

ISFSI LICENSE BASIS DOCUMENTS	Identifier: MCP-3177 Revision*: 13 Page: 1 of 7
--------------------------------------	---

ISFSI Management	Management Control Procedure	For Additional Info: http://EDMS	Effective Date: 07/19/11
------------------	------------------------------	---	--------------------------

Manual: INTEC NRC

USE TYPE 3

Change Number: 333527

*The current revision can be verified on EDMS.

1. PURPOSE

Identify the license basis documents and provide the process for maintaining them.

2. SCOPE

The license basis documents for the Fort St. Vrain (FSV) Independent Spent Fuel Storage Installation (ISFSI), the Three Mile Island Unit 2 (TMI-2) ISFSI, and the Idaho Spent Fuel Facility (ISFF) ISFSI are:

- A. License and Technical Specifications (TS) for each ISFSI
- B. Safety Analysis Report (SAR) for each ISFSI
- C. Technical Specification Bases for each ISFSI
- D. Emergency Response Plan (ERP) for each ISFSI
- E. Physical Protection Plan (PPP) for each ISFSI
- F. Training Program (Section 9.3 of each SAR)
- G. Radiological Environmental Monitoring Program (Section 7.7 of the FSV SAR, Section 7.6 of the TMI-2 SAR and Section 7.6 of the ISFF SAR)
- H. Quality Assurance Program (Chapter 11 of each SAR)
- I. Safeguards Information Protection Plan (applies to all ISFSIs).

The Decommissioning Plan is required to be updated and resubmitted before defueling in accordance with 10 CFR 72.54 and is not covered in this procedure.

3. RESPONSIBILITIES/PREREQUISITES

3.1 Responsibilities

Performer	Responsibilities
License Basis Document Owner	Ensure changes to license basis documents are screened or evaluated, as appropriate. Prepare screens and evaluations as needed. Provide change requests to the ISFSI Safety Review Committee for review or approval, as appropriate. Management of commitments made to the NRC.

ISFSI LICENSE BASIS DOCUMENTS	Identifier: MCP-3177 Revision*: 13 Page: 2 of 7
--------------------------------------	---

Performer	Responsibilities
Regulatory Compliance	Prepare license amendment requests as needed.
Manager, ISFSI Management	Transmit change request to the DOE-ID ISFSI Facility Director.

4. INSTRUCTIONS

4.1 Preparing Changes to License Basis Documents

NOTE 1: *The Technical Specifications are part of the license and issued by NRC. Change requests for the license and Technical Specifications are not managed by Document and Record Service Center (DRSC) until NRC approves the license amendment. A DRF is prepared to transmit the approved license amendment and the updated revision log to the DRSC.*

NOTE 2: *DOE directed changes require screen/evaluation and committee/board review. For DOE directed changes, the changes are considered to be already approved by DOE. Additional changes (identified during review of the DRF, for example) should be deferred or additional approval from the DOE-ID ISFSI Facility Director is needed.*

NOTE 3: *SAR revisions that only change the revision number, which occurs with periodic updates to NRC, and do not contain any other changes not previously approved by the DOE-ID ISFSI Facility Director, are classified as minor changes and do not require screens or evaluations and do not require DOE-ID approval.*

4.1.1 **Requester:** Prepare license basis document change request.

4.1.1.1 Prepare document revision form (DRF).

NOTE: *If an evaluation is required, a screen is not required. If a license amendment is required, neither a screen nor an evaluation is required.*

4.1.1.2 Prepare (or obtain from Regulatory Compliance) the screen or evaluation (in accordance with MCP-2925, “Screen and Evaluate Changes”), or license amendment request.

4.1.1.3 Verify that the change request does not change a historical NRC commitment (refer to MCP-3191 and LST-14). Any change to a NRC commitment requires NRC notification, review, and approval prior to making the change.

ISFSI LICENSE BASIS DOCUMENTS	Identifier: MCP-3177 Revision*: 13 Page: 3 of 7
--------------------------------------	---

- 4.1.1.4 Obtain and document appropriate staff reviews of the change request.
- 4.1.2 Document Owner: Obtain safety review committee or board review.
 - 4.1.2.1 Upon resolution of comments, provide the document review package to the safety review committee or operations safety board (designated by the Manager, ISFSI Management) for review. This review can be combined with staff reviews and would be documented on the DRF.
 - 4.1.2.2 If the designated safety review committee or operations safety board requires changes to the license basis document, inform the previous reviewers of such changes.
- 4.1.3 Regulatory Compliance: Obtain ISFSI Safety Review Committee approval of license amendment requests.
 - 4.1.3.1 If a license amendment is required, present the DRF and markup, the license amendment request, and the designated safety review committee or board meeting minutes to the ISFSI Safety Review Committee for approval.
 - 4.1.3.2 If the ISFSI Safety Review Committee requires changes to the license basis document, inform the reviewers, including the designated safety review committee or board, of such changes.
- 4.1.4 Manager, ISFSI Management: Obtain approval from the DOE-ID ISFSI Facility Director.
 - 4.1.4.1 If the change is not DOE-ID directed or differs from the DOE-ID direction, transmit the DRF and markup and the screen, evaluation, or license amendment request to the DOE-ID ISFSI Facility Director for approval of the change request and any associated evaluation.
 - 4.1.4.2 If the DOE-ID ISFSI Facility Director requires changes to the license basis document, inform the reviewers, including the designated safety review committee or board, of such changes.

ISFSI LICENSE BASIS DOCUMENTS	Identifier: MCP-3177 Revision*: 13 Page: 4 of 7
--------------------------------------	---

NOTE: *A completed document change record package is: (1) the DRF, (2) a screen, evaluation, or license amendment request, (3) the safety review committee or operations safety board review if not documented on the DRF, and (4) DOE approval.*

4.1.5 Regulatory Compliance: If the revision doesn't require a license amendment, transmit a copy of the document change record package to the ISFSI Safety Review Committee for review.

4.1.6 Regulatory Compliance: If the revision does require a license amendment, coordinate the preparation of responses to NRC Request for Additional Information (RAI).

NOTE: *For license amendments, the complete document package includes the License Amendment change request, any NRC Requests for Additional Information and the associated responses, the NRC approval letter and Safety Evaluation Report, changes to the license or technical specifications, and an updated license table of contents.*

4.1.7 Regulatory Compliance: For license amendments that result in changes to more than one document (such as supporting or implementing documents) and for license amendments where the original request was modified (as a result of responses to NRC Request for Additional Information or as a result of direction provided in the NRC Safety Evaluation Report), identify actions needed to implement responses, directions, and any other commitments in accordance with MCP-3191, "ISFSI Commitments Management."

4.1.8 Document Owner: Transmit complete document change record package to the DRSC Administrator.

4.2 Distributing Revised License Basis Documents

NOTE: *The DRSC Administrator for license basis documents is the INTEC DRSC Administrator.*

4.2.1 DRSC Administrator: Upon receipt of the completed document change record package and completion of document revision, distribute the revised license basis document.

ISFSI LICENSE BASIS DOCUMENTS	Identifier: MCP-3177 Revision*: 13 Page: 5 of 7
--------------------------------------	---

4.3 Reporting Changes Made Without NRC Approval

4.3.1 Regulatory Compliance: If the license basis document revision is made without NRC approval, prepare a report for the DOE-ID ISFSI Facility Director's submittal to NRC describing the changes made and per the following directions:

4.3.1.1 Reports of changes made without NRC approval to physical protection plans must be made within 2 months of the change in accordance with 10 CFR 72.44(e).

4.3.1.2 Reports of changes made without NRC approval to emergency response plans must be made within 6 months of the change in accordance with 10 CFR 72.44(f).

4.3.1.3 Reports of changes made without NRC approval to safety analysis reports or the program documents contained within (in other words, the radiological environmental monitoring programs, training programs, or quality assurance programs), and the Technical Specification Bases must be made with the next periodic SAR update in accordance with 10 CFR 72.70, TS 5.5.1, and TS 5.5.2.

5. RECORDS

NOTE: [MCP-557, "Records Management,"](#) the [INL Records Schedule Matrix](#), and associated [record types list\(s\)](#) provide current information on the storage, turnover, and retention requirements for these records.

6. DEFINITIONS

None

7. REFERENCES

None

8. APPENDIXES

Appendix A, Procedure Basis

ISFSI LICENSE BASIS DOCUMENTS	Identifier: MCP-3177 Revision*: 13 Page: 6 of 7
--------------------------------------	---

Appendix A

Procedure Basis

Step	Basis	Source	Citation
Entire procedure	Written procedures shall be established, implemented, and maintained for administrative controls.	FSV TS 5.4.1.a ISFF TS 5.4.1.a	
Entire procedure	Written procedures shall be established, implemented, and maintained for the following: FSV/TMI Technical Specification (TS) Bases Control Program Essential Program Control (QA, REMP, Training)	FSV TS 5.4.1.o TMI TS 5.4.1.p ISFF TS 5.4.1.o	
Entire procedure	TS Bases Control Program shall be established, implemented, and maintained. This program provides a means for processing changes to the bases of these TS.	TS 5.5.1	
Entire procedure	Essential Program Control shall be established, implemented, and maintained. This program provides guidelines for processing changes to essential programs.	FSV TS 5.5.2 TMI TS 5.5.2	
Entire procedure	Changes that do not decrease the effectiveness of the training program will be documented with SAR updates.	SAR 9.3	
4.1.2	Prepare (or obtain from Regulatory Compliance) the screen or evaluation (in accordance with MCP-2925, “Screen and Evaluate Changes”), or license amendment request.	10 CFR 72.44(e) 10 CFR 72.44(f) 10 CFR 72.48 10 CFR 72.56 FSV TS 5.5.2 TMI TS 5.5.2 TS 5.5.1	

ISFSI LICENSE BASIS DOCUMENTS	Identifier: MCP-3177 Revision*: 13 Page: 7 of 7
--------------------------------------	---

Step	Basis	Source	Citation
4.1.2, 4.1.5	Providing license basis document change requests to the designated safety review committee or board for their review and approval and subsequently providing evidence of that committee's review ensures that the ISFSI SRC is able to review selected activities of the staff level document review committee.	FSV TS 5.2.1.4.d TMI TS 5.2.1.4.d	
4.1.3	Providing license basis document change requests that require NRC approval to the ISFSI SRC for their review and approval satisfies the Source requirement.	FSV TS 5.2.1.4.c TMI TS 5.2.1.4.c	
4.1.4	Providing the document review package to the DOE-ID Facility Director ensures that DOE is able to comply with the Source requirement.	FSV TS 5.1.6 TMI TS 5.1.5	
4.3.1	The reporting of changes made without NRC approval in the time periods specified in this section satisfies the Source requirements.	10 CFR 72.44(e) 10 CFR 72.44(f) TS 5.5.1 FSV TS 5.5.2 TMI TS 5.5.2 FSV TS 5.6.1 TMI TS 5.6.1 10 CFR 72.70	