



**ENUSA**

EMPRESA NACIONAL DEL URANIO, S.A.

SANTIAGO RUSIÑOL, 12 / MADRID-3

TELEF.: 233 92 07

Ref.: 0.6.8.

DOCKET NUMBER

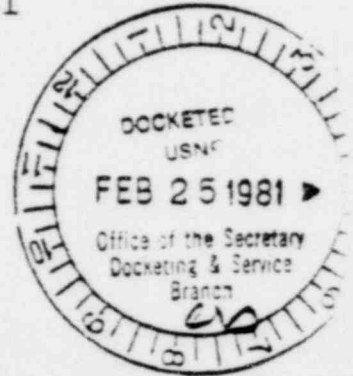
PROPOSED RULE

*PR-Misc. Notice  
Reg Guide*

February 10, 1981

The Secretary of the Commission,  
U.S. Nuclear Regulatory Commission,  
Washington, D.C. 20555.

Attn: Docketing and Service Branch



Subject: Comments on Task FP 029-4 "Standard Formant and Content for the Safety Analysis Report for an Independent Spent Fuel Storage Installation (Dry Storage)."

Gentlemen:

Our suggestion is to insert at the end of page IX (as marked) the following statement:

"In the case of spent fuel shipping cask (SFSC) facilities it should be born in mind, that the safety related systems are supported by the casks themselves; therefore the safety analysis in this case should carried out for the container arrangements and not to the eventual housing installations of casks".

Yours sincerely,



1041 *ELIAS CERRAJERO*, Manager  
Safety and Radiological Protection

FC/LJ

Acknowledged by card

*2-1-81, CLO*

*TAP-11  
COMMENT*

8103370 058

## INTRODUCTION

10 CFR Part 72, "Licensing Requirements for the Storage of Spent Fuel in an Independent Spent Fuel Storage Installation (ISFSI)," specifies the information to be supplied in applications for licenses to store spent fuel in an independent spent fuel storage installation (ISFSI). However, Part 72 does not specify the format for presentation of the safety analysis report (SAR). Guidance on the content of the SAR will vary, depending on the type of installation that is planned. An ISFSI may be either of the wet type, where the clad fuel is in direct contact with water, e.g., in a pool, or of the dry type, where the clad fuel is not in contact with water while in storage. Dry-type ISFSIs may be of several varieties, e.g., aboveground sealed casks exposed to the atmosphere, caissons using the earth as shielding and as a heat sink, hot cell-type shielded enclosures having an air or other atmosphere. Regulatory Guide 3.44 supplies guidance for the preparation of an SAR for an ISFSI of the water-basin type, and this regulatory guide was prepared to supply guidance in the preparation of an SAR for an ISFSI of the dry storage type. The NRC staff suggests its use for presenting the information required in the SAR.

In an ISFSI of the dry storage type, the canyon, caisson, or sealed surface storage cask (SSSC) and the area designated for storing the spent fuel are the common elements. The containment structure must contain the fuel and provide shielding for control of radiation to operating personnel and the surrounding population. The area must be suitably stable, remote, and protected. The SSSCs may be built in the storage area in fixed positions or they may be fabricated elsewhere and fixed in designated positions within the storage area. The support systems required for an ISFSI of this type will depend on the type of fuel containment to be used, the location, and the means of installing this containment and accomplishing necessary testing and the means by which the contained fuel is transferred to the storage area. \*Other types of dry storage systems will have different characteristics and require different considerations.

\* Insert here.