

February 20, 2002

MEMORANDUM TO: James T. Wiggins, Deputy Regional Administrator, RI
Bruce S. Mallett, Deputy Regional Administrator, RII
James L. Caldwell, Deputy Regional Administrator, RIII
Thomas P. Gwynn, Deputy Regional Administrator, RIV

FROM: Bruce A. Boger, Director **/RA/**
Division of Inspection Program Management
Office of Nuclear Reactor Regulation

E. William Brach, Director **/RA/**
Spent Fuel Project Office
Office of Nuclear Material Safety
and Safeguards

SUBJECT: RESPONSE TO REGIONAL INPUT ON ISFSI RESOURCES

On August 13, 2001, we sent you a memorandum providing the NRR/NMSS proposed Independent Spent Fuel Storage Facility Installation (ISFSI) inspection program and estimated resources needed to implement the program. You responded by letters and Email from September 17 through November 21, 2001. In general, your responses indicated that you considered the proposed program and resources to be appropriate. Your specific comments and our resolutions to those comments are detailed in Attachment 1 to this memorandum.

The scope of ISFSI inspections to be performed and the resources estimated for those tasks have now been clarified and are included in Attachment 2. Table 1 of Attachment 2 summarizes the inspection procedure steps required to be performed for each ISFSI inspection procedure and the estimated resources for those steps. If significant performance issues are encountered, the remaining steps in the ISFSI inspection procedures are available for use if a more detailed examination is determined to be warranted.

The Regional Offices should proceed to revise and/or develop new Integrated Inspection Plans (IIPs), as described in IMC 2690, to implement the ISFSI inspection program described in Attachment 2. In accordance with IMC 2690, the Regions are required to submit the IIP to the Spent Fuel Project Office (SFPO) for review and approval. New or revised IIPs should be submitted to SFPO by April 30, 2002. For those inspections funded by the Office of Nuclear Reactor Regulation (NRR), the Regional Offices must use currently budgeted resources for FY 03. The Division of Inspection Program Management (DIPM) will establish a separate budget line (PA Code) for NRR-funded ISFSI inspections at operating reactor sites, which will be resourced at three Full Time Equivalents (FTE) from existing NRR budget lines. This will require efficiency gains within the Reactor Oversight Process.

Donald Norkin, DIPM (415-2954) and Paul Narbut, SFPO (415-2962) are the key points of contact if you have any questions.

Attachment 1: Resolution of Regional Comments
on the ISFSI Budget Model.

Attachment 2: Summary Table of ISFSI Inspection
Requirements and Resource Estimates

cc: See attached list

cc: R. Blough, Director, DRP/RI
W. Lanning, Director, DRS/RI
G. Pangburn, Director, DNMS/RI
L. Plisco, Director, DRP/RII
C. Casto, Director, DRS/RII
D. Collins, Director, DNMS/RII
G. Grant, Director, DRP/RIII
J. Grobe, Director, DRS/RIII
C. Pederson, Director, DNMS/RIII
K. Brockman, Director, DRP/RIV
A. Howell, Director, DRS/RIV
D. Chamberlain, Director, DNMS/RIV
M. Satorius, IIPB/DIPM/NRR

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DISTRIBUTION:
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SFPO r/f

NMSS r/f

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* See previous concurrence sheet

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OFC:	SFPO	E	NRR	E	NRR		SFPO	E	NRR		NRR	
NAME:	PNarbut*		DNorkin*		DCoe*		MTokar		MJohnson		WDean	
DATE:	01/16/02		01/16/02		01/17/02		01/24/02		01/25/02		02/15/02	
OFC:	NRR		SFPO		SFPO							
NAME:	BBoger		CMiller		EBrach							
DATE:	02/15/02		02/20/02		02/20/02							

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Resolution of Regional Comments on the ISFSI Budget Model

Region I considered that the inspection procedures and estimated resources were of appropriate scope and level of effort. Region I noted that level of effort would vary between facilities because of differences in licensee performance and inspector experience.

Region II stated that:

- (a) they did not have a concern with the estimated resources assuming a reduced level of report documentation similar to that prescribed by inspection manual chapter (MC) 0610*.

Response: There is no objection to reduced inspection report documentation. Additionally, MC 2690 was recently revised to state that region-led inspections should be documented per regional instructions. This allows regions the option to use Form 591 to document inspections which has greatly reduced the inspection report effort for SFPO.

- (b) IP 60851, "Design" and 60852. "Fabrication" should be performed by SFPO.

Response: IPs 60851 and 60852 are typically performed SFPO.

- (c) IP60857, "Review of 72.48 Evaluations," (issued 3/9/01) should be included in the budget model for initial and repeat loadings.

Response: Resources are already included in the model for 72.48 reviews in IP 60851, "Design Control," IP 60852, "Fabrication, and IP 60854, "Preoperational Testing of an ISFSI." IP 60857 was issued to provide guidance for performing 72.48 reviews. SFPO considered that no change to the budget model was required, and has clarified that IP 60857 provides guidance in Attachment 2 to this memorandum.

- (d) the budgeted inspection resources for the pad and roads (48 hours) appeared to be low and should be increased to 60 hours.

Response: The estimate of 48 and 60 hours are relatively close, and no change to the budget model is being made at this time.

- (e) there are no specific resources included for event response. Region II's experience is that NRR resources are used for the response activities.

Response: Although there are no separately budgeted resources for operational event response, the NMSS regional budgeted resources for ISFSIs provides some flexibility to support such activities.

- (f) resources should be included for the project management of the ISFSI inspection program.

Response: Project management of inspection activities is included in the overall budget assumptions made for inspection activities.

- (g) Table 1 implies that security inspections (IP 81001) are to be performed during repeat loadings. Region II typically performs IP 81001 as part of the routine security inspection which does not necessarily coincide with an ISFSI loading.

Response: The region has the discretion to schedule the security inspection at appropriate times.

(h) the Table 2 repeat loadings for Region II general licensees and site specific licensees for CY 2002 and 2003 should both be increased from 1 and 0, and 3 and 1, to 3 and 2 each.

Response: The updated schedule and frequency information will be included in subsequent budget models.

Region III did not have any comments or issues with the model.

Region IV found the budget estimates to be reasonable. Region IV:

(a) noted changes in licensee schedules that affect the final budget numbers.

Response: The updated schedule and frequency information will be included in subsequent budget models.

(b) recommended that the model be changed from a calendar year basis to a fiscal year basis to better coincide with the FY budget process.

Response: A change to a FY basis will be made.

(c) noted that budget estimates for annual ISFSI inspections are not included.

Response: Annual inspections are not required by the inspection procedures.

(d) Table 1 only provides 12 hours for security inspections which is not adequate.

Response: The procedure, IP 81001, is written for ISFSIs located adjacent to a power reactor and was envisioned as being performed in conjunction with and as part of the periodic overall security inspection. The procedure specifies 4 hours of direct inspection effort and the budget plan allotment was increased to 12 hours to cover preparation and documentation. The number of hours was increased from 8 hours to 12 hours in response to Region IV's earlier comment on February 15, 2001.

TABLE 1
SUMMARY TABLE OF ISFSI INSPECTION REQUIREMENTS AND RESOURCE ESTIMATES

FOR INITIAL INSPECTIONS- NEW ISFSI GENERAL LICENSEE

Inspection Procedure	Required Inspection Steps	NMSS	NRR
60851 Design	02.01(audits only), 02.02c, 02.03, 02.04, 02.06	200	
60852 Fabrication	02.01, 02.02, 02.05a, 02.05b, 02.06, 02.08b	112	
60853 On site Fabrication- Vaults	02.01a, 02.01b, , 02.02a, 02.02c, 02.02d, 02.03b, 02.03e, 02.03f, 02.03h	120	
- Pads, roads, etc.	02.05a, 02.05b, 02.05c, 02.05d-h, 02.06a, 02.06b, 02.07	48 (0.04FTE)	
60854 Pre-operational Tests	02.02, 02.03, 02.04c-f, 02.05, 02.07, 02.08, 02.09, 02.10		227
60855 Operations	02.04, 02.05, 02.06		134
60856 Review 72.212(b)- (General licensee only)	02.01a, 02.01c, 02.01e, 02.02, 02.03, 02.04,	116	104
60857 Review of 72.48 Evaluations	02.01-.03	See Note 1	
81001 Security - Note2	02.01-.11		12
Subtotals NMSS and NRR		596 (0.46)	477 (0.37)
Total		1073 (0.83FTE)	

FOR INITIAL INSPECTIONS- NEW ISFSI, SITE SPECIFIC LICENSEE

Inspection Procedure	Required Inspection Steps	NMSS	NRR
60851 Design	02.01(audits only), 02.02c, 02.03, 02.04, 02.06	200	
60852 Fabrication	02.01, 02.02, 02.05a, 02.05b, 02.06, 02.08b	112	
60853 On site Fabrication- Vaults	02.01a, 02.01b, , 02.02a, 02.02c, 02.02d, 02.03b, 02.03e, 02.03f, 02.03h	120	
- Pads, roads, etc.	02.05a, 02.05b, 02.05c, 02.05d-h, 02.06a, 02.06b, 02.07	48 (0.04FTE)	
60854 Pre-operational Tests	02.02, 02.03, 02.04c-f, 02.05, 02.07, 02.08, 02.09, 02.10		227
60855 Operations	02.04, 02.05, 02.06		134
60857 Review of 72.48 Evaluations	02.01-.03	See Note 1	
81001 Security - Note2	02.01-.11		12
Subtotals NMSS and NRR		480 (0.37)	373 (0.29)
Total		853 (0.66FTE)	

FOR REPEAT LOADINGS

Inspection Procedure	Required Inspection Steps	NMSS	NRR
60855 Operations	02.04, 02.05, 02.06	0	100
81001 Security - Note2	02.01-.11	0	8
Subtotals NMSS and NRR		0	108
Total		108 (0.08FTE)	

Note 1: Resources for performing an examination of 10 CFR 72.48 evaluations performed by the licensee and/or the Certificate Holder were included in Inspection Procedures 60851, 60852, 60853, and 60854. Procedure 60857 was issued to provide inspection guidance and no additional resources were considered necessary.

Note 2: ISFSI Security inspections are normally expected to be conducted in conjunction with the periodic site security inspections.