



UNITED STATES
NUCLEAR REGULATORY COMMISSION
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April 12, 2019

MEMORANDUM TO: Christopher M. Regan, Deputy Director
Division of Spent Fuel Management
Office of Nuclear Material Safety
and Safeguards

FROM: Christopher Markley, Systems Performance Analyst */RA/*
Renewals and Materials Branch
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SUBJECT: SUMMARY OF MARCH 26, 2019, MEETING WITH NAC
INTERNATIONAL INC TO DISCUSS THE UPCOMING SUBMITTAL OF
THE RENEWAL APPLICATIONS FOR CERTIFICATE OF COMPLIANCE
NO. 1015: NAC- UNIVERSAL STORAGE SYSTEM (UMS) AND NO.
1025: NAC MULTI-PURPOSE CANISTER (MPC) (CAC NO. 001028)

Background

On March 26, 2019, a meeting was held in Rockville, MD, between representatives of NAC International Inc. (NAC), and the U.S. Nuclear Regulatory Commission (NRC) to discuss the upcoming submittal of the applications for Certificate of Compliance (CoC) No. 1015: NAC-Universal Storage System (UMS) (Docket No. 72-1015) and No. 1025: NAC Multi-Purpose Canister (MPC) (Docket No. 72-1025). This was the second pre-submittal meeting between NRC and NAC. A summary of the first pre-submittal meeting is available at Agencywide Documents Access and Management System (ADAMS) Accession No. ML17275A064.

The meeting was noticed on February 25, 2019 (ADAMS Accession No. ML19056A589). A list of meeting attendees is provided in Enclosure 1.

Discussion

The meeting discussion followed the meeting agenda, which is provided in Enclosure 2. NAC gave a presentation, which is included in the Enclosure 3. The presentation provided an overview of work completed since the previous pre-submittal meeting, including some follow-up activities. NAC also discussed pre-application inspections conducted at Maine Yankee. NAC plans to submit the CoC renewal application for the NAC-MPC by December 2019 and for the NAC-UMS by September 2020. These submittal dates would meet requirements for timely renewal. The following are some items of interest:

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- NRC staff indicated NUREG 2214, Managing Aging Processes in Storage (MAPS) Report is in publication and would hopefully be available, at least in final draft form, before summer. Staff noted that if the license renewal application deviates from the guidance provided in the MAPS report, there should be a clear technical basis.
- NAC developed the license renewal applications based on NRC regulations, NRC guidance, industry guidance, and previous CoC renewal applications.
- NAC developed five aging management programs (AMPs) for the NAC-MPC based on the 2016 draft MAPS report and modified based on industry inputs and conditions of the general license. The NAC-UMS license renewal application will have those five plus an additional AMP focused on its content that includes high burnup fuel.
- NAC conducted a pre-application inspection of the NAC UMS and MPC systems at Maine Yankee in 2018. The performed visual inspections of a canister and measured temperature, dose rates and chemistry. This was the second pre-application inspection at Maine Yankee – the first looked at a greater than class C canister in 2016
- NRC staff noted that including operating experience would be useful, given there is data available.
- NRC staff indicated that receiving the aging management review tables in an Excel Spreadsheet format would help with the efficiency of NRC staff's review of the license renewal application.

After the NAC representatives and NRC staff completed the discussion in the first portion of the meeting, the meeting was opened to public comments or questions for the NRC. Public comments and questions were received and generally questioned whether canister inspections methods were adequate. The NRC staff noted there are requirements for examinations in approved aging management programs. If the licensee or CoC holder determines that the proposed examinations identified in the NRC approved aging management programs cannot be performed in accordance with conditions of the license or CoC renewal, then the licensee or CoC holder is out of compliance with the renewed license. In such cases, the licensee or CoC holder would be required to propose alternatives that demonstrate the safety functions of the

structure system or component that is potentially subject to aging will be maintained for period of extended operation.

Action Items/Next Steps

NAC plans to submit the CoC renewal application for the NAC-MPC (CoC No. 1025) by December 2019 and for the NAC-UMS (CoC No. 1015) by September 2020.

Docket No. 72-1015, 72-1025

CAC No. 001028

EPID: L-2019-LRM-0012

Enclosures:

1. Meeting Attendees
2. Agenda
3. Handout – NAC Presentation on
CoC Renewal Applications

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DISTRIBUTION:

NRC Attendees

Closes CAC 001028/07201025/L-2019-LRM-0012

ADAMS Package No.: ML19106A031

Enclosure 1: ML19106A032 Enclosure 2: ML19106A033 Enclosure 3: ML19106A035

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