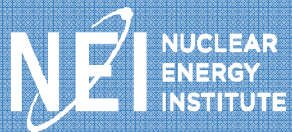


Regulatory Guidance on New and Spent Fuel Pool Criticality Analyses

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Historical Perspective

- NEI 12-16 and the EPRI Benchmarks provide the basis for stable regulatory framework
 - Preliminary Draft NRC Regulatory Guide endorses with clarifications NEI 12-16 Rev 4
- Industry and NRC have spent significant efforts to reach this milestone but we must push this issue to completion
 - Clear schedule for process moving forward
 - Issue Draft Regulatory Guide for public comment
 - Finalize and issue guidance

Initial Industry Feedback

- Pleased with the preliminary draft
 - No “showstoppers” that should delay publishing the document for public comments
- Industry recommends removing exemption A as it should not be part of double contingency principle
 - If new installation, CSA is submitted prior to installation modelling actual conditions
 - If identified after installation
 - If manufacturing defect, Part 21 and Appendix B
 - If installation error, Appendix B, CAR, reporting to NRC, compensatory actions

Questions?

