

## Banovac, Kristina

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**From:** Banovac, Kristina  
**Sent:** Tuesday, April 19, 2022 6:09 PM  
**To:** Murray, Scott P. (GE Power Portfolio); McFadden, Anthony E (GE Power Portfolio)  
**Subject:** ACTION: Request for clarification on GEH responses to RAIs on Morris license renewal application

Hello Scott and Tony,

Thank you for your January 27, 2022, response to the RAIs on the GEH-Morris license renewal application (ADAMS Accession No. ML22027A515), and for the clarifications you provided during the April 6, 2022, clarification call.

As discussed during the call, the NRC staff requests the following clarifications regarding your RAI response. Please revise the proposed Consolidated Safety Analysis Report (CSAR), Appendix A.8 (CSAR supplement) and proposed Standard Operating Procedure (SOP) 16-17, as appropriate, to address the following clarifications.

**RAI-1:** Clarify the CSAR supplement discussion of the aging management activities for the fuel basin crane, fuel handling crane, and cask crane. Specifically, clarify the use of ANSI B30.2 and requirements in 10 [29] CFR 1910.179 and 29 CFR 1919 in the aging management descriptions in the CSAR supplement (in Table 1, Items # XI.M23; and page 7 under “ancillary equipment important to safety” in the CSAR supplement).

**RAI-2:** Clarify whether the Structures Monitoring AMP was intended to be included in the Zircaloy cladding entry in CSAR Table 1 on page 17. The staff notes that the proposed revised SOP 16-17 includes inspection of the visible portions of the spent fuel pool cladding from the basin crane and/or basin walkways. Please clarify the CSAR supplement and SOP on the aging management activities for the cladding, including the scope (e.g., extent of cladding surface examined) for any inspections that may be credited for aging management of the cladding, if applicable.

**RAI-4:** Clarify the discussion between the CSAR supplement and SOP regarding inspection coverage of readily accessible surfaces. The CSAR includes “**typically** include 100% of readily accessible surfaces [emphasis added],” while the SOP includes “100% of the readily accessible of the concrete walls, floors, and expansion gate **from the basin crane and/or the basin walkways** [emphasis added]” and “visual inspection of the visible sections of the stainless-steel liner in the fuel basins **from the basin crane and/or the basin walkways** [emphasis added].”

**RAI-5:** Clarify the CSAR supplement discussion on stainless steel baskets and grids. Specifically, clarify whether Item # III.A5.T-14 in CSAR Table 1 includes the stainless steel baskets and grids. Page 4 of the CSAR notes, “A visual inspection of normally inaccessible components in the basin, baskets, grid, basin liner, if/when they are moved will identify degradation of the material resulting from corrosion.”

The CSAR supplement should be clear and consistent in the discussion of aging management activities for clarity in GEH's implementation of aging management activities and NRC's future inspection of those activities.

Please provide the requested clarifications by May 19, 2022, or let me know if you need additional time to respond.

I will schedule a call in advance of your submittal of the clarifications to ensure that the NRC staff request for clarification is clear and that GEH submits the clarifications needed by the NRC staff to complete its technical review of the license renewal application.

As discussed during the April 6, 2022, clarification call, this request for clarification will affect the NRC review schedule previously communicated to GEH (ADAMS Accession No. ML21104A080). We now estimate making a decision on the license renewal in November 2022.

If you have any questions regarding this request, please contact me.

Thank you,  
Kris

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