



REG CON 2016



DECEMBER 7-8, 2016

HILTON ROCKVILLE HOTEL AND EXECUTIVE MEETING CENTER

ROCKVILLE, MARYLAND

NRC's Collaborative Efforts

Mark Lombard, Director

Division of Spent Fuel Management

Office of Nuclear Material Safety and Safeguards

Division of Spent Fuel Management

Regulatory Conference

December 7, 2016

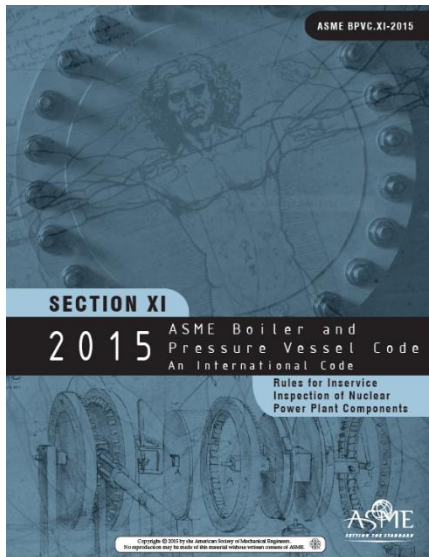
Collaboration Successes

- SCC Regulatory Issue Resolution Protocol
 - Initiated February 2010
 - Closed August 2016
 - Significantly improved understanding of the potential for CISCC of welded stainless steel canisters
- NUREG 1927, Rev. 1 issued to include Aging Management Program (AMP) strategies and details
 - Institute of Nuclear Power Operations (INPO) operating experience database for dry storage systems will inform aging management activities including AMPs
- Draft Managing Aging Process for Storage report developed



Current Efforts – ASME Code Case N860

- March 2015, NRC requested ASME Section XI develop consensus code rules for the in-service inspection of dry storage systems for spent nuclear fuel
- First meeting April 2015
- Estimated development time is 5 years (April 2020)



- Task Group representatives
 - Certificate of Compliance (CoC) holders
 - General and Specific ISFSI Licensees
 - Industry groups and consultants
 - National Laboratories
 - NRC



Current Efforts – 72.48

- NRC issued series of responses to NEI 12-04
 - September 2013, December 2014, and April 2016
- Public meeting with NEI conducted March 3, 2016
- NEI provided industry summary, dated August 8, 2016
 - Four fundamental issues
 - Seven key issues
- NRC staff agrees with most issues in NEI's reply
- NRC response to NEI's meeting summary in concurrence
- NRC expects to meet with NEI in early 2017
- **Method of evaluation is a key issue**



Current and Future Collaboration

– Change Control

- Appropriate thresholds for change control
- Change control continuum includes:
 - License and certificate conditions
 - Graded approach
 - 72.48 evaluations
 - Methods of evaluation key to 72.48



Method of Evaluation

- NEI 96-07, Section B4.3.8 states:

It should be noted that the NRC staff, in reviewing dry cask storage designs, historically has not generically approved methodologies referenced in FSARs for use by other licensees or vendors. Instead it has made statements in its SERs, following the guidance in the Standard Review Plan, that the design has been found to be acceptable in each review discipline area. **If, however, vendors or licensees choose to submit methodologies to the NRC for generic review and approval as part of applications for design approval or as separate topical reports, the staff will document NRC endorsement or approval in appropriate SERs.** Such endorsements or approval will facilitate vendors and licensees to use the 10 CFR 72.48 process that deals with approved methodologies.



MOE Path Forward

- MOE is a critical issue to NRC moving forward with our review and possible endorsement of NEI 12-04
- NRC's position is MOEs are reviewed by NRC as part of licensing actions, but are not approved as part of the action
 - Any review of an MOE as part of an action is only within the narrow confines of the subject action
- The position in 96-07, and the re-affirmed current NRC position, are consistent with each other and with the manner in which 50.59 is implemented, based on our discussions with NRR
- MOEs can be reviewed and approved for broader use if requested in an application
- Open to feedback on MOEs today and in a future meeting

