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February 1, 2019

Mr. Michael C. Layton, Director
Division of Spent Fuel Management
Office of Nuclear Material Safety and Safeguards
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Subject: Industry Comments Regarding NRC Response to December 21, 2016, Nuclear Energy Institute Submittal: NEI 14-03, "Format, Content and Implementation Guidance for Dry Cask Storage Operations-Based Aging Management," Revision 2

Project Number: 689

References:

1. NRC Response to December 21, 2016, Nuclear Energy Institute Submittal: NEI 14-03, "Format, Content and Implementation Guidance for Dry Cask Storage Operations-Based Aging Management," Revision 2 Michael Layton to Rodney McCullum, dated January 2, 2019.
2. Nuclear Energy Institute Submittal: NEI 14-03, "Format, Content and Implementation Guidance for Dry Cask Storage Operations- Based Aging Management," Revision 2, dated December 21, 2016.

Dear Mr. Layton:

On behalf of our members, the Nuclear Energy Institute (NEI)¹ is providing a response to the U.S. Nuclear Regulatory Commission (NRC) regarding its review of NEI 14-03, "Format, Content and Implementation Guidance for Dry Cask Storage Operations-Based Aging Management," Revision 2. NEI understands that NRC has identified two options for proceeding and completing work on NEI 14-03:

1. NRC initiates the process of endorsing NEI 14-03, Revision 2 through a guidance document, which will be published in draft form for public comment. The draft guidance would note the exception on the use of surrogate inspections and several clarifications as noted in Reference 2.

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. NEI develops a Revision 3 to NEI 14-03 to address NRC's comments (reference 2), and NRC staff reviews NEI 14-03, Revision 3 to determine if it can be fully endorsed. NRC staff would proceed with initiating the process of endorsement when it determines that there is a revision of NEI 14-03 that can be fully endorsed. Under this option, the NRC staff would want to discuss with NEI before proceeding, as the NRC may wish to provide additional editorial comments for a future Revision 3.

NEI acknowledges our shared desire to complete work on NEI 14-03 and agrees with NRC staff plans to pursue option 1. Development and implementation of this guidance supports industry implementation of NEI 14-03, with the exception of the use of surrogate inspections. NEI 14-03, Revision 2, proposes a forward-looking, operations-based, learning approach to aging management for DCS SSCs that builds on the lessons learned from the industry's considerable experience with reactor SSC aging management. Partial endorsement now would add significant value towards our common goal of creating an operations-focused approach to aging management.

We thank NRC for the extensive, open, and transparent dialogue around the development and review of NEI 14-03, Revision 2. As industry gains additional experience applying operations-based aging management, we envision reaching a future point at which it would be appropriate to re-engage in the dialogue relative to the use of surrogate inspection results. At that time, we may be interested in proposing a Revision 3 to further define the role surrogate inspections will play in assuring the optimization of resources for maintaining long-term assurance of safety for dry used fuel storage.

Thank you for your time and attention on this important matter. If you have any questions, please contact me.

Sincerely,



Rodney McCullum

c: Mr. Marc Dapas, NMSS, NRC