

CHANGE CONTROL DRY FUEL STORAGE UTILITY LICENSE BASIS

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REG CON 2015

November 18, 2015

Topics for Review

Utility Change Control Items

- ❖ 72.48's
- ❖ License Basis Configuration Control

Site License Basis

FSAR- Site Specific and General Licensee

Technical Specifications-Site Specific and General

CoC-General Licensee

72.48 performed by vendor-Both

72.48 performed by site-Both

72.212 Report- General Licensee

72.48's History

Originally only the licensee, not the cask vendor could complete 72.48's.

Now the majority of 72.48's are performed by the cask vendor not the licensee.

Reporting- 72.48 (d) (2) requires that

(2) The licensee and certificate holder shall submit, as specified in § 72.4, a report containing a brief description of any changes, tests, and experiments, including a summary of the evaluation of each. A report shall be submitted at intervals not to exceed 24 months.

72.48 Reporting Review

A sample review of 30 licensee submittals was completed. Both site specific and general licensee were included. The time frame included reports from 2004 to 2015.

- 20 of the 30 submittals reported that no 72.48 evaluations had been completed in the 2 year reporting period.
- 7 of the submittals reported one 72.48 (majority of these were for a revision to the 72.212)
- 3 reported two 72.48's in the reporting period

72.48 Reporting Review

A sample review of 10 cask vendor submittals was completed. The time frame included reports from 2007 to 2014.

Cask Vendors reported between 5 and 53 72.48's completed during the reporting period. (Note some reports with larger numbers include both screenings and full evaluations)

Change in 72.48 Reporting Requirements?????

72.48 Reporting change to > 2 years if no 72.48's are performed. If a 72.48 is performed within a reporting period then the 2 year report is required.

Vendors report 72.48's twice per the requirements of 72.48 (d) (2) and the requirements of 72.248, perhaps these could be combined into one report.

72.48 Reviews

Cask Vendors submit 72.48's to all customers

Licensee reviews the 72.48 and determines if the change applies to them, some items to consider:

- 1) Component impacted is used by licensee
- 2) FSAR Revision/ Amendment impacted is used by licensee
- 3) Process is used by licensee (Vacuum Drying vs FHD)

Vendor 72.48

Licensee determines that a vendor 72.48 applies then...

Is there any impact to licensing basis or equipment?

Does it impact any analysis/calculations?

Does it impact any previously loaded casks?

What needs to be changed?

- Procedures

- 72.212

- Calculation

- Equipment Modification

If a change is needed when does it need to be applied?

Vendor 72.48

Licensee should document the review, even it is simply to document that this 72.48 does not apply to their ISFSI program.

Vendor 72.48

A Licensee review cannot always determine that a vendor 72.48 is technically correct.

If the 72.48 is on a site specific or customer specific item, then this can be done, as all the analysis and calculations are available.

Generic changes may be based on large volumes of vendor calculations and analysis that is not always readily available to the licensee.

A licensee can review the 72.48 and determine if it is reasonable and ensure that within the limits of their knowledge on the subject matter there are no errors.

LBD Maintenance

Multiple Groups need Access to LBD's
(Licensing, 72.48 preparers and reviewers,
Engineering, Control Room/Ops Personnel)

Almost all licensees will eventually have casks
that have different licensee basis at a single site.

LBD Maintenance

Example Site

2 ISFSI's (one within site protected area, one stand-alone protected area)

3 Cask Vendor Types

Vendor A- All casks loaded to same amendment

Vendor B- 2 Canister Types, 2 Module Types and casks loaded to 3 different amendments

Vendor C- New cask type but licensee credits FSAR of another cask type for some analysis

LBD Maintenance

Roadmap/Table of Requirements for Each Cask

One option is to add Appendix/Table to 72.212

Include vendor type, canister type, overpack/module type, unique canister and module number (canister and overpack serial numbers are unique and do not always match), amendment, FSAR revision.

72.212 Revision

All require multiple reviews by more than one discipline

All require a review under 72.48

Processing the revision and change management including communication to stakeholders

Revision Issued by Document Control

Minimum of 30 days, typically 60-90 days to process a revision

Change Control/Configuration Management

Control and Maintenance of the License Basis for ISFSI programs will grow as additional casks are loaded.

License Renewals and Aging Management requirements will add new elements to capture and monitor.

Learning Aging Management will require additional changes as time goes on.

Summary

Each site needs a plan and resources to keep up with the LBD's for an ISFSI program

As more and more casks are loaded at each site a method of tracking the licensing basis for each cask is needed. Will also be needed should canisters be transferred to a repository or interim storage facility in the future.

Consider a change to the 72.48 Reporting Requirements