

Cumulative Impact of Regulatory Actions Dry Fuel Storage

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Cumulative Regulatory Burden

Cumulative Effects of Regulation describes the challenges that licensees, or other impacted entities (such as State partners) face while implementing new regulatory positions, programs, or requirements (e.g., rules, generic letters, backfits, inspections). Cumulative Effects of Regulation is an organizational effectiveness challenge that results from a licensee or impacted entity implementing a number of complex regulatory positions, programs or requirements within a limited implementation period and with available resources (which may include limited available expertise to address a specific issue). Cumulative Effects of Regulation can potentially distract licensee or entity staff from executing other primary duties that ensure safety or security.²

² The staff has revised the CER definition in SECY-11-0032 by making editorial changes.

Cumulative Impact Documents

- **“Proposed Initiative to Improve Nuclear Safety and Regulatory Efficiency.”**

COMGEA-12-0001/COMWDM-12-0002

- **“Implementation of the Cumulative Effects of Regulation Process Changes” SECY 12-0137**

“Cumulative impact of regulatory actions should be considered in the broader context of actions to improve nuclear safety and regulatory efficiency.”

Cumulative Impact-Cask License

- **Lack of established criteria to define and standardize Dry Cask Certificate of Compliance (CoC) and Tech Spec (TS) format and content at an appropriate level of detail**
- **Included in the NEI petition for rulemaking PRM-72-7, requests a new rule to address this issue**

Cumulative Impact-ISG

DRAFT ISG-26 A “Shielding and Radiation Protection Review Effort and Licensing Parameters for 10 CFR Part 72 Applications”

- **Guidance on dose rate requirements/controls may increase occupational exposure**
- **Does not consider the large difference between calculated dose rates in the FSAR and actual dose rates in the field**
- **Does not consider cask loading history overall occupational exposure has been significantly reduced, initially total cask exposures more than 1000 mrem now routinely loaded for less than 200 mrem**

General Issues/Impact

Questions regarding the need for seismic restraints during a variety of Transfer Cask and Concrete Cask configurations (transfer, stackup, freestanding)

- ❖ **Some sites have implemented seismic restraint systems at significant cost, increased radiation exposure and industrial safety concerns**
- ❖ **A number of sites have delayed loading campaigns**

Questions concerning ISFSI PAD Design

- ❖ **Some sites have limited the number of casks that may be placed on the ISFSI without additional analysis**

Cumulative Impact-Thermal

- **Additional Temperature limits inside building and outside, requiring historical data, 3 day averaging and or site specific evaluations**
- **Additional Requirements regarding fuel selection and when some types of ancillary equipment must be used or available for use**

Cumulative Impact-Security

➤ **10 CFR 73 Security Rule Change**

“What do you mean I have to delay my loading campaign?”

Summary of Impacts

- **Alter Cask Loading Schedules**
 - ❖ Not easy with all the current Spent Fuel Pool activities
- **Loss of Full Core Reserve**
- **Not able to Optimize Fuel Selection**
- **Need to procure additional ancillary equipment**
- **Increased Occupational Exposure**
- **Increased Cost (for improvements that are not safety significant)**
- **Resource Challenges**

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