

Evaluation Forms for CoC 1004 TS Section 1 Items

CoC Condition/TS Identifier: TS-1.1 (Form #13) Revision 0 (NRC comment that this is pending – no changes made)

* 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 1.1: Definitions (as currently listed in Proposed Amendment 15 TS)	
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		Yes	
	Section 2 Approved Contents (Selection Criteria)	A1	No	
		A2	No	
		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?		No	
	The possibility of a new or different kind of accident being created compared to those previously evaluated in the FSAR?		No	
	A Significant reduction in the margin of safety for ISFSI or cask operation?		No	
Evaluation Summary			Retain in CoC Appendix B, TS Section 1 since it meets the criterion for inclusion in the new TS format. No change except potentially to the List of Definitions later to reflect final TS reorganization (some definitions may no longer be needed and others added).	

Evaluation Forms for CoC 1004 TS Section 1 Items

CoC Condition/TS Identifier: TS-1.2 (Form #14) Revision 0 (no NRC questions – no changes made)

* 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 1.2: Logical Connectors (as currently listed in Proposed Amendment 15 TS)	
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		Yes	
	Section 2 Approved Contents (Selection Criteria)	A1	No	
		A2	No	
		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?		No	
	The possibility of a new or different kind of accident being created compared to those previously evaluated in the FSAR?		No	
	A Significant reduction in the margin of safety for ISFSI or cask operation?		No	
Evaluation Summary			Retain in TS Appendix B Section 1 since it meets the criterion for inclusion in the new TS format (Use and Application). No change – Existing Purpose, Background, and Examples are helpful to understand the TS Use and Application.	

Evaluation Forms for CoC 1004 TS Section 1 Items

CoC Condition/TS Identifier: TS-1.3 (Form #15) Revision 0 (no NRC questions – no changes made)

* 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 1.3: Completion Times (as currently listed in Proposed Amendment 15 TS)	
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		Yes	
	Section 2 Approved Contents (Selection Criteria)	A1	No	
		A2	No	
		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?		No	
	The possibility of a new or different kind of accident being created compared to those previously evaluated in the FSAR?		No	
	A Significant reduction in the margin of safety for ISFSI or cask operation?		No	
Evaluation Summary			Retain in TS Appendix B Section 1 since it meets the criterion for inclusion in the new TS format (Use and Application). No change – Existing Purpose, Background, Description, Examples and Immediate Completion Time are helpful to provide guidance on Completion Times use in the TS.	

Evaluation Forms for CoC 1004 TS Section 1 Items

CoC Condition/TS Identifier: TS-1.4 (Form #16) Revision 0 (no NRC questions – no changes made)

* 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 1.4: Frequency (as currently listed in Proposed Amendment 15 TS)	
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		Yes	
	Section 2 Approved Contents (Selection Criteria)	A1	No	
		A2	No	
		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?		No	
	The possibility of a new or different kind of accident being created compared to those previously evaluated in the FSAR?		No	
	A Significant reduction in the margin of safety for ISFSI or cask operation?		No	
Evaluation Summary			Retain in TS Appendix B Section 1 since it meets the criterion for inclusion in the new TS format (Use and Application). No change – Existing Purpose, Description, and Examples are helpful to provide guidance on the proper use and application of Frequency requirements in TS.	