



**UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001**

May 15, 2020

Mr. Rodney J. McCullum  
Senior Director, Fuel and Decommissioning  
Nuclear Energy Institute  
1201 F Street NW, Suite 1100  
Washington, DC 20004

**SUBJECT: STATUS REPORT ON THE U.S. NUCLEAR REGULATORY COMMISSION'S  
ENDORSEMENT OF NEI 14-03, REVISION 2, "FORMAT, CONTENT AND  
IMPLEMENTATION GUIDANCE FOR DRY CASK STORAGE OPERATIONS-  
BASED AGING MANAGEMENT"**

Dear Mr. McCullum:

By letter dated January 2, 2019, the U.S. Nuclear Regulatory Commission (NRC) staff notified you of its completion of the review of the industry guidance document submitted by the Nuclear Energy Institute (NEI), entitled NEI 14-03, "Format, Content and Implementation Guidance for Dry Cask Storage Operations-Based Aging Management," Revision 2, dated December 21, 2016 (Agencywide Document Access Management System (ADAMS) Accession Nos. ML18325A207 and ML16356A204, respectively). In the letter, the NRC staff noted it plans to pursue a partial endorsement of NEI 14-03, Revision 2. By letter dated February 1, 2019, NEI responded and agreed with the NRC staff's plans to pursue a partial endorsement of NEI 14-03, Revision 2 (ADAMS Accession No. ML19192A141).

The purpose of this letter is to provide a status update on the endorsement of NEI 14-03. Currently, the NRC staff has identified no major issues with the NEI 14-03 guidance. The NRC staff plans to begin the work of documenting its endorsement in a new draft Regulatory Guide, which would note the exception and clarifications to the NEI 14-03 guidance that were included in the January 1, 2019, letter enclosure. The NRC staff expects to publish the draft Regulatory Guide for public comment in January 2021.

In addition to the planned endorsement via a draft Regulatory Guide, the NRC staff has previously recognized two key elements in NEI 14-03: (1) a framework for sharing operating experience via the Independent Spent Fuel Storage Installation Aging Management Institute of Nuclear Power Operations Database (AMID), developed by industry; and (2) a framework for learning aging management programs through the use of "tollgates" as a structured approach for assessing operating experience and data from applicable research and industry initiatives. Both the use of AMID and tollgates are considered key elements to ensuring the effectiveness of aging management activities in the period of extended operation, and the NRC staff supports these vital industry initiatives.

NRC guidance in NUREG-1927, Revision 1, "Standard Review Plan for Renewal of Specific Licenses and Certificates of Compliance for Dry Storage of Spent Nuclear Fuel" (ADAMS Accession No. ML16179A148) already includes guidance to reviewers regarding these key elements in NEI 14-03 that may be used or referenced by applicants for storage renewals. Until

the time when NEI 14-03 may be endorsed by NRC, the NRC staff continues to recognize these key elements in NEI 14-03 and encourages the use of the existing guidance in NUREG-1927, Revision 1.

If you have questions regarding this letter, please contact Kristina Banovac at (301) 415-7116 or [Kristina.Banovac@nrc.gov](mailto:Kristina.Banovac@nrc.gov).

Sincerely,

Andrea L. Kock, Director  
Division of Fuel Management  
Office of Nuclear Material Safety  
and Safeguards

cc: Mark Richter, NEI

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