

E-49944 Enclosure 6
Evaluation Forms for CoC 1004 TS Section 5 Items

CoC Condition/TS Identifier: **TS-5.1 (Form #55) Revision 3 (changes made and tracked)**

* 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 5.1: Procedures (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		No
	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		<i>Yes, for the first paragraph, although the bulleted items are not necessary, per the Evaluation Summary at the end of this form.</i>
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

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Requirement	TS 5.1: Procedures (as currently listed in Proposed Amendment 15 TS)
Evaluation Summary	<p>Procedures are required by § 72.150, Instructions, procedures, and drawings, as follows:</p> <p>§ 72.150 Instructions, procedures, and drawings.</p> <p>The licensee, applicant for a license, certificate holder, and applicant for a CoC shall prescribe activities affecting quality by documented instructions, procedures, or drawings of a type appropriate to the circumstances and shall require that these instructions, procedures, and drawings be followed. The instructions, procedures, and drawings must include appropriate quantitative or qualitative acceptance criteria for determining that important activities have been satisfactorily accomplished.</p> <p><i>The first paragraph provides an overarching requirement that procedures of the nature described shall be generated. This paragraph will remain and will be in TS Section 4 Administrative Controls.</i></p> <p>The bullet items listed in this TS are mostly specifically required to be part of the Subpart G Quality Assurance Program, or are required by other regulations, or are required by other TS. Therefore these bullets serve no safety purpose, are redundant to other more direct requirements, and therefore they should be removed from TS and not relocated to anywhere.</p> <p>The two paragraphs following the bullets, regarding the fuel removal procedure, are covered in generally the same language and details in the Operating Systems chapters of the UFSAR for each respective DSC. <i>However, to ensure clarity, the language from these paragraphs which is not currently in the UFSAR is being added to each operating procedure chapter.</i></p>

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CoC Condition/TS Identifier: TS-5.1.1 (Form #56) Revision 0 (no NRC questions – no changes made)

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** 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 5.1.1: DSC Loading, Unloading and Preparation Program (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	No	
	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	

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Requirement	TS 5.1.1: DSC Loading, Unloading and Preparation Program (as currently listed in Proposed Amendment 15 TS)
Evaluation Summary	<p>All of these provisions are covered by other TS or by regulation.</p> <p>The program described in the first paragraph is generally required by § 72.150, Instructions, procedures, and drawings. The first paragraph refers to several TS and the UFSAR commitments. The UFSAR operations chapters call out the TS related to operational steps. The TS themselves must be accounted for in procedures and complied with. Therefore this TS paragraph does not serve any safety purpose and can be removed from the licensing basis.</p> <p>The second paragraph is redundant to TS 3.1.1. The clear intent of TS 3.1.1 is to limit the oxidation of the fuel. The UFSAR operations chapters call out TS 3.1.1 for any water removal from the DSCs. Therefore this TS paragraph does not serve any safety purpose and can be removed from the licensing basis.</p> <p>The activities that would be covered by the third paragraph are LCOs, which have as standard format the ACTIONS and COMPLETION TIMES. Therefore this TS paragraph does not serve any safety purpose and can be removed from the licensing basis.</p>

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CoC Condition/TS Identifier: TS-5.1.2 (Form #57) Revision 3 (changes made and tracked)

* 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 5.1.2: ISFSI Operations Program (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		No
	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		Yes for TS 5.1.2 #2
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

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Evaluation Forms for CoC 1004 TS Section 5 Items

Requirement	TS 5.1.2: ISFSI Operations Program (as currently listed in Proposed Amendment 15 TS)
Evaluation Summary	<p>Item 1 is not really related to UFSAR ISFSI operations, but rather is a verification that TS 4.3.1 is met. TS 4.3.1 will be verified as an item in the Appendix A inspections, tests, and evaluations, and therefore TS 5.1.2 Item 1 serves no purpose and can be removed entirely from the licensing basis.</p> <p>Item 2 is a verification that that the concrete storage pad parameters are consistent with the UFSAR analysis. <i>This verification will be joined with the current TS 5.3.1 TC/DSC lifting and handling requirements in the new TS Section 4 Administrative Controls.</i></p> <p>Item 3 is also not really related to UFSAR ISFSI operations, but rather is a verification that the maximum lifting heights for the cask system meet Technical Specification 5.3.1 requirements. TS 5.3.1 will be verified as an item in CoC Appendix A inspections, tests, and evaluations, and therefore TS 5.1.2 Item 3 serves no purpose and can be removed entirely from the licensing basis.</p>

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Evaluation Forms for CoC 1004 TS Section 5 Items

CoC Condition/TS Identifier: TS-5.2 Programs -Introduction (Form #58) 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 5.2 Programs - Introduction Each user of the NUHOMS® System will implement the following programs: <ul style="list-style-type: none"> • 10 CFR 72.48 Evaluation Program • Training Program • Radiological Environmental Monitoring Program • Radiation Protection Program • HSM Thermal Monitoring Program 	
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	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		Yes, since it introduces the programs	
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	

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Evaluation Forms for CoC 1004 TS Section 5 Items

Requirement		TS 5.2 Programs - Introduction Each user of the NUHOMS® System will implement the following programs: <ul style="list-style-type: none"> • 10 CFR 72.48 Evaluation Program • Training Program • Radiological Environmental Monitoring Program • Radiation Protection Program • HSM Thermal Monitoring Program
	A Significant reduction in the margin of safety for ISFSI or cask operation?	No
Evaluation Summary		This introductory section will be retained in TS and will list the programs which remain in this section.

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Evaluation Forms for CoC 1004 TS Section 5 Items

CoC Condition/TS Identifier: TS-5.2.1 (Form #59) 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 5.2.1: 10 CFR 72.48 Evaluation Program (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		No
	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

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Requirement	TS 5.2.1: 10 CFR 72.48 Evaluation Program (as currently listed in Proposed Amendment 15 TS)
Evaluation Summary	The provisions of this TS are entirely redundant to 10 CFR 72.48 and having them reiterated in the TS is not necessary to assure safe cask or ISFSI operation.

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Evaluation Forms for CoC 1004 TS Section 5 Items

CoC Condition/TS Identifier: TS-5.2.2 (Form #60) Revision 1 (changes made and tracked)

* 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 5.2.2: Training Program (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		No
	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

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Requirement	TS 5.2.2: Training Program (as currently listed in Proposed Amendment 15 TS)
Evaluation Summary	<p>As the TS states, training is required by Part 72. The UFSAR has sections addressing training. The details of the specific training required represent the aspects for which licensees must develop procedures and therefore must train on. That detail more appropriately should be included in the UFSAR. No purpose is served by having that detail in the TS. Therefore, this TS can be removed.</p> <p><i>UFSAR Section 9.3, "Training Program," should be revised to incorporate applicable information from this TS.</i></p>

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Evaluation Forms for CoC 1004 TS Section 5 Items

CoC Condition/TS Identifier: TS-5.2.3 (Form #61) Revision 3 (changes made and tracked)

* 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 5.2.3: Radiological Environmental Monitoring Program	
			(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		No	
	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		Yes	
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	

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Requirement	TS 5.2.3: Radiological Environmental Monitoring Program (as currently listed in Proposed Amendment 15 TS)
Evaluation Summary	<i>This TS establishes a program essentially the same as that required by 72.44(d)(2) for specific licenses. This TS shall be retained and moved to TS Section 4 Administrative Controls.</i>

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CoC Condition/TS Identifier: TS-5.2.4 (introductory paragraph) (Form #62) Revision 0 (no NRC questions – no changes made)

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** 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 5.2.4: Radiation Protection Program (introductory paragraph) The Radiation Protection Program shall establish administrative controls to limit personnel exposure to As Low As Reasonably Achievable (ALARA) levels in accordance with 10 CFR Part 20 and Part 72.	
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	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	

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Requirement		<p>TS 5.2.4: Radiation Protection Program (introductory paragraph)</p> <p>The Radiation Protection Program shall establish administrative controls to limit personnel exposure to As Low As Reasonably Achievable (ALARA) levels in accordance with 10 CFR Part 20 and Part 72.</p>
	A Significant reduction in the margin of safety for ISFSI or cask operation?	No
Evaluation Summary		<p>The introductory paragraph is totally redundant to Part 20 and Part 72, both of which define ALARA and require ALARA. Therefore this TS sentence is not needed and can be removed.</p>

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CoC Condition/TS Identifier: TS-5.2.4.a (Form #63) 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 5.2.4 Item a): Radiation Protection Program – topics dealing with remote handling devices, situations involving the OS197L transfer cask model, and liquid neutron shield draining. (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	No	
	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		Yes	
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?	Yes, based on the importance of radiation safety and the unique nature of the OS197L design, if the requirements in this TS were not met a significant reduction in margin would potentially occur.	

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Requirement	TS 5.2.4 Item a): Radiation Protection Program – topics dealing with remote handling devices, situations involving the OS197L transfer cask model, and liquid neutron shield draining. (as currently listed in Proposed Amendment 15 TS)
Evaluation Summary	Based on risk insights, these TS requirements should remain in the CoC Appendix B TS Section 4 Administrative Controls under the Radiation Protection Program.

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CoC Condition/TS Identifier: TS-5.2.4.b (Form #64) Revision 0 (no NRC questions – no changes made)

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** 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 5.2.4 Item b): Radiation Protection Program – DSC Closure Weld NDE (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		No
	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	Yes; this item is related to the verification of the integrity of a fission produce barrier.
		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, potentially. This TS is only a verification of the confinement boundary multi-layered welds, but if the confinement boundary, which is a fission product barrier, is not ensured, consequences of a drop accident could potentially increase.	
	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	

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Requirement	TS 5.2.4 Item b): Radiation Protection Program – DSC Closure Weld NDE (as currently listed in Proposed Amendment 15 TS)
Evaluation Summary	<p>This item, regarding DSC closure weld NDE, is related to the confinement design function.</p> <p>If these steps are not performed, the worst possible consequences would be that all of the multiple welds were flawed, the flaws line up to create a leak path, and therefore the multiple accidents involving the confinement boundary would involve a potential breach and a potential release of radionuclides, which would result in contamination and increased dose rates.</p> <p>Based on the direct relationship of this TS to the confinement design function, which is a fission product barrier, this TS should remain, but is better suited to become an LCO.</p>

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CoC Condition/TS Identifier: TS-5.2.4.c (Form #65) Revision 0 (no NRC questions – no changes made)

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** 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 5.2.4 Item c): Radiation Protection Program – Leak Test of DSC Inner Seal Weld (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	No	
	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	Yes; this item is related to the verification of the integrity of a fission produce barrier.
		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, potentially. This TS is only a verification of the confinement boundary multi-layered welds, but if the confinement boundary, which is a fission product barrier, is not ensured, consequences of a drop accident could potentially increase.	
	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	

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Requirement	TS 5.2.4 Item c): Radiation Protection Program – Leak Test of DSC Inner Seal Weld (as currently listed in Proposed Amendment 15 TS)
Evaluation Summary	<p>This item, regarding leak testing of the DSC inner seal weld, is related to the confinement design function.</p> <p>If this leak test is not performed, the worst possible consequences would be that all of the multiple welds were flawed, the flaws line up to create a leak path, the NDE of the welds was somehow not performed, and therefore the multiple accidents involving the confinement boundary would involve a potential breach and a potential release of radionuclides, which would result in contamination and increased dose rates.</p> <p>Regardless of the very low risk, based on the direct relationship of this TS to the confinement design function, which is a fission product barrier, this TS should remain, but is better suited to become an LCO.</p>

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CoC Condition/TS Identifier: TS-5.2.4.d (Form #66) Revision 3 (changes made and tracked)

* 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 5.2.4 Item d): Radiation Protection Program – TC/DSC Contamination (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		No
	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	<i>Yes; this item is related to ensuring that radioactive contamination does not exceed limits prior to DSC storage in the HSM.</i>
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 increase in the probability of any accident. Slight Increase in consequences due to increased dose from contamination, but not a significant increase.	
	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	

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Requirement	TS 5.2.4 Item d): Radiation Protection Program – TC/DSC Contamination (as currently listed in Proposed Amendment 15 TS)
Evaluation Summary	<i>In order to ensure that radioactive contamination does not exceed limits prior to DSC storage in the HSM, this item will be moved to TS Section 3 as an LCO.</i>

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CoC Condition/TS Identifier: TS-5.2.4.e (Form #67) Revision 3 (changes made and tracked)

* 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 5.2.4 Item e): Radiation Protection Program – TC Dose Rate Measurements (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		No
	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	<i>Yes; this item provides information to the workers on the radiation level they are exposed to and provide a means for identification of a potential misload.</i>
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 increase in the probability of any accident. Increase in consequences of all accidents, due to increased dose from the TC, only if there was an area with reduced shielding. This TS is a verification and not an overt action involving an SSC that provides shielding.	
	The possibility of a new or different kind of accident being created compared to those previously evaluated in the FSAR?	No	

E-49944 Enclosure 6
Evaluation Forms for CoC 1004 TS Section 5 Items

Requirement		TS 5.2.4 Item e): Radiation Protection Program – TC Dose Rate Measurements (as currently listed in Proposed Amendment 15 TS)
	A Significant reduction in the margin of safety for ISFSI or cask operation?	<p style="text-align: center;">No</p> <p>There would be a slight reduction in the margin of safety for the shielding design function, but only if an area of reduced shielding exists.</p>
Evaluation Summary		<i>Based on the importance of this dose rate information in assessing worker dose and potentially identifying a misload, this item will be moved to TS Section 3 as an LCO.</i>

E-49944 Enclosure 6
Evaluation Forms for CoC 1004 TS Section 5 Items

CoC Condition/TS Identifier: TS-5.2.5 (Form #68) Revision 0 (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 5.2.5: HSM or HSM-H Thermal Monitoring Program (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		No
	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	Yes
		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 The probability of a blocked vent event may go undetected if not detected by inspection of the HSM inlet and outlet vents or monitoring of the DSC/HSM temperatures. The consequences of a blocked undetected vent could cause the cladding temperatures in the DSC to exceed the 752 degrees F temperature limit (loss of confinement safety function) or cause degradation of the structural properties of the concrete HSM.	
	The possibility of a new or different kind of accident being created compared to those previously evaluated in the FSAR?	No	

E-49944 Enclosure 6
Evaluation Forms for CoC 1004 TS Section 5 Items

Requirement		TS 5.2.5: HSM or HSM-H Thermal Monitoring Program (as currently listed in Proposed Amendment 15 TS)
	A Significant reduction in the margin of safety for ISFSI or cask operation?	No
Evaluation Summary		<p>The safety purpose of this program is to provide the licensee with a positive means to identify conditions which threaten to approach temperature criteria for proper HSM or HSM-H operation and allow for the correction of off-normal thermal conditions that could lead to exceeding the concrete and fuel clad temperature criteria.</p> <p>The details of this TS include surveillances, requirements, conditions, and actions, and therefore it is better suited as an LCO.</p> <p>The following aspects of the existing TS can be moved to the TS Bases chapter of the UFSAR:</p> <p>“This program shall monitor the thermal performance of each HSM daily, either by direct visual inspection or remote temperature measurement.</p> <p>The program shall be of sufficient scope to provide the licensee with a positive means to identify conditions which threaten to approach temperature criteria for proper HSM or HSM-H operation and allow for the correction of off-normal thermal conditions that could lead to exceeding the concrete and fuel clad temperature criteria.”</p>

E-49944 Enclosure 6
Evaluation Forms for CoC 1004 TS Section 5 Items

CoC Condition/TS Identifier: TS-5.2.6 (Form #69) 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 5.2.6: Hydrogen Gas Monitoring for 24P, 52B, 24PHB, 61BT, 32PT, 24PTH, 61BTH, 32PTH1, 69BTH, and 37PTH DSCs (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	No	
	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		Yes	
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?	Yes A hydrogen explosion could result from a hydrogen concentration exceeding the flammability limit – an accident threatening occupational workers as well as possible loss of confinement.	
	A Significant reduction in the margin of safety for ISFSI or cask operation?	No	

E-49944 Enclosure 6
Evaluation Forms for CoC 1004 TS Section 5 Items

Requirement	TS 5.2.6: Hydrogen Gas Monitoring for 24P, 52B, 24PHB, 61BT, 32PT, 24PTH, 61BTH, 32PTH1, 69BTH, and 37PTH DSCs (as currently listed in Proposed Amendment 15 TS)
Evaluation Summary	This TS prevents a potential hydrogen explosion during establishment of the confinement boundary or purposeful breaching of the confinement boundary. The explosion could affect the shielding function and is a personnel safety item. This TS should be retained and located in CoC Appendix B TS Section 4 Administrative Controls.

E-49944 Enclosure 6
Evaluation Forms for CoC 1004 TS Section 5 Items

CoC Condition/TS Identifier: TS-5.3.1 (Form #70) Revision 3 (changes made and tracked)

* 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 5.3.1: TC/DSC Lifting/Handling Height Limits (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		No
	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		Yes
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?		Yes A significant reduction in the margin of safety for confinement is possible if there were no limit on the cask lifting and handling height (currently analyzed to 80 inches).

E-49944 Enclosure 6
Evaluation Forms for CoC 1004 TS Section 5 Items

Requirement	TS 5.3.1: TC/DSC Lifting/Handling Height Limits (as currently listed in Proposed Amendment 15 TS)
Evaluation Summary	<p>This TS is associated with ensuring the confinement function. The TS contains evaluations of temperatures with resultant restrictions (impacting the ductility/brittleness of the cask materials) necessary to provide reasonable assurance that the cask safety function of confinement will be performed.</p> <p>Therefore, this TS should be relocated to <i>TS Section 4 Administrative Controls</i>.</p>

E-49944 Enclosure 6
Evaluation Forms for CoC 1004 TS Section 5 Items

CoC Condition/TS Identifier: TS-5.3.2 (Form #71) 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 5.3.2: Cask Drop (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		No	
	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	

E-49944 Enclosure 6
Evaluation Forms for CoC 1004 TS Section 5 Items

Requirement	TS 5.3.2: Cask Drop (as currently listed in Proposed Amendment 15 TS)
Evaluation Summary	<p>This TS requires an inspection of the cask/DSC after a drop height of greater than 15 inches. As explained in the details of this TS, the probability of a confinement breach due to a drop is essentially zero.</p> <p>Based on the quality assurance program and its required corrective action program, a drop of an SSC as massive as the TS/DSC would without doubt receive a thorough investigation and inspection for damage.</p> <p>Therefore, this TS can be removed and relocated to the UFSAR. The requirement for inspection if a drop occurs should become an operational step in the UFSAR operations chapters and the remainder of this TS should be included in the Confinement chapters if the information is not already included in those chapters.</p>

E-49944 Enclosure 6
Evaluation Forms for CoC 1004 TS Section 5 Items

CoC Condition/TS Identifier: TS-5.3.3 (Form #72) Revision 1 (changes made and tracked)

* 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 5.3.3: TC Alignment with HSM or HSM-H (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		No
	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

E-49944 Enclosure 6
Evaluation Forms for CoC 1004 TS Section 5 Items

Requirement	TS 5.3.3: TC Alignment with HSM or HSM-H (as currently listed in Proposed Amendment 15 TS)
Evaluation Summary	<i>This TS provides the alignment tolerances for the transfer cask with respect to the horizontal storage module and is applicable during the insertion and retrieval operations. Those operations are detailed in UFSAR operations chapters (e.g., Chapter 5, Chapter K.8, Chapter M.8). This TS should be moved to those chapters of the UFSAR, including the actions to ensure proper alignment.</i>

E-49944 Enclosure 6
Evaluation Forms for CoC 1004 TS Section 5 Items

CoC Condition/TS Identifier: TS-5.3.4 (Form #73) Revision 3 (changes made and tracked)

* 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 5.3.4: Trailer Shielding Drop onto OS197L TC	
		<p>The DSC and the OS197L TC and the trailer shielding shall be inspected for damage and evaluated for further use after the accident drop of the trailer shielding onto the OS197L TC.</p> <p>The lifting of outer top trailer shielding is restricted such that the bottommost part of the body of the outer top trailer shielding is less than 4 inches above the inner top trailer shielding.</p>	
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	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		Yes	
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

E-49944 Enclosure 6
Evaluation Forms for CoC 1004 TS Section 5 Items

Requirement		<p>TS 5.3.4: Trailer Shielding Drop onto OS197L TC</p> <p>The DSC and the OS197L TC and the trailer shielding shall be inspected for damage and evaluated for further use after the accident drop of the trailer shielding onto the OS197L TC.</p> <p>The lifting of outer top trailer shielding is restricted such that the bottommost part of the body of the outer top trailer shielding is less than 4 inches above the inner top trailer shielding.</p>
	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?	<p>Yes</p> <p>A drop of the outer top trailer shielding could damage the TC. In addition, for radiation shielding purposes, to maintain dose to the occupational workers within acceptable levels, the top trailer shielding should be maintained just above the inner top trailer shielding.</p>
Evaluation Summary		<p><i>These requirements are necessary for radiation protection and should remain in TS as Administrative Controls.</i></p>

E-49944 Enclosure 6
Evaluation Forms for CoC 1004 TS Section 5 Items

CoC Condition/TS Identifier: **TS-5.4 (Form #74) Revision 1 (changes made and tracked)**

* 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 5.4: HSM or HSM-H Dose Rate Evaluation Program (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			Yes	
Appendix B. Technical Specifications	Section 1 Definitions, Use and Application		No	
	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?		Yes Failure of this SSC to provide adequate shielding could result in a significant reduction in the margin of safety for radiation shielding effectiveness and impact on worker and public dose.	

E-49944 Enclosure 6
Evaluation Forms for CoC 1004 TS Section 5 Items

Requirement	TS 5.4: HSM or HSM-H Dose Rate Evaluation Program (as currently listed in Proposed Amendment 15 TS)
Evaluation Summary	<p>This TS is a one-time measurement taken at locations on the exterior of the HSM or HSM-H that contributes to ensuring that the shielding design function has been established correctly. Failure of the HSM to provide shielding could have a significant impact on worker and public health and safety.</p> <p>Therefore, this TS should be retained. However, based on its one-time evaluation nature, it belongs in the CoC Appendix A ITE section.</p>

E-49944 Enclosure 6
Evaluation Forms for CoC 1004 TS Section 5 Items

CoC Condition/TS Identifier: TS-5.5 (Form #75) 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 5.5: Concrete Testing for HSM-H (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			Yes, performed by the CoC holder	
Appendix B. Technical Specifications	Section 1 Definitions, Use and Application		No	
	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?		Yes The consequences of the Blockage of Air Inlet and Outlet Openings could be significantly increased if the concrete fails at elevated temperatures.	
	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	

E-49944 Enclosure 6
Evaluation Forms for CoC 1004 TS Section 5 Items

Requirement	TS 5.5: Concrete Testing for HSM-H (as currently listed in Proposed Amendment 15 TS)
Evaluation Summary	This TS requires tests that are necessary to provide reasonable assurance that HSMs have been manufactured and will operate in conformance with the certified design and that the safety function of shielding will be performed. This TS should remain but should be relocated to CoC Appendix A, Inspections, Tests, and Evaluations, to be performed by the CoC holder during fabrication.

E-49944 Enclosure 6
Evaluation Forms for CoC 1004 TS Section 5 Items

CoC Condition/TS Identifier: **TS-5.6 (Form #76) Revision 3 (changes made and tracked)**

* 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 5.6: HSM-H Configuration Changes (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		No	
	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	

E-49944 Enclosure 6
Evaluation Forms for CoC 1004 TS Section 5 Items

Requirement	TS 5.6: HSM-H Configuration Changes (as currently listed in Proposed Amendment 15 TS)
Evaluation Summary	<p><i>CoCs 1029, 1030, and 1042 are all also based on the NUHOMS® technology and therefore employ HSMs, in one case the same model (HSM-H) under discussion here. The TS for those other CoCs do not include any item of this nature, involving a restriction on HSM dimensional changes.</i></p> <p>Also, the methodology used to evaluate the thermal performance of the HSM-H was validated by thermal tests performed on a 1:1 scale of an HSM-H mockup structure. This is discussed in the UFSAR (e.g., UFSAR Revision 15 Sections P.4.1 and P.4.4.7.2), with reference to those thermal test results. When this TS is moved to the UFSAR, the 8% restriction will be included. Any changes to the HSM-H configuration would generally need to meet that restriction and in any case would need a 10 CFR 72.48 Evaluation. If a change were proposed that would exceed that restriction, the 10 CFR 72.48 Evaluation would need justification for exceeding the restriction. There is no reason to treat this methodology differently than other UFSAR methodologies.</p> <p><i>Additionally, the 10 CFR 72.48 process requirements ensure that use of methodologies are properly assessed by CoC holders and Licensees and, if need be, review and approval by the NRC is obtained. As discussed above, TN has multiple CoCs using HSMs which have been licensed and amended over the last couple decades; therefore the safety basis for NUHOMS® systems and HSM thermal functionality are well understood and well documented.</i></p> <p><i>Lastly, TN does not feel that this TS meets any of the CoC selection criteria for retaining the requirement in the TS.</i></p> <p>Therefore, TN recommends that this item will be relocated to the UFSAR section which covers the HSM-H thermal performance methodology.</p>