

# Updated Industry Guidance on Implementation of 10 CFR 72.48

**NEI 12-04**

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for the

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# History of Guidance Update

- NEI 96-07, Appendix B (2001) currently NRC-endorsed
- After 10+ years of experience with 72.48 implementation, industry identified a need for improved, stand alone, guidance NEI solicited input from both industry and NRC
- Industry developed updated guidance, NEI 12-04, and submitted to the NRC in 2012
- Three sets of NRC comments received 2013-2015
  - Comments reflect a lack of alignment between NRC and industry for Part 72 change control and 72.48 implementation

# Industry's Approach to Updating Guidance

- NEI 72.48 and 50.59 teams collaborate frequently
  - Guidance must remain consistent between the two where the rules align
  - Licensee programs, procedures, training often combined
- Update primarily addresses 72.48 Applicability, Screening
  - No significant changes to full evaluation guidance
- Better addresses differences between general licensee and CoC holder programs and between 50.59 and 72.48
- Simplifies organization of document versus 97-06B nomenclature
- Improves user-friendliness based on lessons learned
- Improves examples

# Guidance Improvements

- Addresses applicability of 72.48 to 72.212 Reports
  - RIS 2012-05, Relationship Between 72.212 and 72.48 Evaluations
- Harmonizes with licensee 50.59 programs
  - Allows single or dual Applicability Review
- Clarifies classification of editorial/administrative changes
- Clarifies interface with other regulatory processes between licensees and CoC holders (e.g., 50.59, 50.54, Part 71)
- Clarifies screening guidance for method of evaluation vs. input parameter based on new 50.59 guidance
  - NEI 96-07, Appendix E

# License/CoC Change Control

- An effective industry change control process is a linchpin of safely managing nuclear facilities
- Industry has decades of experience with safely implementing changes not requiring NRC review
- Industry has primary responsibility for safe operation of nuclear facilities
- NRC oversight via inspection program buttresses safety
- Placing change management under industry control allows limited NRC and industry resources to be better balanced toward safety-significant matters and key issues (e.g., license and CoC renewal)
- PRM 72-7 is founded on these principles

# License/CoC Change Control

- Content of ISFSI licenses and CoCs should better reflect low risk of ISFSI operations
- DSS events evolve slowly
- Public dose consequences from postulated events are very small (i.e., the “consequence” part of risk for dry storage is low compared to power plants)
- However, the high level of detail in ISFSI licenses and cask CoCs results in less flexibility to implement ISFSI changes with 72.48 than plants with 50.59

# License/CoC Content

- Current ISFSI license and DSS CoC content is inappropriate or too detailed given risk:
  - TS that require compliance with other regulations
  - Fabrication requirements that are adequately controlled by the QA program
  - Codes and standards that can be commitments
  - Training and dry run requirements that are adequately covered by licensee training programs
  - Dose rate limits where licensee Part 20 programs adequately protect personnel
  - Fuel parameters

# Licensee/CoC Holder Change Control

- Items for which change control is retained by NRC should be risk-informed and consistent across agency offices
- 1993 NRC Policy Statement on plant TS:
  - Operator-oriented
  - Improved TS bases
  - Reduced transients based on TS-required actions
  - More efficient use of NRC and industry resources



# Path Forward for Updated 72.48 Guidance

- 12-04 intended to completely replace 96-07, App. B
- NRC and industry need to find common ground on Part 72 change control
  - Informed by actual risk of ISFSI operations
  - Consistent with how change control is applied in Part 50 and Commission policy
- To move the dialogue in this direction, Industry will Revise 12-04 where needed and re-submit 3Q 2016
  - Additional pre-meeting with NRC to discuss key issues