CoC Condition/TS Identifier:___C-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 C Section 1.1: Definitions
CoC Body Certified Design	Section I. Technology		No
	Section II. Design Features		No
Appendix C - Inspections, Tests, and Evaluations			No
Appendix D. 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 D Section 1 as it meets the criterion for inclusion in the new TS format (Use and Application).

CoC Condition/TS Identifier:___C-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 C 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 C - Inspections, Tests, and Evaluations			No
Appendix D. 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 D 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:___C-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 C 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 C - Inspections, Tests, and Evaluations			No
Appendix D. 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 D 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:___C-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 C 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 C - Inspections, Tests, and Evaluations			No
Appendix D. 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 D 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:___C-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 C Section 3.0: LCO and SR Applicability
CoC Body Certified Design	Section I. Technology		No
	Section II. Design Features		No
Appendix C - Inspections, Tests, and Evaluations			No
Appendix D. 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 D Section 3.0. Applies generically to all three criteria (L1, L2, L3).

CoC Condition/TS Identifier:___C-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 C 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 C - Inspections, Tests, and Evaluations			No
Appendix D. 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 D 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: C-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 C LCO 3.1.2: HI-STORM 100S VERSION E SFSC Heat Removal System The HI-STORM 100S VERSION E 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 C - Inspections, Tests, and Evaluations			No
Appendix D. 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		No

	being created compared 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 D 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:__C-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 C LCO 3.1.3: MPC Cavity Reflooding The MPC cavity pressure shall be: < 110 psig (MPC-32M/32 Version 1/68 Version 1), or < 100 psig for (MPC-24/24E/24EF/32/32F/68/68F/68FF/68M)
CoC Body Certified Design	Section I. Technology		No
	Section II. Design Features		No
Appendix C - Inspections, Tests, and Evaluations			No
Appendix D. 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 D Section 3 as this LCO ensures that the MPC cavity pressure is below the 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 the limit. 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:____C-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 C 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 C - Inspections, Tests, and Evaluations			No
Appendix D. 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 D 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:___C-3.2.1_____

* 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 C LCO 3.2.1: 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.
CoC Body Certified Design	Section I. Technology		No
	Section II. Design Features		No
Appendix C - Inspections, Tests, and Evaluations			No
Appendix D. 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 from the CoC/TS result in…	A significant increase in the probability or consequences of an accident previously evaluated in the cask FSAR?		No increase to the probability of any accident. 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		No

	being created compared to those previously evaluated in the FSAR?	
	A Significant reduction in the margin of safety for ISFSI or cask operation?	No
Evaluation Summary		Move to Appendix D 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: C-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 C LCO 3.3.1: Boron Concentration 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: a. MPC-32M: Minimum soluble boron concentration as required by the Tables 3-4 through 3-6, per configurations in Appendix D Table 2.4-1. b. MPC-32/32F and MPC-32 Version 1: Minimum soluble boron concentration as required by Table 3-7 c. MPC-24 with one or more fuel assemblies having an initial enrichment greater than the value in Appendix B Table 2.1-2 for no soluble boron credit and < 5.0 wt% 235U: > 400 ppmb d. MPC-24E or MPC-24EF (all INTACT FUEL ASSEMBLIES) with one or more fuel assemblies having an initial enrichment greater than the value in Appendix B Table 2.1-2 for no soluble boron credit and < 5.0 wt% 235U: > 300 ppmb e. MPC-24E or MPC-24EF (one or more DAMAGED FUEL ASSEMBLIES or FUEL DEBRIS) with one or more fuel assemblies having an initial enrichment > 4.0 wt% 235U and < 5.0 wt% 235U: > 600 ppmb
CoC Body Certified Design	Section I. Technology		No
	Section II. Design Features		No
Appendix C - Inspections, Tests, and Evaluations			No
Appendix D. Technical Specifications	Section 1 Definitions, Use and Application		No
		A1	No

	Section 2 Approved Contents (Selection Criteria)	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 D Section 3 as this LCO ensures that a subcritical configuration is maintained. (Criterion L2)

CoC Condition/TS Identifier:__C-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 C Table 3-1a: MPC Cavity Drying Limits for Ventilated Overpack Table 3-1b: MPC-32M Cavity Drying Limits for Unventilated Overpack
CoC Body Certified Design	Section I. Technology		No
	Section II. Design Features		No
Appendix C - Inspections, Tests, and Evaluations			No
Appendix D. 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 D Section 3 as these tables provide information needed to complete LCO 3.1.1. (Criterion L1)

CoC Condition/TS Identifier:___C-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 C 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 C - Inspections, Tests, and Evaluations			No
Appendix D. 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 D Section 3 as these Tables provide information needed to complete LCOs 3.1.1 and 3.1.4. (Criterion L1)

CoC Condition/TS Identifier:___C-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 C Table 3-3: Completion Time for Actions to Restore HI-STORM 100S Version E SFSC Heat Removal System to Operable
CoC Body Certified Design	Section I. Technology		No
	Section II. Design Features		No
Appendix C - Inspections, Tests, and Evaluations			No
Appendix D. 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 LCOs 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 LCOs 3.1.2 above
	A Significant reduction in the margin of safety for ISFSI or cask operation?		See evaluation of LCOs 3.1.2 above
Evaluation Summary			Move to Appendix D Section 3 as the information in this Table relates to completion times for LCO 3.1.2.

CoC Condition/TS Identifier:___C-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 C Table 3-4: MPC-32M with up to Sixteen DFIs Soluble Boron Requirements
CoC Body Certified Design	Section I. Technology		No
	Section II. Design Features		No
Appendix C - Inspections, Tests, and Evaluations			No
Appendix D. 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 3.3.1
		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 3.3.1 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 3.3.1 above
	A Significant reduction in the margin of safety for ISFSI or cask operation?		See evaluation of LCO 3.3.1 above
Evaluation Summary			Move to Appendix D Section 3 as this Table provides soluble boron requirements related to LCO 3.3.1.

CoC Condition/TS Identifier:__C-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 C Table 3-5: MPC-32M with up to Twelve DFCs Soluble Boron Requirements
CoC Body Certified Design	Section I. Technology		No
	Section II. Design Features		No
Appendix C - Inspections, Tests, and Evaluations			No
Appendix D. 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 3.3.1
		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 3.3.1 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 3.3.1 above
	A Significant reduction in the margin of safety for ISFSI or cask operation?		See evaluation of LCO 3.3.1 above
Evaluation Summary			Move to Appendix D Section 3 as this Table provides soluble boron requirements related to LCO 3.3.1.

CoC Condition/TS Identifier: C-Table 3-6

* 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 C Table 3-6: MPC-32M with Thirteen to Sixteen DFCs/DFIs Soluble Boron Requirements
CoC Body Certified Design	Section I. Technology		No
	Section II. Design Features		No
Appendix C - Inspections, Tests, and Evaluations			No
Appendix D. 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 3.3.1
		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 3.3.1 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 3.3.1 above
	A Significant reduction in the margin of safety for ISFSI or cask operation?		See evaluation of LCO 3.3.1 above
Evaluation Summary			Move to Appendix D Section 3 as this Table provides soluble boron requirements related to LCO 3.3.1.

CoC Condition/TS Identifier: C-Table 3-7

* 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 C Table 3-7: MPC-32/32F and Version 1 Soluble Boron Requirements
CoC Body Certified Design	Section I. Technology		No
	Section II. Design Features		No
Appendix C - Inspections, Tests, and Evaluations			No
Appendix D. 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 3.3.1
		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 3.3.1 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 3.3.1 above
	A Significant reduction in the margin of safety for ISFSI or cask operation?		See evaluation of LCO 3.3.1 above
Evaluation Summary			Move to Appendix D Section 3 as this Table provides soluble boron requirements related to LCO 3.3.1.

CoC Condition/TS Identifier:___C-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"?

<table>
<tr><td colspan="3">Requirement</td><td>Appendix C Section 5.1: Radioactive Effluent Control Program for HI-STORM 100S Version E
This program implements the requirements of 10 CFR 72.44(d).
a. The HI-STORM 100 Version E 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 C - Inspections, Tests, and Evaluations</td><td>No</td></tr>
<tr><td rowspan="8">Appendix D. 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>
</table>

	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
	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 D Section 4, Administrative Controls. The remaining sentences in item a are not a safety concern but should be kept in the CoC Appendix D as they reduce the regulatory burden on the licensees. Item b should be kept in the CoC Appendix D 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:___C-5.2_____

* 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 C Section 5.2: Cask Transport Evaluation Program a. For lifting of the loaded MPC, TRANSFER CASK, or OVERPACK using equipment which is integral to a structure governed by 10 CFR Part 50 regulations, 10 CFR 50 requirements apply. b. This program is not applicable when the TRANSFER CASK or OVERPACK is in the FUEL BUILDING or is being handled by equipment providing support from underneath (i.e., on a rail car, heavy haul trailer, air pads, etc...). c. The TRANSFER CASK or OVERPACK, when loaded with spent fuel, may be lifted to and carried at any height necessary during TRANSPORT OPERATIONS and MPC TRANSFER, provided the lifting equipment is designed in accordance with items 1, 2, and 3 below.
CoC Body Certified Design	Section I. Technology		No
	Section II. Design Features		No
Appendix C - Inspections, Tests, and Evaluations			No
Appendix D. 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
	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 D 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: C-5.3

* 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 C Section 5.3: Radiation Protection Program 5.3.1 Each cask user shall ensure that the Part 50 radiation protection program appropriately addresses dry storage cask loading and unloading, as well as ISFSI operations, including transport of the loaded OVERPACK or TRANSFER CASK outside of facilities governed by 10 CFR Part 50. The radiation protection program shall include appropriate controls for direct radiation and contamination, ensuring compliance with applicable regulations, and implementing actions to maintain personnel occupational exposures As Low As Reasonably Achievable (ALARA). The actions and criteria to be included in the program are provided below. 5.3.2 As part of its evaluation pursuant to 10 CFR 72.212(b)(2)(i)(C), the licensee shall perform an analysis to confirm that the dose limits of 10 CFR 72.104(a) will be satisfied under the actual site conditions and ISFSI configuration, considering the planned number of casks to be deployed and the cask contents. 5.3.3 Based on the analysis performed pursuant to Section 5.3.2, the licensee shall establish individual cask surface dose rate limits for the HI-TRAC TRANSFER CASK and the HI-STORM OVERPACK to be used at the site. Total (neutron plus gamma) dose rate limits shall be established at the following locations: a. The top of the OVERPACK. b. The side of the TRANSFER CASK and OVERPACK c. The inlet and outlet ducts on the OVERPACK (not applicable for a non-ventilated OVERPACK)

			(see existing Appendix C for remaining text)
CoC Body Certified Design	Section I. Technology		No
	Section II. Design Features		No
Appendix C - Inspections, Tests, and Evaluations			No
Appendix D. 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			5.3.1 -Move to Appendix D section 4 5.3.2 – Combine main statement with existing Section 5.3.3 as these discussions are currently repetitive. Refer to appropriate Part 72 Section: 72.212(b)(5)(iii) 5.3.3 through 8– Move to Appendix D 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:___C-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"?

Requirement			Appendix C Section 5.4: 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.
CoC Body Certified Design	Section I. Technology		No
	Section II. Design Features		No
Appendix C - Inspections, Tests, and Evaluations			No
Appendix D. 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	A significant increase in the probability or consequences of an accident previously		Yes This test confirms the MPC has been manufactured correctly and will provide confinement as designed.

from the CoC/TS result in…	evaluated in the cask FSAR?	
	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 C 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:___C-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 C Section 5.5: 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.</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 C - Inspections, Tests, and Evaluations</td><td>No</td></tr>
<tr><td rowspan="8">Appendix D. 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?	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 D Section 4.