

CoC Condition/Technical Specification Evaluation Form - CoC original Appendix A

CoC Condition/TS Identifier: A-1.1

* 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 | | | Appendix A Section 1.1: Definitions | |
|---|--|----|--|--|
| 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 | | Yes | |
| | 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? | | N/A | |
| | The possibility of a new or different kind of accident being created compared to those previously evaluated in the FSAR? | | N/A | |
| | A Significant reduction in the margin of safety for ISFSI or cask operation? | | N/A | |
| Evaluation Summary | | | Retain in Appendix B Section 1 as it meets the criterion for inclusion in the new TS format (Use and Application). | |

CoC Condition/Technical Specification Evaluation Form - CoC original Appendix A

CoC Condition/TS Identifier: A-1.2

* 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 | | | Appendix A Section 1.2: Logical Connectors: The purpose of this section is to explain the meaning of logical connectors. |
| 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 | | Yes |
| | 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? | | N/A |
| | The possibility of a new or different kind of accident being created compared to those previously evaluated in the FSAR? | | N/A |
| | A Significant reduction in the margin of safety for ISFSI or cask operation? | | N/A |
| Evaluation Summary | | | Retain in Appendix B Section 1 as it meets the criterion for inclusion in the new TS format (Use and Application). |

CoC Condition/Technical Specification Evaluation Form - CoC original Appendix A

CoC Condition/TS Identifier: A-1.3

* 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 | | | Appendix A Section 1.3: Completion Times: The purpose of this section is to establish the Completion Time convention and to provide guidance for its use. | |
| 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 | | Yes | |
| | 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? | | N/A | |
| | The possibility of a new or different kind of accident being created compared to those previously evaluated in the FSAR? | | N/A | |
| | A Significant reduction in the margin of safety for ISFSI or cask operation? | | N/A | |
| Evaluation Summary | | | Retain in Appendix B Section 1 as it meets the criterion for inclusion in the new TS format (Use and Application). | |

CoC Condition/Technical Specification Evaluation Form - CoC original Appendix A

CoC Condition/TS Identifier: A-1.4

* 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 | | | Appendix A Section 1.4: Frequency: The purpose of this section is to define the proper use and application of Frequency 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 | | Yes | |
| | 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? | | N/A | |
| | The possibility of a new or different kind of accident being created compared to those previously evaluated in the FSAR? | | N/A | |
| | A Significant reduction in the margin of safety for ISFSI or cask operation? | | N/A | |
| Evaluation Summary | | | Retain in Appendix B Section 1 as it meets the criterion for inclusion in the new TS format (Use and Application). | |

CoC Condition/Technical Specification Evaluation Form - CoC original Appendix A

CoC Condition/TS Identifier: A-3.0

* 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 | | | Appendix A Section 3.0: LCO and SR Applicability |
| CoC Body | Section I. Technology | | No |
| Certified Design | 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 | Yes |
| | | L2 | Yes |
| | | L3 | Yes |
| 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? | | Yes These LCO and SR applicability requirements are necessary to ensure that safety functions are maintained as described in the individual LCOs and SRs. |
| | 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? | | Yes These LCO and SR applicability requirements are necessary to ensure that safety functions are maintained as described in the individual LCOs and SRs. |
| Evaluation Summary | | | Retain in Appendix B Section 3.0. Applies generically to all three criteria (L1, L2, L3). |

CoC Condition/Technical Specification Evaluation Form - CoC original Appendix A

CoC Condition/TS Identifier: A-3.1.1

* 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 | | | Appendix A LCO 3.1.1: Multi-Purpose Canister (MPC) | |
| | | | The MPC shall be dry and helium filled. | |
| | | | Table 3-1 provides decay heat and burnup limits for forced helium dehydration (FHD) and vacuum drying. | |
| 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 | Yes | |
| | | 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? | | N/A | |
| | The possibility of a new or different kind of accident being created compared to those previously evaluated in the FSAR? | | N/A | |
| | A Significant reduction in the margin of safety for ISFSI or cask operation? | | N/A | |

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| | |
|--------------------|---|
| Evaluation Summary | Retain in Appendix B Section 3 as this LCO ensures an inert atmosphere around the fuel cladding and that oxidation of the fuel cladding does not occur, preserving the integrity of the fuel cladding fission product barrier. (Criterion L2) |
|--------------------|---|

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CoC Condition/TS Identifier: A-3.1.2

* 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 | | Appendix A LCO 3.1.2: SFSC Heat Removal System | |
| | | The SFSC Heat Removal System shall be operable. | |
| | | Note: The SFSC Heat Removal System is operable when 50% or more of each of the inlet and outlet vent areas are unblocked and available for flow or when air temperature requirements are met. This LCO only applies to the VENTILATED OVERPACKS. | |
| CoC Body | Section I. Technology | No | |
| Certified Design | 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 | Yes |
| | | 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? | N/A | |
| | The possibility of a new or different kind of accident being created compared to those previously evaluated in the FSAR? | N/A | |

CoC Condition/Technical Specification Evaluation Form - CoC original Appendix A

| | | |
|--------------------|--|---|
| | A Significant reduction in the margin of safety for ISFSI or cask operation? | N/A |
| Evaluation Summary | | Retain in Appendix B Section 3 as this LCO ensures fuel cladding temperatures remain below the limit for normal storage operations, preserving the integrity of the fuel cladding fission product barrier. (Criterion L2) |

CoC Condition/Technical Specification Evaluation Form - CoC original Appendix A

CoC Condition/TS Identifier: A-3.1.3

* 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 | | Appendix A LCO 3.1.3: MPC Cavity Reflooding | |
| | | The MPC cavity pressure shall be < 100 psig | |
| | | Note: The LCO is only applicable to wet UNLOADING OPERATIONS. | |
| 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 | Yes |
| | | 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? | N/A | |
| | The possibility of a new or different kind of accident being created compared to those previously evaluated in the FSAR? | N/A | |
| | A Significant reduction in the margin of safety for ISFSI or cask operation? | N/A | |

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| | |
|--------------------|---|
| Evaluation Summary | Retain in Appendix B Section 3 as this LCO ensures an inert atmosphere around the fuel cladding and that oxidation of the fuel cladding does not occur, preserving the integrity of the fuel cladding fission product barrier. (Criterion L2) |
|--------------------|---|

CoC Condition/Technical Specification Evaluation Form - CoC original Appendix A

CoC Condition/TS Identifier: A-3.1.4

* 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 | | Appendix A LCO 3.1.4: Transfer Cask Heat Removal System | |
| | | The HI-TRAC VW Version V or V2 Heat Removal System shall be operable. | |
| | | Note: The HI-TRAC Version V or V2 Heat Removal System is operable when 100% of the inlet and outlet vent areas are unblocked and available for flow. If surveillance shows partial blockage ($\leq 100\%$) of the duct areas, the blockage shall be removed. | |
| 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 | Yes |
| | | 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? | N/A | |
| | The possibility of a new or different kind of accident being created compared | N/A | |

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| | | |
|--------------------|--|---|
| | to those previously evaluated in the FSAR? | |
| | A Significant reduction in the margin of safety for ISFSI or cask operation? | N/A |
| Evaluation Summary | | Retain in Appendix B Section 3 as this LCO ensures fuel cladding temperatures remain below the limit for normal storage operations, preserving the integrity of the fuel cladding fission product barrier. (Criterion L2) |

CoC Condition/Technical Specification Evaluation Form - CoC original Appendix A

CoC Condition/TS Identifier: A-3.2.1

* 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 | | Appendix A LCO 3.2.1: Transfer Cask Surface Contamination | |
| | | Removable contamination on the exterior surfaces of the TRANSFER CASK and accessible portions of the MPC shall each not exceed: | |
| | | a. 1000 dpm/100 cm ² from beta and gamma sources | |
| | | b. 20 dpm/100 cm ² from alpha sources. | |
| | | Note: This LCO is not applicable to the TRANSFER CASK if MPC TRANSFER operations occur inside the FUEL BUILDING. | |
| 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 | Yes |
| | | L3 | No |
| | Section 4 Administrative Controls | | No |
| Risk Insight**: Will removing this requirement | A significant increase in the probability or consequences of an accident previously | | N/A |

CoC Condition/Technical Specification Evaluation Form - CoC original Appendix A

| | | |
|------------------------------|--|---|
| from the CoC/TS result in... | 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? | N/A |
| | A Significant reduction in the margin of safety for ISFSI or cask operation? | N/A |
| Evaluation Summary | | Retain in Appendix B Section 3 as this LCO ensures compliance with contamination limits for normal storage operations when not occurring in Fuel Building. (Criterion L3) |

CoC Condition/Technical Specification Evaluation Form - CoC original Appendix A

CoC Condition/TS Identifier: A-3.3.1

* 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 | | Appendix A LCO 3.3.1: Boron Concentration | |
| | | The concentration of boron in the water in the MPC shall meet the following limits for the applicable MPC model and the most limiting fuel assembly array/class to be stored in the MPC: | |
| | | MPC-37, MPC-32ML, MPC-37P, or MPC-44: Minimum soluble boron concentration as required by the table below†. | |
| 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 | Yes |
| | | 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? | N/A | |
| | The possibility of a new or different kind of accident being created compared | N/A | |

CoC Condition/Technical Specification Evaluation Form - CoC original Appendix A

| | | |
|--------------------|--|---|
| | to those previously evaluated in the FSAR? | |
| | A Significant reduction in the margin of safety for ISFSI or cask operation? | N/A |
| Evaluation Summary | | Retain in Appendix B Section 3 as this LCO ensures that a subcritical configuration is maintained. (Criterion L2) |

CoC Condition/Technical Specification Evaluation Form - CoC original Appendix A

CoC Condition/TS Identifier: A-Tables 3-1

* 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 | | | Appendix A Table 3-1: MPC Cavity Drying Limits | |
| CoC Body | Section I. Technology | | No | |
| Certified Design | 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 | Yes Referenced by LCO 3.1.1 | |
| | | 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? | | N/A | |
| | The possibility of a new or different kind of accident being created compared to those previously evaluated in the FSAR? | | N/A | |
| | A Significant reduction in the margin of safety for ISFSI or cask operation? | | N/A | |
| Evaluation Summary | | | Retain in Appendix B Section 3 as these tables provide information needed to complete LCO 3.1.1. (Criterion L1) | |

CoC Condition/Technical Specification Evaluation Form - CoC original Appendix A

CoC Condition/TS Identifier: A-Tables 3-2

* 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 | | | Appendix A Table 3-2: MPC Helium Backfill Limits |
|---|--|----|---|
| CoC Body | Section I. Technology | | No |
| Certified Design | 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 | Yes Referenced by LCO 3.1.1 |
| | | 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? | | N/A |
| | The possibility of a new or different kind of accident being created compared to those previously evaluated in the FSAR? | | N/A |
| | A Significant reduction in the margin of safety for ISFSI or cask operation? | | N/A |
| Evaluation Summary | | | Retain in Appendix B Section 3 as these Tables provide information needed to complete LCO 3.1.1. (Criterion L1) |

CoC Condition/Technical Specification Evaluation Form - CoC original Appendix A

CoC Condition/TS Identifier: A-5.1

* 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 | | Appendix A Section 5.1: Radioactive Effluent Control Program This program implements the requirements of 10 CFR 72.44(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 | | 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? | First statement (quoted in Evaluation Summary below) – No Rest of section – Yes Without this control program, radioactive material may not be controlled appropriately. | |

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| Evaluation Summary | <p>Remove “This program implements the requirements of 10 CFR 72.44(d)” as this is a regulatory requirement that must be met.</p> <p>Retain the rest of the text in Appendix B Section 4, Administrative Controls, as this program is necessary to assure that the operations involved in the storage of spent fuel in an ISFSI are performed in a safe manner.</p> |
|--------------------|---|

CoC Condition/Technical Specification Evaluation Form - CoC original Appendix A

CoC Condition/TS Identifier: A-5.2

* 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”?

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|--|--|----|--|--|
| Requirement | | | Appendix A Section 5.2: Transport Evaluation Program | |
| | | | a. For lifting of the loaded TRANSFER CASK or OVERPACK using devices which are integral to a structure governed by 10 CFR Part 50 regulations, 10 CFR 50 requirements apply. | |
| | | | b. This program is not applicable when the TRANSFER CASK or OVERPACK is in the FUEL BUILDING or is being handled by equipment providing support from underneath (i.e., on a rail car, heavy haul trailer, air pads, etc...). | |
| | | | c. The TRANSFER CASK or OVERPACK, when loaded with spent fuel, may be lifted to and carried at any height necessary during TRANSPORT OPERATIONS and MPC TRANSFER, provided the lifting equipment is designed in accordance with... | |
| CoC Body | Section I. Technology | | No | |
| Certified Design | 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 | |
| Risk Insight**: Will removing | A significant increase in the probability or | | No | |

CoC Condition/Technical Specification Evaluation Form - CoC original Appendix A

| | | |
|---|--|---|
| this requirement from the CoC/TS result in... | 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? | Yes A significant reduction in the margin of safety for confinement is possible if there were no restrictions on equipment used for lifting a loaded cask. |
| Evaluation Summary | | Retain in Appendix B Section 4, Administrative Controls, as this provides restrictions on what equipment can be used to transfer the HI-STORM System casks and canisters when they are loaded with fuel. These controls are necessary to assure that the operations involved in the storage of spent fuel in an ISFSI are performed in a safe manner. |

CoC Condition/Technical Specification Evaluation Form - CoC original Appendix A

CoC Condition/TS Identifier: A-5.3

* 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”?

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| Requirement | | | Appendix A Section 5.3: Radiation Protection Program |
| 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 | |
| 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? | | 5.3.2 – No 5.3.3 through 5.3.8 – Yes, based on the importance of radiation safety and the unique nature of the HI-STORM design, if the requirements in this were not met a significant reduction in margin could potentially occur. |
| Evaluation Summary | | | 5.3.1 -Retain in Appendix B section 4, Administrative Controls. |

CoC Condition/Technical Specification Evaluation Form - CoC original Appendix A

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| | <p>5.3.2 – Combine main statement with existing Section 5.3.3 as these discussions are currently repetitive. Refer to appropriate Part 72 Section: 72.212(b)(5)(iii) 5.3.3 through 8– Retain in Appendix B section 4, Administrative Controls. These controls are necessary to assure that the operations involved in the storage of spent fuel in an ISFSI are performed in a safe manner.</p> |
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