

E-49944 Enclosure 4
Evaluation Forms for CoC 1004 TS Section 3 Items

CoC Condition/TS Identifier: **TS-3.0 (Form #21) Revision 0 (no NRC questions – no changes made)**

* 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 3.0 LCO and SR applicability (as currently listed in Proposed Amendment 15 TS)	
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	Yes
		L2	Yes
		L3	Yes
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	These LCO and SR applicability requirements are necessary to ensure that safety functions are maintained as described in the individual LCOs and SRs.
	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	These LCO and SR applicability requirements are necessary to ensure that safety functions are maintained as described in the individual LCOs and SRs.

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Requirement	TS 3.0 LCO and SR applicability (as currently listed in Proposed Amendment 15 TS)
Evaluation Summary	These applicability items are standard information in TS LCO and SR sections. They therefore should remain. All three criteria (L1, L2, L3) are given a Yes response since this TS applies generically to all LCOs/SRs.

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CoC Condition/TS Identifier: TS-3.1.1 (Form #22) Revision 0 (no NRC questions – no changes made)

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** 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 3.1.1: DSC Bulkwater Removal Medium and Vacuum Drying Pressure (as currently listed in Proposed Amendment 15 TS)	
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	Yes
		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	This LCO ensures the integrity of the fission product barrier. Its removal would reduce the margin of safety for confinement.

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Requirement	TS 3.1.1: DSC Bulkwater Removal Medium and Vacuum Drying Pressure (as currently listed in Proposed Amendment 15 TS)
Evaluation Summary	This LCO ensures that oxidation of the fuel cladding does not occur, preserving the fuel cladding fission product barrier. Therefore this TS meets criterion L2 and should remain.

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CoC Condition/TS Identifier: **TS-3.1.2 (Form #23) Revision 0 (no NRC questions – no changes made)**

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** 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 3.1.2: DSC Helium Backfill Pressure (as currently listed in Proposed Amendment 15 TS)	
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	Yes
		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 This LCO ensures the integrity of the cladding fission product barrier. Its removal would reduce the margin of safety for confinement.	

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Requirement	TS 3.1.2: DSC Helium Backfill Pressure (as currently listed in Proposed Amendment 15 TS)
Evaluation Summary	This LCO ensures an inert atmosphere around the fuel cladding, preserving the integrity of the fuel cladding fission product barrier. Therefore this TS meets criterion L2 and should remain.

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CoC Condition/TS Identifier: TS-3.1.3 (Form #24) Revision 0 (no NRC questions – no changes made)

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** 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 3.1.3: Time Limit for Completion of DSC Transfer (24PTH, 61BTH Type 2, 32PTH1, 69BTH, or 37PTH DSC only). (as currently listed in Proposed Amendment 15 TS)	
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	Yes
		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	This LCO ensures the integrity of the cladding fission product barrier. Its removal would reduce the margin of safety for confinement.

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Requirement	TS 3.1.3: Time Limit for Completion of DSC Transfer (24PTH, 61BTH Type 2, 32PTH1, 69BTH, or 37PTH DSC only). (as currently listed in Proposed Amendment 15 TS)
Evaluation Summary	This LCO ensures fuel cladding temperatures remain below the 752°F limit for normal storage operations provided in NUREG-1536, Rev. 1, preserving the integrity of the fuel cladding fission product barrier. Therefore this TS meets criterion L2 and should remain.

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CoC Condition/TS Identifier: TS-3.1.4 (Form #25) Revision 0 (no NRC questions – no changes made)

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** 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 3.1.4: HSM Maximum Air Exit Temperature with a Loaded DSC	
		(as currently listed in Proposed Amendment 15 TS)	
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	Yes
		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	This LCO ensures the integrity of the cladding fission product barrier. Its removal would reduce the margin of safety for confinement.

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Requirement	TS 3.1.4: HSM Maximum Air Exit Temperature with a Loaded DSC (as currently listed in Proposed Amendment 15 TS)
Evaluation Summary	This LCO ensures that fuel cladding temperatures remain below the 752°F limit, preserving the integrity of the fuel cladding fission product barrier. This LCO also ensures that HSM concrete temperatures do not exceed limits, preserving the shielding, thermal, and structural functions. Therefore this TS meets criterion L2 and should remain.

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CoC Condition/TS Identifier: TS-3.2.1 (Form #26) Revision 0 (no NRC questions – no changes made)

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** 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 3.2/3.2.1: Cask Criticality Control (as currently listed in Proposed Amendment 15 TS)	
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	Yes
		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 accident is significantly increased.
	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	Loss of criticality control would cause a significant reduction in the margin of safety.

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Requirement	TS 3.2/3.2.1: Cask Criticality Control (as currently listed in Proposed Amendment 15 TS)
Evaluation Summary	This LCO ensures that a subcritical configuration is maintained. Therefore this TS meets criterion L2 and should remain.