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Ms. May Ma
Office of Administration
Mail Stop: TWFN-7-A60M
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Subject: Comments on Draft NUREG-2224, "Dry Storage and Transportation of High Burnup Spent Nuclear Fuel" (NRC Docket ID NRC-2018-0066)

Project Number: 689

Dear Ms. Ma:

On behalf of its members, the Nuclear Energy Institute (NEI)¹ appreciates the opportunity to provide comments on Draft NUREG-2224, "Dry Storage and Transportation of High Burnup Spent Nuclear Fuel" (HBU SNF). The purpose of this NUREG is to "expand the technical basis" in support of the U.S. Nuclear Regulatory Commission's (NRC) guidance on adequate fuel conditions "as it pertains to hydride reorientation in HBU SNF Fuel Cladding."² This is a goal that the industry heartily endorses. Through the scientific and technical efforts of the NRC, the U.S. Department of Energy (DOE), and the Electric Power Research Institute (EPRI), much has been learned about HBU SNF over the past 10 years. As a result, the technical basis for safe extended storage and transportation of HBU SNF has been greatly strengthened.

Draft NUREG-2224 successfully captures much of the scientific and technical information that has been acquired through the collective efforts of the NRC, DOE, National Laboratories and EPRI. The NRC is to be commended for this effort to improve its regulatory guidance based on the most current available science. It is particularly important that the extensive technical basis that now exists on HBU SNF – which demonstrates that safety margins for the storage and transportation of HBU SNF are significantly greater than previously understood – be deployed in a timely manner to support more efficient and better risk-informed management of used fuel. This information is especially valuable towards expediting the safe

¹ The Nuclear Energy Institute (NEI) is responsible for establishing unified policy on behalf of its members relating to matters affecting the nuclear energy industry, including the regulatory aspects of generic operational and technical issues. NEI's members include entities licensed to operate commercial nuclear power plants in the United States, nuclear plant designers, major architect and engineering firms, fuel cycle facilities, nuclear materials licensees, and other organizations involved in the nuclear energy industry.

² As stated in the abstract of Draft NUREG-2224

decommissioning of the increasing number of shutdown nuclear plants, by more expeditiously transferring all fuel to dry storage, and facilitating the near-term transportation of used fuel to the two interim storage sites now actively seeking NRC licenses.

Towards these goals, the NRC's draft NUREG-2224 represents a significant step forward. The industry is interested in engaging the commission in a follow-on dialogue on how we can best build upon the information contained in draft NUREG-2224 to define near-term actions that could significantly improve the NRC's dry storage and transportation regulatory framework. This represents a valuable opportunity that is very much consistent with the second recommendation of the May 23, 2018, staff paper *Achieving Modern Risk-Informed Regulation*, SECY-18-0060, to "expand the systematic use of qualitative and quantitative risk insights; thereby enabling staff to scale the scope of review and the level of detail needed in licensing."

The NRC specifically sought public comment in the Federal Register Notice accompanying draft NUREG-2224 (83 Fed. Reg. 39,476) with particular emphasis on six questions. The industry position is that, to a large extent, the answers will depend on how the information contained in the draft NUREG is applied to risk inform the dry storage and transportation regulatory framework. For that reason, further exploration of each of these questions would, in part, make for a good set of discussion topics in the dialogue we are seeking.

And while NEI's primary focus is on working with the NRC going forward to optimize the regulatory utility of NUREG-2224, we note that EPRI has provided detailed technical comments on the document. We agree with these comments and believe they provide valuable insights that should also be applied in the upcoming dialogue.

We would like to begin the dialogue on this important opportunity as soon as possible and, therefore, request a public meeting be scheduled between the industry and NRC at your earliest convenience. If you have any questions, please do not hesitate to contact me.

Sincerely,



Rodney McCullum

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