

Change Control - Revisions

**Kimberly Manzione
November 18, 2015**



Introduction

- Due to level of detail in regulations and dry storage system CoCs, multitude of active amendments available for loading
- Revision process makes a change to an existing amendment and supersedes existing amendment entirely
 - ✓ Reduces number of active amendments available for loading
 - ✓ Changes should consider existing, stored casks
- Revision process is different from the corrections process used for editorial errors

Holtec Revision Experience

- 4 Revisions either completed or close to completion
- Revisions take as long or longer than typical amendment reviews
- Letters requested from sites to accept changes
- Implementation period for revisions – 4 revisions handled in 3 different ways

Revision Experience

■ HI-STORM FW Amendment 1, Revision 1

- ✓ Changes including contents and material
- ✓ Submitted 7/31/2013 (as Amd 2), effective 12/17/2014
- ✓ When issued, no HI-STORM FW Amendment 1 systems had been loaded
- ✓ Posted in Federal Register with standard 30 day public comment period and effective date 45 days after, if no significant comments received
- ✓ *Cover letter sent with signed CoC instructed users who had loaded Amendment 1, implement Amendment 1, Revision 1 within 180 days of Rev 1 effective date*

Revision Experience

■ HI-STORM 100 Amendment 8, Revision 1

- ✓ Changes including content and material - two sites had previously loaded Amendment 8
- ✓ Submitted 8/21/2013 (as Amd 10), will be effective 2/16/2016
- ✓ *NRC requested letters from sites stating that they would voluntarily implement the Revision 1 changes*
- ✓ Published in Federal Register with standard comment period and effective date
- ✓ *After comment period, staff determined that the effective date should be 180 days later to allow time for implementation*
 - *Still creates difficulty with one day switch, Revision 0 effective on Feb 15, 2016, Revision 1 on Feb 16, 2016*
- ✓ Discussions with staff indicate that a grace period will be given in cover letter
- ✓ Similar approach for HI-STORM FW Amendment 0 Revision 1

Upcoming Revisions

■ HI-STORM 100 Amendment 9, Revision 1

- ✓ Same changes as Amendment 8, Revision 1
- ✓ Submitted 7/1/2014
- ✓ *Letters also requested from sites who had loaded Amendment 9*
- ✓ Currently in rulemaking
- ✓ *Expect a CoC condition allowing for a 180 day implementation period where original amendment is still effective – allows for overlap*

Recommendations

- Written guidelines for the revision process
- 180 day implementation period preferred over 180 day lag in effective date
 - ✓ Short overlap where both original amendment and revision are effective
 - ✓ Gives CoC holders and sites necessary time to update documentation
- Remove need for sites to provide letters agreeing to implement revisions voluntarily – impractical when large number of sites impacted