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From: Ray Lutz <raylutz@citizenoversight.org>
Sent: Saturday, August 22, 2015 2:40 PM
To: Gallagher, Carol; Torres, Ricardo; shutsanonofre@citizenoversight.org
Subject: [External_Sender] COPS Comments on NUREG 1927
Attachments: COPS Comment on NUREG1927 2015-08-22.pdf

Please accept the comment by Citizens Oversight

Comments on NUREG-1927 Rev 1 Draft, Docket ID NRC-2015-0106

Comments Reference: NUREG-1927, Rev 1 - Standard Review Plan for Renewal of Specific Licenses and Certificates of Compliance for Dry Storage of Spent Nuclear Fuel, revised 6/29/2015

<http://pbadupws.nrc.gov/docs/ML1518/ML15180A011.pdf>

--Ray Lutz

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August 22, 2015



To: Nuclear Regulatory Commission
Carol.Gallagher@nrc.gov
Ricardo.Torres@nrc.gov

From: Ray Lutz, Citizens Oversight
raylutz@citizenoversight.org

Subject: NUREG-1927 Rev 1 Draft, Docket ID NRC-2015-0106
Comments Reference: NUREG-1927, Rev 1 - Standard Review Plan for Renewal of Specific Licenses and Certificates of Compliance for Dry Storage of Spent Nuclear Fuel, revised 6/29/2015
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1. TOO MANY DISTINCT AMPS: This document talks about how to design an Aging Management Plan (AMP) with the implication that potentially each holder of a specific license will have a separate and distinct AMP perhaps with almost no correlation to other sites. This makes it very difficult for the public and regulatory agencies to provide essential oversight of the requirements in the AMPs because each one is different and requires individualized oversight and review. The variation between ISFSIs is not that great. Instead of a document that says how to design an AMP, the NRC should generate a standard AMP that is maintained as a public document. Licensees should have to publish their inspection data in a standard format so it is accessible and understood by the public so the public can provide oversight.

The "hands off" approach being proposed here may have been appropriate for complex nuclear plants where each one is very different from other plants. Dry Storage systems are not so complex that a standardized AMP is not feasible.

Furthermore, we note that even for nuclear plants, Technical Specifications did move toward uniform standards rather than distinct specifications for each plant. There is no reason not to establish uniform AMPs that can be shared as open standards rather than potentially having hundreds of distinct and incomparable programs.

2. NO INFORMATION SHARING: The flow charts provided in this document describes how a licensee will design their own AMP and modify it based on information gained in their own review of their own program. It does not show how information is shared between licensees. Instead, as mentioned, the NRC should prepare a standard AMP which can be applied at nearly all dry storage sites. Any variation from the standard should be disclosed and approved. This will allow the information gathered from the sites to be compared so all sites can learn from lessons at other plants.

3. CORRECTIVE ACTIONS MISSING: The sample AMP provided in Appendix B has a section called "Corrective Actions" on page B-6. But there this section only covers changes in surveillance frequencies and sample sizes. It unfortunately does not cover actual corrective actions.

On page B-7, the following sentence is the closest we get to any specification of corrective actions.

Canisters with confirmed localized corrosion or stress corrosion cracking must be evaluated for continued service. Canisters with localized corrosion or stress corrosion cracking that do not meet the prescribed evaluation criteria must be repaired or replaced.

- > What is the procedure(s) used for repair?
- > What is the procedure(s) used for replacement?

Each of these should be specified as referenced documents.

The aging management program with respect to spent fuel canisters includes only half of what any program should provide. Sure, we must monitor the canisters with regard to aging. But once cracking or other degradation exceeds threshold criteria, a method to correct the aging is required. Thus, it is necessary to specify procedures which will be used for repair or replacement of the canisters.

If the canisters are to be "replaced," without more detail in terms of a document specifying how this will be done may mean that spent fuel storage sites will not be prepared to deal with a repair or replacement.

Additionally, once a canister is repaired, what changes in the management program are then put into place to deal with the repair? There will likely need to be a whole new branch of the flowchart for repaired canisters.

CONCLUSION

I sincerely hope this is not the direction the NRC is planning to take on this. Please create a standard AMP that will be a public document which is applicable to all spent fuel storage sites rather than this plan to establish no real standards, and end up with a bazillion difference AMPs which are nearly impossible to oversee.

Sincerely,

A handwritten signature in black ink, appearing to read 'Ray Lutz', with a stylized flourish extending to the right.

Raymond Lutz
National Coordinator, Citizens' Oversight Projects