

Enclosure 14 to E-51306

**NRC February 28, 2018 Feedback
on CoC 1004 Amendment 16 Changes**

TN Americas Certificate of Compliance No. 1004 Amendment #16

Form #	Certificate of Compliance Proposed Changes	Feedback	Question/Comment
3	CoC 3a	Question	<p>3-a) (CoC, Page 1, 3rd para.) Would it make sense to include in the list of DSC models authorized for use in the Standardized NUHOMS System all the variants of the DSCs? (24P, 24PTH, 24PTH-L, 24PTH-S, 24PTH-S-LC, 24PHB, 24PHBL, 24PHB-L, 32PT, 32PT-S, 32PT-L, 32PTH-M, 32PTH-S, 32PTH1, 32PTH1-S, 32PTH1-M, 32PTH1-L, 32PTH1-S, 37PTH, 37PTH-S, 37PTH-M, 52B, 61BT, 61BTH Type 1; 61BTH Type 2, 69BTH.)</p> <p>3-b) Would it make sense to include a list of nomenclatures for DSC variants (-L, -LC, -M, -S) and what each designate.</p> <p>3-c) Would it make sense to add the following statement: "Information concerning the fuel types, dose rate limits, or other technical specifications applies to all variants if they are not explicitly mentioned in the CoC or technical specification"</p>
13	TS 1.1 (relocate Definitions to TS Appendix B, Section 1)	Question	13-a) (Appendix B, Page 1-2) Should definition for OPERABILITY be included in the definition list? See example definition in NUREG-1745.
25	TS 3.1.4 (retain)	Question	25-a) (Appendix B, Page 3-9) TS 3.1.4 best fits in ITE (Appendix A) in light of the proposed TS 3.1.5, how will it be incorporated?

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35	TS 4.2.4 (move to FSAR, add to TS ref. FSAR location for code alternative)	Question	<p>35-a) (Evaluation Form #35-a) NRC conducts review and approval of Code alternatives as part of licensing basis. The table of approved code alternatives can be located just in the UFSAR, but any newly proposed code alternatives has to be submitted for review.</p> <p>Could this be covered by retaining the following provision from Amendment #15, page 4-36: "Proposed alternatives to the ASME Code, other than the aforementioned ASME Code alternatives may be used when authorized by the Director of the Office of Nuclear Material Safety and Safeguards, or designee?"</p>
41	Table of DSC model and Minimum B-10 Areal Density. Appendix A, page 2.		41-a) (Appendix A, Page 2) Would it make sense to add, in Table of DSC model and Minimum B-10 Areal Density, DSC models 52B, 24P, and 24 PHB; and include a statement that these three models are not designed to take credit for boron content in the neutron absorber plates or poison rod assemblies?
54	TS 4.5 (move to TS Appendix A - IT&E)	Question	54-a) (Appendix B, Page 3-14) LCO 3.3.2, ACTIONS A. - what is the required action to bring to operability or safe condition? This LCO is missing the required action.
57	TS 5.1.2 (delete)	Comment	57-a) (Appendix B, Pages 4-4, 4-5, 4-7). There is an issue with the formatting of the page header. The header is missing the double line underscore on some pages. Should the header be consistent with prior pages?
64	TS 5.2.4b (retain, move to LCO)	Comment	64-a) (Appendix B, Page 3-13) In SR 3.3.1, "Perform dye penetrant testing..." compare to "Perform liquid penetrant testing" - check wording consistency with LCO 3.3.1.
66	TS 5.2.4d (move to UFSAR)	Question	66-a) (Appendix B, Page 3-15) – Item "A" - What are the technical bases for "30 days" completion times?

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67	LCO 3.4.2	Question	67-a) (Appendix B, Page 3-17) LCO 3.4.2. Should that be, "As soon as possible after loading is completed, the TC total dose rate shall be less than or equal to the value specified below for various DSCs."
67	SR 3.4.2	Question	67-b) (Appendix B, Page 3-19) In SR 3.4.2, for clarity in the frequency, should it state "Once, as soon as possible after the TC is removed"?
68	TS 5.2.5 (move parts to LCO, and parts to UFSAR)	Questions	68-a) (Appendix B, Page 3-11) LCO 3.1.5 - What is the completion time? 68-b) What is the alternative statement if required action cannot be met? 68-c) What are the technical bases for the Technical Specifications?
69	TS 5.2.6 (move to TS Appendix B, Section 4 – Administrative Controls)	Question	69-a) (Appendix B, Page 4-4) In Section 4.3.3, Hydrogen Gas Monitoring, not all models and sub-models of the DSCs are listed as authorized in the CoC – verify all applicable models and variants are correctly listed in this section.
74	TS 5.4 (HSM dose evaluation program should be move to CoC Appendix A ITE section)	Comment	70-a) (Appendix A, Page 5) Check 24PHTS model changes and any canister changes pending approval before finalizing submittals for AMD 16.
76	TS 5.6 (Relocate to the UFSAR section which covers the HSM-H thermal performance methodology)	Question	76-a) (Evaluation Form #76-a) The 8% limitation introduced in TS 5.6 for configuration changes was a condition for acceptance of the analysis in a prior amendment. Therefore, removal of this condition is out of scope for this amendment.
77	TS Table 1-1a (retain A1 & A2 information, move table to FSAR)	Question	77-a) (Evaluation Form #77) Bounding gamma and neutron spectrums should be included in the TS for the removal of the Fuel Qualification Tables. How will this be incorporated?

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	Amendment #16, LCO 3.2.1- page numbering starting on this page is incorrect. Page numbers 11 and 12 are repeated.	Editorial	E1) (Appendix B, Page 3-13) Should the page numbers be in sequence? Page numbers 3-11 and 3-12 are repeated.
	Amendment #16, TS 1-1i, for Control Components, states: "Up to 24 CCs are authorized for storage in 24PHBL DSC."	Editorial	E2) (Appendix B, Page T-15) In Table 1-1i, Control Components, " <i>Up to 24 CC are authorized for storage in 24PHBL DSCs only.</i> " Should 24PHBL be typed as 24PHB-L? Is 24PHBL a different variant from 24PHB-L?
	Amendment #16, TS Table 1-1i on page T-15, footnote: "Radiological characteristics for CCs listed in this table for 24 PTH DSC are also applicable to 24 PHB DSC."	Editorial	E3) (Appendix B, Page T-16) Should this footnote read: " <i>Radiological characteristics for CCs listed in this table for 24PHB DSC are also applicable to 24PTH DSC?</i> " Table 1-1i contain information pertaining to 24PHB and not 24PTH DSC.