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March 18, 2014

Mr. Mark Lombard  
Director  
Division of Spent Fuel Storage and Transportation  
Office of Nuclear Materials Safety and Safeguards  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

**Subject:** Draft Annotated Outline of Proposed Industry Guidance for Operations-based Aging Management for Dry Cask Storage (NEI 14-03)

**Project Number: 689**

Dear Mr. Lombard:

On behalf of the nuclear energy industry, the Nuclear Energy Institute (NEI)<sup>1</sup> is transmitting a draft annotated outline of proposed industry guidance for Operations-based Aging Management for Dry Cask Storage (NEI 14-03) for your consideration. This early product of the industry's ongoing effort to develop, and submit to NRC for endorsement, guidance in support of independent spent fuel storage installation (ISFSI) license renewals is being shared with the NRC in accordance with industry verbal commitments made at a recent NRC public meeting held on January 24, 2014.

The attached draft annotated outline describes each element of the proposed guidance and documents the industry's current expectations for its eventual format and content. Any feedback the NRC might have at this time would be most welcome and would be extremely helpful towards our goal of completing NEI 14-03 and submitting it to NRC for endorsement by September of this year.

NEI 14-03 is being developed by an industry team consisting of dry cask storage Certificate of Compliance holders and licensees along with scientific, technical and licensing experts. The team is interested in interacting with the NRC frequently between now and September to assure that the development of the

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<sup>1</sup> The Nuclear Energy Institute (NEI) is the organization responsible for establishing unified industry policy on matters affecting the nuclear energy industry, including the regulatory aspects of generic operational and technical issues. NEI's members include all entities licensed to operate commercial nuclear power plants in the United States, nuclear plant designers, major architect/engineering firms, fuel cycle facilities, nuclear materials licensees, and other organizations and entities involved in the nuclear energy industry.

Mr. Mark Lombard

March 18, 2014

Page 2

guidance proceeds in a manner that is consistent with the NRC's expectations. To that end, we have also discussed conducting a series of public meetings between now and then to further discuss the guidance. We would like to schedule and notice these meetings as soon as possible, with the first one occurring in early April. I understand that Kris Cummings of NEI is working with your staff in this regard.

With a significant increase in ISFSI license renewal activity expected in the coming years, this guidance will be an important tool for assuring consistency and predictability in both renewal applications and the NRC's review of them. I look forward to continuing to work with you on this effort. If you have any questions, please do not hesitate to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read 'Rodney McCullum', with a stylized, cursive script.

Rodney McCullum

Attachment

c: Ms. Catherine Haney, NMSS, NRC  
Mr. Aladar Csontos, NMSS/DSFST, NRC  
Ms. Michele M. Sampson, NMSS/DSFST, NRC