



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

March 28, 2018

MEMORANDUM TO: Kimyata Morgan-Butler, Chief  
Materials Rulemaking and Project Management Branch  
Division of Rulemaking

FROM: John McKirgan, Chief **/RA/**  
Spent Fuel Licensing Branch  
Division of Spent Fuel Management

SUBJECT: USER NEED FOR RULEMAKING FOR AMENDMENT NO. 6 TO THE  
NAC INTERNATIONAL NAC-UMS STORAGE SYSTEM

The following information is being provided to request rulemaking support for the following Division of Spent Fuel Management certification activity to amend Title 10, *Code of Federal Regulations* (10 CFR) Part 72:

1. Changes to 10 CFR 72.214 rule text (changes appear in bold):

Certificate Number: 1015.

Initial Certificate Effective Date: November 20, 2000.

Amendment Number 1 Effective Date: February 20, 2001.

Amendment Number 2 Effective Date: December 31, 2001.

Amendment Number 3 Effective Date: March 31, 2004.

Amendment Number 4 Effective Date: October 11, 2005.

Amendment Number 5 Effective Date: January 12, 2009.

**Amendment Number 6 Effective Date: TBD**

SAR Submitted by: NAC International, Inc.

SAR Title: Final Safety Analysis Report for the NAC-UMS Universal Storage System.

Docket Number: 72-1015.

Certificate Expiration Date: November 20, 2020. Model Number: NAC-UMS.

CONTACT: Bernard White, NMSS/DSFM  
(301) 415-6577

2. Use the following text for the purpose and scope of the amendment:

On May 23, 2017 (see Agencywide Documents Access and Management System (ADAMS) Accession No. ML17145A380), as supplemented on January 16, 2018 (see ADAMS Accession No. ML18018A893), NAC International (NAC) submitted an application to amend the NAC-UMS Storage System. NAC requested the following changes:

- Revise Technical Specification No. A.3.1.6 to revise Condition A from “LCO not met” to read : CONCRETE CASK heat removal system inoperable ,“ and remove required action A.2;
- Clarify that the applicability of Technical Specification No. A.3.3.2, “Concrete Cask Average Surface Dose Rates” is prior to placement into storage; and
- Delete Technical Specification No. 5.4.

Specific changes to the TS are listed below:

- Condition A was changed from “LCO not met” to read : CONCRETE CASK heat removal system inoperable ,“ and Action A.2 in Technical Specification No. A 3.1.6, Limiting Condition for Operation (LCO) 3.1.6 was deleted and Action A.3 was renumbered as A.2;
- Condition B in Technical Specification No. A 3.1.6, Limiting Condition for Operation LCO 3.1.6 was revised to delete Action A.3;
- The applicability for LCO 3.2.2 was clarified to state that the measurements should be taken prior to storage conditions; and
- Item A 5.4 was deleted.

3. The proposed CoC and TS, and preliminary safety evaluation report (SER) have been placed in ADAMS (see references below) and are available for your use in the rulemaking package. DSFM will designate these documents as Official Agency Records after the Executive Director for Operations has approved the rulemaking package (ADAMS Package No. ML18088A169).

The Office of the General Counsel has reviewed this memorandum with its referenced documents and has no legal objection to its contents.

Docket No. 72-1015

Enclosures:

1. Proposed CoC No. 1015, Amendment No. 6 (ML18088A174)
2. Proposed TS Appendix A (ML18088A176)
3. Proposed TS Appendix B (ML18088A178)
4. Preliminary SER (ML18088A181)

USER NEED FOR RULEMAKING FOR AMENDMENT NO. 6 TO THE NAC INTERNATIONAL  
 NAC-UMS STORAGE SYSTEM, DOCUMENT DATE: MARCH 28, 2018

Distribution:

DSFM r/f                      DMarcano      CKenney  
 Memo ADAMS Accession No. ML18088A171                      Package Accession No. ML18088A169  
 CoC ADAMS Accession No. ML18088A174      TS Appendix A Accession No. ML18088A176  
 TS Appendix B ADAMS Accession No. ML18088A178      SER Accession No. ML18088A181

<b>OFC</b>	DSFM	DSFM	DSFM	DSFM	DSFM
<b>NAME</b>	BWhite	WWheatley via email	ASotomayor-Rivera via email	Arigato via email	JPiotter via email
<b>DATE</b>	1/24/18	1/31/18	1/29/18	1/24/18	1/29/18
<b>OFC</b>	DSFM	DSFM	OGC	DSFM	
<b>NAME</b>	ABarto for TTate via email	YDiaz-Sanabria via email	GHendersen Via email	JMcKirgan	
<b>DATE</b>	2/2/18	2/13/18	3/9/18	3/28/18	

**OFFICIAL RECORD COPY**