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SNF PROJECT PATH FORWARD ADDITIONAL NRC
REQUIREMENTS

Pages: 24

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ADDITIONAL NRC REQUIREMENTS

November 1995

**Prepared for the U.S. Department of Energy
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Spent Nuclear Fuel Project Path Forward
Additional NRC Requirements

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Spent Nuclear Fuel Project Path Forward

Additional NRC Requirements

I. Introduction and Purpose

The U.S. Department of Energy (DOE), established in the K Basin Spent Nuclear Fuel Project - Regulatory Policy, dated August 4, 1995 (hereafter referred to as the Policy), the requirement for new Spent Nuclear Fuel Project (SNFP) facilities to achieve "nuclear safety equivalency" to comparable U.S. Nuclear Regulatory Commission (NRC)-licensed facilities. An evaluation was performed to identify any additional NRC requirements needed, in combination with the existing and applicable DOE requirements, to establish nuclear safety equivalency. The results (titled Actions for Consideration) and process used to identify these NRC requirements were documented in WHC-SD-SNF-DB-002, Rev. 0, *Spent Nuclear Fuel Project Path Forward Nuclear Safety Equivalency to Comparable NRC-Licensed Facilities*.

This document, Additional NRC Requirements, presents the SNFP's position on each Action for Consideration, with exception to the design earthquake, and transforms those identified for implementation into a requirements format. At this time the issue of the appropriate design earthquake is addressed in detail in a separate Westinghouse Hanford Company (WHC) document, WHC-SD-SNF-DB-004, titled *Spent Nuclear Fuel Project Seismic Design Criteria, Nuclear Regulatory Commission Equivalency Evaluation Report*, October 1995.

II. Scope

In accordance with the Policy, the scope of potentially applicable NRC technical requirements are the design and construction measures (as opposed to also including preoperational or operational measures) mandated by the NRC regulations, for the purposes of this evaluation, Title 10 Code of Federal Regulations, Parts 0 through 199, revised as of January 1, 1995. In addition, NRC guidance (located in NRC public document rooms as of September 18, 1995) that may have direct application to SNFP design and construction activities, was reviewed as a prudent step in implementing the Policy's objectives.

In implementing the Policy, nuclear safety equivalency is being established on a one-time basis with respect to the NRC regulations and guidance, based on the dates in the preceding paragraph. For DOE requirements, used to establish nuclear safety equivalency, that may change in the future (e.g., if DOE 5480.7A was reissued as DOE 5480.7B), those changes would need to be reviewed to ensure that nuclear safety equivalency remained to be preserved through the use of the new order, or the relevant historical DOE requirements, now deleted in the new order, would need to be specifically identified as a separate SNFP project-specific requirement and implemented accordingly. This latter control must be applied to WHC procedures

and instructions as well where such documents were used to establish nuclear safety equivalency.

Further, the additional NRC requirements identified herein only apply to the Canister Storage Building (CSB), Conditioning Facility and K Basins Path Forward Projects. DOE requirements apply to all SNFP activities. For the purposes of this report, K Basins Path Forward Projects include: desludging and cleaning of the K Basins fuel, reracking and cold vacuum drying.

III. Results

The additional NRC requirements were consolidated into 29 items. All items will be implemented per the NRC regulations with exception to the design earthquake, which is being implemented in a manner that establishes equivalence in safety, as opposed to direct equivalence to the regulation. As mentioned above, the seismic issue is presented in detail in a separate WHC document.

Table 1 identifies the responsible discipline(s) for implementation of the requirements (e.g., civil structural and mechanical) to help facilitation by the end user. Where the table includes a reference(s), this does not imply that the identified additional NRC requirement(s) and related DOE requirements necessarily satisfy the requirements of the reference(s), or even that the SNFP Path Forward must satisfy the requirements of the reference(s). It is simply a notation as to where the basic issue is raised, and where the reader may refer to in WHC-SD-SNF-DB-002, Rev. 0, and NRC regulations and guidance for related information.

Recognizing that the designs and safety analyses of the CSB, Conditioning Facility and K Basins Path Forward Projects will evolve further and be refined as the engineering progresses (e.g., the number and nature of active and passive systems and the safety class designation of systems and components), the SNFP may need to revisit the results (additional NRC requirements) of this document and make revisions as appropriate with DOE approval.

Additional NRC Requirements

Table 1

Responsible Discipline	Additional NRC Requirements	Related DOE/NRC References
1. CIVIL/ Structural and Mechanical (ALT)	<p>The final designs of the CSB, Conditioning Facility and K Basins Path Forward Projects shall be reevaluated to reconfirm that DOE Orders 5480.7A and 6430.1A provide adequate fire protection requirements to achieve nuclear safety equivalence. Aspects of the designs to reconfirm are the use of a passive cooling system for MCO cooling in the CSB and the lack of safety class 1 prevention or mitigation systems in the CSB, Conditioning Facility or K Basins Path Forward Projects. For additional information, refer to NRC document WMC-SD-SNF-DB-002, Rev. 0, Spent Nuclear Fuel Project Path Forward Nuclear Safety Equivalency to Comparable NRC-Licensed Facilities, Table 5.b, Section 50.48 and Appendix K. Further, fire protection requirements considered for incorporation into the design of the CSB, Conditioning Facility and K Basins Path Forward Projects should take into account the implementation of Section 72.122(c) to date for licensed independent spent fuel storage installations.</p> <p>(References: Section 50.48, Fire Protection, Part 50, Appendix R, Fire Protection for Nuclear Power Facilities Operating Prior to January 1, 1979, and Section 72.122(c), Protection against fires and explosions)</p>	<p>DOE 5480.7A DOE 6430.1A</p>

NOTE: Only the lead responsible disciplines are listed. It is assumed these disciplines will coordinate efforts of additional support disciplines as needed.

(ALT) Indicates the associated requirements are applicable to the Canister Storage Building, Conditioning Facility and K Basins Path Forward Projects design/construction. (Note: For the purposes of this report, K Basins Path Forward Projects include: desludging and cleaning of the K Basins fuel, restacking and cold vacuum drying.)

Table 1

Additional NRC Requirements

Responsible Discipline	Additional NRC Requirements	Related DOE/WHC References
2. Civil/ Structural and Mechanical (ALL)	<p>Adopt the seismic criteria as outlined in WHC-SD-SNF-DB-004, <i>Spent Nuclear Fuel Project Seismic Design Criteria, Nuclear Regulatory Commission Equivalency Evaluation Report</i>, October 1995, for the design of the CSB, Conditioning Facility and K Basins Path Forward Projects, with exception to activities internal to K Basins.</p> <p>Justify the use of alternate seismic response spectra and damping values from those presented in Regulatory Guides 1.60 and 1.61.</p> <p>Incorporate a design basis tornado (including translational velocity, rotational velocity and pressure differential) and tornado missile for safety class 1 SSCs into the designs of the CSB, Conditioning Facility and K Basins Path Forward Projects (with exception to activities internal to K Basins) taking into consideration the most recent version of Regulatory Guide 1.76, <i>Design Basis Tornado for Nuclear Power Plants, SECY-93-087, Policy, Technical, and Licensing Issues Pertaining to Evolutionary and Advanced Light-Water Reactor (ALWR) Designs</i>, and NUREG/CR-4461, <i>Tornado Climatology of the Contiguous United States</i> (potential revisions to SRP 3.5.1.4, Revision 2, <i>Missiles Generated by Natural Phenomena</i>). Refer to WHC document WHC-SD-SNF-002, Rev. 0, <i>Spent Nuclear Fuel Project Path Forward Nuclear Safety Equivalency to Comparable NRC-Licensed Facilities</i>, Table 5.c, §§72.24 and 72.122, for related information.</p> <p>The designs of 1) the CSB and Conditioning Facility and 2) K Basins and K Basins Path Forward Projects shall ensure that sharing of common utilities and services and physical interaction between the facilities do not impair the capability of either facility to perform its safety functions.</p> <p>Incorporate the ability for ready retrieval of MCOs into the design of the CSB.</p>	DOE 5480.28 and companion stds. DOE 6430.1A SDC 4.1, Rev.12

Table 1
Additional NRC Requirements

Responsible Discipline	Additional NRC Requirements	Related DOE/WHC References
2. Civil/Structural and Mechanical (All) (Continued)	<p>(References: Sections 72.24, Contents of application: Technical information, 72.90, General considerations, 72.92, Design basis external natural events, 72.102, Geological and seismological characteristics, 72.122, Overall requirements, and 72.212, Conditions of general license issued; Regulatory Guides 1.60, Design Response Spectra for Seismic Design of Nuclear Power Plants, Revision 1, 1.61, Damping Values for Seismic Design of Nuclear Power Plants, Revision 0, and 3.48, Standard Format and Content for the Safety Analysis Report for an Independent Spent Fuel Storage Installation (Dry Storage), Revision 1; and SECY-93-087, Policy, Technical, and Licensing Issues Pertaining to Evolutionary and Advanced Designs)</p>	

Additional NRC Requirements

Table 1

Responsible Discipline	Additional NRC Requirements	Related DOE/WHC References
<p>3. Electrical (ALL)</p>	<p>In the event that safety class 1 electrical equipment may be required and may be exposed to harsh environments for the CSB, Conditioning Facility and K Basins Patch Forward Projects during off-normal or postulated accident conditions, the following are additional NRC requirements.</p> <p>Ensure that the electrical equipment qualification program includes the requirements of Section 50.49 that are missing from DOE 6430.1A and WHC-CM-4-46, Safety Analysis Manual, Section 9.0, Revision 1, Safety Classification of Structures, Systems, and Components, Appendix B, Design Criteria. For safety class 1 equipment, non-safety class equipment that could, upon failure, adversely impact safety class 1 equipment in performance of their safety function, and certain post-accident monitoring equipment, as described in Regulatory Guide 1.97, these requirements include: 1) review Section 50.49(e)(5) and Regulatory Guide 1.89 during the design process to determine the aging requirements for such electrical equipment, and 2) testing requirements provided in Section 50.49(f)(1-4). For additional information, refer to WHC document WHC-SD-SNF-DB-002, Rev. 0, Spent Nuclear Fuel Project Forward Nuclear Safety Equivalency to Comparable NRC-Licensed Facilities, Table 5.b, Section 50.49, and Attachment A, Detailed Evaluations, Environmental Qualification of Electrical Equipment.</p> <p>(References: Section 50.49, Environmental qualification of electrical equipment, and Regulatory Guides 1.89, Environmental qualification of certain electrical equipment important to Safety for Nuclear Power Plants, Revision 1, and 1.97, Instrumentation for Light Water Cooled Nuclear Power Plants to Assess Plant and Environments Conditions During and Following an Accident, Revision 3)</p>	<p>DOE 6430.1A DOE-STD-3009-94 WHC-CM-4-46, Section 9.0, Rev. 1</p>

Table 1

Additional NRC Requirements

Responsible Discipline	Additional NRC Requirements	Related DOE/WHC References
4. Electrical (B)	<p>Include in the SNFP Path Forward Safety Management Plan or the SAR Preparation Plans, the requirement for the CSB, Conditioning Facility and K Basins SARs to evaluate a loss of ac power to the facility. The design of the CSB, Conditioning Facility and K Basins Path Forward Projects should respond as needed for accident prevention and mitigation.</p> <p>(Reference: Section 50.63, <i>Loss of all alternating current power</i>)</p>	<p>DOE 5480.23 DOE 6430.1A DOE-STD-3009-94</p>
5. Electrical (ALL)	<p>For the CSB, Conditioning Facility and K Basins Path Forward Projects, incorporate the requirements of IEEE Std 484-1987, <i>IEEE Recommended Practices for Installation Design and Installation of Large Lead Storage Batteries for Generation Stations and Substations</i>, into the design and installation of safety class 1 batteries.</p> <p>(Reference: Regulatory Guide 1.128, <i>Installation Design and Installation of Large Lead Storage Batteries for Nuclear Power Plants</i>, Revision 1)</p>	<p>DOE 6430.1A</p>
6. Electrical (ALL)	<p>For the CSB, Conditioning Facility and K Basins Path Forward Projects, incorporate the requirements of IEEE Std 535-1986, <i>IEEE Standard for Qualification of Class 1E Lead Storage Batteries for Nuclear Power Generating Stations</i>, for the qualification of safety class 1 lead storage batteries.</p> <p>(Reference: Regulatory Guide 1.158, <i>Qualification of Safety-Related Lead Storage Batteries for Nuclear Power Plants</i>, Revision 0)</p>	<p>DOE 6430.1A</p>

Additional NRC Requirements

Table 1

Discipline	Additional NRC Requirements	Related DOE/WHC References
7. Instrumentation & Controls (ALL)	<p>For the CSB, conditioning facility and K Basins Path Forward Projects, incorporate into the design for safety class 1 instrumentation and control systems, the requirements of IEEE Std 603-1991, IEEE Standard Criteria for Safety Systems for Nuclear Power generating Stations.</p> <p>(References: Sections 50.55a, Codes and standards, and Regulatory guide 1.153, criteria for power, instrumentation, and control portions of safety systems, Revision 0)</p>	DOE 6430.1A
8. Instrumentation & Controls (ALL)	<p>For the CSB, conditioning facility and K Basins Path Forward Projects, incorporate the requirements of MS1/MS-8.3-1986, criteria Accident Alarm System, into the design. (Note: using the NCO design, which includes the basket configuration, and the quantities and form of the K Basin fuel, evaluate these features as a basis for not incorporating critically accident alarm systems in the CSB, conditioning facility and K Basins Path Forward Projects, based on demonstrating through safety analyses documented in the associated SARs, that critically is not possible. As the design progresses, reconfirm the evaluation results.) Refer to WHC document WHC-SD-SNF-DB-002, Rev. 0, Spent Nuclear Fuel Project Path Forward Nuclear Safety Equivalency to Comparable NRC-Licensed Facilities, Table 6.a, Regulatory guide 8.12, for additional information.</p> <p>(References: Regulatory guides 8.5, critically and other Interior Evacuation Signals, Revision 1, and 8.12, critically Accident Alarm Systems, Revision 2, and Sections 70.24, critically accident requirements, and 72.124, criteria for nuclear critically safety)</p>	<p>DOE 5480.24 DOE 6430.1A WHC-CN-4-29 (manual rev. 4/17/95)</p>

Table 1

Additional NRC Requirements

Responsible Discipline	Additional NRC Requirements	Related DOE/WEC References
9. Instrumentation & Controls (ALL)	<p>Direct the AEs for the CSB, Conditioning Facility and K Basins Path Forward Projects to review the NRC guidance of NUREG-0700 and SRP 18.1 against DOE 6430.1A, Section 1300-12.4 and the DOE draft standard, <i>Human Factors Engineering Design Criteria: Volume I, General Criteria</i>, to identify appropriate additional NRC guidance for design of these facilities. The AE reviews should give consideration to the differences in complexity between power reactor control rooms and those of the CSB and Conditioning Facility or associated with the K Basins Path Forward Projects.</p> <p>(References: NUREG-0700, <i>Guidelines for Control Room Design Reviews</i>, and SRP 18.1, <i>Control Room</i>, Revision 0)</p>	DOE 6430.1A
10. Mechanical (ALL)	<p>For the CSB, Conditioning Facility and K Basins Path Forward Projects, use Regulatory Guide 1.26 to assist in assigning the appropriate code class to ASME Section III systems and components.</p> <p>(Reference: Regulatory Guide 1.26, <i>Quality Group Classifications and Standards for Water, Steam, and Radioactive-Waste-Containing Components of Nuclear Power Plants</i>, Revision 3)</p>	DOE 6430.1A
11. Mechanical (ALL)	<p>For the CSB, Conditioning Facility and K Basins Path Forward Projects, direct the AEs to review the NRC positions in Regulatory Guides 1.84 and 1.85 on ASME Section III code cases before using such code cases for safety class 1 applications. The NRC positions on applicable code cases should be used in the designs. Where no NRC position is stated in regards to the acceptance of a code case, that code case may be used as approved by the code Committee.</p> <p>(References: Regulatory Guides 1.84 and 1.85 [both Revision 30], <i>Design and Fabrication Code Case Acceptability ASME Section III, Division 1 and Materials Code Case Acceptability ASME Section III, Division 1</i>, respectively)</p>	DOE 6430.1A

Table 1

Additional NRC Requirements

Responsible Discipline	Additional NRC Requirements	Related DOE/WEC References
12. Mechanical (ALL)	<p>For the CSB, Conditioning Facility and K Basins Path Forward Projects, ensure the requirements of ANSI/ANS N509-1989, <i>Nuclear Power Plant Air-Cleanup Units and Components</i>, and ANSI/ANS N510-1989, <i>Testing of Nuclear Air Treatment Systems</i>, are incorporated into the design of safety class 2 and 3 HVAC systems used to achieve onsite radiological limits or to implement the principals of ALARA.</p> <p>(Reference: Regulatory Guide 1.140, <i>Design, Testing, and Maintenance Criteria for Normal Ventilation Exhaust System Air Filtration and Adsorption Units of Light-Water-Cooled Nuclear Power Plants</i>, Revision 1)</p>	DOE 6430.1A
13. Mechanical (ALL)	<p>For the CSB, Conditioning Facility and K Basins Path Forward Projects, incorporate the design requirements of ANSI/ANS-57.1, <i>Design Requirements for Light Water Reactor Fuel Handling System</i>, and ANSI/ANS-57.2, <i>Design Requirements for Light Water Reactor Spent Fuel Storage Facilities at Nuclear Power Plants</i>. (This only applies to facilities that will include the capabilities to lift MCOs or MCO casks.)</p> <p>(References: SRP 9.1.5, <i>Overhead Heavy Load Handling Systems</i>, Revision 0; NUREG-0554, <i>Single Failure Proof Cranes for Nuclear Power Plants</i>; and NUREG-0612, <i>Control of Heavy Loads at Nuclear Power Plants</i>, Resolution of Generic Technical Activity A-36)</p>	DOE 6430.1A
14. Mechanical (ALL)	<p>For the CSB, Conditioning Facility and K Basins Path Forward Projects, incorporate applicable design requirements of Generic Letters 88-14, 89-10 and 89-13 into safety class 1: instrument air systems, motor operated valves and open-cycle cooling water systems, respectively.</p> <p>(References: Generic Letters 88-14, <i>Instrument Air Supply System Problems Affecting Safety-Related Equipment</i>; 89-10, <i>Safety-Related Motor-Operated Valve Testing and Surveillance</i> 10CFR50.54(f), with supplements; and 89-13, <i>Service Water System Problems Affecting Safety-Related Equipment</i>)</p>	DOE 6430.1A

Table 1
Additional NRC Requirements

Responsible Discipline	Additional NRC Requirements	Related DOE/WHC References
15. Programs/Management (ALL)	<p>For the CSB, Conditioning Facility and K Basins Path Forward Projects, incorporate Westinghouse Hanford Company (WHC) Procurement Clause E13 (Reporting of Safety Defects and Noncompliance) into safety class 1 procurement specifications to require reporting by suppliers of defects in items or services. (Note: this procurement clause is located in Appendix A, Revision 1, to WHC-CN-4-2, <i>Quality Assurance Manual</i>.)</p> <p>(Reference: Part 21, <i>Reporting of Defects and Noncompliance</i>)</p>	WHC-CN-4-2, App. A, E13, Rev.1
16. Programs/Management (DOE Action)	<p>Before implementation, the DOE-Richland Operations Office will review and approve any changes to the WHC Quality Assurance (QA) Program and Implementation Plan, WHC-SP-1131, for the SNFP that could be interpreted as decreasing the QA Program's existing commitments for the SNFP.</p> <p>(Reference: Section 50.54(a), <i>Conditions of Licenses (Quality Assurance Provisions)</i>)</p>	10CFR830.120
17. Programs/Management (ALL)	<p>Implement the WHC Occurrence Reporting System for the design and construction of the CSB and Conditioning Facility and K Basins Path Forward Projects.</p> <p>(Reference: Section 50.55(e), <i>Conditions of construction permits</i>)</p>	DOE 5000.3B WHC-CN-1-5, Section 7.1, Rev.0

Table 1

Additional NRC Requirements

Responsible Discipline	Additional NRC Requirements	Related DOE/WHC References
18. Programs/ Management (ALL)	<p>For the CSS, Conditioning Facility and K Basins Path Forward Projects, ensure the appropriate quality requirements in existing WHC procedures and instructions remain in effect (e.g., in SNFP-specific documents). These WHC procedures and instructions and the subject requirements are identified in WHC document WHC-SD-SNF-DB-002, Rev. 0, <i>Spent Nuclear Fuel Project Path Forward Nuclear Safety Equivalency to Comparable NRC-Licensed Facilities</i>, Attachment A, Detailed Evaluations, Quality Assurance Criteria.</p> <p>(References: Part 50, Appendix B, <i>Quality Assurance Criteria for Nuclear Power Plants and Fuel Reprocessing Plants</i>, and 10CFR72, Subpart G, <i>Quality Assurance</i>)</p>	<p>10CFR830.120 DOE 4700.1 WHC-CN-4-2 QR 1.0, Rev.4 QR 3.0, Rev.5 QR 4.0, Rev.4 QR 7.0, Rev.4 QR 9.0, Rev.4 QR 10.0, Rev.3 QR 14.0, Rev.5 QI 7.2, Rev.5 WHC-CN-4-46 Section 9.0, Rev.1 WHC-CN-6-1 (manual rev. 8/8/95) WHC-IP-1026 (manual rev. 7/10/95)</p>
19. Programs/ Management (ALL)	<p>Institute a process to identify safety class 1 equipment that has been identified in the commercial nuclear power industry, via IE Bulletins and Notices, as being potentially defective.</p> <p>Ensure the areas of vendor and subcontractor quality assurance records and control of safety class 1 purchased material, equipment, and services receive emphasis during SNFP audits, surveillances, and assessments.</p> <p>(Reference: IEN 95-29 and a number of IE Bulletins and Notices addressing procurement of potentially defective equipment)</p>	WHC Procurement Clauses

Table 1

Additional NRC Requirements

Responsible Discipline	Additional NRC Requirements	Related DOE/WEC References
20. Radiological Protection (ALL)	<p>For the CSB, Conditioning Facility and K Basins Path Forward Projects, incorporate control devices for access to High Radiation Areas that conform to the requirements of Section 20.1601. Section 20.1601 requires control devices to all High Radiation Areas, defined in Section 20.1003 to be 0.1 rem in one hour at 30 cm, whereas 10CFR835 does not require incorporation of control devices until the dose rate in an accessible area reaches 1 rem per hour at 30 cm. Control devices are hardware features, such as alarms or locked entryways, as opposed to administrative controls.</p> <p>For the CSB, Conditioning Facility and K Basins Path Forward Projects, incorporate into the design the Section 20.1301 hourly dose limit of 0.002 rem to the public for any unrestricted area from external sources during normal operations and anticipated occurrences.</p> <p>(References: Part 20, <i>Standards for Protection Against Radiation</i>, and Section 72.126, <i>Criteria for radiological protection</i>)</p>	<p>10CFR835 DOE 5480.11 Hanford Site Radiological Control Manual (HSRCM-1)</p>
21. Radiological Protection (ALL)	<p>Apply the radiological exposure criteria of Section 72.104 to the design and safety analyses of the CSB, Conditioning Facility and K Basins Path Forward Projects. These criteria apply during normal operations and anticipated occurrences to any real individual of the public. These annual dose equivalent criteria are: 25 mrem to the whole body, 75 mrem to the thyroid, and 25 mrem to any other critical organ. (Note: existing DOE requirements are: 25 mrem to the whole body and 75 mrem to any critical organ.)</p> <p>(References: Sections 72.100, <i>Defining potential effects of the ISPSI or MRS on the region</i>; 72.104, <i>Criteria for radioactive materials in effluents and direct radiation from an ISPSI or MRS</i>; and 72.126, <i>Criteria for radiological protection</i>)</p>	<p>DOE 5400.5 DOE 5480.23 DOE 6430.1A DOE-STD-3009-94</p>

Table 1
Additional NRC Requirements

Responsible Discipline	Additional NRC Requirements	Related DOE/WHC References
22. Radiological Protection (ALL)	<p>Use a deterministic value of 5 rem in safety analyses for the onsite worker at the boundary of the controlled area (defined as 100 meters from the facility release point) for design basis accidents to assist in determining safety class 2 and 3 SSCs (as opposed to the WHC-CM-4-46, Section 9.0, Revision 1, onsite probabilistic values).</p> <p>(References: Sections 72.106, Controlled areas of an ISFSI or NRS; 72.100, Defining potential effects of the ISFSI or NRS on the region; and 72.126, Criteria for radiological protection)</p>	<p>DOE 5480.23 DOE 6430.1A DOE-STD-3009-94 WHC-CM-4-46, Section 9.0; Rev.1</p>
23. Radiological Protection (ALL)	<p>For the CSS, Conditioning Facility and K Basins Path Forward Projects, incorporate the requirements of Regulatory Guide 8.8 into the design. (Note: DOE 6430.1A-1540-99.0.6 references Regulatory Guide 8.8 for piping design considerations for systems that carry radioactive material.)</p> <p>(Reference: Regulatory Guide 8.8, Information Relative to Ensuring that Occupational Radiation Exposures at Nuclear Power Stations Will be as Low as Reasonably Achievable, Revision 3)</p>	<p>DOE 5480.11 DOE 6430.1A 10CFR835 HSCM-1</p>

Table 1

Additional NRC Requirements

Responsible Discipline	Additional NRC Requirements	Related DOE/WMC References
24. Safety Documentation (ALL)	<p>Include in the SNFP Path Forward Safety Management Plan the requirement to provide for the CSB SAR the information called for in Section 72.24 and Regulatory Guide 3.48 that is not required in DOE 5480.23 and DOE-STD-3009-94 and that is unique to spent nuclear fuel storage. For further information, refer to WMC document WMC-SD-SNF-DB-002, Rev. 0, <i>Spent Nuclear Fuel Project Path Forward Nuclear Safety Equivalency to Comparable NRC-Licensed Facilities</i>, Table 5.c, Section 72.24. Further, as the Hanford Site evolves, public health and safety must be revisited, and probable use of Hanford lands in the future should be considered in the design bases of the CSB, Conditioning Facility and K Basins Path Forward Projects at this time.</p> <p>Include in the SNFP Path Forward Safety Management Plan the requirement to provide for the Conditioning Facility SAR and K Basins SAR update to include K Basins Path Forward Projects, in consideration of conditioning processes and safety features, relevant information called for in Regulatory Guide 3.26 that is not required in DOE 5480.23 and DOE-STD-3009-94 and that is unique to the conditioning process. (The review to identify any additional applicable information for the Conditioning Facility or K Basins SARs should not occur until the associated processes and safety features are better defined.)</p> <p>(References: Section 50.34, <i>Contents of an application: Technical information</i>; Regulatory Guide 3.26, <i>Standard Format and Content of Safety Analysis Reports for Fuel Reprocessing Plants</i>, Revision 0; Regulatory Guide 3.48, <i>Standard Format and Content for the Safety Analysis Report for an Independent Spent Fuel Storage Installation (Dry Storage)</i>, Revision 1; and Sections 72.24, <i>Contents of an application: Technical information</i>, and 72.98, <i>Identifying regions around an ISPSI or MRS site</i>)</p>	DOE 5480.23 DOE-STD-3009-94

Table 1
Additional NRC Requirements

Responsible Discipline	Additional NRC Requirements	Related DOE/WHC References
25. Safety Documentation (ALL)	<p>Direct the AEs for the CSB, Conditioning Facility and K Basins Path Forward Projects to review the effluent monitoring requirements of, for example 10CFR20, 10CFR70.59 and 10CFR835, to provide the necessary monitoring instrumentation. (For the CSB, this may apply as a result of MCOs being vented at anytime while in the CSB.)</p> <p>(References: Section 50.36a, Technical specifications on effluents from power reactors and Part 70, Domestic Licensing of Special Nuclear Material)</p>	DOE 5480.22 DOE 5480.23
26. Safety Documentation (CF/KB)	<p>During final design of the Conditioning Facility and K Basins Path Forward Projects, review 1) the conclusions of Attachment A, Detailed Evaluations, 10CFR50, Appendix A, General Design Criteria, to WHC document WHC-SD-SNF-DB-002, Rev. 0, Spent Nuclear Fuel Project Path Forward Nuclear Safety Equivalency to Comparable NRC-Licensed Facilities, and 2) the general design criteria of 10CFR50, Appendix A, to determine if NRC nuclear safety equivalency is achieved without application of any of the general design criteria of 10CFR50, Appendix A.</p> <p>(References: Part 50, Appendix A, General Design Criteria for Nuclear Power Plants)</p>	DOE 6430.1A
27. Safety Documentation (ALL)	<p>Incorporate a criticality safety value of 0.95 for k_{eff}.</p> <p>(References: SRP 9.1.2, Spent Fuel Storage, Revision 3, and NUREG-0612, Control of Heavy Loads at Nuclear Power Plants, Resolution of Generic Technical Activity A-36)</p>	DOE 5480.24 WHC-CN-4-29 (manual rev. 4/17/95)

(CF/KB) Indicates the associated requirements are applicable to the Conditioning Facility and K Basins Path Forward Projects design/construction.

Table 1

Additional NRC Requirements

Responsible Discipline	Additional NRC Requirements	Related DOE/WHC References
28. Safety Documentation (CSB)	<p>For the CSB, review ANSI/ANS-57.9-1992, <i>Design Criteria for an Independent Spent Fuel Storage Installation (Dry Type)</i>, to identify any additional requirements that would need to be incorporated into the design to demonstrate nuclear safety equivalency.</p> <p>(Reference: Regulatory Guide 3.60, <i>Design of an Independent Spent Fuel Storage Installation (Dry Storage)</i>, Revision 0)</p>	DOE 6430.1A
29. Safety Documentation (ALL)	<p>Identify structures, systems and components (SSCs) "important to safety", in accordance with Section 72.3, as follows: those SSCs that assure there is not a credible breach of the spent nuclear fuel containment/confinement such that a radioactive release could be postulated to reach the controlled area boundary, defined as 100 meters from the facility release point. Once SSCs "important to safety" have been identified, impose the requirements for safety class 1 SSCs as defined in WHC-CM-4-46, <i>Safety Analysis Manual</i>, Section 9.0, Revision 1, <i>Safety Classification of Structures, Systems, and Components</i>.</p> <p>(Reference: Sections 72.3, <i>Definitions</i>, and 72.122, <i>Overall requirements</i>)</p>	DOE 6430.1A WHC-CM-4-46 Section 9.0, Rev.1

(CSB) Indicates the associated requirements are applicable to the Canister Storage Building design/construction.

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