



Compatibility and Integration of 10 CFR Parts 71 and 72 Requirements

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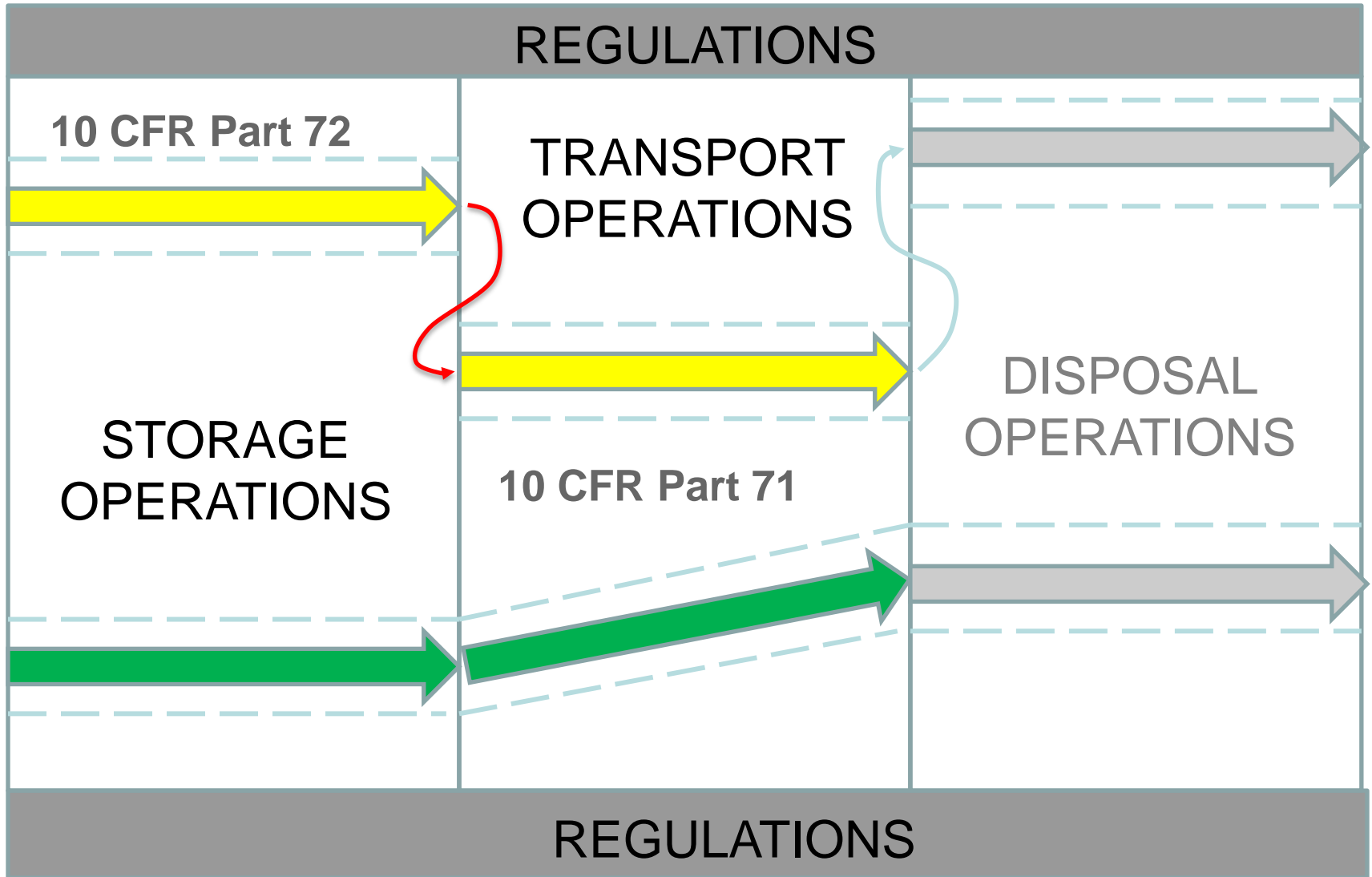
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Overview

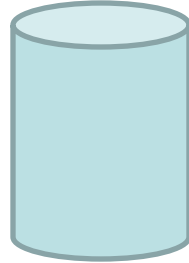
- Background
- Issue Summary
- Considerations

Background

- 10 CFR Parts 71 (Transportation) and 72 (Storage)
- Current regulations are flexible enough to:
 - accommodate a wide range of operational and design conditions
 - support future changes in technology/policy (because they are based on performance requirements rather than specific technologies)
- However, current regulations permit operational and design conditions:
 - that are based on differing assumptions
 - that may result in inconsistencies



Storage



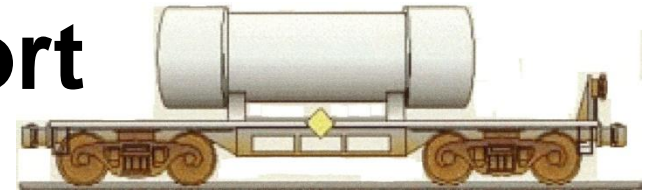
Licensee can use larger capacity casks to minimize number of casks needed.

Large casks could have high heat loads.

Storage cask size currently not constrained by regulations on repository design or transportation size limits.

Up to 40 year license terms.

Transport

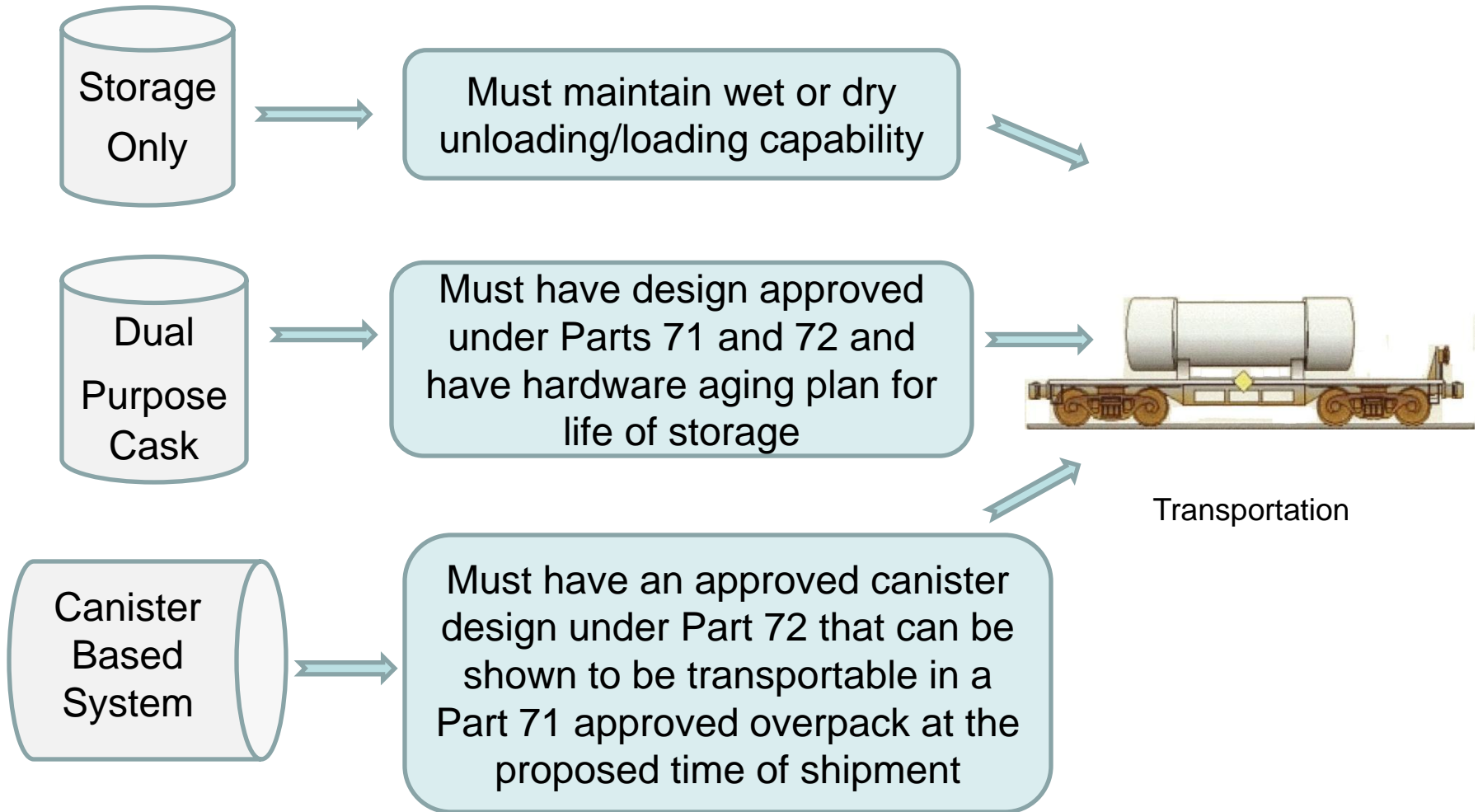


Casks must be transportable by rail or legal weight truck.

Entire storage cask or only components of the storage cask (i.e., canister) may be used for transportation.

Fuel in large storage casks could be repackaged for transportation.

Certificates of Compliance are issued for 5 year terms.



Considerations

- Development of more detailed requirements regarding the aspects of transportation which should be considered as a part of storage licensing.

Considerations

- Revision of Part 72 to incorporate the preliminary determinations required under Part 71 prior to a package being used for transport.

Considerations

- Revision of Part 71 regulations to address unique aspects of the safe transportation of spent nuclear fuel after it has been in dry cask storage for a specified period.

Considerations

- Identification of common technical analyses for storage and transportation regulations and incorporation of the analyses into one regulation.

Considerations

- Revision of storage and transportation requirements to allow the issuance of a combined Certificate of Compliance.
- Consideration of the impact Part 71 revisions would have on the ability of cask vendors to use storage systems for international transport.

Feedback

- What provisions of the storage and transportation regulations would benefit from enhanced integration and/or compatibility?
- What are the potential issues with changing the current regulatory structure for storage and transportation?

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