



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

August 19, 2020

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

FROM: Marlone F. Davis, Senior Storage and Transportation
Safety Inspector
Inspection and Oversight Branch
Division of Fuel Management
Office of Nuclear Material Safety
and Safeguards

SUBJECT: SUMMARY OF JULY 22, 2020, PUBLIC WEBINAR WORKSHOP
TO DISCUSS THE PROPOSED REVISIONS TO REGULATORY
GUIDE 3.72 (DRAFT GUIDE 3054), "GUIDANCE FOR
IMPLEMENTATION OF 10 CFR 72.48, CHANGES, TESTS, AND
EXPERIMENTS"

On July 22, 2020, the U.S. Nuclear Regulatory Commission (NRC) held a Category 3 public webinar workshop to discuss the proposed revisions to Regulatory Guide (RG) 3.72, "Guidance for Implementation of Title 10 of the *Code of Federal Regulations* (10 CFR) 72.48, Changes, Tests, and Experiments". The revisions proposed to RG 3.72 was for endorsement of the Nuclear Energy Institute (NEI) 12-04, "Guidelines for 10 CFR 72.48 Implementation," Revision 2, dated September 2018. The meeting notice and agenda dated July 10, 2020, are available in the Agencywide Documents Access and Management System (ADAMS) at Accession No. ML20203M240. During the webinar workshop, the NRC staff presented an overview of the major changes to RG 3.72, which is available at ADAMS Accession No. ML20202A667. Additionally, the NRC requested a transcript of the webinar workshop, which is available at ADAMS Accession No. ML20231A229. The enclosure to this document contains the webinar attendance list.

The webinar workshop began with an introduction of the NRC staff involved in the public meeting. Mr. Marlone Davis, a Senior Storage and Transportation Inspector, provided the introductory remarks and PowerPoint presentation regarding the purpose of the workshop, information on the public comment period and a brief overview of the excepted changes, exceptions, and clarifications contained in the draft regulatory guide. The presentation focused on the proposed changes that included the departure from method of evaluation, relationship between 10 CFR 72.48 and 10 CFR 72.212 evaluation reports and applying 10 CFR 72.48 to nonconforming or degraded conditions. The webinar promoted an open dialogue such that the NRC staff would receive comments and questions regarding the draft regulatory guide from the nuclear industry and members of the public.

Over 70 people participated in the webinar using both WebEx and a teleconference line controlled by an operator. Four participants asked questions and/or provided comments. Participants that self-identified as attending the webinar included representatives from the NEI, nuclear industry, non-government organizations, and other members of the public.

A summary of the key topic discussed during the public comment portion of the webinar included changes in the NRC's previous guidance on departures from method of evaluation (MOE) and the NRC's approval of an MOE. The NRC staff answered two questions related to the new MOE guidance that explains that "approved by the NRC for the intended application" can mean approved for the type of analysis being conducted across cask systems and amendments for a single vendor and design authority as long as the approval meets the limitations and conditions of the safety evaluation report.

The NRC staff responded to each question asked and committed to follow-up on one question regarding the schedule for one of the interim consolidated storage facility. The NRC staff stated that the comments and questions received will be considered during finalization of the RG. The NRC staff presented a proposed schedule of the completion of the final RG.

No regulatory decisions were made during the meeting.

Enclosure:
List of Attendees

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DOCUMENT DATE: August, 19, 2020

DISTRIBUTION:

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NRC Attendees

ADAMS Package Nos.: ML20244A368 (Pkg) ML20244A369 (Memo)
Slides: ML20202A667 ML20203M240 (Meeting Notice)
ML20231A229 (Transcript)

OFFICE:	NMSS/IOB	NMSS/STLB	NMSS/IOB
NAME:	MDavis	WWheatley	LCuadrado-Caraballo
DATE:	8/17/2020	8/18/2020	8/19/2020

OFFICIAL RECORD COPY

LIST OF ATTENDEES

July 22, 2020, PUBLIC WEBINAR WORKSHOP TO DISCUSS THE PROPOSED REVISIONS
TO REGULATORY GUIDE 3.72 (DRAFT GUIDE 3054), "GUIDANCE FOR IMPLEMENTATION
OF 10 CFR 72.48, CHANGES, TESTS, AND EXPERIMENTS"

<u>Name</u>	<u>Affiliation</u>
Chris Regan	U.S. Nuclear Regulatory Commission (NRC)
Christian Araguas	NRC
Leira Cuadrado	NRC
Marlone Davis	NRC
Tomeka Terry	NRC
Dylan Duvigneaud	NRC
Jeffery Lynch	NRC
Gary Jenkins	NRC
Harriet Karagiannis	NRC
Joann Ireland	NRC
Jodi Via	NRC
Joseph Borowsky	NRC
Michael Call	NRC
Lynn Chen	NRC
Veronica Wilson	NRC
Yaira Diaz Sanabria	NRC
Patricia Jehle	NRC
Jimmy Chang	NRC
Brian Thomas	PSEG Nuclear
Al Bates	Southern California Edison
Randall Granaas	Southern California Edison
Alex Gonzalez	Exelon
Ben Day	Exelon
Dan Stelom	Exelon
David Knepper	Exelon
Edward Fischer	Exelon
Ernest Updegrove	Exelon
Jack DeSando	Exelon
Jesse Lucas	Exelon

<u>Name</u>	<u>Affiliation</u>
Kenn Hunter	Exelon
Kimberly Hobbs	Exelon
Gary Voss	Exelon
Fred Hazboun	Exelon
Pamela Fergen	Energy Solutions
Andrea Barker	Omaha Public Power District
Richard Church	Omaha Public Power District
Bob Capstick	Three Yankees
Paul Plante	Three Yankees
Carolyn Greene	UXC
Chris Wandell	APS Palo Verde
Brian Sarno	Southern California
Jen Wilson	Southern California Edison
Leon Rafner	Southern California Edison
Gary Stephenson	Southern California Edison
Oravio Jaron	Orano TN
Phyllis Dixon	Duke Energy
Tracy Weaver	Next Era Energy Duane Arnold
James Cordes	New Grow Court Reporters
Richard Hagler	Pacific Gas and Electric Company
Kevin Braico	Pacific Gas and Electric Company
Kyle Duke	PG&E
Mark Mayer	PG&E
Mark Oswald	South Texas Project Electric Generation Station
Doug Yates	Trans Nuclear
Jayant Bondre	Trans Fuel Consulting
Shelly Hodgson	Toronto
Robert Quinn	Westinghouse
John Phabe	Westinghouse
Luke McIntyre	Arizona Public Service Electric
Nawapron Aarons Cooke	Arizona Public Service Electric
Sara King	Arizona Public Service Electric

<u>Name</u>	<u>Affiliation</u>
David Medek	Arizona Public Service Electric
Matthew Cox	Arizona Public Service Electric
Donald Ricard	Ameren Calloway Energy Center
John Conly	Centrec
Tom Tramm	Centrec
Thomas Forland	Cooper Nuclear Station
David Thomlin	Dominion Energy
Don Shaw	TN Americas LLC
Jeff Waddell	Energy Northwest
Keith Waldrop	Electric Power Research Institute
John Schrage	Entergy Corp
Shannon Chew	Electric Power Research Institute (EPRI)
Stavroula Mihalakea	Florida Power and Light
Kimberly Manzione	Holtec International
Mark Richter	NEI
Will Phillips	Southern Nuclear
Wren Fowler	NAC International
Zeta Martin	TVA
Raynard Wharton	Member of the Public
Doug Phillips	Member of the Public
Deeresh Sayarey	Member of the Public
Sandra Christianson	Licensee
Glenn Schwartz	Utility
Sheryl Sweet	Wolf Creek Nuclear
Jim McInbale	Wolf Creek Nuclear