

## Agenda for NRC meeting May 10

1. ISFSI Management – Discuss preferred options
  - a. Self-perform - Using Dairyland Employees
  - b. Self-perform – Using Contractor (Dairyland retains the license)
  - c. Contractor Performs – Contractor obtains the license (Dairyland owns the fuel)
  - d. Sale of Fuel Contract – Third Party owns the fuel and operates ISFSI facility. (Dairyland retains land ownership)
  
2. Industry examples of “ISSFSI Only” operations that implement methods discussed in #1 above.
  - a. Is one method more effective than another from a regulatory perspective?
  - b. Is one method preferred over another from a regulatory perspective?
  - c. For options where an independent contractor is used to perform ISSFSI operations, what level of licensee/owner oversight is preferred from a regulatory perspective?
  
3. We are interested in changing the basis for personnel qualifications from ANSI 18.1 to specific requirements within the QAPD for the site. We understand that other “ISFSI Only” licensees have taken this approach.
  - a. We are interested in the regulator’s perspective.
  - b. Specifically we are interested in the regulators perspective on incorporating combined educational and experience based qualifications in the QAPD vs the ANSI 18.1 based qualifications on education only.
  
4. Questions on impact of proposed New Rule
  - a. Public meeting stated new rule would be an option for licensees, not required.
    - i. What does “option” mean?
    - ii. Would the new rule apply to ISFSI only facilities?
  - b. How would new rule limit our ability to implement the newly approved Eplan?
    - i. Specifically new rule 10 CFR 50.200.c.iii.1 and 2 calls for use of UE and Alert. Our site uses the Part 72 scheme of Alert only.
  - c. PSDAR – The revision to 10 CFR 50.82.a.2.ii does not require a PSDAR but draft reg guide 1349 encourages the use of PSDAR
    - i. Dairyland does not have a PSDAR
    - ii. Would our plan to continue without a PSDAR be accepted by the regulator if the new rule is implemented?
  
5. Communications with NRC just prior to license transfer
  - a. Submit Rev 31 of QAPD to reflect current Dairyland organization structure (60 days prior to license transfer)
  
6. Changes at LACBWR (Post License Transfer)
  - a. Communicate plan to move Security Plan license basis to 73.51 vs current 73.55 (requires LAR)

- b. Implement new Eplan
  - c. Revise QAPD to remove requirement to use ANSI 18.1 as guide and prescribe the training/qualifications for ISFSI leadership roles
7. Status of NRC Security rule
- a. How will Dairyland personnel be screened/cleared
  - b. What would the time table look like on restart of rulemaking
8. LAR for license transfer – will it include an expiration date or will LACBWR continue with Part 50/Part 72 General license until fuel is removed and ISFSI deconned?