November 3, 2000

MEMORANDUM TO: Susan F. Shankman, Deputy Director

Licensing and Inspection Directorate Spent Fuel Project Office, NMSS

THRU: Michael Tokar, Chief

Transportation and Storage Safety

and Inspection Section

Spent Fuel Project Office, NMSS

FROM: Chester Poslusny, Senior Project Manager

Transportation and Storage Safety

and Inspection Section

Spent Fuel Project Office, NMSS

SUBJECT: SUMMARY MEETING WITH NUCLEAR ENERGY INSTITUTE TO

DISCUSS STANDARDIZED TECHNICAL SPECIFICATIONS FOR

SPENT FUEL STORAGE CASK DESIGNS

On September 26, 2000, representatives from the Spent Fuel Project Office, the Nuclear Energy Institute (NEI), and industry met to discuss standardized technical specifications (STS) for dry cask storage designs. The Nuclear Regulatory Commission (NRC) noticed this meeting on September 14, 2000. Attachment 1 is a list of attendees.

The NEI representatives provided an overview of their efforts with the NRC staff in developing a proposed format and content for STS. This included emphasizing the value of establishing a revised set of specifications to complement the new requirements of 10 CFR 72.48 and its associated process for identifying and evaluating proposed design changes. Meetings and discussions have continued from December 1998 through July 2000. NEI voiced some concern about a potential loss of industry interest and support for the STS based on the lack of NRC progress. Also, a question was raised concerning the vendors' and utilities' ability to adopt the new STS format once the staff has approved it and how quickly the adoption could be processed. Lastly, NEI requested that the staff provide feedback on its proposed STS by providing a markup.

NEI provided Attachments 2, 3, 4, 5, and 6 for staff review and consideration. Attachment 2 is a revision of the proposed STS for fuel criticality. Attachment 3 is guidelines for implementing the revised fuel specifications. Attachment 4 describes the control of changes to fuel specifications under 10 CFR 72.48. Attachment 5 describes the technical specifications (TS) and criticality analyses in the safety analysis reports (SARs) for recently approved cask designs. Attachment 6 lists programs for inclusion in the STS.

After additional discussion, the participants made the following observations and agreements:

- 1. STS are associated with an enhanced level of detail for a number of areas in a supporting SAR to enable vendors and utilities to use the new features of 10 CFR 72.48.
- 2. The focus for the new STS will be for new designs. Vendors will need to upgrade the SARs for existing designs to request adoption of the STS for their designs.
- 3. SFPO has assigned technical leads that will be responsible for review and comment on the proposed STS based on specified discipline areas. The leads will coordinate the review of Attachments 2-5 and will provide feedback to NEI via a conference call by the end of the first week of October. Subsequently, NEI and SFPO will meet to agree on the philosophy for the development and application of the STS and to discuss a schedule for review and approval of the STS package. In addition, SFPO will develop a matrix that will reflect for each TS item, which review disciplines have responsibility for review and approval.
- 4. SFPO will provide written feedback to NEI on the format and content of the proposed STS with an objective of completing this effort by the end of Calendar Year 2000. The staff will complete its review of the criticality fuel TS first, then work on the remaining areas using the fuel TS as a model.
- 5. NEI is considering a pilot process to identify a vendor who will develop a submittal for adoption of the STS.
- 6. SFPO will need to revise its standard review plan (SRP) to address how reviews should be performed to include the level of detail in both the SAR and TS and how methodologies and analyses supporting the designs should be reviewed and approved.
- 7. SFPO staff are concerned about the vendors' capability to perform adequate screening and evaluations in accordance with the requirements of the revised 10 CFR 72.48. Further, reactor licensees may have some difficulty in performing 10 CFR 72.48 evaluations due to the lack of familiarity with the storage cask design methods and analyses, which were performed by the vendors. This area will require training programs and need auditing by the NRC inspection program.

No regulatory decisions were made at this meeting. Please contact me if you have any questions about this meeting.

Attachments:

- 1. Attendance List
- 2. Revision of Proposed STS for Fuel Criticality
- 3. Guidelines for Implementation of Revised Fuel Specifications
- 4. Description of Control of Changes to Fuel Specifications Under 72.48
- 5. Description of the Technical Specifications and Criticality Analyses in the SARs for Recently Approved Cask Designs
- 6. Program Descriptions

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Attachment 1Attendance List

NRC/NEI MEETING STANDARDIZED TECHNICAL SPECIFICATIONS FOR SPENT FUEL STORAGE CASK DESIGNS SEPTEMBER 26, 2000

ATTENDANCE LIST

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<u>NAME</u>	ORGANIZATION	PHONE
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Alan Nelson	NEI	202-739-8110
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David Tang	NRC/NMSS/SFPO	301-415-8535
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Joe Kovacic	NRC/NMSS/SFPO	301-415-8532

Attachment 2 Revision of Proposed STS for Fuel Criticality

Attachment 3 Guidelines for Implementation of Revised Fuel Specifications

Attachment 4

Description of Control of Changes to Fuel Specifications Under 72.48

Attachment 5

Description of the Technical
Specifications and Criticality
Analyses in
the Safety Analysis Reports for
Recently Approved Cask Designs

Attachment 6 Program Descriptions