Section II. Design Features		**No**
Appendix A - Inspections, Tests, and Evaluations			**No**
Appendix B. Technical Specifications	**Section 1 Definitions, Use and Application**		**No**
	Section 2 Approved Contents (Selection Criteria)	**A1**	**No**
		A2	**No**
		A3	**No**
	Section 3 Limiting Conditions for Operation (LCOs)* and Surveillance Requirements (SRs) (Selection Criteria)	**L1**	**No**
		L2	**No**
		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?**		**No**

	The possibility of a new or different kind of accident being created compared to those previously evaluated in the FSAR?	**No**
	A Significant reduction in the margin of safety for ISFSI or cask operation?	**No**
Evaluation Summary		**The fuel qualification tables will be deleted from the Technical Specifications, although the minimum fuel assembly cooling time will be retained as a global parameter, which will appear in the respective fuel specification table. The fuel qualification tables will be placed in the UFSAR to maintain the history of the analysis method and indicate the burnup and enrichment combinations considered to determine the bounding source term, but *the cooling times will not be treated as a requirement*. An exhaustive fuel qualification is performed to determine bounding source terms as documented in the UFSAR. Fuel assembly decay heat is determined by the Licensee, and HSM dose rates are verified by a one-time measurement as a part of the TS ITE.** **Details and instructions to Licensees for performing Fuel Qualification for burnup/enrichment combinations not considered in the UFSAR will be included in the BASES. The notes associated with the FQTs will be included in the instructions to Licensees, as needed.**

CoC Condition/TS Identifier:

(Form #95) Revision 0

- **TS Figure 1-1, PWR Fuel Criticality Acceptance Curve for the 24P DSC**

*** 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"?**

Requirement			**TS Figure 1-1, PWR Fuel Criticality Acceptance Curve for the 24P DSC**
CoC Body Certified Design	**Section I. Technology**		**No**
	Section II. Design Features		**No**
Appendix A - Inspections, Tests, and Evaluations			**No**
Appendix B. Technical Specifications	**Section 1 Definitions, Use and Application**		**No**
	Section 2 Approved Contents (Selection Criteria)	**A1**	**No**
		A2	**Yes** **The PWR Fuel Criticality Acceptance curve for the 24P DSC is an important figure that provides reasonable assurance that the cask safety function of sub-criticality will be maintained if the fuel initial enrichment versus assembly burnup is kept in the acceptable region.**
		A3	**No**
	Section 3 Limiting Conditions for Operation (LCOs)* and Surveillance Requirements (SRs) (Selection Criteria)	**L1**	**No**
		L2	**No**
		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 probability of a criticality event significantly increases if the initial enrichment versus fuel assembly burnup curve falls in the unacceptable region.**
	The possibility of a new or different kind of accident being created compared to those previously evaluated in the FSAR?		**No**
	A Significant reduction in the margin of safety for ISFSI or cask operation?		**Yes** **The margin of safety would be reduced or eliminated if a fuel assembly loaded in the 24P DSC does not fall in the acceptable region of the initial enrichment versus burnup curve.**

Evaluation Summary	**The PWR Fuel Criticality Acceptance curve for the 24P DSC is an important figure that provides reasonable assurance that the cask safety function of sub-criticality will be maintained if the fuel initial enrichment versus assembly burnup is kept in the acceptable region. It is required per Criterion A2 and shall be retained.**

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- **TS Figure 1-2 through Figure 1-4a, Heat Load Zoning Configurations for the NUHOMS®-32PT DSC**
- **TS Figure 1-8 and Figure 1-9, Heat Load Zoning Configuration for Fuel Assemblies Stored in the NUHOMS®-24PHB DSC**
- **TS Figure 1-11 through Figure 1-15a, Heat Load Zoning Configurations for 24PTH DSCs**
- **TS Figure 1-17 through 1-24, Figure 1-25a, Figure 1-25b, Heat Load Zoning Configurations for the 61BTH DSC**
- **TS Figure 1-26 through Figure 1-28c, Heat Load Zoning Configurations for the NUHOMS®-32PTH1-S, 32POTH1-M and 32PTH1-L DSCs**
- **TS Figure 1-29, Heat Load Zone Configuration for the 61BT DSC Contained in an OS197L TC**
- **TS Figure 1-30, Heat Load Zone Configuration for the 32PT DSC Contained in an OS197L TC**
- **TS Figures 1-31 through 1-36, and Figure 1-38, Heat Load Zoning Configurations for the 69BTH DSCs**
- **TS Figure 1-39 and Figure 1-40, Heat Load Zoning Configurations for the 37PTH DSC**

*** 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"?**

Requirement			TS Figures with Heat Load Zoning Configurations for NUHOMS® DSCs
CoC Body Certified Design	Section I. Technology		No
	Section II. Design Features		No
Appendix A - Inspections, Tests, and Evaluations			No
Appendix B. Technical Specifications	Section 1 Definitions, Use and Application		No
	Section 2 Approved Contents (Selection Criteria)	A1	Yes
		A2	No
		A3	No
	Section 3 Limiting Conditions for Operation (LCOs)* and Surveillance Requirements (SRs) (Selection Criteria)	L1	No
		L2	No
		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 possibility of a new or different kind of accident being created compared to those previously evaluated in the FSAR?	**Yes**
	A Significant reduction in the margin of safety for ISFSI or cask operation?	**Yes**
Evaluation Summary		**The Heat Load Zone Configurations are required per Criterion A1 (maximum heat designed to be dissipated) and shall be retained.**

CoC Condition/TS Identifier:

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- **TS Figure 1-4b, Location of Damaged and Failed Fuel Assemblies Inside the NUHOMS®-32PT DSC**
- **TS Figure 1-16, Location of Failed or Damaged Fuel Inside 24PTH DSC**
- **TS Figure 1-25, Location of Damaged and Failed Fuel Assemblies for the 61BTH DSC**
- **TS Figure 1-37, Location of Damaged Fuel Assemblies Inside the 69BTH DSC**

*** 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"?**

Requirement			TS Figures for Location of Damaged and/or Failed Fuel Assemblies Inside NUHOMS® DSCs
CoC Body Certified Design	Section I. Technology		No
	Section II. Design Features		No
Appendix A - Inspections, Tests, and Evaluations			No
Appendix B. Technical Specifications	Section 1 Definitions, Use and Application		No
	Section 2 Approved Contents (Selection Criteria)	A1	No
		A2	Yes The permitted locations of damaged and failed fuel assemblies inside DSCs is a key feature required to provide reasonable assurance that the cask safety functions of decay heat removal and shielding will be maintained.
		A3	No
	Section 3 Limiting Conditions for Operation (LCOs)* and Surveillance Requirements (SRs) (Selection Criteria)	L1	No
		L2	No
		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 possibility of a new or different kind of accident being created compared to those previously evaluated in the FSAR?	**Yes**
	A Significant reduction in the margin of safety for ISFSI or cask operation?	**Yes**
Evaluation Summary		**The permitted locations of damaged and failed fuel assemblies inside DSCs are required per Criterion A2 and shall be retained.**

CoC Condition/TS Identifier:

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- **TS Figures 1-5, 1-6 and 1-7, Required PRA Locations for the NUHOMS®-32PT DSC Configurations**
- **TS Figure 1-41 and Figure 1-42, PRA Locations for the 37PTH DSC**

*** 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"?**

Requirement			TS Figures for Required PRA Locations for certain NUHOMS® DSCs
CoC Body Certified Design	Section I. Technology		No
	Section II. Design Features		No
Appendix A - Inspections, Tests, and Evaluations			No
Appendix B. Technical Specifications	Section 1 Definitions, Use and Application		No
	Section 2 Approved Contents (Selection Criteria)	A1	No
		A2	Yes The required PRA locations in DSCs is a key feature required to provide reasonable assurance that the cask safety function of sub-criticality will be maintained.
		A3	No
	Section 3 Limiting Conditions for Operation (LCOs)* and Surveillance Requirements (SRs) (Selection Criteria)	L1	No
		L2	No
		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 possibility of a new or different kind of accident being created compared to those previously evaluated in the FSAR?		Yes

	A Significant reduction in the margin of safety for ISFSI or cask operation?	**Yes**
Evaluation Summary		**The PRA locations are required per Criterion A2 (criticality function) and shall be retained.**

CoC Condition/TS Identifier:

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- **TS Figure 1-10, Soluble Boron Concentration vs. Fuel Initial U-235 Enrichment (Intact Fuel) for the NUHOMS® 24PHB System**
- **TS Figure 1-10a, Soluble Boron Concentration vs. Fuel Initial U-235 Enrichment (Damaged Fuel) for the NUHOMS® 24PHB System**

*** 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"?**

Requirement			TS Figure 1-10 and Figure 1-10a, Soluble Boron Concentration vs. Fuel Initial U-235 Enrichment for the NUHOMS® 24PHB System
CoC Body Certified Design	Section I. Technology		No
	Section II. Design Features		No
Appendix A - Inspections, Tests, and Evaluations			No
Appendix B. Technical Specifications	Section 1 Definitions, Use and Application		No
	Section 2 Approved Contents (Selection Criteria)	A1	Yes Maximum Planar Average Initial Enrichment as defined in the embedded graph and table is one of the parameters defined in 10 CFR 72.236(a)
		A2	No
		A3	No
	Section 3 Limiting Conditions for Operation (LCOs)* and Surveillance Requirements (SRs) (Selection Criteria)	L1	No
		L2	No
		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 possibility of a new or different kind of accident being created compared to those previously evaluated in the FSAR?		Yes

	A Significant reduction in the margin of safety for ISFSI or cask operation?	**Yes**
Evaluation Summary		**The maximum planar average enrichment is required per Criterion A1 and shall be retained.**