



Improving the Efficiency and Openness of Storage and Transportation Licensing and Certification Activities

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Agenda

- NRC's Efficiency and Openness Goals
- DSFM Activities to Support Efficiency and Openness:
 - RIS 17-05, “Administration of 10 CFR Part 72 CoC Corrections and Revisions”
 - NRC's OIG Audit of NRC's Storage and Transportation Certification Activities
 - Additional efficiency efforts
 - Enhancing openness and participation: upcoming activities
- Conclusions

NRC's Vision for Safety and Security



- NRC's Strategic Plan identifies Efficiency and Openness as guiding principles for executing its safety and security mission
 - “Nuclear regulation is the public’s business, and it must be transacted publicly and candidly.”
 - “The American taxpayer, the rate-paying consumer, and licensees are all entitled to the best possible management and administration of regulatory activities.”

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Efficiency Initiatives: Regulatory Issue Summary (RIS) 2017-05

- RIS 2017-05, “Administration of 10 CFR Part 72 Certificate of Compliance Corrections and Revisions”
 - Issued September 13, 2017, informs licensees and certificate holders of the process for issuing corrections and revisions to Part 72 CoC for Dry Cask Storage Systems
 - Provides predictable and efficient alternatives to the certificate amendment process for administrative corrections or technical changes not affecting cask design features

Efficiency Initiatives: Regulatory Issue Summary (RIS) 2017-05

- Corrections to Part 72 CoCs:
 - Intended for minor typographical, formatting, or numbering errors in CoCs
 - No backfit or issue finality considerations
 - Issued by rule without notice or comment
- Revisions to Part 72 CoCs:
 - Intended for technical changes to approved CoCs/amendments, not affecting design bases or cask structures, systems, or components
 - Revision to CoC supersedes previous certificate or amendment, backfit/issue finality analysis may be necessary
 - Issued by direct final rule with notice and comment period

OIG Audit of NRC's Oversight of Storage and Transportation CoCs

- OIG-17-A-21, “Audit of NRC’s Oversight for Issuing Certificates of Compliance for Radioactive Material Packages,” issued on August 16, 2017 (available on <http://www.nrc.gov/reading-rm/doc-collections/insp-gen>)
- Two main recommendations for NRC staff:
 - Determine and provide the basis for an appropriate term for Part 71 certificates of compliance; and
 - Establish sufficient controls for Part 72.48 reviews
- NRC staff has reviewed and agrees with the recommendations, will develop action plan to address OIG’s recommendations, more details upcoming

Additional Efficiency Efforts for Storage and Transportation

- Reducing the time required for release of publicly available licensing and certification application documents:
 - Driven by the increased visibility and public interest in consolidated interim storage applications
 - Evaluating improvements to SUNSI review process, redactions, possible RIS on SUNSI review criteria
 - Focus on NRC acceptance criteria for electronic submissions, possible adoption and use of electronic submission tools used in New Reactor licensing (EIE, Application Intake Tool with Packing List)

Enhancing openness: upcoming activities

- NRC staff remains committed to providing opportunities for public involvement and participation
 - Participation in NRC-sponsored public meetings and conferences (via attendance, moderated teleconferences, webinars, etc.)
 - Public availability of storage and transportation application and review documents (from NRC and applicants) via ADAMS and PDR
 - Opportunities to comment during NRC rulemaking process for dry cask storage certificates
- Consolidated interim storage licensing to provide expanded opportunities for public participation
 - Opportunity to request hearing and submit contentions before Atomic Safety Licensing Board Panel (ASLBP)
 - Opportunity to attend, participate, and submit comments during scoping, draft EIS, and final EIS stages of the environmental review process

Conclusions

- NRC continues to focus on its transportation and storage safety and security mission; continue efforts to improve efficiency and enhance openness
- Ongoing NRC efforts to examine and revise our internal licensing and administrative processes will help us achieve additional improvements
- Continued engagement and discussion between NRC and industry on future licensing and certification activities is essential for continued success