

NEI Responses to Topics on which DOE Specifically Invited Comment on the proposed Form GC-859 and NEI Specific Detailed Comments

Responses to Topics on which DOE Specifically Invited Comment:

(a) Whether the proposed collection of information is necessary for the proper performance of the functions of the agency, including whether the information shall have practical utility

The industry believes that this proposed information collection, reinstating the Nuclear Fuel Data Survey, will facilitate the Department's efforts to carry out its responsibility under the Nuclear Waste Policy Act and Standard Contracts to remove the spent nuclear fuel and high-level radioactive waste from reactor sites. Accordingly, we support the use of Form 859 for that purpose.

As the new Form GC-859 represents a change from previous version of the Nuclear Fuel Data Survey, we would caution that the terminology and definitions used in the new Form GC-859 must remain fully consistent with those established in the Standard Contract and used as the basis for collecting and reporting information compiled in the historical RW-859 Forms. To not do so would result in the collection and reporting of data in the new Form GC-859 that would not be consistent with the data historically collected and reported in the Form RW-859.

RESPONSE (a)

When drafting the new Form GC-859, the terminology and definitions established and used in the Standard Contract were called upon so that a consistency was in place for all parties having involvement and/or interaction with the new Form GC-859. This allows a baseline understanding of verbiage no-matter what the role of any individual or organization during the data collection and sharing process. This will apply whether that role might be in conducting the survey, responding to the survey or utilizing the compiled results of the survey.

In most cases, all of the terms and definitions are worded exactly as stated in the Standard Contract except where data collection requirements have changed. Examples of this would be in the collection of certain special fuel forms data, in distinguishing between single-element canisters and multi-element casks, and in terms related to initial loading weights and enrichments.

(b) The accuracy of the agency's estimate of the burden of the proposed collection of information, including the validity of the methodology and assumptions used

The Federal Register Notice cites an estimated "Number of Annual Burden Hours" per response. This estimate appears to be reasonable. We note that the DOE is piloting the use of the Form GC-859 at three industry locations. The results of these pilots will either confirm the accuracy of this estimate or provide the DOE with feedback that can be used to improve the process should the estimate prove to be low. We urge the DOE to take into account the results of the pilots in assessing the burden of the proposed

collection and to assure that appropriate measures are taken to assure that the actual burden is reduced to the maximum extent possible.

For the permanently shut down nuclear reactors respondent category, we would note that a number of utilities with stand-alone shutdown reactor Independent Spent Fuel Storage Installation (ISFSI) sites no longer have reactor fuels groups or the resources available to compile and report all of the information requested in the Form GC-859. Accordingly, in those cases, it is difficult to evaluate the accuracy of the agency's estimate of annual burden hours. It our understanding, however, that utilities with stand-alone shutdown reactor ISFSI sites will only have to provide the information that they have available, and that it can be submitted in "any readily-available database or spreadsheet" format, and that the DOE will fill in the Form 859. If this is the case, then we believe that the estimate provided could be accurate.

RESPONSE (b)

The DOE will work with the three industry respondents that will pilot the Form GC-859 collection software and will most certainly apply their feedback into the process to allow for refinement within some of the specific areas that will be collected. This should also assist in clarification of expectations so that not only will the respondents know what the level of effort will be but as a guide to help them navigate through their response. The DOE hopes that this will help to minimize the burden and the questions that may arise.

One thing that the DOE must stress throughout this process is a desire to collect as much of the data as possible without totally monopolizing the time of the respondent. To do this will greatly enhance the ability to make much more informed future decisions regarding the program and the support mechanisms necessary to long term industry needs. There is an inherent burden associated with this survey that will need to be factored into making sure the information collected is accurate and usable. The DOE understands that in certain situations the information that will need to be provided may not be available in a format that easily conveys to the Form GC-859 collection system or, as your example indicates, may be from a no-longer active environment. In those scenarios, the DOE will welcome any and all information available provided in any format.

Note that where there may be a case where detail is required (for example C.1.1 - Data On Permanently Discharged Fuel, C.1.2 - Fuel Cycle History, and D.3 - Storage Facility Information (Dry Storage)) the DOE will accept the information in any available form.

After the DOE has entered all of the data that may have been supplied in an alternate format and that data has been reviewed by the appropriate DOE representative, the survey data information will be returned to the respondent so that they may verify that the information was captured correctly.

(c) Ways to enhance the quality, utility, and clarity of the information to be collected

The DOE should carefully evaluate the results of the three pilots now underway and identify any opportunities for improvements.

RESPONSE (c)

As was discussed in our response to the first part of (b), the DOE will work closely with the three industry respondents that will pilot the Form GC-859 collection software and where it makes sense will apply their feedback into the process to allow for refinement within some of the specific areas that will be collected. We will also utilize the pilot location's feedback to assist with form clarification to help other respondents navigate through their response in a more expeditious manner. To that end, in conversations with the three test respondents, the DOE has stressed if any section/schedule poses an excessive burden, the test respondents should contact the DOE immediately so the requirement and the associated burden can be lessened. Again, we hope that this will help to minimize the burden and the questions that may arise.

(d) Ways to minimize the burden of the collection of information on respondents, including through the use of automated collection techniques or other forms of information technology.

We understand that the three pilots currently underway at industry sites will test the utility of the information technology being proposed. We urge the DOE to consider the results of these pilots and refine its techniques and technologies as appropriate to minimize burden.

Also, as noted in the comments to (b) above, the DOE should recognize the specific issues associated with shutdown plants, including that some of the utilities involved no longer have reactor fuels groups or resources available to compile and report all of the information requested in the Form GC-859. Accordingly, it will be important that they only be required to provide information that is available and can be submitted in "any readily-available database or spreadsheet" format.

RESPONSE (d)

The question / comment (d) is similar to (b). The response to question (b) also pertains to (d).

The system has been designed in Microsoft Access so that when DOE or other users perform analytics they have the information in a database format. However, in certain sections (for example, permanently discharged fuel and fuel cycle history), Microsoft Excel has been utilized to simplify data entry and manipulation.

Specific Detailed Comments:

Section C.1 (Q1): Regarding the statement that non-intact assemblies may have more than one entry with pieces in separate locations, it would be useful for the DOE to provide guidance on the naming of each piece and whether or not the initial U content should be divided up among the entries. Also, does the DOE consider a broken rod to be a canistered fuel rod or canistered fuel debris?

RESPONSE (Section C.1 (Q1))

The statement that “non-intact assemblies may have more than one entry with pieces in separate locations” was meant to pertain to Schedule C in its entirety, not specifically to the Permanently Discharged Fuel table (Schedule C.1.1). The instructions to Schedule C will be modified to reflect this. The Permanently Discharged Fuel table was originally designed to accept one entry for each assembly with a fuel cycle history. Assemblies listed in Schedule C.1.1 should correspond to assemblies listed in the Fuel Cycle History table (C.1.2). In cases where an assembly has had fuel rods removed, or been consolidated or reconstituted, that data should be reported in the appropriate section of Schedule C.3 Special Fuel Forms. The respondent should use the Comments (Schedule G) to enter details on any entry in Schedule C.1.1.

The respondent may also choose to include in Schedule C.1.1 data on canistered fuel rods (status code R), canistered fuel debris or pieces (status code P), fuel in a basket (status code B), or other fuel (status code O). Details on these Special Fuel Forms, however, should be entered in the appropriate Sections of Schedule C.3.

The assembly identifier for an original assembly listed in Schedule C.1.1 should either be a utility assigned code (A001, B003, etc.) or the assemblies ANSI ID. The ANSI ID is recommended. The entry for the original assembly should include its total initial uranium content. Identifiers for entries in the Special Fuel Forms sections of Schedule C may be a canister ID assigned to a canister by its manufacturer or a utility assigned ID. The DOE is more interested in the contents of these canisters than in the way they are named.

Any canistered broken rods should be considered as fuel debris (pieces).

Section C.1 (Q2): It is our understanding that individual removed fuel rods should not be listed as part of the assembly in this section, that the initial weight should be that of the original assembly, and that data for removed rods should be provided in Section C.3? Can the DOE confirm this?

RESPONSE (Section C.1 (Q2))

The DOE confirms that all of the above statement is correct.

Section C.1 (Q3): With regard to a failed assembly with cladding damage or mechanical damage, what is the DOE's expectation where a failed rod has been removed and replaced with a SS rod?

RESPONSE (Section C.1 (Q3))

For a failed assembly with cladding damage or mechanical damage where a failed rod has been removed and replaced with a SS rod, the following should apply. The assembly should be assigned a status code of F (failed fuel). A statement should be made in the Comments (Schedule G) showing this. If the rod replacement results in the assembly being no longer classified as failed, it should also be noted in the Comments. Data on the removed rod should be entered in the appropriate section of Schedule C Special Fuel Forms.

Section C.3.2: Regarding the statement, "For all uncanistered fuel rods and fuel pieces, provide a detailed description." Can the DOE provide additional guidance on the level of detail required? Is anything beyond the information needed to fill out Table C.3.2 necessary?

RESPONSE (Section C.3.2)

Should you the respondent have any special circumstances or comments pertaining to the information needed to complete Table C.3.2, they should be provided those in the Comments (Schedule G). Otherwise, the information provide in Table C.2 should be sufficient. The instructions to this part of the survey form will be modified to reflect this.

Section D.3.2: Regarding the request for model number: Is this meant to refer to the overpack number or the can that gets welded and placed in the overpack? The overpack model could have 3-4 different cans that can contain different number of fuel assemblies in addition to some quantity of greater than Class C waste.

RESPONSE (Section D.3.2)

The model number should be the number on the canister. No data on the overpack need be provided. The instructions will be modified to reflect this requirement.

Section E.2: This question asks for "estimated" weights. We request clarification of the level of precision needed for this estimate. Given that the weight of inserts has not been a significant issue in the past, some of the information may be highly approximate.

RESPONSE (Section E.2)

The level of precision will be dependent upon the information that you have regarding your non-fuel components. Any degree of precision is okay. The respondent should not spend an elaborate amount of time on this section. If certain non-fuel components are routinely included as an integral part of the assembly, include the details for one assembly and enter a statement in the comments section (Schedule G) that all other assemblies contain the same components. The instructions will be modified to reflect this.

Section E.4: Is there a need to conservatively assume that inserts are going to be shipped separately sometime in the future? What level of conservatism?

RESPONSE (Section E.4)

At this time, there is no need to assume that inserts are to be shipped separately.

Section G: Additional guidance on DOE expectations concerning the types of situations for which the industry should include comments in this section (e.g. signification reconstitution and re-irradiation) would be useful and appreciated.

RESPONSE (Section G)

Please utilize Schedule G to provide clarification or additional details for any circumstance or situation that does not easily fit into the framework of information requested in a given schedule. The comments section may also be used by the respondent to reduce the burden in filling out certain schedules or sections of the form.