

# PUBLIC SUBMISSION

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Draft Regulatory Guide: Weather-Related Administrative Controls at Independent Spent Fuel Storage Installations

**Comment On:** NRC-2023-0107-0001

Draft Regulatory Guide: Weather-Related Administrative Controls at Independent Spent Fuel Storage Installations

**Document:** NRC-2023-0107-DRAFT-0005

Comment on FR Doc # 2023-11895

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## Submitter Information

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## General Comment

See attached file(s)

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## Attachments

BYR 2023-013 - Comments on DG-3057



**YANKEE ATOMIC ELECTRIC COMPANY**  
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June 29, 2023  
BYR 2023-013

U.S. Nuclear Regulatory Commission  
ATTN: Program Management, Announcements and Editing Staff  
Office of Administration, Mail Stop: TWFN-7-A60M  
Washington, DC 20555-000

Yankee Atomic Electric Company  
Yankee Rowe Independent Spent Fuel Storage Installation  
NRC License No. DPR-3 (NRC Docket Nos. 50-029 and 72-31)

Subject: Comments on Draft Regulatory Guide DG-3057

On June 5, 2023, the U.S. Nuclear Regulatory Commission (NRC) issued for public comment a draft regulatory guide (DG), DG-3057, “Weather-Related Administrative Controls at Independent Spent Fuel Storage Installations.” Yankee Atomic Electric Company (YAEC) offers the following comments for consideration:

Overall, the draft Regulatory Guide DG-3057 provides a prescriptive methodology for managing the performance of Outdoor Dry Cask Storage Operations. Over numerous years, licensees have successfully applied administrative controls to minimize the risks associated with the performance of Outdoor Dry Cask Storage Operations. A risk-informed and performance-based approach should be adopted without introducing a new significant level of effort.

Clarification #5 effectively requires a design review to determine what weather conditions are analyzed in order to then determine what weather conditions are unanalyzed, to then determine qualitative or quantitative criteria that define/outline a “safe condition and forecast.” A significant level of effort would be required to meet the prescriptive requirements of this clarification. If the concern is that activities/equipment/personnel used to support the operation need to be considered, then this clarification could be simplified to specify that review. This clarification has been written to be an overly prescriptive task which can be re-written to require that the given project has considered all supporting work and has applied ‘stop work criteria’ for the limitations specific to those activities/equipment/personnel.

In addition, how would a licensee properly apply the “appropriate error margin?” Did the NRC intend for this to permit licensees to take credit for using cranes with extra capacity and setting wind speed thresholds that are less than the specified limits by the crane manufacturer or industry standards? This term is vague and subject to interpretation and the sentence that contains this term should be deleted. The sentence that precedes it provides enough additional guidance to licensees.

Although Clarification #6 allows for justification to use an equivalent weather service to the national weather service (NWS), the NRC should recognize that the closest NWS to a site may not

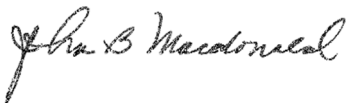
represent the weather at the site. In these cases, the user would enter the site's zip-code and the NWS usually provides a forecast based on data from the closest airport, not from NWS data. Does the utilization of this data provided through the NWS meet the intent of the NRC's clarification?

Exception #8 is too open ended and could be subject to differing opinions on how well a site has addressed contingencies. What a licensee develops as a sufficient contingency policy for a site may not seem sufficient to an inspector/auditor. Consideration should also be given to Independent Spent Fuel Storage Installation (ISFSI) only sites that do not have access to plant equipment like single failure proof cranes. Aging management inspections performed to date have proved to have sufficient contingencies. Examples that have been used in typical planning activities include; using mobile cranes with double the capacity for the heaviest lift and documented in the crane certifications; using single failure proof rigging; identifying sources for a suitable backup crane with an acceptable response time to the site; maintaining redundant torque wrenches on site for torquing requirements; obtaining tooling to address stuck bolts; utilizing personnel with multiple qualifications to address personnel absences; limiting load lift height when removing/reinstalling components over casks; requiring load transit paths that avoid other casks and safety related hardware; and obtaining multiple spare parts for inspection robots and cameras.

Typically, malfunctions and delays are addressed in technical support documents. As a result of these considerations, limitations are included in the work order controlling the work that include contingency steps for malfunctions and delays. All such events would also be documented in the site's corrective action program. This is standard practice for licensees using existing programs and processes which already occur without reliance on the NEI guidance or the NRC exception. We think the NEI guidance adequately highlights the consideration to licensees engaged in these activities.

If you have any questions regarding this submittal, please do not hesitate to contact me at (413) 424-5261 ext. 304.

Respectfully,



John Macdonald  
ISFSI Manager