

E-49984

Enclosure 1

Evaluation Form # 86, Revision 2

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CoC Condition/TS Identifier:

(Form #86) Revision 2 (changes made and tracked)

• **TS Table 1-1I, PWR Fuel Specifications for the Fuel to be Stored in the NUHOMS®-24PTH DSC**

* All LCOs also require an Applicability, Condition(s), Required Action(s), Completion Time(s), Surveillance Requirement(s), and Frequency(ies). Refer to NUREG-1745 for additional guidance.

** In performing the risk insight evaluation above, the evaluator should think about subsequent changes to a relocated CoC requirement. Specifically, ask the question “what is the likelihood and worst possible consequences of a future change to this requirement in the less-conservative direction”?

Requirement		TS Table 1-1I, PWR Fuel Specifications for the Fuel to be Stored in the NUHOMS®-24PTH DSC	
CoC Body Certified Design	Section I. Technology	No	
	Section II. Design Features	No	
Appendix A - Inspections, Tests, and Evaluations		No	
Appendix B. Technical Specifications	Section 1 Definitions, Use and Application	No	
	Section 2 Approved Contents (Selection Criteria)	A1	<p>The following items in Table 1-1I are required per Criterion A1 and shall be retained:</p> <ul style="list-style-type: none"> • Fuel class (type of spent fuel) • Fuel damage (condition of the spent fuel) • Failed fuel (condition of the spent fuel) • Partial Length Shield Assemblies – maximum burnup and decay heat and minimum cooling time (type of spent fuel) • Maximum Number of Irradiated Stainless Steel Rods in Reconstituted Assemblies per DSC (type and condition of the spent fuel) • Maximum Number of Irradiated Stainless Steel Rods per Reconstituted Assembly (type and condition of the spent fuel) • Maximum Number of Reconstituted Assemblies per DSC with Unlimited Number of Low Enriched UO₂ Rods and/or Unirradiated Stainless Steel Rods and/or Zr Rods or Zr Pellets (type and condition of the spent fuel) • Control Components (type of spent fuel) • Number of intact assemblies (condition of spent fuel) • Number and location of damaged assemblies (condition of spent fuel) • Number and location of failed assemblies (condition of spent fuel) • Allowable heat load zoning configurations (maximum heat designed to be dissipated) • Maximum planar average enrichment • Decay heat (maximum heat designed to be dissipated) • <i>Maximum fuel assembly weight (type of spent fuel)</i>

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		A2	The following items in Table 1-1I are required per Criterion A2 and shall be retained: <ul style="list-style-type: none"> • Minimum boron loading (criticality function)
		A3	No
	Section 3 Limiting Conditions for Operation (LCOs)* and Surveillance Requirements (SRs) (Selection Criteria)	L1	No
		L2	No
		L3	No
	Section 4 Administrative Controls		No
Risk Insight**: Will removing this requirement from the CoC/TS result in...	A significant increase in the probability or consequences of an accident previously evaluated in the cask FSAR?		Yes (for A1 and A2 items)
	The possibility of a new or different kind of accident being created compared to those previously evaluated in the FSAR?		Yes (for A1 and A2 items)
	A Significant reduction in the margin of safety for ISFSI or cask operation?		Yes (for A1 and A2 items)

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<p>Evaluation Summary</p>	<p>The A1 and A2 items to be maintained are summarized above.</p> <p>The fuel qualification tables will be deleted from the Technical Specifications <i>and placed in the UFSAR</i>, although <i>key parameters (e.g., minimum fuel assembly cooling time, maximum burnup, minimum assembly average enrichment)</i> will be retained as global parameters, which will appear in the respective fuel specification table. An exhaustive fuel qualification is performed to determine bounding source terms, as documented in the UFSAR. Fuel assembly decay heat is determined by the Licensee, <i>transfer cask dose rates are verified at loading</i>, and HSM dose rates are verified by a one-time measurement as a part of the <i>CoC Appendix A ITE</i>.</p> <p><i>In Amendment 15 (currently under NRC review), the fuel qualification tables (FQTs) for the 24PTH, 32PT, 32PTH1, and 37PTH DSC were consolidated into a single set of FQTs based solely on heat load and are applicable to all four systems. These FQTs are documented in Section M.5.2.6 of the FSAR. Design basis sources were developed for each system based on the bounding heat load zone configuration, and the FSAR dose rates were updated as needed. For example, for the 24PTH DSC, the updated source terms are documented in Section P.5.2.6 of the FSAR.</i></p> <p>Details and instructions to Licensees for performing Fuel Qualification for burnup/enrichment combinations not considered in the UFSAR will be included in the BASES. The notes associated with the FQTs will be included in the instructions to Licensees, as needed.</p> <p>The following characteristic will be moved from the Technical Specifications to the UFSAR:</p> <ul style="list-style-type: none">• Nominal Assembly Width for Intact and Damaged Fuel Only <p>If the Licensee has fuel that does not meet the nominal assembly width, acceptability will be determined per 10 CFR 72.48.</p>
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