

SPENT FUEL CASK CERTIFICATE OF COMPLIANCE FORMAT AND CONTENT

Petition PRM-72-7 Issues

Content:

- I. Petition amendment requests
- II. List of potentially impacted/relevant guidance documents

I - Petition Amendment Requests (P1-P6)

(P1) Add new rule for certificate of compliance format and content:

Requested Change: The petition requests adding a new rule, "10 CFR 72.237, Certificate of Compliance format and content", to describe the structure of the Certificate of Compliance (CoC) and define criteria to clarify and standardize the CoC and the technical specifications (TS) for the storage cask.

(P2) Amend the backfitting rule so that it is applicable to Certificates of Compliance and CoC holders:

Requested Change: Amend the backfitting rule in § 72.62 so that it applies to the CoCs and CoC holders and not just licenses and licensees.

(P3) Amend the rule to remove the requirement that the general licensee perform a review of the NRC SER for the storage cask:

Requested Change: Amend § 72.212(b)(6) to remove the requirement that the general licensee perform a review of the NRC SER compliance evaluation for the storage cask.

(P4) Amend the rule to clarify that the required reviews and changes to programs will be in accordance with the existing change control processes in 10 CFR Part 50:

Requested Change: Amend § 72.212(b)(10) to clarify the required review and changes that are necessary to maintain the effectiveness of programs will be performed in accordance with the applicable change control processes currently in place in 10 CFR Part 50. The proposed change would maintain the requirements that the general licensee perform the necessary reviews and prepare written evaluations of the emergency plan, quality assurance program, training program, and radiation protection program to determine if their effectiveness is decreased and if so, prepare the necessary changes and obtain the necessary approvals. It would only clarify that, if there are any required changes to the programs, these changes should be processed in accordance with the applicable change control programs in 10 CFR Part 50.

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(P5) Amend the rule to do away with the requirement for empty weight marking of the storage cask:

Requested Change: Amend § 72.236 to remove the cask empty weight marking (i.e., delete §72.236(k)(3)).

(P6) Amend the rule to expand the scope of activities for which criticality monitoring is not required:

Requested Change: Modify the criteria for nuclear criticality safety in § 72.124(c) to clarify that criticality monitoring does not apply to spent fuel dry storage, including cask loading, preparation, onsite transport, and storage operations; and expand the scope of activities for which criticality monitoring is not required.

II. Potentially Impacted Guidance:

- NUREG-1745, "Standard Format and Content for Technical Specifications for 10CFR Part 72 Cask Certificates of Compliance"
- NUREG-1536, "Standard Review Plan for Spent Fuel Dry Storage Systems at a General License Facility"
- Standard format and content regulatory Guides (RGs) for the safety analysis report of a 10 CFR Part 72 dry storage application, including:
 - RG 3.48, "Standard Format and Content for the Safety Analysis Report for an Independent Spent Fuel Storage Installation or Monitored Retrievable Storage Installation (Dry Storage);"
 - RG 3.61, "Standard Format and Content for a Topical Safety Analysis Report for a Spent Fuel Dry Storage Cask;"
 - RG 3.62, "Standard Format and Content for the Safety Analysis Report for Onsite Storage of Spent Fuel Storage Casks."
 - NUREG-2215, "Standard Review Plan for Spent Fuel Dry Storage Systems and Facilities"³
 - NUREG-1927, Revision 1, "Standard Review Plan for Renewal of Specific Licenses and Certificates of Compliance for Dry Storage of Spent Nuclear Fuel"
- Inspection Procedures
 - Inspection Procedure 60856, "Review of 10 CFR 72.212(b) Evaluations"

U.S. Nuclear Regulatory Commission
Public Meeting on November 18, 2019

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- Inspection Procedure 60856.1, “Review of 10 CFR 72.212(b) Evaluations”
