



**UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001**

November 18, 2019

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

FROM: Kristina L. Banovac, Project Manager */RA/*
Storage and Transportation Licensing Branch
Division of Fuel Management
Office of Nuclear Material Safety
and Safeguards

SUBJECT: SUMMARY OF NOVEMBER 12, 2019, MEETING WITH GE-HITACHI
NUCLEAR ENERGY AMERICAS, LLC TO DISCUSS THE UPCOMING
SUBMITTAL OF THE APPLICATION FOR RENEWAL OF THE MORRIS
INDEPENDENT SPENT FUEL STORAGE INSTALLATION LICENSE
NO. SNM-2500 (CAC/EPID NOS. 001028/L-2018-LRM-0065)

Background

On November 12, 2019, a telephone meeting was held between representatives of GE-Hitachi Nuclear Energy Americas, LLC (GEH) and the U.S. Nuclear Regulatory Commission (NRC) to discuss the upcoming submittal of the application for renewal of the Morris Independent Spent Fuel Storage Installation (ISFSI) License No. SNM-2500. This meeting was a follow-up to the previous pre-application meeting held on November 7, 2018 (see meeting summary at Agencywide Documents Access and Management System (ADAMS) Accession No. ML18319A256).

The meeting was noticed on October 28, 2019 (ADAMS Accession No. ML19301E803). The list of meeting attendees is provided in Enclosure 1.

Discussion

The meeting discussion followed the meeting agenda, which is provided in Enclosure 2. GEH's presentation is provided in Enclosure 3. GEH provided an overview of the Morris ISFSI operational history and the planned license renewal application. The Morris ISFSI is the only wet storage facility licensed under 10 CFR Part 72. GEH noted the static nature of the facility and that no fuel movements have occurred since the initial placement of fuel in the fuel storage basin. The license for the Morris ISFSI (SNM-2500) was previously renewed for a 20-year term, and the current expiration date is May 31, 2022. The timely renewal due date for the submittal of the renewal application is May 31, 2020. GEH plans to submit the renewal application in March 2020 and plans to request an additional 20-year term.

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The following items were discussed between GEH and NRC representatives during the meeting:

- GEH noted that it plans to update the final safety analysis report (which is called the Consolidated Safety Analysis Report (CSAR) for the Morris ISFSI) and will likely include the complete updated CSAR as part of the license renewal application (LRA). GEH noted that it does not currently expect any substantive changes to Appendix A.8 of the CSAR, which includes aging management information. However, GEH has not yet completed its review of the guidance in NUREG-1927, Revision 1 (“Standard Review Plan for Renewal of Specific Licenses and Certificates of Compliance for Dry Storage of Spent Nuclear Fuel”) to determine what additional information on aging management it may include in the LRA. GEH plans to make other updates throughout the CSAR (e.g., updates to demographic information in Chapter 1).
- GEH clarified that there is no vitrified waste in storage at the Morris ISFSI. Only spent fuel is stored, and the actual inventory is considered security-related information.
- The NRC staff asked whether there were any fuel inspections conducted to support the classification of the fuel condition (e.g., intact, undamaged). GEH noted that fuel inspections are not conducted as part of operations. Rather, the water chemistry program is considered to be a preventative action to maintain fuel cladding integrity. The NRC staff noted that GEH should discuss this in the LRA.
- The NRC staff noted that the LRA should include an evaluation of any relevant operating experience, including results from surveillances and aging management program (AMP) inspections at the Morris ISFSI and wet storage facilities in general. The NRC staff noted that the summary of operating experience could be included in element 10 of the proposed AMPs or could otherwise be included in the LRA. Also, the summary should contain publicly available information, even if some of the supporting documents (e.g., corrective action reports) are not public. The NRC staff noted that the review of operating experience should focus on whether there are any new degradation mechanisms that are considered operable for the requested period of extended operation, which may be different than what was considered in the first renewal.
- GEH and NRC staff discussed references that may be cited in the LRA. The NRC staff noted that it may be helpful for GEH to post references to a view-only electronic portal that NRC staff may view to determine what references it may need for its technical review and should be submitted on the docket. GEH and NRC staff may discuss further as GEH further develops its LRA.
- The NRC staff asked how the buildings housing or supporting the spent fuel basin are considered in the ISFSI design bases (e.g., credited for shielding, considered in accident analyses), and if there is a need for a structures monitoring program. GEH noted that some monitoring and inspection of important to safety structures is already conducted, such as the steel structure surrounding the pool. The NRC staff noted that its scoping review of the LRA will also consider structures, systems, and components (SSCs) that are not important to safety, but their failure could prevent fulfillment of a function that is important to safety. The NRC staff noted that it would be helpful to the NRC staff’s scoping review if the LRA includes the scoping of SSCs using the scoping criteria in Chapter 2 of NUREG-1927, Revision 1.

- GEH noted that it submitted its triennial submittal of the decommissioning funding plan, per 10 CFR 72.30(c), in December 2018. The NRC staff noted that if GEH received the NRC approval of the 2018 DFP, it could cite that in the LRA and note if there are any changes since the 2018 submittal.
- The NRC staff noted that GEH may contact the NRC with any questions about scheduling or the logistics of the LRA submittal. If GEH wishes to discuss more substantive details, such as AMP details after it has a chance to review NUREG-1927, Rev. 1 to determine what information it may include in the LRA, GEH may request another noticed meeting.

After GEH and NRC representatives completed their discussion, the meeting was opened to public comments or questions. Carlyn Greene noted that the fuel inventory information is public information. Ms. Greene also asked if GEH has considered dry storage of the spent fuel. GEH noted that it currently has no plans for dry storage.

Action Items/Next Steps

GEH plans to submit the renewal application in March 2020.

Docket No. 72-01

CAC/EPID Nos. 001028/L-2018-LRM-0065

Enclosures:

1. Meeting Attendees
2. Agenda
3. Handout – GEH Presentation on Morris
SNM-2500 License Renewal

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DOCUMENT DATE: November 18, 2019

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MEETING ATTENDEES

Meeting with GE-Hitachi Nuclear Energy Americas, LLC to discuss the upcoming submittal of the application for renewal of the Morris Independent Spent Fuel Storage Installation License No. SNM-2500

November 12, 2019, 1:00 p.m. – 3:00 p.m.

Kristina Banovac	NRC/NMSS/DFM/STL
Daniel Doyle	NRC/NMSS/DFM/STL
Christopher Markley (via teleconference)	NRC/NMSS/DFM/STL
Meraj Rahimi	NRC/NMSS/DFM/MSB
Darrell Dunn	NRC/NMSS/DFM/MSB
Ricardo Torres (via teleconference)	NRC/NMSS/DFM/MSB
John Wise	NRC/NMSS/DFM/MSB
Jimmy Chang (via teleconference)	NRC/NMSS/DFM/CTCF
JoAnn Ireland	NRC/NMSS/DFM/CTCF
Caylee Kenny (via teleconference)	NRC/NMSS/DFM/CTCF
Travis Tate (via teleconference)	NRC/NMSS/DFM/NARA
Alayna Pearson (via teleconference)	NRC/NMSS/DFM/IOB
Diana Diaz-Toro (via teleconference)	NRC/REFS/ERMB
Matt Learn (via teleconference)	NRC/Region III
Scott Murray (via teleconference)	GEH
Tony McFadden (via teleconference)	GEH
Carlyn Greene (via teleconference)	UxC

MEETING AGENDA

Meeting with GE-Hitachi Nuclear Energy Americas, LLC (GEH)

November 12, 2019

1:00 p.m. – 3:00 p.m. (Eastern Standard Time)

Two White Flint North Building, Room T-4A73

Purpose: Meeting with GEH to discuss the upcoming submittal of the application for renewal of the Morris Independent Spent Fuel Storage Installation License No. SNM-2500

Agenda:

- Welcome, introductions, and meeting objectives
- GEH presentation and discussion
- Public questions or comments
- Wrap-up and closing remarks
- Meeting adjourned

HANDOUTS