

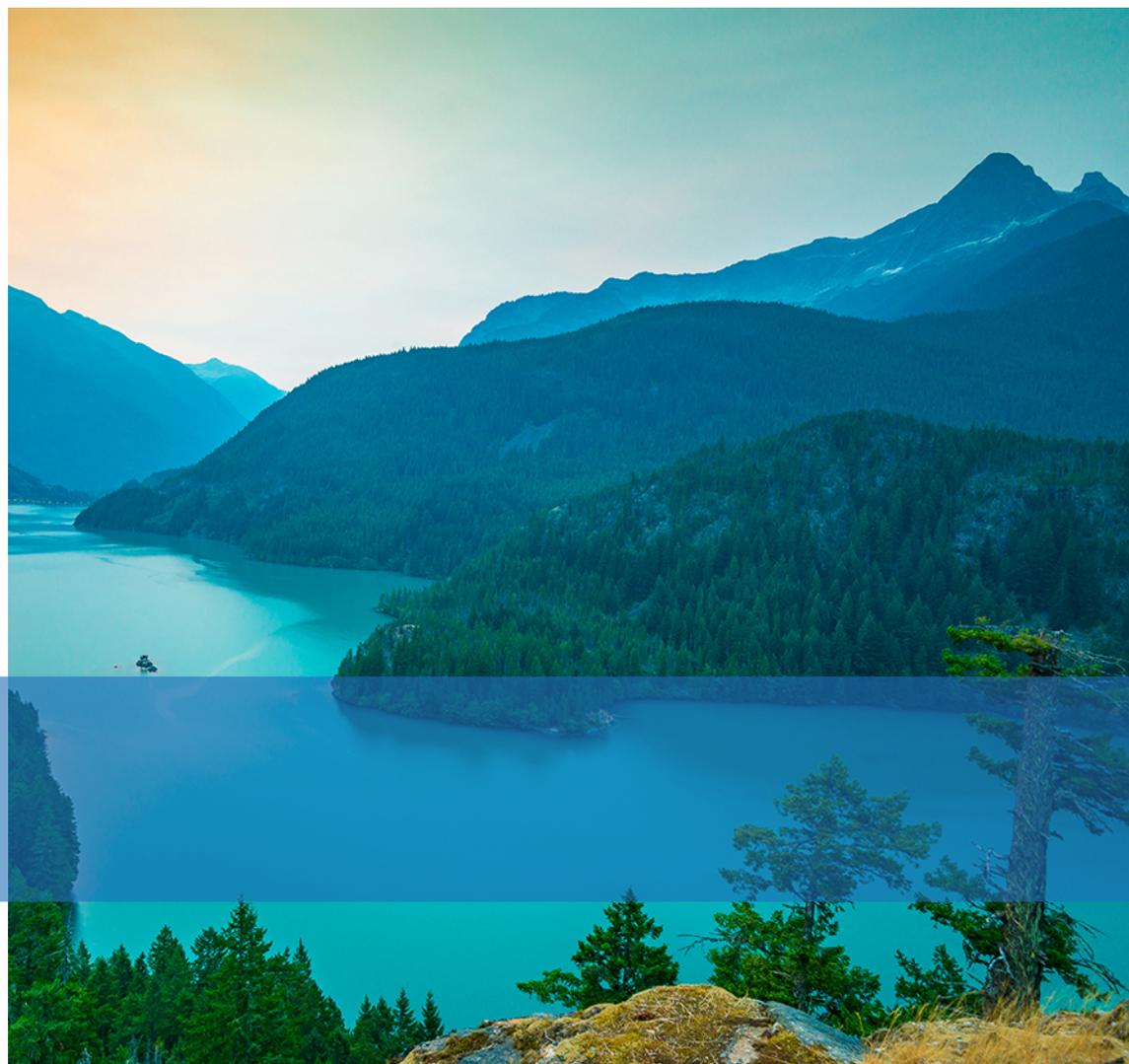
# NEI Response to NRC's Acceptance Review of NEI 22- 02 – Guidelines for Weather- Related Administrative Controls for Short Duration Outdoor Dry Cask Storage Operations

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Nuclear Energy Institute



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# Dry Cask Operations and Weather

- Administrative Controls have been reliably preventing severe weather disruptions of dry cask operations for 35+ years
  - A safe and efficient alternative to tornado missile analyses of all operational configurations
  - Consistent with severe weather considerations for other outdoor plant operations and maintenance
  - NRC staff now questioning this practice for various site-specific configurations
- NEI 22-02 submitted (2/16/22) to clarify use of Administrative Controls
  - Demonstrates Industry commitment to rigorous approach
  - NRC endorsement would provide generic acceptance of Administrative Control use
  - NRC Enforcement Guidance (4/15/22) provides time for agreement to be reached
- NRC Requested Supplemental Information (RSI) (4/29/22)
- Industry submitted revision to NEI 22-02 (6/17/22)
  - Bolsters industry commitment to sound practices in avoiding severe weather disruptions
  - Enhances safety while preserving efficiency

# NRC Requests for Supplemental Information

- Procedures
  - Additional guidance and consistent approach requested
- Weather Resources
  - Additional guidance on how industry uses these resources requested
- Duration
  - Specifics on estimating time windows requested
- Compensatory Measures
  - Acceptance criteria, site-specific information, staffing information, and malfunction contingencies requested
- Licensing and Inspection
  - Guidance on incorporating Administrative Controls into Technical Specifications/Final Safety Analysis Report (FSAR)/72.212 report requested



# Industry RSI Response – Procedures

- NEI 22-02 revised to recommend:
  - CoC holders add generic severe weather info. to FSAR
  - Licensees develop engineering evaluations as technical basis for site-specific administrative controls
  - Licensee procedures include timing and frequency of weather forecast checks
  - Recommend that Licensee procedures clearly specify compensatory actions, roles, and responsibilities
- NEI 22-02 revision does not include
  - Recommendations for broad scope design review (out of scope)
  - Recommendations for a graded response to weather conditions of varying severity

# Industry RSI Response – Weather Resources



- NEI 22-02 revised to:
  - Address the use of relevant onsite meteorological data
  - Recommend licensees use radar projections
  - Clarify that personnel address forecast changes during DCS operations if self-identified or if informed by control room



# Industry RSI Response – Duration

- NEI 22-02 revised to:
  - Add most of NRC suggested checklist for use “as appropriate” and recommend inclusion of estimated durations in FSAR
  - Address malfunctions and delays
  - Recommend that estimated durations be addressed in licensee specific engineering evaluations

# Industry RSI Response – Comp. Measures

- NEI 22-02 revised to:
  - Add a list of things to be considered in the development of Administrative Controls



# Industry RSI Response – Licensing and Inspection

- NEI 22-02 revised to:
  - Recommend that CoC holders reference NEI 22-02 in FSARs
  - Recommend that CoC holders include generic guidance for Administrative Controls in the Operations Chapter of the FSAR
  - Include new guidance clarifying roles and responsibilities between CoC holders and licensees
- NEI 22-02 revision does not include
  - Guidance on including Administrative Controls in Technical Specifications
  - Address “nonconforming or degraded conditions”

## Conclusion

- Industry's commitment to rigorous dry storage operational practices has successfully protected public health and safety for 35+ years
- NEI 22-02 codifies that commitment w.r.t. severe weather
- NEI 22-02 Rev. 1 (response to NRC RSIs) makes that commitment stronger than ever
- Generic agreement on acceptable use of Administrative Controls to protect short duration dry storage operations is needed to preserve regulatory efficiency consistent with NRC principles of good regulation



# Discussion