

# NEI Dry Storage Task Force Thoughts and Insights

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# Dry Cask Licensing Process

- Technology evolving
- Review times may be lengthy
- The approval process requires rulemaking
  - No exigent or emergency amendment process and difficult to correct administrative errors in an approved amendment
  - Often requires exemption process to be used
- General licensees may use any approved amendment listed in §72.214

# Challenges

- Efficiency of review process
- Regulatory predictability during reviews
- Multiple active CoC amendments apply to one ISFSI for the same storage technology
  - Unusual process for plant operators and others accustomed to one Part 50 license and TS

## Part 72 CoC Renewal

- When a CoC is renewed, all amendments are simultaneously renewed
- How are new requirements incorporated into each previously approved amendment (e.g., aging management) for user implementation?

# Suggestions for Improvement Short-Term

- Increase NRC and CoC holder staff face-to-face interactions on technical issues
- Improve quality of documents
  - LAR guidance document
- Streamline information in CoCs going forward to reduce the need for amendments
- NRC-NEI FAQ process

# Suggestions for Improvement Long-Term

- Propose that CoC amendments fully encompass all previous amendments
- Permit CoC issuance and/or amendments without rulemaking
  - Need to preserve public participation in the process