

Partial Response to RAIs on NEI 12-16

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Topics of Discussion

- Background/Timeline
- Breakdown of RAIs in Partial Response
- Role of NEI 12-16

Background

- NEI 12-16, Revision 0 submitted April 2013
- Four day-long public meetings Sept 2013-February 2014
- NEI 12-16, Revision 1 re-submitted April 2014
- Draft RAIs Received in May 2015
- Finalized RAIs Received in November 2015
- Partial Response provided in December 2015
 - Responded to 32 of 62 RAIs on NEI 12-16
 - Responded to 3 of 20 RAIs on EPRI Report 3002003073

Breakdown of RAI Responses on NEI 12-16

Category	RAI Number
Provided Clarification	1, 5a, 11, 17, 18, 19b, 21, 27, 36a, 47, EPRI-1
Already addressed in NEI 12-16	6b, 7, 8, 10, 10b, 12
Agreed to request	2, 3, 10a, 11, 13, 15a, 16, 19a, 24, 34a, 35, 37, 49, 51, 55, 56, 59
Disagree with Request	4, 6a, 15c, 34b-c, EPRI-3
Change control, QA Program	5b-e, 15b, 53
Out of Scope	36b-c
Separate guidance document	45
Deferred to next Response	EPRI-15

Role of NEI 12-16

- Serves as guidance to industry and NRC of scope of analysis and acceptable analysis approaches
- Summarizes approaches already found acceptable on individual License Amendment Requests
- Not a topical report.
- Detail provided is in line with a Regulatory Guide or Standard Review Plan
- Focus should be on those areas significant to safety.

Updates to NEI 12-16

- New Appendix B to address Format and Content (RAI-2)
- Checklist for licensees to document compliance/deviation from NEI 12-16 – allows NRC review to focus on areas of deviation (RAI-3)
- Detail isotopes to be credited (RAI-5)
- Update Section 4.2.1 on relative vs. absolute power (RAI-13)
- Update Section 4.2.1 on core soluble boron content (RAI-15)

Updates to NEI 12-16

- Update Section 4.2.1 on burnable absorbers (RAI-16)
- Update Section 4.2.1 on other depletion topics (RAI-17)
- Add section on fuel assembly modeling (RAI-24)
- Update Section 5.2.2.3.1 on modeling rack neutron absorber (RAI-36)
- Update Section 5.2.2 on including figures/tables of fuel, rack and depletion parameters (RAI-37)

RAIs on EPRI Report 3002003073

- RAI-1: Report has been independently reviewed. No changes to conclusions
- RAI-3: Scope of analysis agreed upon during NRC/NEI meetings
- RAI-15: Eccentric positioning treatment will be addressed in next set of RAI responses