



**HITACHI**

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U.S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Director, Division of Fuel Management  
Office of Nuclear Material Safety and Safeguards  
Washington, DC 20555-0001

**Subject: GEH Morris Operation Submittal of Biennial Report 10CFR72.48;  
Changes, Tests, and Experiments**

**Reference: SNM-2500  
Docket 72-1**

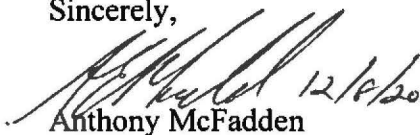
This letter is submitted, on behalf of GE Hitachi Nuclear Energy Americas, LLC (GEH), per the requirements of 10CFR72.48(d)(2) for the period of Dec 2018 to Dec 2020 for GEH Morris Operation (MO).

One 72.48 evaluation was conducted from the period of 06 Dec 2018 to 08 Dec 2020. No evaluations warranted an amendment to the current NRC license (SNM-2500).

A brief description and summary of the evaluation is included in the attached enclosure (Encl 1).

Please do not hesitate to contact me if there are any questions.

Sincerely,



Anthony McFadden  
Plant Manager  
GEH Morris Operation

**Commitments:** No commitments have been made in this letter.

**Enclosures:** 1. 72.48 Evaluation for Revision of SOP 16-17 Fuel Storage System Inspection

**Cc:** PM 20-013



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**Morris Operation**  
 Morris Operation Instruction

 Employees Only  
 MOI-430

**72.48 Applicability Analysis for Changes, Tests, Experiments**

Review Number: SC-2019-48-01

**Description of Activity:**

Revise SOP 16-17 Fuel Storage System Inspection – change acceptance criteria for the stainless steel liner to match the language in the CSAR Aging Management Attachment (A.8).

**Does this activity:**

Yes No

<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Require an amendment to the license, SNM-2500, due to a change in technical specifications?
<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Result in more than a minimal increase in the frequency of occurrence of an accident previously evaluated in the CSAR?
<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Result in more than a minimal increase in the likelihood of occurrence of a malfunction of a system, structure, or component (SSC) important to safety previously evaluated in the CSAR?
<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Result in more than a minimal increase in the consequences of an accident previously evaluated in the CSAR?
<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Result in more than a minimal increase in the consequences of a malfunction of an SSC important to safety previously evaluated in the CSAR?
<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Create a possibility for an accident of a different type than any previously evaluated in the CSAR?
<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Create a possibility for a malfunction of an SSC important to safety with a different result than the previously evaluated in the CSAR?
<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Result in a design basis limit for fission product barrier as described in the CSAR being exceeded or altered?
<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Result in a departure from a method of evaluation described in the CSAR used in establishing the design bases or in the safety analyses?

A **YES** response to any of the questions in the list will require an amendment to the license, SNM-2500 and NRC approval prior to implementation.

If all responses are **NO**, written records shall be produced which provide the basis for the determination that the change, test, or experiment does not require a license amendment. Changes and evaluation summaries shall be reported to the NRC every two years.

Prepared by: F. C. Partney Title: OMC Date: 7/31/19  
 Safety Committee Approval (required if any of the above questions are answered Yes)

Operations & Maintenance Coordinator: [Signature] Date: 7/31/19  
 Administrator, EHS & Procurement: [Signature] Date: 7/31/19  
 QA Administrator: [Signature] Date: JUL 31 2019  
 Manager, Morris Operation: [Signature] Date: 7/31/19

Note: Additional pages may be attached to provide specific information required to address any of the above questions

**72.48 Applicability Analysis for Changes, Tests, Experiments**

Review Number: SC-2019-48-01

**Description of Activity:**

**Revise SOP 16-17 Fuel Storage System Inspection – change acceptance criteria for the stainless steel liner to match the language in the CSAR Aging Management Attachment (A.8).**

**“No” Justification -**

The original language for revision 2 of this SOP was too restrictive and has been modified to reflect the requirements laid out in the Consolidated Safety Analysis Report (CSAR).

Original language:

**3.2 Fuel Storage Basin – Stainless steel liner**

*The condition of the SS liner is monitored in part by the tests conducted on the BLD system which is indicative of the condition of the liner. But a visual inspection of the liner (those parts of the liner which can be seen) may reveal other conditions. The liner should be intact with no buckling and/or corrosion. Some discoloration is expected.*

Revised language:

**3.2 Fuel Storage Basin – Stainless steel liner**

*The condition of the SS liner is monitored in part by the tests conducted on the BLD system which is indicative of the condition of the liner. But a visual inspection of the liner (those parts of the liner which can be seen) may reveal other conditions. The liner should be intact and capable of performing its intended function. Some discoloration is expected.*

The language in the revised inspection criteria is consistent with the language in the CSAR. Changing the implementing procedure does not reduce the effectiveness of the aging management program and does not require new evaluations or tests.