

**E-54825 Enclosure 4
Evaluation Forms for CoC 1004 CoC Items**

CoC Condition/TS Identifier: **CoC-1 (Form #1) Revision 4 (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			CoC Condition 1: Casks approved for use by holders of Part 50 licenses at reactor sites under the general license issued per 72.210 subject to 72.212 conditions and attached TS.
CoC Body Certified Design	Section I. Technology		Yes, but just before the actual Technology section.
	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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Evaluation Summary	<p>Replace Conditions 1 and 2 with language suggested by NRC staff during a public meeting on 09/22/2017, <i>plus additional language concerning the addition of Appendix C. The revised language is as follows:</i> "This certificate is conditioned upon fulfilling the requirements of 10 CFR Part 72, as applicable, the attached Appendix A (Inspections, Tests and Evaluations), .Appendix B (Technical Specifications), Appendix C (<i>ASME Code Alternatives</i>), and the conditions specified below:" The existing CoC#1 text is not required as it is a restatement of the regulations in 10 CFR Part 72, Subpart K that allow for General Licenses for Storage of Spent Fuel at Power Reactor Sites. In addition, the introductory material at the top of the CoC indicates that: "The certificate is conditional upon fulfilling the requirements of 10 CFR Part 72, as applicable...."</p>
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Evaluation Forms for CoC 1004 CoC Items**

CoC Condition/TS Identifier: CoC-2 (Form #2) 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			CoC Condition 2: The holder of this certificate who desires to change the certificate or technical specifications shall submit an application for amendment of the certificate or technical specifications.
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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Evaluation Forms for CoC 1004 CoC Items

Evaluation Summary	Eliminate from CoC - not required as it is a regulatory requirement (10 CFR 72.244) that must be met.
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Evaluation Forms for CoC 1004 CoC Items**

CoC Condition/TS Identifier: **CoC-3a (Form #3) Revision 4 (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		CoC Condition 3a: CASK Model Nos. Standardized NUHOMS®-24P, -52B, -61BT, -32PT, -24PHB, -24PTH, -32PTH1, -37PTH, -61BTH and -69BTH The two digits refer to the number of fuel assemblies stored in the dry shielded canister (DSC), the character P for pressurized water reactor (PWR) or B for boiling water reactor (BWR) is to designate the type of fuel stored, and T is to designate that the DSC is intended for transportation in a 10 CFR Part 71 approved package. The characters H or HB refer to designs qualified for fuel with burnup greater than 45 GWd/MTU.	
CoC Body Certified Design	Section I. Technology	Yes	
	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

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	The possibility of a new or different kind of accident being created compared to those previously evaluated in the FSAR?	Yes – since a different non-analyzed DSC configuration could conceivably be loaded
	A Significant reduction in the margin of safety for ISFSI or cask operation?	No
Evaluation Summary	<p>Retain in CoC - part of Certified Design criteria [Technology].</p> <p><i>In addition, based on NRC suggestions at the 02/28/18 public meeting, include in the list of DSC models all the variants of the DSCs.</i></p> <p><i>Other clarifications added include noting that the characters H or HB “generally” refer to designs qualified for fuel with burnup greater than 45 GWd/MTU, “although certain design such as the 32PT, are now also qualified for fuel with burnup greater than 45 GWd/MTU.</i></p> <p><i>Other added clarifications are to describe also the list of nomenclatures for DSC variants (-L, -LC, -M and -S). A statement has also been added as generally suggested by NRC staff that “Information concerning the fuel types, dose rate limits, or other TS applies to all variants if they are not explicitly mentioned in the CoC, ITE, or TS.”</i></p> <p>See Attachment A at the end of Enclosure 1.</p>	

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Evaluation Forms for CoC 1004 CoC Items**

CoC Condition/TS Identifier: **CoC-3b (Form #4) 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			CoC Condition 3b: CASK DESCRIPTION: The Standardized NUHOMS® System is certified as described in the final safety analysis report (FSAR) and in the NRC’s safety evaluation report (SER). The Standardized NUHOMS® System is a horizontal canister system..... [PARTIAL LISTING]	
CoC Body Certified Design	Section I. Technology		Yes	
	Section II. Design Features		Yes	
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?		Yes – since a different non-analyzed DSC, HSM or TC configuration could conceivably be loaded	

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Evaluation Forms for CoC 1004 CoC Items**

	A Significant reduction in the margin of safety for ISFSI or cask operation?	No
Evaluation Summary	<p>Retain in CoC - part of Certified Design criteria [Technology]. Replace with concise description of dry storage system.</p> <p>See Attachment A at the end of Enclosure 1.</p> <p><i>Include following language in CoC Section II – Design Features:</i></p> <p><i>“The TC is designed and fabricated as a lifting device to meet NUREG-0612 and ANSI N14.6 requirements.”</i></p>	

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Evaluation Forms for CoC 1004 CoC Items**

CoC Condition/TS Identifier: CoC-3c (Form #5) Revision 0 (NRC comment only – 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		CoC Condition 3c: CASK Drawings: The drawings for the Standardized NUHOMS® System are contained in Appendices E, K, M, N, P, T, U, W, Y, and Z of the FSAR.	
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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Evaluation Forms for CoC 1004 CoC Items**

	A Significant reduction in the margin of safety for ISFSI or cask operation?	No
Evaluation Summary	Remove from CoC – not required as a part of the proposed CoC Certified Design (Technology or Design Features). In addition, Risk Insight responses are all “no”. This information (drawings) is included in the UFSAR. This is simply a cross-reference to the UFSAR for the location of the drawings.	

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Evaluation Forms for CoC 1004 CoC Items**

CoC Condition/TS Identifier: CoC-3d (Form #6) Revision 0 (NRC comment only – 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		CoC Condition 3d: CASK Basic Components: The basic components of the Standardized NUHOMS® System that are important to safety are the DSC, HSM, and TC, including the decontamination area shielding and the support skid supplemental shielding for the OS197L TC. These components are described in Section 4.2, Table K.2-8 (Appendix K), Table M.2-18 (Appendix M), Table P.2-17 (Appendix P), Section T.2.3 (Appendix T), Section U.2.3 (Appendix U), Section W.2.3 (Appendix W), Section Y.2.3 (Appendix Y), and Section Z.2.3 (Appendix Z) of the FSAR.	
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	

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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		Remove from CoC – not required as a part of the proposed CoC Certified Design (Technology or Design Features). In addition, Risk Insight responses are all “no”. This information (important to safety basic components) is included in the UFSAR. This also includes a cross-reference to the UFSAR for the location of this information.

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CoC Condition/TS Identifier: CoC-4 (Form #7) Revision 0 (NRC comment only – 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			CoC Condition 4: Notification of fabrication schedules shall be made in accordance with the requirements of 10 CFR 72.232(d).
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?	
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 Summary	Eliminate from CoC - not required as it is a regulatory reporting requirement (10 CFR 72.232(d)) that must be met.
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Evaluation Forms for CoC 1004 CoC Items**

CoC Condition/TS Identifier: CoC-5 (Form #8) 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		CoC Condition 5: If it is necessary to engage active cooling for the OS197FC, the OS197FC-B, the OS197HFC, the OS197HFC-B, or the OS200FC Transfer Casks during transfer of a loaded DSC, the appropriate NRC Division of Spent Fuel Management Project Manager shall be notified within 30 days, via electronic correspondence, of the occurrence. Appropriate detail should be provided, including the date and time of the occurrence, when the active cooling was initiated, the facility at which the transfer was taking place, and the current state of the 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	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

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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 – this is a notification requirement (within 30 days) that has no risk or safety basis. LCO 3.1.3 provides time limits for completion of DSC transfer, including requirements for using blowers for active cooling when the TC is in a horizontal orientation on the transfer skid.
	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		Eliminate from CoC - does not meet Selection Criteria for new CoC format and is strictly a notification requirement that is not defined by regulation. LCO 3.1.3 adequately covers the action required when DSC transfer is not completed within a specified timeframe and actions to initiate active cooling within a specified time limit.

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Evaluation Forms for CoC 1004 CoC Items**

CoC Condition/TS Identifier: CoC-6 (Form #9) Revision 0 (NRC comment only – 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			CoC Condition 6: Activities in the areas of design, purchase, fabrication, assembly, inspection, testing, operation, maintenance, repair, modification of structures, systems and components, and decommissioning shall be conducted in accordance with a quality assurance program that satisfies the applicable requirements of 10 CFR Part 72, Subpart G, and that is established, maintained, and executed with regard to the cask system.
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

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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		Eliminate from CoC - not required as compliance with the QA provisions in 10 CFR 72 Subpart G is a regulatory requirement that must be met.

**E-54825 Enclosure 4
Evaluation Forms for CoC 1004 CoC Items**

CoC Condition/TS Identifier: CoC-7 (first paragraph) (Form #10) 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		CoC Condition 7 (first paragraph): Each lift of a DSC and TC must be made in accordance with the existing heavy loads requirements and procedures of the licensed facility at which the lift is made. A plant-specific safety review (under 10 CFR 50.59 or 10 CFR 72.48, if applicable) is required to show operational compliance with NUREG-0612 and or existing plant-specific heavy loads requirements.	
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	

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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 Adherence to heavy load lifting procedures is necessary to preclude the possibility of a cask drop during loading operations inside the plant's fuel handling building (per 10 CFR 50) and during transfer operations (per 10 CFR 72). A significant increase in the probability of a cask drop would occur if these heavy load handling procedures are not followed. Note that in spite of the incredible nature of any scenario that could lead to a drop accident for the transfer cask, bounding scenarios were evaluated in the FSAR to assure that the integrity of the DSC and spent fuel cladding is not compromised.
	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		Relocate this CoC Condition (<i>exact text</i>) to TS - Administrative Controls. Note that this administrative control is applicable to heavy load lifting procedures at the ISFSI. Lifts of the DSC and TC within the Reactor Building are governed by existing 10 CFR Part 50 license requirements.

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CoC Condition/TS Identifier: CoC-7 (second paragraph) (Form #11) 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			CoC Condition 7 (second paragraph): If a single failure proof crane is not used, the licensee must evaluate the accidental drop of the shielding components of the OS197L TC under 10 CFR 50.59, 10 CFR 72.48, and 10 CFR 72.212, and evaluate the consequences of the accident drops.
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

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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 If a single failure proof crane is not used, the probability of a drop of the OS197L TC shielding components is significantly increased. The accidental drop of the top trailer shielding is evaluated in FSAR Appendix W. However, the licensee must evaluate the accidental drop of the shielding components of the OS197L TC under 10 CFR 50.59, 10 CFR 72.48, and 10 CFR 72.212, and evaluate the consequences of the accident drops to ensure the existing analysis is bounding.
	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		Relocate this CoC Condition (<i>exact text</i>) to TS, Appendix B, TS Section 4 – Administrative Controls An evaluation (procedural control) must be performed by the licensee (reactor licensee, CoC holder or GL) under 10 CFR 50.59, or 10 CFR 72.48 and 10 CFR 72.212 of the accidental drop of shielding components of the OS197L TC, and consequences must be judged to be acceptable [if single failure proof crane is not used for the lift].

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CoC Condition/TS Identifier: CoC-8 (Form #12) 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		<p>CoC Condition 8: A dry run training exercise of the loading, closure, handling, unloading and transfer of the Standardized NUHOMS® System shall be conducted by each licensee prior to the first use of the system to load spent nuclear fuel assemblies. The training exercise shall not be conducted with spent nuclear fuel in the canister. The dry run may be performed in an alternate step sequence from the actual procedural guidelines in the SAR. The dry run shall include, but need not be limited to the following:</p> <p>Loading Operations</p> <ul style="list-style-type: none"> a. Fuel Loading b. DSC sealing, drying and backfilling operations c. TC downending and transport to the ISFSI d. DSC transfer to the HSM e. Use of the remote crane operations and laser/optical systems for targeting if the OS197L TC is to be used for loading f. Manual crane operations if the OS197L TC is to be used for loading <p>Unloading Operations</p> <ul style="list-style-type: none"> a. DSC retrieval from the HSM b. Flooding of the DSC c. Opening of the DSC
CoC Body Certified Design	Section I. Technology	No
	Section II. Design Features	No
Appendix A - Inspections, Tests, and Evaluations		No

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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
Evaluation Summary			Relocate this CoC Condition to the <i>TS, Appendix B, TS Section 4 – Administrative Controls</i> . The specifics of dry run training <i>should be performed by the general licensee prior to initial use of the system to load spent fuel. In addition, the general license's training program is subject to NRC inspection.</i>

Revision 4

Attachment A

The Standardized NUHOMS[®] System is certified as described in the final safety analysis report (FSAR) and in the NRC's safety evaluation report (SER). The Standardized NUHOMS[®] System is certified as described in the final safety analysis report (FSAR) and in the NRC's safety evaluation report (SER). The Standardized NUHOMS[®] System is certified as described in the final safety analysis report (FSAR) and in the NRC's safety evaluation report (SER). The Standardized NUHOMS[®] System is a horizontal, canister-based, dry spent fuel storage system. The Standardized NUHOMS[®] System is comprised of a dry shielded canister (DSC), a horizontal storage module (HSM), and a transfer cask (TC). The welded metal DSC provides confinement and criticality control for the storage and transfer of spent fuel. The concrete HSM provides radiation shielding while allowing for cooling of the DSC and fuel by natural convection during storage. The TC is used to facilitate the loading of spent fuel into the DSC at the reactor spent fuel handling building, preparation of the DSC for storage operations, and subsequent transfer of the DSC into the HSM (and out of the HSM for eventual transport and disposal offsite or for other purposes). The TC provides the necessary radiation shielding during these operations.

The following DSC models are authorized for use in the Standardized NUHOMS[®] System: *24P (Standard and Long Cavity), 24PHB (Standard and Long Cavity), 24PTH (24PTH-S, 24PTH-L, 24PTH-S-LC), 32PT (32PT-S100, 32PT-S125, 32PT-L100, 32PT-L125), 32PTH1 (32PTH1-S, 32PTH1-M, 32PTH1-L), 37PTH (37PTH-S, 37PTH-M), 52B, 61BT, 61BTH Type 1, 61BTH Type 2, and 69BTH.*

The two digits refer to the number of fuel assemblies stored in the DSC, the character P for pressurized water reactor (PWR) or B for boiling water reactor (BWR) is to designate the type of fuel stored, and T is to designate that the DSC is intended for transportation in a 10 CFR Part 71 approved package. The characters H or HB generally refer to designs qualified for fuel with burnup greater than 45 GWd/MTU, although certain designs, such as the 32PT, are now also qualified for fuel with burnup greater than 45 GWd/MTU. *Variations of the DSC models have -S, -M or -L at the end to indicate the relative length of the DSCs (-S for short, -M for medium, and -L or -LC for long cavity configurations). Information concerning the fuel types, dose rate limits, or other TS applies to all variants if they are not explicitly mentioned in the CoC, ITE, or TS.*

The following HSM models are authorized for use: Standardized HSM, HSM-H, HSM-HS.

The following TC models are authorized for use in the Standardized NUHOMS[®] System: Standardized TC, OS197, OS197H, OS197L, OS200. Additional TCs include the OS197FC and the OS197FC-B variants of the OS197, the OS197HFC and the OS197HFC-B variants of the OS197H, and the OS200FC variant of the OS200, as described in the TS.

With the exception of the TC, fuel transfer and auxiliary equipment necessary for ISFSI operations are not included as part of the Standardized NUHOMS[®] System referenced in this certificate of compliance (CoC). Such site-specific equipment may include, but is not limited to, special lifting devices, the transfer trailer and the skid positioning system.