

**Project Working Guidance
Independent Spent Fuel Storage Installation
Inspection Program Enhancement**

June 4, 2019

Objective

The primary objective of the Independent Spent Fuel Storage Installation (ISFSI) Enhancement team is to evaluate and enhance the Nuclear Regulatory Commission's (NRC) existing ISFSI inspection program by developing a clearer, risk-informed, comprehensive, and consistent approach to ISFSI inspections across the NRC four regions. This project will incorporate best practices learned from implementation of the current program and evaluate stakeholder recommendations to enhance and improve the NRC's oversight of ISFSIs.

The updated ISFSI inspection program will improve the effectiveness, efficiency, and consistency of our ISFSI inspections, as well as the budget and tracking mechanisms used by the agency to track and plan the ISFSI inspections.

Scope

The project will include the following:

1. Performing an evaluation of the ISFSI inspection program to determine the appropriate:
 - a. scope,
 - b. resources,
 - c. inspection frequency,
 - d. initial and refresher inspector training, and
 - e. associated risk with ISFSI and spent fuel activities.
2. Develop a draft Manual Chapter, a Manual Chapter Basis document, and associated Inspection Procedure(s) that implement a robust, risk-informed, efficient ISFSI inspection program that provides adequate security of high level waste and provides reasonable assurance of public health and the environment.
3. Provide insights and path forward for development of enforcement guidance to assist NRC staff when assessing the significance of inspection findings and guidance for event reporting.

Coordination and Communications

The ISFSI Enhancement team will:

- a. Develop and implement a communications plan throughout the project duration, adjusting the messages, means, and messengers to communicate with stakeholders.

- b. Meet weekly with the ISFSI Enhancement project SES Champion, and provide status updates, as needed, to Regional Inspectors and Branch Chiefs, the ROP Enhancement Team in NRR, NEI and the NRC staff.

Expected Product and Schedule

The ISFSI Enhancement team will produce the following:

- a. Memorandum to the Division of Spent Fuel Management (DSFM) Division Director with the results of its assessment and proposal for the new ISFSI inspection program, including any specific findings, recommended actions, and milestones for implementation and designated responsible branch/division(s) for completion of any of the actions.
- b. Draft documents for the proposed new ISFSI inspection manual chapter and procedure revisions.

The schedule for the project team will be:

Milestone	Date
Finalizing the project working guidance memo	June 4, 2019
Complete assessment of the ISFSI inspection program	June 26, 2019
Develop drafts for proposed new ISFSI inspection manual chapter, procedure revisions and memorandum with the results of the team's assessment	August 27, 2019
Review, resolution of comments and concurrence	September 2 -25, 2019
Issue Memo to DSFM Division Management	September 27, 2019

The sequence and schedule for the project will be adjusted as the team formulates a more detailed schedule. The team recognizes that this project will be conducted with other priority NRC work, so it may need to adjust schedules to accommodate these priorities while ensuring that the project is completed in a timely and quality manner to meet agency needs.

Structure

The ISFSI Enhancement team will be led by Troy Pruett, Special Assistant to the Region IV Regional Administrator, and will include the following staff members:

Name	Office
Carla P. Roque Cruz	NMSS
Katherine Warner	Region I
Tom Morrissey and Bob Carrion	Region II

Matt Learn	Region III
Chris Smith	Region IV
Ami Agrawal	NRR/DIRS

Level of Effort and Time and Labor Reporting

Enclosure 1

Project Working Guidance Approval

It is expected that all team members will have an opportunity to review and comment on the working guidance. Approval of the working guidance requires the signature of the SES Sponsor.

Approval

Troy Pruett, Special Assistant to the Region IV Regional Administrator

6/21/2019

X Troy Pruett

Troy Pruett
Special Assistant
Signed by: Troy W. Pruett