

PUBLIC SUBMISSION

SUNSI Review Complete
Template=ADM-013
E-RIDS=ADM-03
ADD: John -Chau Nguyen,
Harriet Karagiannis, Bridget
Curran, Mary Neely

Comment (6)
Publication Date: 6/5/2023
Citation: 88 FR 36514

As of: 7/5/23, 8:52 AM
Received: July 03, 2023
Status: Pending Post
Tracking No. ljn-55ze-jjba
Comments Due: July 05, 2023
Submission Type: Web

Docket: NRC-2023-0107

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-0008

Comment on FR Doc # 2023-11895

Submitter Information

Email: TForland@Ameren.com

Organization: Ameren Missouri - Callaway Plant

General Comment

1. Based on the 6-13-2023 public meeting, licensees will not be required to anticipate and have specific procedures addressing all causes for delays and all SSC failure modes. In general, a high-level procedure that utilizes the station's Corrective Action Program (CAP), makes required notifications, and triggers prompt repairs would be acceptable. The exception to this would be if OE, benchmarking, or dry runs show that:

- a given failure or delay has a high probability of occurrence,
- the failure/delay could occur during an unanalyzed condition,
- and restoration to an analyzed condition would take significant time (>24 hours).

In these cases, there should be specific contingencies (procedures and equipment) to promptly restore the system to an analyzed condition.

If this is the intended meaning of the guidance, clarifying text should be added to indicate this.

2. It is understood that contingency equipment, if required as discussed above, would need to be readily available and its usage to have been demonstrated in a dry run or by other means acceptable to the NRC.

If this is the intended meaning of the guidance, clarifying text should be added to indicate this.

3. Based on the 6-13-2023 public meeting, the duration for a "safe condition and forecast" should be based on the environmental design criteria for equipment that would be used while in an unanalyzed condition during an outdoor dry storage system (DSS) handling activity (ODHA).

If this is an accurate interpretation, clarifying text should be added to indicate this.

4. Will the unanalyzed conditions typically occurring during ODHAs that have not been generically evaluated, be required documentation in the storage system FSAR (i.e., the chapter 9 description of generic loading procedures)? Would this description be expected to include recovery steps, contingency equipment needed, and estimated durations?

5. Some licensees have loading campaigns scheduled in early 2024 (after or during the current expiration date for EGM 22-01). The EGM expiration date should be extended to allow adequate time for resolution of public comments, approval, and issuance of the final Regulatory Guide, updating of cask vendors' FSARs, and utility implementation activities. It is suggested the EGM expiration date be extended at least 6 months beyond the date of issuance of the finalized Regulatory Guide.