



Licensing Program Improvements: Update

Emma L. Wong

DSFM/Inspection and Operations Branch

REGCON 2016

December 7, 2016



Outline

- Background
- Process Overview
- Key Areas
- Upcoming Activities

Background

- Identify and address potential regulatory framework issues associated with the new paradigm of a longer storage duration
- Perform a comprehensive review of storage and transportation regulatory framework
 - COMDEK-09-0001
 - COMSECY-10-0007
 - SRM-COMSECY-10-0007
 - SECY-11-0029
- Incorporate decades of experience

Process Overview

- Assembled teams to identify improvement needs
- Outreach to stakeholders on key areas
- Review of regulations and guidance
- Develop recommendations
- Implement framework improvements

Key Areas

- Compatibility of requirements for storage and transportation of spent nuclear fuel (SNF)
- Regulating stand-alone independent spent fuel storage installations (ISFSIs)
- Applicability and consistency of regulatory framework between specific and general license options
- Administration of storage certificates of compliance (CoC) for general license use

Compatibility of Requirements for Storage and Transportation of SNF

- Improve the compatibility of the storage and transportation requirements
 - Consider longer than anticipated storage duration impacts
- Recommended actions
 - Update retrievability
 - High burnup fuel cladding integrity research
 - Aging management guidance
- Ongoing actions
 - Reviewing Part 71 and Part 72 regulatory framework for additional recommendations

Regulating Stand-Alone ISFSIs

- Improve the framework for the general and specific license regulations for stand-alone ISFSIs
 - Consider future aging management or repackaging needs
- Ongoing actions
 - Examining the regulatory framework for recommendations
 - Fuel handling capability for these sites
 - Current site plans for unloading

Applicability and Consistency of Regulatory Framework

- Improve the consistency and clarify the applicability of Part 72 for general and specific licenses and between Part 72, 50, and 52
 - Consider the infrastructure associated with reactor operation
- Recommended actions
 - Rulemaking or guidance to close a gap between 10 CFR 72.218 and Part 50 on license termination
- Ongoing actions
 - Continued review of Part 72, 50 and 52 framework for additional recommendations

Administration of Storage CoC for General License Use



- Improve the process for certification of CoCs and CoC amendments
 - Consider guidance and the rulemaking process
- Recommended actions
 - Develop a process to change existing CoCs or CoC amendments (corrections or revisions)
- Ongoing actions
 - Issuing a draft RIS for public comment

Upcoming Activities

- Draft RIS on CoC changes for public comment
- Determine if rulemaking on Part 72 should be proposed
- Determine if additional guidance should be updated or developed
- Knowledge management NUREG on the Licensing Program Improvements initiative

Questions/Comments

Contact:

Emma Wong: (301) 415-7091

emma.wong@nrc.gov

Abbreviations

- CFR – *Code of Federal Regulations*
- CoC – Certificate of Compliance
- DSFM – Division of Spent Fuel Management
- ISFSI – Independent Spent Fuel Storage Installation
- NRC – Nuclear Regulatory Commission
- RIS – Regulatory Issue Summary
- SNF – Spent Nuclear Fuel



NMSS