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## INSPECTION PROCEDURE 60855

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### OPERATION OF AN INDEPENDENT SPENT FUEL STORAGE INSTALLATION

Effective Date: 01/01/2021

PROGRAM APPLICABILITY: 2690

#### 60855-01 INSPECTION OBJECTIVE

Determine by direct observation and independent evaluation whether the licensee is operating the independent spent fuel storage installation (ISFSI) in conformance with regulatory requirements.

#### 60855-02 INSPECTION REQUIREMENTS

The following are the minimum inspection requirements to be performed during each inspection. The requirements were established following the development of a risk-informed performance-based inspection program and the establishment of five safety focus areas. The five safety focus areas include: occupational exposure, public exposure, fuel damage, confinement, and impact to plant operations. Successful implementation of this inspection procedure will include a review of licensee activities in each safety focus area. Inspection Manual Chapter (IMC) 2691, "Technical Basis for the Independent Spent Fuel Storage Installation Inspection Program" provides a description of the ISFSI inspection program technical basis.

If significant or multiple performance deficiencies are identified, then the inspector shall perform additional inspection activities to determine the breadth of performance deficiencies and their basis. The additional inspection activities shall be approved by regional management. The basis for the added inspection activity will be communicated to the licensee and documented in a publicly available record, such as the inspection report. IMC 2690, "Inspection Program for Storage of Spent Reactor Fuel and Reactor Related Greater than Class C Waste at Independent Spent Fuel Storage Installations and for 10 CFR Part 71 Transportation Packagings" provides guidance on when to consider performance-based inspection activity.

02.01 Changes, Tests, and Experiments and 72.212 Evaluations. Review selected changes, tests, or experiments associated with the ISFSI and review changes to Title 10 of the *Code of Federal Regulations* (10 CFR) 72.212 evaluations performed by general licensees since the last ISFSI inspection.

- a. Verify that when changes, tests, or experiments were made, evaluations were performed in accordance with 10 CFR 50.59 and 10 CFR 72.48, if required. Verify the licensee appropriately concluded the change, test or experiment can be accomplished without obtaining either a license amendment or a certificate of compliance (CoC) amendment.

- b. For changes, tests, or experiments where the licensee determined evaluations were not required, verify the licensee's conclusions were correct and consistent with 10 CFR 50.59, 10 CFR 72.48, and licensee procedures.
- c. For general licensees, verify evaluations required by 10 CFR 72.212 are revised when required by changes to the facility, to the dry storage system (DSS), or to ISFSI procedures.

02.02 Loading and Unloading Activities. If loading or unloading operations are ongoing, verify the licensee safely performs either loading or unloading, as applicable, in a safe manner and in compliance with approved procedures.

- a. For loading activities, as practical, inspectors shall perform direct observation of risk informed loading activities as categorized in IMC 2690, Appendix D. Absent other risk significant considerations, it is the expectation that a significant portion of time spent onsite by inspectors be dedicated to direct observation of activities based upon their risk priority. It is expected that if the inspectors are onsite during priority level 1 activities, the inspectors will observe these activities. Priority level 2 activities should be observed unless other inspection areas preclude their observations. Priority level 3 activities may be observed at the inspector's discretion.
- b. For unloading activities, inspectors shall perform direct observation of all activities, as practical, due to their relatively infrequent nature.
- c. Inspectors should review risk significant changes to loading and unloading procedures since the last ISFSI inspection, to ensure they include appropriate quantitative or qualitative acceptance criteria for determining important activities have been satisfactorily accomplished.

02.03 DSS Fuel Selection. If loading operations are ongoing, inspectors shall select documentation for fuel assemblies being loaded into a DSS and verify each fuel assembly is permitted for storage in the DSS based upon its parameters and characteristics compared against the DSS CoC or specific license. The minimum number of fuel assemblies reviewed by the inspectors shall be a single DSS loaded during the campaign. For continuous loading campaigns, the minimum number of fuel assemblies reviewed by the inspectors shall be a single DSS in each quarter the loading campaign occurred.

02.04 ISFSI Storage Monitoring and Surveillance. Verify by direct observation, interviews, or review of selected records, that ISFSI monitoring activities are performed in accordance with approved procedures and surveillance activities have been conducted at the specified periods.

02.05 Quality Assurance Program. Evaluate the effectiveness of the licensee's corrective actions and oversight of ISFSI activities, by reviewing ISFSI quality assurance (QA) audits or surveillances, corrective action documents, and records associated with the dispositioning of nonconforming conditions. If the contractor(s) have a corrective action program separate from or integral to the licensee's program, the inspector shall evaluate all corrective action programs associated with ISFSI activities.

02.06 Aging Management Activities. If the licensee has entered the ISFSI period of extended operations, verify that the licensee adequately completed selected actions necessary to comply with the license conditions and commitments for the renewed ISFSI license or renewed CoC,

and adequately implemented selected aging management programs (AMPs) elements and time limited aging analyses (TLAAs) as described in the safety evaluation report (SER).

- a. Verify that the licensee revised and incorporated the final safety analysis report (FSAR) supplement as revised into the FSAR or 10 CFR 72.212 evaluation report. The FSAR supplement describes the AMPs and TLAAs approved by the NRC in the SER for license renewal. Verify that the FSAR supplement description matches the AMP or TLAA being implemented and that changes, caused by the inclusion of any newly identified SSCs, were included in the FSAR supplement.
- b. Verify that the licensee identified and corrected age-related degradation, as applicable.

## 60855-03 INSPECTION GUIDANCE

### General Guidance.

The licensee shall provide reasonable assurance the spent fuel can be handled, stored, and retrieved without undue risk to the health and safety of the public. Activities (e.g., lifting of heavy loads, movement of spent fuel, or cask transfer to the ISFSI pad) may have a direct impact on reactor safety-related structures, systems, and components (SSCs). Therefore, ISFSI activities potentially affecting safety-related SSCs should also be inspected. IMC 2691, Section 04.05, provides guidance regarding the five safety focus areas evaluated by the ISFSI inspection program. The inspectors should refer to the risk prioritization table in IMC 2690, Appendix D. A majority of the inspectors' focus should include review of priority level 1 items.

For the purposes of this procedure, the term "licensee" may refer to a specific license holder (10 CFR 72.16) or a reactor licensee using a general license (10 CFR 72.210).

This procedure can be implemented in three distinct phases:

- a. Loading - Activities related to transferring spent fuel from the Spent Fuel Pool (SFP) to the DSS, preparing the cask or canister for storage, and moving the DSS to the ISFSI. Loading activities are considered higher risk because all five risk-informed safety performance focus areas are impacted.
- b. Unloading - Activities related to retrieving spent fuel from a loaded DSS at the ISFSI and transferring the fuel either back into the SFP or into a separate component (storage or transportation). Unloading activities are considered higher risk because all five risk-informed safety performance focus areas are impacted.
- c. Monitoring Operations - Activities related to long-term operation and monitoring of the ISFSI when no loading or unloading activities are occurring. Monitoring activities should also include greater than Class C (GTCC) waste casks stored onsite. Monitoring activities have the lowest risk given the static nature of licensee activities and the passive safety systems associated with ISFSIs. Implementation of an aging management program with early detection and resolution of potential deficiencies should ensure ISFSI risk, while in monitoring, remains low. Monitoring operations are also applicable during loading and unloading operations.

Licensee pre-job briefs may be observed as part of the direct observation of risk significant operational activities.

If the licensee intends to use a different DSS than what has been previously used onsite, additional oversight is required in accordance with IMC 2690, Appendix A, Phase 2. If the licensee is constructing a new ISFSI pad or onsite support SSCs, not including storage overpacks, additional oversight is required in accordance with IMC 2690, Appendix A, Phase 2.

### Specific Guidance.

03.01 Changes, Tests, and Experiments and 72.212 Evaluations. This requirement impacts all five safety focus areas. The 10 CFR 72.48 screenings and evaluations selected for review should be based upon their safety significance, impact on the five risk-informed safety focus areas, and complexity.

Regulatory Guide 1.187, "Guidance for Implementation of 10 CFR 50.59, Changes, Tests, and Experiments," Revision 1 states Revision 1 of NEI 96-07, "Guidelines for 10 CFR 50.59 Implementation" is acceptable for complying with the NRC regulations in 10 CFR 50.59 with clarifications provided within the Regulatory Guide.

Regulatory Guide (RG) 3.72, "Guidance for implementation of 10 CFR 72.48, "Changes, Tests, and Experiments," Revision 1, endorses Nuclear Energy Institute (NEI) document NEI 12-04, "Guidelines for 10 CFR 72.48 Implementation," Revision 2, dated September 2018 with exceptions and clarifications.

Inspectors should refer to Inspection Procedure (IP) 60857, "Review of 10 CFR 72.48 Evaluations," as needed for additional guidance for the review of 10 CFR 72.48 evaluations. Inspection hours are charged to IP 60855.

For changes to 10 CFR 72.212 evaluations, specific attention should be placed on review of evaluations performed to apply changes authorized by an amended CoC to a cask loaded under the initial CoC or an earlier amended CoC. Additionally, specific attention should be placed on review of evaluations used to transition to a new amendment of the same CoC. Inspectors should be aware that performance of a 10 CFR 72.212 evaluation alone does not relieve the licensee from performing a 10 CFR 72.48 evaluation as discussed in NRC Regulatory Issue Summary (RIS) 2012-05, "Clarifying the Relationship Between 10 CFR 72.212 and 10 CFR 72.48 Evaluations."

Inspectors should also review changes to administrative programs such as emergency preparedness, fire protection, environmental monitoring, quality assurance, and radiological protection as applied to ISFSI operations. These programs may have more specific change management requirements.

Inspectors should refer to IP 60856, "Review of 10 CFR 72.212 Evaluations," as needed for additional guidance for the review of 10 CFR 72.212 evaluations. Inspection hours are charged to IP 60855.

### 03.02 Loading and Unloading Activities.

#### Specific Heavy Loads Guidance (Impacts all safety focus areas)

The inspectors should verify DSS lift procedures conform to an acceptable safety basis and include any assumptions or limitations contained within these bases. Acceptable safety bases include: (1) use of a single-failure-proof crane or equivalent or (2) a valid load drop analysis. As an example, through a review of the safety bases, inspectors should verify specific crane testing, lift height restrictions, soluble boron concentrations, impact limiters, sling safety factor, building ventilation, ambient temperature requirement, and maximum critical lifting load assumptions or limitations included in procedures.

Licensee procedures for crane preventive maintenance should be reviewed against applicable commitments to industry standards.

The inspectors should verify that the licensee has a preventive maintenance program in place based on vendor recommendations for their type of crane (i.e. single-failure-proof or non-single-failure-proof). It should be verified, by a review of records, that the cask handling crane's daily, frequent, and periodic inspection procedures are completed in accordance with American National Standards Institute (ANSI)/American Society of Mechanical Engineers (ASME) B30.2, "Overhead and Gantry Cranes (Top Running Bridge, Single or Multiple Girder, Top Running Trolley Hoist)," or alternative code as appropriate.

The inspectors should perform direct observation of the licensee's daily cask handling crane inspection or complete an independent walkdown (visual direct observation) of the crane and heavy lift equipment. Inspectors should be observant for material deficiencies, such as, corrosion, missing or broken fasteners, cable fraying, broken indicators, missing and/or misaligned parts/components or cracked paint, which could be an indication of a surface defect.

The inspectors should verify, by a review of periodic inspection records and direct observation of daily inspections, that the special lifting devices and slings used for DSS lifts are tested in accordance with the applicable standard (e.g., ANSI/American Nuclear Society (ANS) N14.6, "Standard for Special Lifting Devices for Shipping Containers Weighing 10,000 pounds (4,500 kg) or More for Nuclear Materials" and ASME B30.9, "Slings," respectively). The condition of special lifting devices and slings should be evaluated by performing an independent walkdown of these items.

The inspectors should verify by direct observation and a review of licensee procedures that the licensee has evaluated the structural loading of ISFSI loading activities on 10 CFR Part 50 safety-related SSCs and non-safety-related but risk-significant SSCs. Designated load paths should be specified, if required by supporting analysis, to protect 10 CFR Part 50 safety-related SSCs and non-safety-related but risk-significant SSCs both inside the building containing the spent fuel pool and on the heavy load path from the building to the ISFSI pad. It should be verified that any temporary modifications during ISFSI loading activities are installed in accordance with approved procedures and design change processes. Examples of temporary modifications may include steel plates used to protect buried piping, or temporary columns to strengthen supporting flooring.

### Specific Dewatering, Drying, and Backfilling Guidance (Impacts all safety focus areas)

The inspectors should verify licensee procedures contain appropriate acceptance criteria to ensure processing operations can be completed in accordance with the Technical Specifications (TS) and FSAR requirements. As an example, TS may have requirements for: minimum soluble boron concentration, time to boil clock, pressure testing, canister dryness levels, helium gas purity, and backfill pressure.

The inspectors should ensure the canister and fuel are maintained in an analyzed condition, specifically as it relates to thermal and pressure limitations. This may include such limitations as the ambient temperature surrounding the canister or cask, heat transfer media inside the canister (air, nitrogen, water, helium, etc.), pressure inside the canister, annular cooling water system temperatures, additional required cooling mechanisms, time to boil, transfer time limitations, temporary shielding placed on the canister and cask, and the structural geometry surrounding the cask.

### Welding Operations Guidance (Impacts all safety focus areas)

By direct observation, the inspectors should verify welding activities are performed by a qualified welder, in accordance with a welding procedure specification (WPS), which is demonstrated as acceptable in accordance with a series of procedure qualification reports (PQRs). By review of records, it should be verified that the welding procedure specification contains the appropriate essential and non-essential variables and the welders are trained in accordance with the governing code specified in the CoC or specific license, typically the ASME Boiler & Pressure Vessel (BPV) Code Section IX.

By direct observation as licensee loading activity schedules allow, the inspectors should verify nondestructive testing activities including visual testing, liquid penetrant testing, and helium mass spectrometer leak detection are performed by a qualified inspector in accordance with approved procedures. By review of records, it should be verified that nondestructive testing procedures contain the appropriate process for performing the evaluations and the procedure is qualified in accordance with the governing code, typically, the ASME BPV Code Section III and Section V, and ANSI N14.5.

The inspectors should also ensure non-destructive testing technicians are qualified in accordance with the governing code, typically SNT-TC-1A.

Welding procedures should have appropriate quantitative acceptance criteria for ensuring the maximum deposition of weld filler material is less than the critical flaw size as applicable to that specific system. The inspectors should verify that the weld and the nondestructive testing is performed in accordance with the applicable design of the weld joint found in the licensing drawings or the FSAR.

Sealing and nondestructive testing operations are frequently performed via use of contractor procedures. The licensee should have reviewed and accepted contractor procedures in accordance with the site QA program. Contractor activities should include appropriate and knowledgeable QA oversight in accordance with 10 CFR 72.154, "Control of purchased material, equipment, and services."

For welded canisters, at a minimum, a single weld pass and the corresponding set of required nondestructive tests for that weld pass should be observed. Additional examinations may be

observed as needed based on identification of licensee performance issues.

The licensee's loading procedures should contain guidance to monitor and/or purge the canister internal cavity, as required. This is to ensure the canister internal hydrogen gas concentration is maintained less than half (2%) of the lower explosive limit (4%) during all hot work, including welding or grinding activities, when the canister internal gases are exposed to the hot work. Additional details may be found in NRC Bulletin 96-04, "Chemical, Galvanic, or Other Reactions in Spent Fuel Storage and Transportation Casks."

#### Radiological (Impacts occupational and public exposure safety focus areas)

The inspectors should review radiological survey records or observe licensee radiation protection personnel perform radiological surveys on a DSS. Inspectors should verify the DSS canister outer shell meets any relevant removable contamination levels as specified in the TS. Additionally, inspectors should also verify transfer and storage cask gamma and neutron dose rates meet site specific and generic limits specified in the TS. As a result of the licensee's controls for compliance with 10 CFR 72.104, the inspector should review the licensee's adherence to the dose rate limits for the storage cask. Neutron dose may be difficult to quantify due to the unmoderated neutron energy spectrum of fuel assemblies. The licensee's approach for occupational monitoring and environmental monitoring of neutron dose should be reviewed. During canister dewatering and drying, discharge of liquids and gases from the canister will occur to areas surrounding the cask, the spent fuel pool, or other plant processing systems. In an effort to mitigate dose and safety system actuations, the licensee should be monitoring and/or filtering as necessary per site specific requirements.

03.03 DSS Fuel Selection. This requirement impacts all five safety focus areas.

The inspectors should verify specific fuel assembly parameters including initial enrichment, burnup, decay heat load, cooling time, physical assembly type and parameters, non-fuel hardware inserts, and intact/damaged classification meet limitations described in the CoC or specific license, as applicable. If the licensee is utilizing a software program to select fuel assemblies from a database, inspectors should review the selection limitation input criteria to the software program. Inspectors should verify several software input constraints for accuracy.

A selection of supporting documentation associated with each parameter should be verified. Examples of supporting documentation may include core power history to verify fuel assembly burnup and core chemistry, and sipping traces or ultrasonic testing traces, in conjunction with visual inspection records to verify the licensee's classification of the fuel as undamaged, intact, or damaged.

Inspectors should review if site-specific thermal evaluations may place additional limitations on fuel assembly characteristics that may be loaded into a DSS. Specifically, method of canister drying, canister active or passive cooling systems used during processing, building temperature during processing, transfer cask location in the building, transfer cask supplemental shielding, and specific processing time limitations may cause a change in the temperature of DSS components including the peak cladding temperature of fuel. To ensure DSS component and fuel peak cladding temperature acceptance limits specified in the FSAR are met, inspectors should ensure that site-specific thermal considerations are appropriately incorporated into calculations and procedures.

Inspectors should determine if site-specific dose rate evaluations place additional limitations on fuel assembly characteristics that may be loaded into a DSS. Specifically, some licensee's 10 CFR 72.104 evaluations, or as low as reasonably achievable (ALARA) evaluation may impose a design requirement on the allowable gamma or neutron source term of an assembly. To ensure the dose rates from these evaluations are met, inspectors should ensure these site-specific considerations are accounted for during the selection of fuel assemblies, which may be in the form of limitations of minimum enrichments, maximum burnups, or minimum cooling times.

Inspectors should be aware that for a small population of Westinghouse fuel assemblies there is a potential for top nozzle separation and the dropping of a fuel assembly during fuel movement. If the licensee plans to move fuel from this population, their mitigation strategy or fuel assembly structural repairs should be evaluated. More information may be found in NRC Information Notice (IN) 2002-09, "Potential for Top Nozzle Separation and Dropping of a Certain Type of Westinghouse Fuel Assembly."

03.04 ISFSI Storage Monitoring and Surveillance. This requirement impacts all safety focus areas except impact to plant operations. The inspectors should observe the various operations, maintenance, surveillance, engineering and plant support activities performed at the ISFSI. Normal activities may include monitoring temperatures, calibrating instruments, inspecting ventilation openings for obstructions, surveying radiation levels, monitoring the structural condition of the DSS and ISFSI pad, and environmental monitoring. Inspectors should perform a walkdown and an independent radiation survey of the ISFSI to perform an assessment of its material and radiological condition. Inspectors should perform a walkdown of the haul path and ISFSI pad to ensure fire and explosion hazards are identified and described in licensee evaluations.

If the inspector identifies concerns with radiation levels or radiation monitoring activities, the inspector may refer the observations to the inspectors that provide primary radiation protection oversight for the facility for an evaluation of the ISFSI radiological operation impacts.

Results of environmental monitoring reports, which include direct radiation level monitoring, and effluent monitoring reports should be reviewed as it relates to the ISFSI to verify that doses to the nearest real individual are within limits prescribed by 10 CFR 72.104.

03.05 Quality Assurance Program. This requirement affects all safety focus areas. Audits and self-assessments are required to be performed by the licensee of ISFSI operations in accordance with their NRC-approved QA program. Additionally, many licensees perform pre-campaign or pre-inspection readiness reviews. The inspectors should perform a risk-informed review of several audits and self-assessments since the last ISFSI inspection and verify that findings are documented in the licensee's corrective action program, as required. Also, the inspectors should perform a risk-informed review of corrective action documents associated with the ISFSI. This review may include a review of corrective action documents of programs supporting ISFSI operations as they directly relate to the ISFSI (e.g., the control of heavy loads program). Conditions adverse to quality associated with the ISFSI program should be promptly identified and corrected and for any significant condition identified as adverse to quality, the cause of the condition should be determined, and corrective action should be taken to preclude repetition.

03.06 Aging Management Activities. This requirement may impact all safety focus areas except impact to plant operations. The inspectors should become familiar with the renewed

ISFSI license or renewed CoC in use at the ISFSI, the NRC SER for the renewal, license or CoC conditions and TS related to aging management, and the aging management FSAR supplement. The inspectors should evaluate whether the licensee implemented the AMPs and TLAAs provided in the renewed license or renewed CoC. The evaluation should include how the licensee incorporated the ten elements into their AMP.

#### 60855-04 RESOURCE ESTIMATE

04.01 Loading and Unloading Operations - the estimated average time to complete the inspection requirements is 96 hours of direct inspection per triennial cycle.

04.02 Monitoring Only Operations Onsite - the estimated average time to complete the inspection requirements is 24 hours of direct inspection per triennial cycle (assuming no loading campaigns, unloading activities, or other significant licensee activities occurred during the triennial cycle). Inspection Requirements 02.02 and 02.03 are not required during monitoring only operations.

04.03 Periodic In-office Follow-up - the expected time to follow-up on risk-important licensee ISFSI activities between onsite inspections is 10 hours per triennial cycle. It is expected that time spent on this effort be charged to applicable inspection procedure and docket. It is not expected this be performed at each site during the triennial period. Review beyond this level of effort should be considered additional performance-based inspection and receive specific regional management approval as specified in IMC 2690.

The above average resource estimates do not include time expended for preparation, documentation, and escalated enforcement.

#### 60855-05 PROCEDURE COMPLETION

Inspection procedure completion is based upon completion of the inspection procedure requirements (sections 02.01 through 02.06). The inspection procedure shall be completed in accordance with the inspection procedure frequency requirements specified in IMC 2690 Appendix A.

#### 60855-06 REFERENCES

IMC 2690, "Inspection Program for Storage of Spent Reactor Fuel and Reactor Related Greater than Class C Waste at Independent Spent Fuel Storage Installations and for 10 CFR Part 71 Transportation Packagings"

IMC 2691, "Technical Basis for the Independent Spent Fuel Storage Installation Inspection Program"

IP 60856, "Review of 10 CFR 72.212 Evaluations"

IP 60857, "Review of 10 CFR 72.48 Evaluations"

TI 2690/011, "Review of Aging Management Plans at Independent Spent Fuel Storage Installations," ML20023A016.

NRC Bulletin 96-04, "Chemical, Galvanic, or Other Reactions in Spent Fuel Storage and Transportation Casks"

NUREG-1927, Revision 1, "Standard Review Plan for Renewal of Specific Licenses and Certificates of Compliance for Dry Storage of Spent Nuclear Fuel," ML16179A148.

NEI 14-03, Revision 2, "Format, Content and Implementation Guidance for Dry Cask Storage Operations-Based Aging Management," ML16356A210.

NUREG-2214, "Managing Aging Processes in Storage (MAPS) Report," Draft Report for Comment, ML17289A237.

IN 2002-09, "Potential for Top Nozzle Separation and Dropping of a Certain Type of Westinghouse Fuel Assembly"

Regulatory Guide 1.187, "Guidance for Implementation of 10 CFR 50.59, Changes, Tests, and Experiments," Revision 1

Regulatory Guide 3.72, "Guidance for Implementation of 10 CFR 72.48, Changes, Tests, and Experiments" Revision 2

RIS 2012-05, "Clarifying the Relationship Between 10 CFR 72.212 and 10 CFR Evaluations"

ANSI/ASME B30.2, "Overhead and Gantry Cranes (Top Running Bridge, Single or Multiple Girder, Top Running Trolley Hoist)"

ANSI/ANS N14.6, "Standard for Special Lifting Devices for Shipping Containers Weighing 10,000 pounds (4,500 kg) or More for Nuclear Materials"

ASME B30.9, "Slings"

ASME BPV Code Section III, "Rules for Construction of Nuclear Facility Components"

ASME BPV Code Section V, "Nondestructive Examination"

ASME BPV Code Section IX, "Welding and Brazing Qualifications"

ANSI N14.5, "American National Standard for Radioactive Materials—Leakage Tests on Packages for Shipment"

SNT-TC-1A, "Personnel Qualification and Certification in Nondestructive Testing"

END

Attachment 1: Revision History for IP 60855

Commitment Tracking Number	Accession Number Issue Date Change Notice	Description of Change	Description of Training Required Completion Date	Comment Resolution and Closed Feedback Form Accession Number (Pre-Decisional, Non-Public Information)
N/A	ML073100489 01/16/08 CN 08-003	This document has been revised to change SFPO to SFST and some minor editorial changes. No other major changes are proposed by 10/22/2007.	N/A	N/A
N/A	ML20294A519 11/25/20 CN 20-065	Major Revision. Revised to update inspection hours. Also revised to clarify and enhance the inspection requirements and guidance as a result of the risk-informed review of the inspection process.	Yes. Verbal discussion of changes during inspector training session on revised ISFSI inspection program. Due date is 12/31/2020	ML20294A515