

Regulatory Guide Periodic Review

Regulatory Guide Number: 3.61

Title: Standard Format and Content for a Topical Safety Analysis Report for a Spent Fuel Dry Storage Cask

Office/division/branch: NMSS/DSFM

Technical Lead: Bernie White

Recommended Action: Revise and combine with Regulatory Guide Nos. 3.48 and 3.62

1. What are the known technical or regulatory issues with the current version of the Regulatory Guide (RG)?

Significant changes to staff guidance have been made since the publication of the current RG revision, including combining NUREG-1536, "Standard Review Plan for Spent Fuel Dry Storage Systems at a General License Facility — Final Report," and NUREG-1567, "Standard Review Plan for Spent Fuel Dry Storage Facilities" into a single standard review plan, NUREG-2215, "Standard Review Plan for Spent Fuel Dry Storage Systems and Facilities". Thus, the RG information is inconsistent with current staff expectations for applications for cask certificates of compliance (CoCs) and storage facility licenses. Differences include the addition to the staff's review guidance of a materials chapter and information regarding storage of non-fuel hardware, the condition of the spent fuel contents, off-site dose evaluations for the radiation protection chapter, off-normal conditions and accident conditions evaluations in the thermal chapter, and off-normal conditions evaluations for the confinement chapter. This information is not reflected in the current RG revision.

2. What is the impact on internal and external stakeholders of not updating the RG for the known issues, in terms of anticipated numbers of licensing and inspection activities over the next several years?

The staff's review guidance in NUREG-2215, "Standard Review Plan for Spent Fuel Dry Storage Systems and Facilities" will become publicly available in the September 2019 timeframe. This guidance explains how the staff review applications for cask CoCs and storage facility licenses. Applicants can infer from this staff guidance the kinds of information and analyses they need to include in their applications. Holders of, and applicants for storage facility licenses and storage cask CoCs currently refer to the staff's review guidance for this information and will look towards the new NUREG-2215 for the same information. However, a RG (which is supposed to explain the needed information for CoC applications to potential applicants) that is inconsistent with the related staff guidance can be a source of confusion and lead to incomplete or inadequate CoC applications. This in turn can mean lengthier reviews and increased resource expenditures for the staff and the applicant.

3. What is an estimate of the level of effort needed to address identified issues in terms of full-time equivalent (FTE) and contract dollars?

1.0 FTE and no contract dollars.

4. Based on the answers to the questions above, what is the recommended staff action for this RG (Revise, Review, Administrative Change, or Withdraw)?

The staff recommends combining and revising RG 3.48, "Standard Format and Content for the Safety Analysis Report for an Independent Spent Fuel Storage Installation or Monitored Retrievable Storage Installation (Dry Storage)," RG 3.61, "Standard Format and Content for a Topical Safety Analysis Report for a Spent Fuel Dry Storage Cask," and RG 3.62, Standard Format and Content for the Safety Analysis Report for Onsite Storage of Spent Fuel Storage Casks."

5. If a RG should be revised, provide a conceptual plan and timeframe to accomplish this.

After completion of NUREG-2215, DSFM will evaluate the effort, available staff, and develop a plan to complete the new RG.

NOTE: This review was conducted in April 2019 and reflects the NRC staff plans as of that date. These plans are tentative and are subject to change. (ML19141A089)