



UNITED STATES
NUCLEAR REGULATORY COMMISSION
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September 26, 2017

MEMORANDUM TO: Anthony Hsia, Deputy Director
Division of Spent Fuel Management
Office of Nuclear Material Safety
and Safeguards

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SUBJECT: SUMMARY OF SEPTEMBER 6, 2017, MEETING WITH NAC
INTERNATIONAL TO DISCUSS THE UPCOMING SUBMITTAL OF THE
APPLICATIONS FOR NAC-MPC AND NAC-UMS CERTIFICATE OF
COMPLIANCE RENEWAL AND NAC-MPC AMENDMENT NO. 7 (CAC
NO. L25244)

Background

On September 6, 2017, a meeting was held in Rockville, MD, between representatives of NAC International (NAC), and the U.S. Nuclear Regulatory Commission (NRC) to discuss the upcoming submittal of the applications for renewal of the certificates of compliance (CoC) for the Model Nos. NAC-MPC and NAC-UMS storage system and NAC-MPC Amendment No. 7 (Docket Nos. 72-1015 and 72-1025). The list of meeting attendees is provided in Enclosure 1.

The meeting was noticed on August 24, 2017 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML17236A216).

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Discussion

The meeting discussion followed the meeting agenda, which is provided in Enclosure 2. NAC gave two presentations, which are included in Enclosures 3 and 4, on the planned NAC-MPC and NAC-UMS renewals and NAC-MPC Amendment No. 7. The presentation provided an overview of the content of their forthcoming renewal and amendment applications. NAC plans to submit the renewal applications for the NAC-UMS and NAC-MPC by December 2019 and September 2020, respectively. NAC plans to submit the amendment application for the NAC-MPC by the end of calendar year 2017.

The first portion of the meeting focused on the planned NAC-MPC and NAC-UMS CoC renewals. NAC gave a presentation titled; "NAC-MPC/NAC-UMS CoC Renewal Application Projects" (Enclosure 3) NAC indicated the intent to have the NAC-MPC Amendment No. 7 complete prior to submitting the renewal application in 2020. NAC indicated the goal during inspections is to see 100% of the welds and to be consistent with past performance that saw 70-80% of a greater than Class C waste canister.

The NRC staff noted draft guidance that is available for reference, such as the Managing Aging Processes in Storage Report, and that these documents provide insights into what NRC would expect in a renewal application. NRC staff also noted that Aging Management Programs for the Model Nos. VSC-24 and the NUHOMS storage system (Docket Nos. 72-1007 and 72-1004, respectively) may be additional sources of determining what NRC would expect in a renewal application for a CoC. NRC staff repeatedly stressed that the application should clearly define technical bases for including and excluding structures, systems, and components such as the concrete pad, and to clearly define technical bases for including and excluding aging mechanisms. Additionally, the NRC staff noted that the safety analysis report should provide a level-of-detail that ensures different licensees have consistent operations.

NRC staff indicated that receiving the aging management review tables in an Excel Spreadsheet would help with the efficiency of NRC staff's review of the renewal applications.

After NAC and NRC representatives completed the discussion in the first portion of the meeting, the meeting was opened to public comments or questions for the NRC. No public comments were received.

The second portion of the meeting focused on the planned NAC-MPC CoC amendment. NAC gave a presentation titled, "NAC-MPC Amendment 7 LACBWR Enhancements" (Enclosure 4). NAC discussed the technical basis supporting the approval of the LaCrosse boiling-water reactor (LACBWR) canister. NAC stated that the licensing basis for the LACBWR does not account for conduction or convection through the annulus between the canister and the concrete overpack. NAC proposed to remove the applicability of Limiting Condition of Operation 3.1.6, "CONCRETE CASK Heat Removal System" as a requirement for LACBWR since operability of the decay heat removal system using convection. Additionally, NAC is going to request that the surveillance requirement to inspect the blocked vents be done annually. There were no questions or comments by members of the public.

A. Hsia

Action Items/Next Steps

NAC plans to conduct a second pre-application inspection at Maine Yankee in the second quarter of 2018. NAC noted that, "Per NUREG 1927, pre-application inspections 'demonstrate that an aging effect either does or does not require management.' Therefore, pre-application inspections are done for a specific aging mechanism."

Docket Nos. 72-1015 and 72-1025
CAC No. L25244

Enclosures:

1. Meeting Attendees
2. Agenda
3. Handout – NAC Presentation on
CoC Renewal Application
4. Handout – NAC Presentation on
CoC Amendment

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DISTRIBUTION: NRC Attendees

Closes CAC L25244

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Enclosure 1 Accession No.: ML17275A065 Enclosure 2 Accession No.: ML17275A066
Enclosure 3 Accession No.: ML17275A067 Enclosure 4 Accession No.: ML17275A068

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