



NUCLEAR ENERGY INSTITUTE

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November 24, 2009

DOCKETED  
USNRC

Ms. Annette Vietti-Cook  
Secretary  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

November 24, 2009 (3:30pm)

OFFICE OF SECRETARY  
RULEMAKINGS AND  
ADJUDICATIONS STAFF

**ATTN:** Rulemakings and Adjudications Staff

**Subject:** Nuclear Energy Institute Comments on Proposed Rule Language for 10 CFR Part 72, Docket ID NRC-2008-0361, 74 *Federal Register* 47126 (September 15, 2009)

**Project Number: 689**

The Nuclear Energy Institute (NEI)<sup>1</sup>, on behalf of the nuclear energy industry, is pleased to comment on the U.S. Nuclear Regulatory Commission's (NRC) proposed rule language for 10 CFR Part 72 concerning licensing requirements for the independent storage of spent nuclear fuel. This proposed rule changes 10 CFR Part 72 to increase the initial and renewal licensed duration of dry storage casks from 20 years to 40 years and appropriately recognizes that the lifetime of independent spent fuel storage and installations (ISFSIs) and dry storage casks is well in excess of the current 20-year licensed term.

In addition to increasing the licensed life of ISFSIs and dry storage casks, the proposed rule explicitly permits general licensees to operate a dry storage cask using a Certificate of Compliance (CoC) amendment that is more recent than the amendment or original CoC under which it was loaded. It is industry's view that the current 10 CFR Part 72 regulations implicitly permit this practice (NEI letter dated March 31, 2008 on Draft RIS 2007-26). This viewpoint notwithstanding, industry welcomes the clarification to the regulations.

Industry commends the NRC for having provided an earlier opportunity for public comment (RIN 3150-AI09, 73 *Federal Register* 45173, August 4, 2008). These comments, and the responses from the NRC, have enhanced the current proposed rule. By providing opportunities for public input, the NRC is helping assure a sound and predictable regulatory process.

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<sup>1</sup> NEI is the organization responsible for establishing unified nuclear industry policy on matters affecting the nuclear energy industry. NEI's members include all utilities licensed to operate commercial nuclear power plants in the United States, nuclear plant designers, major architect/engineering firms, fuel fabrication facilities, nuclear material licensees, and other organizations and individuals involved in the nuclear energy industry.

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Industry's comments on the proposed rule are contained in the enclosure. To date, the need to renew a CoC listed in 10 CFR 72.214 has not arisen, and as a result, industry does not have experience with CoC renewals under Part 72. In anticipation of upcoming renewals, industry has included within one comment, a hypothetical example, to determine if our interpretation of the proposed rule is as the NRC intends.

Please do not hesitate to call me or Dr. Everett L. Redmond II (202-739-8122; elr@nei.org) if you have any questions.

Sincerely,



Steven P. Kraft

Attachment

c: Mr. Michael Weber, U.S. Nuclear Regulatory Commission  
Ms. Catherine Haney, U.S. Nuclear Regulatory Commission  
Mr. E. William Brach, U.S. Nuclear Regulatory Commission  
Ms. Vonna Ordaz, U.S. Nuclear Regulatory Commission  
Mr. Raymond Lorson, U.S. Nuclear Regulatory Commission  
Mr. Eric Benner, U.S. Nuclear Regulatory Commission  
Mr. Douglas Waters, Nuclear Energy Institute

**NUCLEAR ENERGY INSTITUTE (NEI)**  
**SPECIFIC COMMENTS ON**  
**PROPOSED RULEMAKING PERTAINING TO CHANGES TO 10 CFR 72,**  
**“LICENSING REQUIREMENTS FOR THE INDEPENDENT STORAGE OF SPENT**  
**NUCLEAR FUEL, HIGH-LEVEL RADIOACTIVE WASTE, AND REACTOR-**  
**RELATED GREATER THAN CLASS C WASTE”**  
**(DOCKET ID NRC-2008-0361)**

All 10 CFR Part 72 sections references below are from the preliminary draft language and do not necessarily correspond to the existing regulations unless otherwise noted.

NO.	SECTION	COMMENT
1	II, “Discussion” Item E	In the fifth paragraph, use of the term “for an unloaded cask” is unclear. Does this mean a cask never loaded or cask that has been used and then unloaded of the stored fuel? In either case, the review for a generic CoC renewal should not depend on whether or not a particular cask is unloaded. This sentence should be removed in the final statements of consideration for the rule.
2	II, “Discussion” Items I and V  and  III, “Discussion of Proposed Amendments by Section” Item 4  and  10 CFR 72.212(a)(3)	<p>The relationship of the general license expiration, the CoC term and renewal, and the date at which an individual cask is loaded, as described in the proposed rule language, requires clarification. The rule appears to permit a cask to be operated for the entire term of the original CoC no matter when during that term it is loaded. That is, a cask loaded at year 19 of a 20 year initial term may be operated for 20 years whether or not the CoC is renewed. However, if a CoC is renewed, the general license for the user expires and all casks governed by that CoC must be removed from service at the end of the renewed term of the CoC.</p> <p>Industry believes that each individual cask should be permitted to be operated for the full design life of the cask, including the full renewal period, provided it is loaded in accordance with an active CoC on the day it is loaded and the cask is maintained properly. Actions (e.g. maintenance) required by the CoC holder’s time-limited aging analyses would be required to be implemented during the storage life of the cask as required by these aging analyses, in order for the cask to be operated after the initial term.</p> <p>As an example, a cask loaded under an active CoC with a 20-year initial term and not renewed should be permitted to be operated under a general license for 20 years from the date of initial use, no matter when that cask is placed into service. A cask loaded under an active CoC with a 20-year initial term and renewed for 40 years should be permitted to be operated under a general license for 60 years from the date of initial use, no matter when that cask is placed into service. Aging management requirements would become effective after the</p>

NO.	SECTION	COMMENT
		<p>20-year initial term of service.</p> <p>The basis for this position is that each cask is fabricated to meet a specific design life. The successful renewal of the CoC extends that design life provided all design and maintenance parameters that were part of the renewal approval are met. That design life does not begin for each individual cask until the cask is loaded, i.e., the cask is experiencing the conditions contemplated in design. Forcing casks to be taken out of service at an arbitrary date not linked to the technical basis of the cask design would result in unnecessary fuel repackaging and occupational radiation exposure with no commensurate public health and safety benefit.</p>
3	II, "Discussion" Item K	<p>The statement in the first sentence, "General licensees maintain a schedule for each cask used at their sites, and the licensees submit this information to the Commission," is not consistent with the regulations and implies that licensees submit schedules on some regular basis to the NRC. The regulations do not require general licensees to maintain a "schedule" or submit a cask loading schedule of any kind to the Commission after the first loading campaign. Licensees are permitted to track cask loading dates and the expiration of the general license for each cask loaded in any manner they choose. NRC may inspect this process at any time.</p> <p>General licensees are required by 10 CFR 72.212(b)(1) to inform the Commission at least 90 days prior to deploying the first cask at an ISFSI. They are also required by (new) 10 CFR 72.212(b)(2) to register each cask placed into service at the ISFSI within 30 days of deployment. Please delete references to submittal of schedules to the Commission or revise the wording to refer only to the notification required for the first loading.</p>
4	II, "Discussion" Item L	<p>The discussion states that if a general licensee seeks to fabricate a cask design it must establish and maintain a QA program that satisfies the requirements of 10 CFR Part 72. Please clarify the QA program requirements in this instance. General licensees typically use their Part 50 QA programs to govern Part 72 activities under the general license. Can a general licensee fabricate a cask under their Part 50 QA program as long as it governs Part 72 activities (and includes QA requirements pertaining to fabrication), or must a separate Part 72 QA program be established by the general licensee and approved by the NRC to govern fabrication of a cask?</p>

NO.	SECTION	COMMENT
5	II, "Discussion" Item O	The sentence in the first paragraph "However, partial or selective application of a CoC amendment's changes would result in a cask that would be in an unanalyzed condition" is a significant overstatement. The CoC contains many and varied requirements, including administrative requirements and requirements that do not change the physical cask hardware. Applying partial or selective requirements from a later CoC amendment to a previously loaded cask may or may not result in the cask being in an unanalyzed condition. Please delete this sentence or replace the first instance of "would" with "could."
6	II, "Discussion" Item P	The NRC should consider including in CoC amendments language addressing whether or not the amendment encompasses all requirements of the initial CoC and previous amendments. This would significantly simplify the adoption process for general licensees, especially in cases where only the contents have changed and no cask hardware modifications are involved.
7	II, "Discussion" Item T	The regulation should include a provision (as of the rule effective date) to permit licensees with existing 212 Reports formatted and cross-referenced in accordance with the existing rule section numbering to maintain that numbering system and not have to revise their 212 Report simply to re-number the references to the regulation sections.
8	II, "Discussion" Item U  and  10CFR 72.212(b)(2)	The phrase "...no later than 30 days after using (loading) that cask..." is vague and should be defined more clearly. "Using" or "loading" a cask could be defined as anything from placing the first fuel assembly into the cask in the spent fuel pool to placing the cask in storage at the ISFSI. Please revise the discussion and rule language to replace the affected text with "placing the cask in storage at the ISFSI" or similar language to clearly establish the clock start date.
9	II, "Discussion" Item W	a) Once a CoC is renewed, do subsequent amendments continue the existing numbering or start over as the first amendment against the renewed CoC?  b) Do the aging management requirements apply to casks loaded under the later amendment against the renewed CoC if that cask is brand new or do they start when the initial term is exceeded? Industry believes aging management requirements would only apply after the cask is in service for the initial term of the CoC.

NO.	SECTION	COMMENT
10	II, "Discussion" Item Y	It appears the term "current licensing basis" (CLB) is being interpreted inconsistently when compared with the response to a similar question posed in Discussion Item E. The time-limited aging analyses for CoC renewals should be based on the CLB for the cask, using generic attributes. The CLB for the cask is the original regulatory framework (i.e., the regulations, review guidance, and the associated SER(s)) under which the cask design, including amendments, was approved, plus any mandated or voluntary changes applied thereafter, as tracked by the CoC holder and discussed in the cask FSAR. Please clarify that the time-limited aging analyses do not have to adopt the latest regulatory framework at the time of renewal unless that is part of the cask's CLB.
11	II, "Discussion" Item AA	<p>a) Positing that the NRC may need to review a general licensee's evaluations performed pursuant to 10 CFR 72.212(b)(5) to apply a later CoC amendment to previously loaded casks is inappropriate and contrary to the concept of a general license. The NRC will have already approved the CoC amendment. Original 10 CFR 72.212 evaluations and revisions thereto are reviewed by NRC under the inspection program, at NRC's discretion. Whether changes to the 10 CFR 72.212 Evaluation Report require <u>prior</u> NRC review and approval is determined by the 10 CFR 72.48 review performed for the changes to the 212 Report.</p> <p>b) It is not clear what NRC intends regarding "site aging issues." Aging management program requirements should be established by CoC holders in the same manner that the CoCs themselves are developed and 10 CFR 72.212 evaluations performed. That is, the CoC holder should identify what design features of the cask are subject to age-related degradation and address them in a bounding manner for use of a cask beyond its initial CoC term. Users would review the CoC holder's aging analysis to verify whether it bounds their site conditions and perform their own analyses, as necessary, to supplement or supersede the generic analyses.</p>

NO.	SECTION	COMMENT
12	III, "Discussion of Proposed Amendments by Section" Item 4  and  10 CFR 72.212(b)(7)	It is not clear what is meant by "...and revise it to add a requirement to evaluate any changes to the site parameters determination and analyses required by §72.212(b)(6)" in the discussion or the proposed changes to 10 CFR 72.212(b)(7). The last sentence of 10 CFR 72.212(b)(6) requires the results of the review (i.e., "the site parameters determination and analyses") to be "documented in the evaluation made in paragraph (b)(5) of this section." Paragraph (b)(5) represents the 212 Report, and changes to the 212 Report are already required to be reviewed in accordance with 10 CFR 72.48 by the replacement of the term "this paragraph" with "paragraph (b)(5) of this section" in the proposed (b)(6) changes. The addition of the text "and any changes to the site parameters determination and analyses required by paragraph (b)(6) of this section" to (b)(7) is redundant and, therefore, unnecessary. If NRC still desires a clarifying change to (b)(7), we recommend a simpler change that modifies the new text "paragraph (b)(5) of this section" to "paragraphs (b)(5) and (b)(6) of this section."
13	III, "Discussion of Proposed Amendments by Section" Item 4 10 CFR 72.212(b)(11)	The use of the word "terms" in the phrase "terms, conditions, and specifications" could be confused with the word "term," which is also used elsewhere in the rule in the context of "term certified in the cask CoC." See Comment 14 and revise this discussion accordingly.
14	10 CFR 72.3	To provide clarity in interpretation of the rule changes, please add a definition of the phrase "term certified by the cask's CoC." It appears that "term certified in the CoC" means the time frame from initial certification to CoC expiration and "terms, conditions, and specifications of the CoC" means the requirements set down in the CoC document, including appendices.

NO.	SECTION	COMMENT
15	10 CFR 72.212(a)(3)	<p>a) The term “casks of that design” as used in this section is unclear and should either be clarified or revised to be consistent with the term used earlier in that section: “cask[s] fabricated under a Certificate of Compliance,” if the same meaning is intended. If the same meaning is not intended, please define the two terms in 10 CFR 72.3.</p> <p>b) If a “cask user or user’s representative” renews a CoC, does that user or user’s representative become the CoC holder and absorb all CoC holder responsibilities such as cask FSAR updating and 10 CFR 72.48 reporting?</p> <p>c) This section uses the term “cask user or user’s representative,” yet 10 CFR 72.240(a) uses the term “any licensee” in the same context. Are these intended to be the same? If so, the same term should be used in both sections.</p> <p>d) The phrase “term certified by the cask’s Certificate of Compliance” appears twice within this section. However, this phrase is not defined in the regulations or the Certificates of Compliance. It is assumed to mean the period of time defined by the difference between the CoC effective date and the CoC expiration date. It is suggested that this phrase be defined in the regulations for clarity.</p>

NO.	SECTION	COMMENT
16	10 CFR 72.212(b)(4)	<p>The timeframe (30 days) for the requirement to notify the NRC of the use of a cask and when applying a later CoC amendment to a previously loaded cask can cause licensees an unnecessary administrative burden. Both should be extended to 120 days to permit general licensees to combine notifications.</p> <p>Applying a later CoC amendment to previously loaded casks can be implemented at any time, via documentation of the appropriate evaluations required by the regulations. However, such changes are typically made as part of a cask loading campaign where the new casks are loaded under the later CoC amendment and the later CoC amendment is also applied to previously loaded casks at that time.</p> <p>The revision of the 212 Evaluation Report in support of the cask loading campaign (if conducted in accordance with a later CoC amendment) would also document the application of the later CoC amendment to previously loaded casks. The 212 Evaluation Report revision would normally be completed well in advance of the loading campaign, in which case a notification within 30 days of the 212 Evaluation report revision would be required for the previously loaded casks. Then, the new casks must be registered with the NRC within 30 days of deployment, requiring a second notification within 30 days after the cask loading campaign. Permitting 120 days for both notifications would allow general licensees to combine these two notifications into one, in most cases.</p>
17	10 CFR 72.212(b)(4)	Please remove the word “all” in the first sentence to be consistent with the discussion provided in Item O of Section II.
18	10 CFR 72.212(b)(4)	<p>The first sentence is unclear as to when the 30-day clock starts and is not consistent with the wording used in 10 CFR 72.212(b)(2). Suggest wording the first sentence of this new section: “Register each cask with the Nuclear Regulatory Commission no later than 30 days after applying all the changes authorized by an amended CoC to the cask(s) loaded under the initial or an earlier amended CoC and documentation of all required evaluations.” See also, Comment 16 regarding the appropriateness of 30 days for these notifications.</p>

NO.	SECTION	COMMENT
19	10 CFR 72.212(b)(7)	<p>The wording of new section 10 CFR 72.212(b)(7) is unnecessarily complex. The first sentence of this section could be simplified as follows: "Changes to the written evaluations required by §72.212(b)(5) of this section shall be reviewed in accordance with 10 CFR 72.48(c), as applicable."</p> <p>Alternatively, simply change the first word of this section from "Evaluate" to "Review." The intent of the word "evaluate" is unclear in this context and causes confusion in practice. Specifically, some general licensees believe use of the word "evaluate" requires a full 10 CFR 72.48 evaluation (i.e., answers to the questions in 10 CFR 72.48(c)(2)), irrespective of the nature of the change to the document.</p> <p>In practice, and consistent with the NRC-endorsed NEI guidance governing implementation of 10 CFR 72.48, editorial and administrative modifications to the 212 Evaluation Report do not fall under the §72.48 process and receive no review at all under the rule. Further, modifications to the 212 Evaluation Report that are not defined as an adverse change, a change to a method of evaluation, a test, or an experiment receive only a §72.48 screening, not a full evaluation. The word "review" is broader and accurately reflects industry practice and the guidance for implementation of the §72.48 rule by general licensees.</p>
20	10 CFR 72.212(b)(8)	Change "§50.59(c)(2)" to "§50.59(c)." Review of the impact of dry storage activities may or may not require a full 10 CFR 50.59 evaluation pursuant to 50.59(c)(2), and §50.59(c)(1) also applies.
21	10 CFR 72.212(b)(9)(iii)	Does "a new protected area" only apply to an ISFSI not located inside a plant protected area? Please clarify.
22	10 CFR 72.212(b)(11)	<p>The addition of the phrase "and, for those casks to which the licensee has applied the changes of an amended CoC, the amended CoC" in two places in this section is unnecessary. Amendments to the CoC are considered part of the CoC. General licensees treat the amendments, if adopted for any casks, exactly the same as the original CoC. Suggest simplifying the wording as follows:</p> <p>"Maintain a copy of the CoC and each amended CoC(s) applicable to casks loaded and deployed at the ISFSI, and the documents referenced in such Certificates for each cask model used for the storage of spent fuel until use of the cask model is discontinued."</p>
23	10 CFR 72.212(b)(12)	This section uses the terms "cask supplier" and "cask vendor" neither of which are consistent with the term "CoC holder" used elsewhere in the Part 72 rules. Terminology should be consistent.

## Rulemaking Comments

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**From:** REED, Joseph [jsr@nei.org] on behalf of KRAFT, Steven [spk@nei.org]  
**Sent:** Tuesday, November 24, 2009 2:27 PM  
**Subject:** Nuclear Energy Institute Comments on Proposed Rule Language for 10 CFR Part 72, Docket ID NRC-2008-0361, 74 Federal Register 47126 (September 15, 2009)  
**Attachments:** 11-24-09\_NRC\_NEI Comments on Proposed Rule Language for 10 CFR Part 72, Docket ID NRC-2008-0361, 74 Federal Register 47126 (September 15, 2009).pdf; 11-24-09\_NRC\_NEI Comments on Proposed Rule Language for 10 CFR Part 72, Docket ID NRC-2008-0361, 74 Federal Register 47126 (September 15, 2009)\_Attachment.pdf

November 24, 2009

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Washington, DC 20555-0001

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Please do not hesitate to call me or Dr. Everett L. Redmond II (202-739-8122; [elr@nei.org](mailto:elr@nei.org)) if you have any questions.

Sincerely,

Steven P. Kraft  
Senior Director  
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**nuclear. clear air energy.**

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(September 15, 2009)

Thread-Index: AcptPBhLmSsvO2F/RTecMF3jN6mhZw==

From: "KRAFT, Steven" <spk@nei.org>

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