



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**
WASHINGTON, D.C. 20555-0001

May 27, 2016

Dr. Dennis Bley, Chairman
Advisory Committee on Reactor Safeguards
U.S. Nuclear Regulatory Commission
Washington, DC 20555

SUBJECT: RESPONSE TO ADVISORY COMMITTEE ON REACTOR SAFEGUARDS
RECOMMENDATIONS ON NUREG-1927, REVISION 1, "STANDARD REVIEW
PLAN FOR RENEWAL OF SPECIFIC LICENSES AND CERTIFICATES OF
COMPLIANCE FOR DRY STORAGE OF SPENT NUCLEAR FUEL"

Dear Dr. Bley:

During the 633rd meeting of the Advisory Committee on Reactor Safeguards (ACRS), which occurred on April 7–9, 2016, the ACRS completed its review of the proposed final NUREG-1927, Revision 1, "Standard Review Plan for Renewal of Specific Licenses and Certificates of Compliance for Dry Storage of Spent Nuclear Fuel." In your letter dated April 20, 2016 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML16102A167), you provided ACRS views and recommendations on the proposed final NUREG. The ACRS recommendations were as follows:

1. NUREG-1927, Revision 1, "Standard Review Plan for Renewal of Specific Licenses and Certificates of Compliance for Dry Storage of Spent Nuclear Fuel," should be issued.
2. A future revision should be undertaken that places a priority on the development of a risk-informed approach, which includes analysis of event consequences, for aging management of dry storage systems.

The U.S. Nuclear Regulatory Commission (NRC) staff agrees with the first recommendation and will proceed to issue NUREG-1927, Revision 1. The staff also agrees with the second recommendation for undertaking a future revision to NUREG-1927 following the development of a risk-informed approach. As discussed at the March 23, 2016, meeting with the Subcommittee on Metallurgy and Reactor Fuels, the staff has initiated the development of a framework for risk informing spent fuel dry storage regulatory activities. The goal of this effort is to implement a risk-informed framework to better enable the staff to focus regulatory efforts, improve guidance, streamline casework activities, and evaluate requests for exemptions to the regulations while maintaining appropriate margins of safety and security. Any insights gained from this effort will inform the future updates to NUREG-1927.

In its April 20, 2016, letter, the ACRS said that, "improving access to the canisters to increase the probability of successful inspection could make the canisters more vulnerable to security concerns." The industry is making good progress in developing and deploying technology that allows inspections of current canistered systems without overpack modifications. As a result, future modifications to improve access may not be necessary. The staff is confident in the

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safety and security of the spent fuel storage systems approved to date and is available to discuss this point further with the ACRS.

The NRC staff appreciates the ACRS review of NUREG-1927, Revision 1 and looks forward to working with the ACRS in the future.

Sincerely,

/RA Daniel H. Dorman Acting for/

Victor M. McCree
Executive Director
for Operations

cc: Chairman Burns
Commissioner Svinicki
Commissioner Ostendorff
Commissioner Baran
SECY

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