

**NRC PRE-APPLICATION MEETING**

# **PRAIRIE ISLAND ISFSI LICENSE CONDITION 26 LICENSE AMENDMENT REQUEST**

License Amendment Request to Revise the Prairie Island Independent Spent Fuel Storage  
Installation (ISFSI) License Condition 26

05/05/2026



# AGENDA

Purpose

Background

Proposed License Amendment

Schedule

## **PURPOSE**

- Communicate LAR plans for a proposed change to Prairie Island ISFSI License Condition 26.

# BACKGROUND

- Prairie Island site-specific Renewed ISFSI License No. 72-10 License Condition 26 was added to the license as part of the license renewal process. The license condition states:

<b>NRC FORM 588A</b> (10-2000) 10 CFR 72	<b>U. S. NUCLEAR REGULATORY COMMISSION</b>		PAGE <b>7</b> OF <b>7</b> PAGES	
	<b>LICENSE FOR INDEPENDENT STORAGE OF SPENT NUCLEAR FUEL AND HIGH-LEVEL RADIOACTIVE WASTE SUPPLEMENTARY SHEET</b>		License No. SNM-2508	Amendment No. 13
			Docket or Reference No. 72-10	

26. NSPM shall submit the evaluations related to high burnup fuel performance specified in the toll gates in the "High Burnup Fuel Aging Management Program" in Appendix A, Rev. 2, of the Supplement to the License Renewal Application (ML15285A007) to serve as confirmation that the high burnup fuel continues to meet the requirements in 10 CFR 72.122(h), "Confinement barriers and systems" and 72.122(l), "Retrievability".
- a. The first evaluation shall be provided in a letter to the NRC (submitted pursuant to 10 CFR 72.4) by April 4, 2028 (see Section A3.5 Toll Gate 1).
  - b. An additional evaluation shall be provided in a letter to the NRC (submitted pursuant to 10 CFR 72.4) by April 4, 2038 (see Section A3.5 Toll Gate 2).

## BACKGROUND (CONT)

- The High Burn up Fuel Monitoring Program relies upon the joint EPRI and DOE "High Burnup Dry Storage Cask Research and Development Project" (HDRP), or an alternative program meeting the guidance to ISG 24 as a surrogate program to monitor the condition of high burn up spent fuel assemblies in dry storage.
- Formal evaluations of the aggregate feedback from the HDRP and other sources of information will be performed at the specific points in time during the period of extended operation (4/4/2028)
- Evaluate information obtained from the HDRP loading and initial period of storage along with other available sources of information. If the HDRP non-destructive examination (NDE) (i.e., cask gas sampling, temperature data) has not been obtained at this point and no other information is available then NSPM has to provide evidence to the NRC that no more than 1% of the high burnup fuel (HBF) has failed.

# PROPOSED LICENSE AMENDMENT

- NSPM proposes to revise License Condition 26, part a, as follows:

26. NSPM shall submit the evaluations related to high burnup fuel performance specified in the toll gates in the “High Burnup Fuel Aging Management Program” in Appendix A, Rev. 2, of the Supplement to the License Renewal Application (ML15285A007) to serve as confirmation that the high burnup fuel continues to meet the requirements in 10 CFR 72.122(h), “Confinement barriers and systems” and 72.122(i), “Retrievability”.

- a. The first evaluation shall be provided in a letter to the NRC (submitted pursuant to 10 CFR 72.4) ~~by April 4, 2028 (see Section A3.5 Toll Gate 1).~~
- b. An additional evaluation shall be provided in a letter to the NRC (submitted pursuant to 10 CFR 72.4) by April 4, 2038 (see Section A3.5 Toll Gate 2).

27. This renewed license is effective as of the date of issuance shown below.

FOR THE U.S. NUCLEAR REGULATORY COMMISSION

within six months of the publication of data from the High Burnup Dry Storage Cask Research and Development Project, or by April 4, 2033, whichever is earlier.

Yaira

on 09/23/24

## PROPOSED LICENSE AMENDMENT (CONT)

- NSPM believes the proposed due date is reasonable because the first HBF assembly was stored in the Prairie Island ISFSI in 2013, so the proposed 2033 date ensures operating experience will be obtained and evaluated prior to 20 years of storage.
  - NUREG-2215 indicates dry storage has been allowed for periods up to 20 years without the need to provide confirmatory performance data. Licenses that exceed 20 years must include a plan to obtain such confirmatory data. The proposed amendment ensures the intent of the NUREG remains met.

# SCHEDULE

NSPM plans to:

- Submit LAR by 6-30-2026
- Request NRC approval within 12 months of acceptance
- Implement within 90 days of approval.

