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Session: Applying Risk Consideration in a Graded Approach for Regulating Spent Fuel Storage

Graded Approach and the Inspection Program


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Marlone Davis, Senior Safety Inspector
U.S. Nuclear Regulatory Commission
Office of Nuclear Material Safety and Safeguards

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Agenda

- Introduction
- Background
- Overview
- Summary



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Introduction

- The purpose of this presentation is to provide an informative overview of how the NRC applies risk consideration within the inspection program and how adopting a graded approach would impact the program for spent fuel storage activities.
- Goal for this presentation is to have a good interaction and dialogue about the inspection program and potential impacts stemming from the proposed process

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Background

- NRC Inspection Manual Chapters (IMC)s
 - IMC 2690, Inspection Program for Dry Storage of Spent Reactor Fuel at Independent Spent Fuel Storage Installations (ISFSI)s
 - IMC 2515, Appendix C, Special and Infrequently Performed Inspections
- NRC Inspection Procedures (IP)s
 - ISFSI Construction
 - Preoperational Testing
 - Operations
 - Security



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Background

- Operation Reviews
 - IP 60855, "Operation of an ISFSI"
- Licensing Reviews
 - IP 60856, "10 CFR 72.212(B) Evaluations"
 - IP 60857, "10 CFR 72.48 Evaluations"

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Overview

What is our focus?

- Important to Safety Structures, Systems, and Components (SSC)s
- Review procedure and program changes
- Select a representative sample based on risk significance

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Overview

What are the potential impacts?

- Potential increase in the number of samples due to the relocation of ISFSI programs and procedures into the Final Safety Analysis Report (FSAR) as updated
- More changes evaluated under the 72.48 process


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Summary

- Inspectors consider risk doing the selection of samples to conduct inspection objectives.
- Potential increase in the number of 72.48 screening and evaluations

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Questions





References

- Code of Federal Regulations (CFR), Title 10, Part 72 – Licensing Requirements for the Independent Storage of Spent Nuclear Fuel, High-Level Radioactive Waste, and Reactor-Related Greater Than Class C Waste.
- NUREG/CR-6407, Classification of Transportation Packaging and Dry Spent Fuel Storage Components According to Importance to Safety
- Inspection Manual Chapter (IMC) 2690, Inspection Program for Dry Storage of Spent Reactor Fuel at Independent Spent Fuel Storage Installations and for 10 CFR Part 71 Transportation Packaging
- Regulatory Guide 3.72, Guidance for Implementation of 10 CFR 72.48, Changes, Tests, and Experiments
