

2013 NEI Used Fuel Management Conference: ISFSI Security Rulemaking Update

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May 7, 2013 • Saint Petersburg, FL



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Overview

- ISFSI Task Force Purpose and Objectives
- Activities and Developments
- Current Perspective
- Task Force Members and Key Contributors
- NEI and Task Force Path Forward

Task Force Objective

- Engage the NRC to ensure that the results of testing and analysis are accurate and sufficient to support rulemaking appropriate for the current threat analysis

Strategy

- Maintain a task force consisting of industry representatives who are knowledgeable and experienced in implementing physical protection of ISFSI facilities, as well as the regulatory, rulemaking process
- Develop the industry position regarding the regulatory rulemaking process for physical protection of ISFSI facilities
- Maintain concurrence from NEI and the Security Working Group on industry position

Strategy Cont'd

- Review and provide comments to NRC on all documentation impacting ISFSI Security Rulemaking initiative
- Identify inconsistencies and challenge the NRC when appropriate
- Remain engaged with NRC throughout initiative development and participate in data collection and analysis activities

ISFSI Activities

- On 01/10/12 held a closed/classified meeting with NRC to review classified material
- On 11/13/12 responded to issuance of NRC's draft test plan for proof of concept testing on a simple cask surrogate
- On January 7–11, 2013 a group of industry and cask vendor stakeholders observed NRC and contractors conduct proof of concept testing in Socorro, New Mexico

Activities Cont'd

- On 02/31/13 held a closed/classified meeting with NRC to discuss results of proof of concept testing
- On 03/04/13 members of task force and industry attended the ISFSI Classified Briefing at NRC HQ

NEI and Industry Perspective

- The consensus of the industry remains that the NRC staff has not provided justification to initiate proposed rulemaking for additional protective measures for ISFSIs and; therefore, should stop all rulemaking efforts and if necessary, codify the existing Security Orders for ISFSIs.

Members and Contributors

- Larry Weber, AEP
- Chris Kelley, Exelon
- Mike Karney, Exelon
- Ron Teed, Constellation
- Nelson Martin, Dominion
- Keith Wooten, Southern
- Dick Rosano, Talisman International
- Fred Marcussen, Entergy
- Albert Micheils, EPRI
- Jim Lenois, Connecticut Yankee Atomic
- Mike Priebe, PG&E
- Chris Glover, TVA
- Marcus Nichol, NEI
- Craig Seaman, NAC International
- Terry King, Duke
- Bob Mitchell, Yankee Atomic

Path Forward

- Task force and NEI are committed to stated objective and will remain engaged with NRC until this initiative is ultimately resolved

Questions?

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