

# **DISCUSSION OF NRC ACCEPTANCE REVIEW OF NEI 16-03, REVISION 1, GUIDANCE FOR MONITORING OF FIXED NEUTRON ABSORBERS IN SPENT FUEL POOLS**

**11/21/2022**

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# Introduction

NRC Review Team:

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# Opening Remarks

Gregory Suber, Deputy Director for Division of Operating Reactor Licensing, Office of Nuclear Reactor Regulation

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# Background

- Application from NEI – August 19, 2022 (ML22231B041)
- Supplemental Letter from NEI – October 12, 2022 (ML22298A281)
- Fee Waiver from NRC to NEI – June 22, 2021 (ML21146A261)  
(For NRC Review of NEI-16-03, Revision 1 only)
- References
  1. EPRI Technical Report 3002018497, “Industrywide Learning Aging Management Program (i-LAMP): Global Neutron Absorber Material Monitoring Program for Spent Fuel Pools,” Dated August 2022 (ML22231B044)
  2. NRC Office Instruction, LIC-109, Revision 3, “Acceptance Review Procedures for Licensing Basis Changes” (ML20036C829)

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# Purpose

The purpose of this meeting is to discuss the acceptance review of NEI 16-03, Revision 1 for sufficient technical information to proceed with detailed review.

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## NRC Acceptance Review Findings

- Quote from LIC-109 – A licensee's use of unapproved codes or TRs [Topical Reports] (or the use of codes and TRs outside the limitations imposed by the NRC staff) may be acceptable if the licensee has provided a full analysis to justify that the proposed use satisfies NRC regulations and is appropriately conservative. However, simply referencing an unapproved TR or code is not acceptable.  
EPRI report 3002018497 is an unapproved TR and the lack of full analysis in the NEI's application to justify the proposed use will not permit NRC's further review of NEI 16-03, Revision 1.
- The changes made in NEI 16-03, Revision 1, do not provide i-LAMP programmatic details and guidance on how licensees will use the program to manage neutron absorbers at its facilities.

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## **NRC Acceptance Review Findings (continued)**

- NEI 16-03, Revision 1 does not provide guidance on implementation of i-LAMP, and instead, states that the i-LAMP describes different implementation options.
- NEI 16-03, Revision 1 does not address description of parameters licensees are expected to follow if they choose to use i-LAMP (e.g., verification of bounding data for a specific plant, periodicity of formal i-LAMP data review to ensure plant is bounded or new operating experience is available).
- Unlike NEI 16-03, Revision 0, Revision 1 does not address programmatic details such as program elements, sampling intervals, acceptance criteria, and guidance on evaluation of results.

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## NRC Acceptance Review Findings (continued)

- The NEI's supplemental letter dated October 12, 2022, provides some clarification on the current i-LAMP's focus on Boral plants without coupons, however, further describes i-LAMP's applicability to newer materials. The NRC staff does not agree with the notion that i-LAMP should be treated as a non-material specific alternative monitoring approach as described in the NEI 16-03, Revision 1, under "Forward" section.



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## Path Forward

- The NRC staff's intention is non-accept the NEI's application.
- NRC's LIC-109 requires 13 working days (excluding weekends and holidays) from the date of non-acceptance letter for NEI to provide the desired information to accept the application for detailed review.

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# Questions?