CoC Condition/TS Identifier:___A-1.1_____

* All LCOs also require an Applicability, Condition(s), Required Action(s), Completion Time(s), Surveillance Requirement(s), and Frequency(ies). Refer to NUREG-1745 for additional guidance.

** In performing the risk insight evaluation above, the evaluator should think about subsequent changes to a relocated CoC requirement. Specifically, ask the question "what is the likelihood and worst possible consequences of a future change to this requirement in the less conservative direction"?

Requirement			Appendix A Section 1.1: Definitions
CoC Body Certified Design	Section I. Technology		No
	Section II. Design Features		No
Appendix A - Inspections, Tests, and Evaluations			No
Appendix B. Technical Specifications	Section 1 Definitions, Use and Application		Yes
	Section 2 Approved Contents (Selection Criteria)	A1	No
		A2	No
		A3	No
	Section 3 Limiting Conditions for Operation (LCOs)* and Surveillance Requirements (SRs) (Selection Criteria)	L1	No
		L2	No
		L3	No
	Section 4 Administrative Controls		No
Risk Insight**: Will removing this requirement from the CoC/TS result in…	A significant increase in the probability or consequences of an accident previously evaluated in the cask FSAR?		N/A
	The possibility of a new or different kind of accident being created compared to those previously evaluated in the FSAR?		N/A
	A Significant reduction in the margin of safety for ISFSI or cask operation?		N/A
Evaluation Summary			Move to Appendix B Section 1 as it meets the criterion for inclusion in the new TS format (Use and Application).

CoC Condition/TS Identifier:___A-1.2_____

* All LCOs also require an Applicability, Condition(s), Required Action(s), Completion Time(s), Surveillance Requirement(s), and Frequency(ies). Refer to NUREG-1745 for additional guidance.

** In performing the risk insight evaluation above, the evaluator should think about subsequent changes to a relocated CoC requirement. Specifically, ask the question "what is the likelihood and worst possible consequences of a future change to this requirement in the less conservative direction"?

Requirement			Appendix A Section 1.2: Logical Connectors: The purpose of this section is to explain the meaning of logical connectors.
CoC Body Certified Design	Section I. Technology		No
	Section II. Design Features		No
Appendix A - Inspections, Tests, and Evaluations			No
Appendix B. Technical Specifications	Section 1 Definitions, Use and Application		Yes
	Section 2 Approved Contents (Selection Criteria)	A1	No
		A2	No
		A3	No
	Section 3 Limiting Conditions for Operation (LCOs)* and Surveillance Requirements (SRs) (Selection Criteria)	L1	No
		L2	No
		L3	No
	Section 4 Administrative Controls		No
Risk Insight**: Will removing this requirement from the CoC/TS result in…	A significant increase in the probability or consequences of an accident previously evaluated in the cask FSAR?		N/A
	The possibility of a new or different kind of accident being created compared to those previously evaluated in the FSAR?		N/A
	A Significant reduction in the margin of safety for ISFSI or cask operation?		N/A
Evaluation Summary			Move to Appendix B Section 1 as it meets the criterion for inclusion in the new TS format (Use and Application).

	No change to text as the existing Purpose, Background, and Examples are helpful to understand the use and application of Logical Connectors.

CoC Condition/TS Identifier:___A-1.3_____

* All LCOs also require an Applicability, Condition(s), Required Action(s), Completion Time(s), Surveillance Requirement(s), and Frequency(ies). Refer to NUREG-1745 for additional guidance.

** In performing the risk insight evaluation above, the evaluator should think about subsequent changes to a relocated CoC requirement. Specifically, ask the question "what is the likelihood and worst possible consequences of a future change to this requirement in the less conservative direction"?

Requirement			Appendix A Section 1.3: Completion Times: The purpose of this section is to establish the Completion Time convention and to provide guidance for its use.
CoC Body Certified Design	Section I. Technology		No
	Section II. Design Features		No
Appendix A - Inspections, Tests, and Evaluations			No
Appendix B. Technical Specifications	Section 1 Definitions, Use and Application		Yes
	Section 2 Approved Contents (Selection Criteria)	A1	No
		A2	No
		A3	No
	Section 3 Limiting Conditions for Operation (LCOs)* and Surveillance Requirements (SRs) (Selection Criteria)	L1	No
		L2	No
		L3	No
	Section 4 Administrative Controls		No
Risk Insight**: Will removing this requirement from the CoC/TS result in…	A significant increase in the probability or consequences of an accident previously evaluated in the cask FSAR?		N/A
	The possibility of a new or different kind of accident being created compared to those previously evaluated in the FSAR?		N/A
	A Significant reduction in the margin of safety for ISFSI or cask operation?		N/A
Evaluation Summary			Move to Appendix B Section 1 as it meets the criterion for inclusion in the new TS format (Use and Application).

	No change to text as the existing Purpose, Background, Description, Examples, and Immediate Completion Time are helpful to provide guidance on the use and application of Completion Times.

CoC Condition/TS Identifier:___A-1.4_____

* All LCOs also require an Applicability, Condition(s), Required Action(s), Completion Time(s), Surveillance Requirement(s), and Frequency(ies). Refer to NUREG-1745 for additional guidance.

** In performing the risk insight evaluation above, the evaluator should think about subsequent changes to a relocated CoC requirement. Specifically, ask the question "what is the likelihood and worst possible consequences of a future change to this requirement in the less conservative direction"?

Requirement			Appendix A Section 1.4: Frequency: The purpose of this section is to define the proper use and application of Frequency requirements.
CoC Body Certified Design	Section I. Technology		No
	Section II. Design Features		No
Appendix A - Inspections, Tests, and Evaluations			No
Appendix B. Technical Specifications	Section 1 Definitions, Use and Application		Yes
	Section 2 Approved Contents (Selection Criteria)	A1	No
		A2	No
		A3	No
	Section 3 Limiting Conditions for Operation (LCOs)* and Surveillance Requirements (SRs) (Selection Criteria)	L1	No
		L2	No
		L3	No
	Section 4 Administrative Controls		No
Risk Insight**: Will removing this requirement from the CoC/TS result in…	A significant increase in the probability or consequences of an accident previously evaluated in the cask FSAR?		N/A
	The possibility of a new or different kind of accident being created compared to those previously evaluated in the FSAR?		N/A
	A Significant reduction in the margin of safety for ISFSI or cask operation?		N/A
Evaluation Summary			Move to Appendix B Section 1 as it meets the criterion for inclusion in the new TS format (Use and Application).

	No change to text as the existing Purpose, Description, and Examples are helpful to understand the use and application of Frequency.

CoC Condition/TS Identifier:___A-3.0_____

* All LCOs also require an Applicability, Condition(s), Required Action(s), Completion Time(s), Surveillance Requirement(s), and Frequency(ies). Refer to NUREG-1745 for additional guidance.

** In performing the risk insight evaluation above, the evaluator should think about subsequent changes to a relocated CoC requirement. Specifically, ask the question "what is the likelihood and worst possible consequences of a future change to this requirement in the less conservative direction"?

Requirement			Appendix A Section 3.0: LCO and SR Applicability
CoC Body Certified Design	Section I. Technology		No
	Section II. Design Features		No
Appendix A - Inspections, Tests, and Evaluations			No
Appendix B. Technical Specifications	Section 1 Definitions, Use and Application		No
	Section 2 Approved Contents (Selection Criteria)	A1	No
		A2	No
		A3	No
	Section 3 Limiting Conditions for Operation (LCOs)* and Surveillance Requirements (SRs) (Selection Criteria)	L1	Yes
		L2	Yes
		L3	Yes
	Section 4 Administrative Controls		No
Risk Insight**: Will removing this requirement from the CoC/TS result in…	A significant increase in the probability or consequences of an accident previously evaluated in the cask FSAR?		Yes These LCO and SR applicability requirements are necessary to ensure that safety functions are maintained as described in the individual LCOs and SRs.
	The possibility of a new or different kind of accident being created compared to those previously evaluated in the FSAR?		No
	A Significant reduction in the margin of safety for ISFSI or cask operation?		Yes These LCO and SR applicability requirements are necessary to ensure that safety functions are maintained as described in the individual LCOs and SRs.
Evaluation Summary			Move to Appendix B Section 3.0. Applies generically to all three criteria (L1, L2, L3).

CoC Condition/TS Identifier:___A-3.1.1_____

* All LCOs also require an Applicability, Condition(s), Required Action(s), Completion Time(s), Surveillance Requirement(s), and Frequency(ies). Refer to NUREG-1745 for additional guidance.

** In performing the risk insight evaluation above, the evaluator should think about subsequent changes to a relocated CoC requirement. Specifically, ask the question "what is the likelihood and worst possible consequences of a future change to this requirement in the less conservative direction"?

Requirement			Appendix A LCO 3.1.1: Multi-Purpose Canister (MPC) The MPC shall be dry and helium filled. Table 3-1 provides decay heat and burnup limits for forced helium dehydration (FHD) and vacuum drying. FHD is not subject to time limits. Vacuum drying of MPCs may be subject to time limits, from the end of bulk water removal until the start of helium backfill, as shown in Table 3-1.
CoC Body Certified Design	Section I. Technology		No
	Section II. Design Features		No
Appendix A - Inspections, Tests, and Evaluations			No
Appendix B. Technical Specifications	Section 1 Definitions, Use and Application		No
	Section 2 Approved Contents (Selection Criteria)	A1	No
		A2	No
		A3	No
	Section 3 Limiting Conditions for Operation (LCOs)* and Surveillance Requirements (SRs) (Selection Criteria)	L1	No
		L2	Yes
		L3	No
	Section 4 Administrative Controls		No
Risk Insight**: Will removing this requirement from the CoC/TS result in…	A significant increase in the probability or consequences of an accident previously evaluated in the cask FSAR?		No
	The possibility of a new or different kind of accident being created compared		No

	to those previously evaluated in the FSAR?	
	A Significant reduction in the margin of safety for ISFSI or cask operation?	Yes This LCO ensures an inert atmosphere around the fuel cladding, and that oxidation of the fuel cladding does not occur, preserving the integrity of the fuel cladding fission product barrier. Its removal would reduce the margin of safety for confinement.
Evaluation Summary		Move to Appendix B Section 3 as this LCO ensures an inert atmosphere around the fuel cladding and that oxidation of the fuel cladding does not occur, preserving the integrity of the fuel cladding fission product barrier. (Criterion L2)

CoC Condition/TS Identifier: A-3.1.2

* All LCOs also require an Applicability, Condition(s), Required Action(s), Completion Time(s), Surveillance Requirement(s), and Frequency(ies). Refer to NUREG-1745 for additional guidance.

** In performing the risk insight evaluation above, the evaluator should think about subsequent changes to a relocated CoC requirement. Specifically, ask the question "what is the likelihood and worst possible consequences of a future change to this requirement in the less conservative direction"?

Requirement			Appendix A LCO 3.1.2: SFSC Heat Removal System The SFSC Heat Removal System shall be operable. Note: The SFSC Heat Removal System is operable when 50% or more of the inlet and outlet vent areas are unblocked and available for flow or when air temperature requirements are met. This LCO does not apply to the HI-STORM 100 UVH overpack, which does not include an SFSC heat removal system.
CoC Body Certified Design	Section I. Technology		No
	Section II. Design Features		No
Appendix A - Inspections, Tests, and Evaluations			No
Appendix B. Technical Specifications	Section 1 Definitions, Use and Application		No
	Section 2 Approved Contents (Selection Criteria)	A1	No
		A2	No
		A3	No
	Section 3 Limiting Conditions for Operation (LCOs)* and Surveillance Requirements (SRs) (Selection Criteria)	L1	No
		L2	Yes
		L3	No
	Section 4 Administrative Controls		No
Risk Insight**: Will removing this requirement from the CoC/TS result in…	A significant increase in the probability or consequences of an accident previously evaluated in the cask FSAR?		No
	The possibility of a new or different kind of accident being created compared		No

	to those previously evaluated in the FSAR?	
	A Significant reduction in the margin of safety for ISFSI or cask operation?	Yes This LCO ensures fuel cladding temperatures remain below the limit for normal storage operations, preserving the integrity of the fuel cladding fission product barrier. Its removal would reduce the margin of safety for confinement.
Evaluation Summary		Move to Appendix B Section 3 as this LCO ensures fuel cladding temperatures remain below the limit for normal storage operations, preserving the integrity of the fuel cladding fission product barrier. (Criterion L2)

CoC Condition/TS Identifier: A-3.1.3

* All LCOs also require an Applicability, Condition(s), Required Action(s), Completion Time(s), Surveillance Requirement(s), and Frequency(ies). Refer to NUREG-1745 for additional guidance.

** In performing the risk insight evaluation above, the evaluator should think about subsequent changes to a relocated CoC requirement. Specifically, ask the question "what is the likelihood and worst possible consequences of a future change to this requirement in the less conservative direction"?

Requirement			Appendix A LCO 3.1.3: MPC Cavity Reflooding The MPC cavity pressure shall be < 100 psig Note: The LCO is only applicable to wet UNLOADING OPERATIONS.
CoC Body Certified Design	Section I. Technology		No
	Section II. Design Features		No
Appendix A - Inspections, Tests, and Evaluations			No
Appendix B. Technical Specifications	Section 1 Definitions, Use and Application		No
	Section 2 Approved Contents (Selection Criteria)	A1	No
		A2	No
		A3	No
	Section 3 Limiting Conditions for Operation (LCOs)* and Surveillance Requirements (SRs) (Selection Criteria)	L1	No
		L2	Yes
		L3	No
	Section 4 Administrative Controls		No
Risk Insight**: Will removing this requirement from the CoC/TS result in…	A significant increase in the probability or consequences of an accident previously evaluated in the cask FSAR?		No
	The possibility of a new or different kind of accident being created compared to those previously evaluated in the FSAR?		No
	A Significant reduction in the margin of safety for ISFSI or cask operation?		Yes This LCO ensures that the MPC cavity pressure limit is not exceeded during reflooding such that the

		integrity of the MPC enclosure vessel confinement boundary is compromised.
Evaluation Summary		Move to Appendix B Section 3 as this LCO ensures that the MPC cavity pressure is below the 100 psig limit before reflooding operations the MPC is then reflooded with water at a controlled rate and/or the pressure monitored to ensure that the pressure remains below 100 psig. The integrity of the MPC depends on maintaining the internal cavity pressures within design limits. This is accomplished by introducing water to the cavity in a controlled manner such that there is no sudden formation of large quantities of steam during MPC reflooding, preserving the integrity of the MPC enclosure vessel confinement boundary (fission product barrier). (Criterion L2)

CoC Condition/TS Identifier:____A-3.1.4_____

* All LCOs also require an Applicability, Condition(s), Required Action(s), Completion Time(s), Surveillance Requirement(s), and Frequency(ies). Refer to NUREG-1745 for additional guidance.

** In performing the risk insight evaluation above, the evaluator should think about subsequent changes to a relocated CoC requirement. Specifically, ask the question "what is the likelihood and worst possible consequences of a future change to this requirement in the less conservative direction"?

Requirement			Appendix A LCO 3.1.4: Supplemental Cooling System A supplemental cooling system (SCS) shall be operable. Note: Upon reaching steady state operation, the SCS may be temporarily disabled for a short duration (< 7 hours) to facilitate necessary operational evolutions, such as movement of the TRANSFER CASK through a door way, or other similar operation.
CoC Body Certified Design	Section I. Technology		No
	Section II. Design Features		No
Appendix A - Inspections, Tests, and Evaluations			No
Appendix B. Technical Specifications	Section 1 Definitions, Use and Application		No
	Section 2 Approved Contents (Selection Criteria)	A1	No
		A2	No
		A3	No
	Section 3 Limiting Conditions for Operation (LCOs)* and Surveillance Requirements (SRs) (Selection Criteria)	L1	No
		L2	Yes
		L3	No
	Section 4 Administrative Controls		No
Risk Insight**: Will removing this requirement from the CoC/TS result in…	A significant increase in the probability or consequences of an accident previously evaluated in the cask FSAR?		No
	The possibility of a new or different kind of accident being created compared		No

	to those previously evaluated in the FSAR?	
	A Significant reduction in the margin of safety for ISFSI or cask operation?	Yes This LCO ensures fuel cladding temperatures remain below the limit for normal storage operations, preserving the integrity of the fuel cladding fission product barrier. Its removal would reduce the margin of safety for confinement.
Evaluation Summary		Move to Appendix B Section 3 as this LCO ensures fuel cladding temperatures remain below the limit for normal storage operations, preserving the integrity of the fuel cladding fission product barrier. (Criterion L2)

CoC Condition/TS Identifier:___A-3.2.2_____

* All LCOs also require an Applicability, Condition(s), Required Action(s), Completion Time(s), Surveillance Requirement(s), and Frequency(ies). Refer to NUREG-1745 for additional guidance.

** In performing the risk insight evaluation above, the evaluator should think about subsequent changes to a relocated CoC requirement. Specifically, ask the question "what is the likelihood and worst possible consequences of a future change to this requirement in the less conservative direction"?

Requirement			Appendix A LCO 3.2.2: Transfer Cask Surface Contamination Removable contamination on the exterior surfaces of the TRANSFER CASK and accessible portions of the MPC shall each not exceed: a. 1000 dpm/100 cm2 from beta and gamma sources b. 20 dpm/100 cm2 from alpha sources. Note: This LCO is not applicable to the TRANSFER CASK if MPC TRANSFER operations occur inside the FUEL BUILDING.
CoC Body Certified Design	Section I. Technology		No
	Section II. Design Features		No
Appendix A - Inspections, Tests, and Evaluations			No
Appendix B. Technical Specifications	Section 1 Definitions, Use and Application		No
	Section 2 Approved Contents (Selection Criteria)	A1	No
		A2	No
		A3	No
	Section 3 Limiting Conditions for Operation (LCOs)* and Surveillance Requirements (SRs) (Selection Criteria)	L1	No
		L2	No
		L3	Yes
	Section 4 Administrative Controls		No
Risk Insight**: Will removing this requirement	A significant increase in the probability or consequences of an accident previously		No increase to the probability of any accident.

from the CoC/TS result in…	evaluated in the cask FSAR?	Slight increase in consequences due to increased dose from contamination, but not a significant increase.
	The possibility of a new or different kind of accident being created compared to those previously evaluated in the FSAR?	No
	A Significant reduction in the margin of safety for ISFSI or cask operation?	No
Evaluation Summary		Move to Appendix B Section 3 as this LCO ensures compliance with contamination limits for normal storage operations when not occurring in Fuel Building. (Criterion L3)

CoC Condition/TS Identifier: A-3.3.1

* All LCOs also require an Applicability, Condition(s), Required Action(s), Completion Time(s), Surveillance Requirement(s), and Frequency(ies). Refer to NUREG-1745 for additional guidance.

** In performing the risk insight evaluation above, the evaluator should think about subsequent changes to a relocated CoC requirement. Specifically, ask the question "what is the likelihood and worst possible consequences of a future change to this requirement in the less conservative direction"?

Requirement			Appendix A LCO 3.3.1: Boron Concentration As required by CoC Appendix B, Table 2.1-2, the concentration of boron in the water in the MPC shall meet the following limits for the applicable MPC model and the most limiting fuel assembly array/class and classification to be stored in the MPC: (see existing CoC text)
CoC Body Certified Design	Section I. Technology		No
	Section II. Design Features		No
Appendix A - Inspections, Tests, and Evaluations			No
Appendix B. Technical Specifications	Section 1 Definitions, Use and Application		No
	Section 2 Approved Contents (Selection Criteria)	A1	No
		A2	No
		A3	No
	Section 3 Limiting Conditions for Operation (LCOs)* and Surveillance Requirements (SRs) (Selection Criteria)	L1	No
		L2	Yes
		L3	No
	Section 4 Administrative Controls		No
Risk Insight**: Will removing this requirement from the CoC/TS result in…	A significant increase in the probability or consequences of an accident previously evaluated in the cask FSAR?		Yes The probability of a criticality accident would be increased.
	The possibility of a new or different kind of accident being created compared to those previously evaluated in the FSAR?		No

	A Significant reduction in the margin of safety for ISFSI or cask operation?	Yes Loss of criticality control would cause a significant reduction in the margin of safety.
Evaluation Summary		Move to Appendix B Section 3 as this LCO ensures that a subcritical configuration is maintained. (Criterion L2)

CoC Condition/TS Identifier:__A-Tables 3-1a and 3-1b_____

* All LCOs also require an Applicability, Condition(s), Required Action(s), Completion Time(s), Surveillance Requirement(s), and Frequency(ies). Refer to NUREG-1745 for additional guidance.

** In performing the risk insight evaluation above, the evaluator should think about subsequent changes to a relocated CoC requirement. Specifically, ask the question "what is the likelihood and worst possible consequences of a future change to this requirement in the less conservative direction"?

Requirement			Appendix A Table 3-1a: MPC Cavity Drying Limits for Ventilated Overpack Table 3-1b: MPC Cavity Drying Limits for Unventilated Overpack
CoC Body Certified Design	Section I. Technology		No
	Section II. Design Features		No
Appendix A - Inspections, Tests, and Evaluations			No
Appendix B. Technical Specifications	Section 1 Definitions, Use and Application		No
	Section 2 Approved Contents (Selection Criteria)	A1	No
		A2	No
		A3	No
	Section 3 Limiting Conditions for Operation (LCOs)* and Surveillance Requirements (SRs) (Selection Criteria)	L1	Yes Referenced by LCO 3.1.1
		L2	No
		L3	No
	Section 4 Administrative Controls		No
Risk Insight**: Will removing this requirement from the CoC/TS result in…	A significant increase in the probability or consequences of an accident previously evaluated in the cask FSAR?		See evaluation of LCO 3.1.1 above
	The possibility of a new or different kind of accident being created compared to those previously evaluated in the FSAR?		See evaluation of LCO 3.1.1 above
	A Significant reduction in the margin of safety for ISFSI or cask operation?		See evaluation of LCO 3.1.1 above

Evaluation Summary	Move to Appendix B Section 3 as these tables provide information needed to complete LCO 3.1.1. (Criterion L1)

CoC Condition/TS Identifier:___A-Tables 3-2a and 3-2b_____

* All LCOs also require an Applicability, Condition(s), Required Action(s), Completion Time(s), Surveillance Requirement(s), and Frequency(ies). Refer to NUREG-1745 for additional guidance.

** In performing the risk insight evaluation above, the evaluator should think about subsequent changes to a relocated CoC requirement. Specifically, ask the question "what is the likelihood and worst possible consequences of a future change to this requirement in the less conservative direction"?

Requirement			Appendix A Table 3-2a: MPC Helium Backfill Limits for Ventilated Overpack Table 3-2b: MPC Helium Backfill Limits for Unventilated Overpack
CoC Body Certified Design	Section I. Technology		No
	Section II. Design Features		No
Appendix A - Inspections, Tests, and Evaluations			No
Appendix B. Technical Specifications	Section 1 Definitions, Use and Application		No
	Section 2 Approved Contents (Selection Criteria)	A1	No
		A2	No
		A3	No
	Section 3 Limiting Conditions for Operation (LCOs)* and Surveillance Requirements (SRs) (Selection Criteria)	L1	Yes Referenced by LCO 3.1.1 and 3.1.4
		L2	No
		L3	No
	Section 4 Administrative Controls		No
Risk Insight**: Will removing this requirement from the CoC/TS result in…	A significant increase in the probability or consequences of an accident previously evaluated in the cask FSAR?		See evaluation of LCO 3.1.1 and 3.1.4 above
	The possibility of a new or different kind of accident being created compared to those previously evaluated in the FSAR?		See evaluation of LCO 3.1.1 and 3.1.4 above
	A Significant reduction in the margin of safety for ISFSI or cask operation?		See evaluation of LCO 3.1.1 and 3.1.4 above

Evaluation Summary	Move to Appendix B Section 3 as these Tables provide information needed to complete LCOs 3.1.1 and 3.1.4. (Criterion L1)

CoC Condition/TS Identifier:___A-Table 3-3_____

* All LCOs also require an Applicability, Condition(s), Required Action(s), Completion Time(s), Surveillance Requirement(s), and Frequency(ies). Refer to NUREG-1745 for additional guidance.

** In performing the risk insight evaluation above, the evaluator should think about subsequent changes to a relocated CoC requirement. Specifically, ask the question "what is the likelihood and worst possible consequences of a future change to this requirement in the less conservative direction"?

Requirement			Appendix A Table 3-3: Regionalized Storage Cell Heat Load Limits
CoC Body Certified Design	Section I. Technology		No
	Section II. Design Features		No
Appendix A - Inspections, Tests, and Evaluations			No
Appendix B. Technical Specifications	Section 1 Definitions, Use and Application		No
	Section 2 Approved Contents (Selection Criteria)	A1	Yes
		A2	No
		A3	No
	Section 3 Limiting Conditions for Operation (LCOs)* and Surveillance Requirements (SRs) (Selection Criteria)	L1	No
		L2	No
		L3	No
	Section 4 Administrative Controls		No
Risk Insight**: Will removing this requirement from the CoC/TS result in…	A significant increase in the probability or consequences of an accident previously evaluated in the cask FSAR?		No
	The possibility of a new or different kind of accident being created compared to those previously evaluated in the FSAR?		No
	A Significant reduction in the margin of safety for ISFSI or cask operation?		Yes This LCO ensures fuel cladding temperatures remain below the limit for normal storage operations, preserving the integrity of the fuel cladding fission product barrier. Its removal would reduce the margin of safety for confinement.

Evaluation Summary	Move to Appendix B Section 2 as this Table provides heat load limits (72.236(a)). (Criterion A1)

CoC Condition/TS Identifier: A-Table 3-4

* All LCOs also require an Applicability, Condition(s), Required Action(s), Completion Time(s), Surveillance Requirement(s), and Frequency(ies). Refer to NUREG-1745 for additional guidance.

** In performing the risk insight evaluation above, the evaluator should think about subsequent changes to a relocated CoC requirement. Specifically, ask the question "what is the likelihood and worst possible consequences of a future change to this requirement in the less conservative direction"?

Requirement			Appendix A Table 3-4: Uniform Storage Cell Heat Load Limits
CoC Body Certified Design	Section I. Technology		No
	Section II. Design Features		No
Appendix A - Inspections, Tests, and Evaluations			No
Appendix B. Technical Specifications	Section 1 Definitions, Use and Application		No
	Section 2 Approved Contents (Selection Criteria)	A1	Yes
		A2	No
		A3	No
	Section 3 Limiting Conditions for Operation (LCOs)* and Surveillance Requirements (SRs) (Selection Criteria)	L1	No
		L2	No
		L3	No
	Section 4 Administrative Controls		No
Risk Insight**: Will removing this requirement from the CoC/TS result in…	A significant increase in the probability or consequences of an accident previously evaluated in the cask FSAR?		No
	The possibility of a new or different kind of accident being created compared to those previously evaluated in the FSAR?		No
	A Significant reduction in the margin of safety for ISFSI or cask operation?		Yes This LCO ensures fuel cladding temperatures remain below the limit for normal storage operations, preserving the integrity of the fuel cladding fission product barrier. Its removal would reduce the margin of safety for confinement.

Evaluation Summary	Move to Appendix B Section 2 as this Table provides heat load limits (72.236(a)). (Criterion A1)

CoC Condition/TS Identifier: A-Table 3-5

* All LCOs also require an Applicability, Condition(s), Required Action(s), Completion Time(s), Surveillance Requirement(s), and Frequency(ies). Refer to NUREG-1745 for additional guidance.

** In performing the risk insight evaluation above, the evaluator should think about subsequent changes to a relocated CoC requirement. Specifically, ask the question "what is the likelihood and worst possible consequences of a future change to this requirement in the less conservative direction"?

Requirement			Appendix A Table 3-5: Completion Time for Actions to Restore SFSC Heat Removal System Operable
CoC Body Certified Design	Section I. Technology		No
	Section II. Design Features		No
Appendix A - Inspections, Tests, and Evaluations			No
Appendix B. Technical Specifications	Section 1 Definitions, Use and Application		No
	Section 2 Approved Contents (Selection Criteria)	A1	No
		A2	No
		A3	No
	Section 3 Limiting Conditions for Operation (LCOs)* and Surveillance Requirements (SRs) (Selection Criteria)	L1	No
		L2	Yes Referenced by LCO 3.1.2
		L3	No
	Section 4 Administrative Controls		No
Risk Insight**: Will removing this requirement from the CoC/TS result in…	A significant increase in the probability or consequences of an accident previously evaluated in the cask FSAR?		See evaluation of LCO 3.1.2 above
	The possibility of a new or different kind of accident being created compared to those previously evaluated in the FSAR?		See evaluation of LCO 3.1.2 above
	A Significant reduction in the margin of safety for ISFSI or cask operation?		See evaluation of LCO 3.1.2 above
Evaluation Summary			Move to Appendix B Section 3 as the information in these Tables relates to completion times for LCO 3.1.2.

CoC Condition/TS Identifier:___A-5.4_____

* All LCOs also require an Applicability, Condition(s), Required Action(s), Completion Time(s), Surveillance Requirement(s), and Frequency(ies). Refer to NUREG-1745 for additional guidance.

** In performing the risk insight evaluation above, the evaluator should think about subsequent changes to a relocated CoC requirement. Specifically, ask the question "what is the likelihood and worst possible consequences of a future change to this requirement in the less conservative direction"?

<table>
<tr><td colspan="3">Requirement</td><td>Appendix A Section 5.4: Radioactive Effluent Control Program
This program implements the requirements of 10 CFR 72.44(d).
a. The HI-STORM 100 Cask System does not create any radioactive materials or have any radioactive waste treatment systems. Therefore, specific operating procedures for the control of radioactive effluents are not required. Specification 3.1.1, Multi-Purpose Canister (MPC), provides assurance that there are not radioactive effluents from the SFSC.
b. This program includes an environmental monitoring program. Each general license user may incorporate SFSC operations into their environmental monitoring programs for 10 CFR Part 50 operations.
c. An annual report shall be submitted pursuant to 10 CFR 72.44(d)(3).</td></tr>
<tr><td rowspan="2">CoC Body Certified Design</td><td colspan="2">Section I. Technology</td><td>No</td></tr>
<tr><td colspan="2">Section II. Design Features</td><td>No</td></tr>
<tr><td colspan="3">Appendix A - Inspections, Tests, and Evaluations</td><td>No</td></tr>
<tr><td rowspan="8">Appendix B. Technical Specifications</td><td colspan="2">Section 1 Definitions, Use and Application</td><td>No</td></tr>
<tr><td rowspan="3">Section 2 Approved Contents (Selection Criteria)</td><td>A1</td><td>No</td></tr>
<tr><td>A2</td><td>No</td></tr>
<tr><td>A3</td><td>No</td></tr>
<tr><td rowspan="3">Section 3 Limiting Conditions for Operation (LCOs)* and Surveillance Requirements (SRs) (Selection Criteria)</td><td>L1</td><td>No</td></tr>
<tr><td>L2</td><td>No</td></tr>
<tr><td>L3</td><td>No</td></tr>
<tr><td colspan="2">Section 4 Administrative Controls</td><td>Yes</td></tr>
</table>

Risk Insight**: Will removing this requirement from the CoC/TS result in…	A significant increase in the probability or consequences of an accident previously evaluated in the cask FSAR?	No
	The possibility of a new or different kind of accident being created compared to those previously evaluated in the FSAR?	No
	A Significant reduction in the margin of safety for ISFSI or cask operation?	First statement (quoted in Evaluation Summary below) – No a. – No The first sentence establishes that the HI-STORM System does not create any radioactive materials or have any radioactive waste treatment systems. The second sentence merely explains that specific operating procedures and reporting is not required based on the first sentence. This is not necessary for safety as implementing the unnecessary procedures and reporting would not decrease any margin to safety for the system. Similarly, the third sentence merely points to an LCO providing additional assurance that the first statement is true. b. – Yes Without this environmental monitoring program, radioactive material may not be controlled appropriately. c. – No This statement merely specifies a regulatory requirement that must be met.
Evaluation Summary		Remove “This program implements the requirements of 10 CFR 72.44(d)” as this is a regulatory requirement that must be met. Also remove “Specification 3.1.1, Multi-Purpose Canister (MPC), provides assurance that there are not radioactive effluents from the SFSC.” from item a as these are not necessary based on the risk insight discussion above. Also remove item c “An annual report shall be submitted pursuant to 10 CFR 72.44(d)(3)” as this is a regulatory requirement that must be met. Move the rest of the text to Appendix B Section 4, Administrative Controls. The remaining sentences in

	item a are not a safety concern but should be kept in the CoC Appendix B as they reduce the regulatory burden on the licensees. Item b should be kept in the CoC Appendix B as this program is necessary to assure that the operations involved in the storage of spent fuel in an ISFSI are performed in a safe manner.

CoC Condition/TS Identifier:___A-5.5_____

* All LCOs also require an Applicability, Condition(s), Required Action(s), Completion Time(s), Surveillance Requirement(s), and Frequency(ies). Refer to NUREG-1745 for additional guidance.

** In performing the risk insight evaluation above, the evaluator should think about subsequent changes to a relocated CoC requirement. Specifically, ask the question "what is the likelihood and worst possible consequences of a future change to this requirement in the less conservative direction"?

<table>
<tr><td colspan="3">Requirement</td><td>Appendix A Section 5.5: Cask Transport Evaluation Program

This program provides a means for evaluating various transport configurations and transport route conditions to ensure that the design basis drop limits are met. For lifting of the loaded TRANSFER CASK or OVERPACK using devices which are integral to a structure governed by 10 CFR Part 50 regulations, 10 CFR 50 requirements apply. This program is not applicable when the TRANSFER CASK or OVERPACK is in the FUEL BUILDING or is being handled by a device providing support from underneath (i.e., on a rail car, heavy haul trailer, air pads, etc...) or is being handled by a device designed in accordance with the increased safety factors of ANSI N14.6 and having redundant drop protection.

Pursuant to 10 CFR 72.212, this program shall evaluate the site-specific transport route conditions.</td></tr>
<tr><td rowspan="2">CoC Body Certified Design</td><td colspan="2">Section I. Technology</td><td>No</td></tr>
<tr><td colspan="2">Section II. Design Features</td><td>No</td></tr>
<tr><td colspan="3">Appendix A - Inspections, Tests, and Evaluations</td><td>No</td></tr>
<tr><td rowspan="8">Appendix B. Technical Specifications</td><td colspan="2">Section 1 Definitions, Use and Application</td><td>No</td></tr>
<tr><td rowspan="3">Section 2 Approved Contents (Selection Criteria)</td><td>A1</td><td>No</td></tr>
<tr><td>A2</td><td>No</td></tr>
<tr><td>A3</td><td>No</td></tr>
<tr><td rowspan="3">Section 3 Limiting Conditions for Operation (LCOs)* and Surveillance Requirements (SRs) (Selection Criteria)</td><td>L1</td><td>No</td></tr>
<tr><td>L2</td><td>No</td></tr>
<tr><td>L3</td><td>No</td></tr>
<tr><td colspan="2">Section 4 Administrative Controls</td><td>Yes</td></tr>
</table>

Risk Insight**: Will removing this requirement from the CoC/TS result in…	A significant increase in the probability or consequences of an accident previously evaluated in the cask FSAR?	No
	The possibility of a new or different kind of accident being created compared to those previously evaluated in the FSAR?	No
	A Significant reduction in the margin of safety for ISFSI or cask operation?	Yes A significant reduction in the margin of safety for confinement is possible if there were no restrictions on equipment used for lifting a loaded cask.
Evaluation Summary		Move to Appendix B Section 4, Administrative Controls, as this provides restrictions on what equipment can used to transfer the HI-STORM System casks and canisters when they are loaded with fuel. These controls are necessary to assure that the operations involved in the storage of spent fuel in an ISFSI are performed in a safe manner such that the casks will not be dropped which could impact safety functions such as confinement.

CoC Condition/TS Identifier: A-Table 5-1

* All LCOs also require an Applicability, Condition(s), Required Action(s), Completion Time(s), Surveillance Requirement(s), and Frequency(ies). Refer to NUREG-1745 for additional guidance.

** In performing the risk insight evaluation above, the evaluator should think about subsequent changes to a relocated CoC requirement. Specifically, ask the question "what is the likelihood and worst possible consequences of a future change to this requirement in the less conservative direction"?

Requirement			Appendix A Table 5-1 Transfer Cask and Free-Standing Overpack Lifting Requirements
CoC Body Certified Design	Section I. Technology		No
	Section II. Design Features		No
Appendix A - Inspections, Tests, and Evaluations			No
Appendix B. Technical Specifications	Section 1 Definitions, Use and Application		No
	Section 2 Approved Contents (Selection Criteria)	A1	No
		A2	No
		A3	No
	Section 3 Limiting Conditions for Operation (LCOs)* and Surveillance Requirements (SRs) (Selection Criteria)	L1	No
		L2	No
		L3	No
	Section 4 Administrative Controls		Yes (This table is referenced in A-5.5)
Risk Insight**: Will removing this requirement from the CoC/TS result in…	A significant increase in the probability or consequences of an accident previously evaluated in the cask FSAR?		See evaluation of A-5.5 above
	The possibility of a new or different kind of accident being created compared to those previously evaluated in the FSAR?		See evaluation of A-5.5 above
	A Significant reduction in the margin of safety for ISFSI or cask operation?		See evaluation of A-5.5 above
Evaluation Summary			Move to Appendix B Section 4, Administrative Controls, as this provides restrictions on what equipment can used to transfer the HI-STORM System casks and canisters when they are loaded

	with fuel. These controls are necessary to assure that the operations involved in the storage of spent fuel in an ISFSI are performed in a safe manner such that the casks will not be dropped which could impact safety functions such as confinement.

CoC Condition/TS Identifier:__A-5.7_____

* All LCOs also require an Applicability, Condition(s), Required Action(s), Completion Time(s), Surveillance Requirement(s), and Frequency(ies). Refer to NUREG-1745 for additional guidance.

** In performing the risk insight evaluation above, the evaluator should think about subsequent changes to a relocated CoC requirement. Specifically, ask the question "what is the likelihood and worst possible consequences of a future change to this requirement in the less conservative direction"?

Requirement			Appendix A Section 5.7: Radiation Protection Program
CoC Body Certified Design	Section I. Technology		No
	Section II. Design Features		No
Appendix A - Inspections, Tests, and Evaluations			No
Appendix B. Technical Specifications	Section 1 Definitions, Use and Application		No
	Section 2 Approved Contents (Selection Criteria)	A1	No
		A2	No
		A3	No
	Section 3 Limiting Conditions for Operation (LCOs)* and Surveillance Requirements (SRs) (Selection Criteria)	L1	No
		L2	No
		L3	No
	Section 4 Administrative Controls		Yes
Risk Insight**: Will removing this requirement from the CoC/TS result in…	A significant increase in the probability or consequences of an accident previously evaluated in the cask FSAR?		No There would be no increase in the probability of any accident. There would only be an increase in the consequences of accidents due to increased dose from the Overpack or Transfer Cask if there was an area of reduced shielding. This protection program verifies that there is no such area of reduced shielding but does not include an overt action involving an SSC that provides shielding.
	The possibility of a new or different kind of accident being created compared to those previously evaluated in the FSAR?		No
	A Significant reduction in the margin of safety for ISFSI or cask operation?		No There would be a slight reduction in the margin of safety for the shielding function, but only if an area of reduced shielding exists.
Evaluation Summary			5.7.1 - Move to Appendix B section 4

	5.7.2 – Combine main statement with existing Section 5.7.3 as these discussions are currently repetitive. Refer to appropriate Part 72 Section: 72.212(b)(5)(iii) 5.7.3 through 8– Move to Appendix B section 4. These controls are important as they provide dose rate information in assessing worker dose and potentially identifying a misload.

CoC Condition/TS Identifier:___A-5.8_____

* All LCOs also require an Applicability, Condition(s), Required Action(s), Completion Time(s), Surveillance Requirement(s), and Frequency(ies). Refer to NUREG-1745 for additional guidance.

** In performing the risk insight evaluation above, the evaluator should think about subsequent changes to a relocated CoC requirement. Specifically, ask the question "what is the likelihood and worst possible consequences of a future change to this requirement in the less conservative direction"?

Requirement		Appendix A Section 5.8: Fabrication Helium Leak Test At completion of welding the MPC shell to baseplate, an MPC confinement weld helium leak test shall be performed using a helium mass spectrometer. This test shall include the base metals of the MPC shell and baseplate. A helium leak test shall also be performed on the base metal of the fabricated MPC lid. The confinement boundary leakage rate tests shall be performed in accordance with ANSI N14.5 to "leaktight" criteria. If a leakage rate exceeding the acceptance criteria is detected, then the area of leakage shall be determined and the area repaired per ASME Code Section III, Subsection NB requirements. Re-testing shall be performed until the leakage rate acceptance criterion is met. Casks initially loaded to Amendments No. 2 through 7 must meet the following: • Casks fabricated on or after July 1, 2009 a fabrication helium leak test at completion of the welding of the MPC shell to baseplate must be performed in accordance with the above requirements. • Casks loaded before July 1, 2009 must meet the fabrication helium leak test requirements of the lid base metal of the amendment to which they were originally loaded. • Casks loaded before July 1, 2009 do not meet the above fabrication helium leak test requirements after MPC shell to baseplate welding. These casks may be upgraded to Amendment 15.
CoC Body Certified Design	Section I. Technology	No
	Section II. Design Features	No
Appendix A - Inspections, Tests, and Evaluations		No
	Section 1 Definitions, Use and Application	Yes

Appendix B. Technical Specifications	Section 2 Approved Contents (Selection Criteria)	A1	No
		A2	No
		A3	No
	Section 3 Limiting Conditions for Operation (LCOs)* and Surveillance Requirements (SRs) (Selection Criteria)	L1	No
		L2	No
		L3	No
	Section 4 Administrative Controls		No
Risk Insight**: Will removing this requirement from the CoC/TS result in…	A significant increase in the probability or consequences of an accident previously evaluated in the cask FSAR?		Yes This test confirms the MPC has been manufactured correctly and will provide confinement as designed.
	The possibility of a new or different kind of accident being created compared to those previously evaluated in the FSAR?		No
	A Significant reduction in the margin of safety for ISFSI or cask operation?		No
Evaluation Summary			Keep in Appendix A as it describes a test to provide reasonable assurance that an MPC has been manufactured and will operate in conformance with the certified design, and that the confinement safety function will be performed.

CoC Condition/TS Identifier:___A-5.9_____

* All LCOs also require an Applicability, Condition(s), Required Action(s), Completion Time(s), Surveillance Requirement(s), and Frequency(ies). Refer to NUREG-1745 for additional guidance.

** In performing the risk insight evaluation above, the evaluator should think about subsequent changes to a relocated CoC requirement. Specifically, ask the question "what is the likelihood and worst possible consequences of a future change to this requirement in the less conservative direction"?

Requirement			Appendix A Section 5.9: Aging Management Program Each general licensee shall have a program to establish, implement, and maintain written procedures for each AMP described in the FSAR. The program shall include provisions for changing AMP elements, as necessary, and within the limitations of the approved licensing bases to address new information on aging effects based on inspection findings and/or industry operating experience provided to the general licensee during the renewal period. The general licensee shall establish and implement these written procedures within 365 days after the effective date of the renewal of the CoC or 365 days of the 20th anniversary of the loading of the first dry storage system at its site, whichever is later. Each general licensee shall perform tollgate assessments as described in Chapter 9 of the FSAR.
CoC Body Certified Design	Section I. Technology		No
	Section II. Design Features		No
Appendix A - Inspections, Tests, and Evaluations			No
Appendix B. Technical Specifications	Section 1 Definitions, Use and Application		No
	Section 2 Approved Contents (Selection Criteria)	A1	No
		A2	No
		A3	No
	Section 3 Limiting Conditions for Operation (LCOs)* and Surveillance Requirements (SRs) (Selection Criteria)	L1	No
		L2	No
		L3	No

	Section 4 Administrative Controls	Yes
Risk Insight**: Will removing this requirement from the CoC/TS result in…	A significant increase in the probability or consequences of an accident previously evaluated in the cask FSAR?	Yes - Lack of appropriate evaluation of the effects of aging on the dry storage equipment could result in an increase to the consequences of a previously evaluated accident.
	The possibility of a new or different kind of accident being created compared to those previously evaluated in the FSAR?	No
	A Significant reduction in the margin of safety for ISFSI or cask operation?	Yes – Lack of appropriate evaluation of the effects of aging on the dry storage equipment could result in a significant reduction in safety over time.
Evaluation Summary		Move to Appendix B Section 4.