



Holtec Center, 555 Lincoln Drive West, Marlton, NJ 08053

Telephone (856) 797-0900

Fax (856) 797-0909

BY FAX AND OVERNIGHT MAIL

February 29, 2000

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555-0001

Subject: USNRC Docket Nos. 72-1008 and 72-1014
High-Seismic Topical Report Review, TAC No. L22966

- References:
1. Holtec Project Nos. 71178 and 5014
 2. NRC Letter dated February 15, 2000, "Request for Additional Information on High Seismic Topical Report (TAC NO. L22966)"

Dear Sir:

We appreciate the RAIs on the above referenced topical report forwarded through the NRC's letter of February 15, 2000. We thank the reviewers of the report for their diligence in explaining the underlying rationale for each RAI, and for their willingness to discuss them with us on March 15, 2000 at NRC's offices. Our objective in this meeting with the reviewers is to remove the ambiguities in the scope of the topical report and in its design basis, and analysis methodologies which appear to have spawned a number of RAIs. In certain cases, as required, we will request NRC's official position with respect to a technical issue on which an official regulatory position does not presently exist. For a limited number of RAIs, we will use the vehicle of the meeting to explain their non-significance in the full context of the cask anchoring problem. We also plan to articulate what we discern to be a misinterpretation of the ASME Code and mathematical formulations in a very limited number of RAIs. To facilitate a productive meeting, we categorize those RAIs on which most of our technical discussion will be focussed into five categories in the following.

	Category	RAI No.
1.	Discuss proposed response to a RAI.	5-1, 7-1, 7-2, 9-3, 9-4, 9-5, 10-1, 10-2, 10-7, 10-11, 10-14, 10-18, 11-2, 11-3, 11-4, 11-7, 11-8, 11-9

Kim SSOI Public



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	Category	RAI No.
2.	Explore technical significance (or lack thereof) of an RAI with respect to the overall problem.	10-3†, 10-4†, 10-5†, 10-9†, 10-10†, 10-15†, 10-16†, 10-17†, 10-19†, 10-20†, 10-21,†
3.	Request NRC's technical position on the issue.	1-2, 6-5
4.	Clarify the scope of the topical report and reach concurrence on the relevance of the RAI.	4-1†, 4-2†, 4-3†, 9-6†
5.	Provide technical rebuttal to an RAI and reach concurrence with staff.	10-8†, 11-1†, 11-5†

The discussion on the RAIs marked with a dagger (†) impinge on the proprietary technologies contained in the topical report. We request that the discussion of these annotated RAIs occur in the proprietary session.

We trust that the above outline would lead to a productive meeting to resolve the RAIs and an expedited conclusion of this effort.

If you have any questions or require additional information, please contact us.

Sincerely,

Approval

Bernard Gilligan
Project Manager

K.P. Singh, Ph.D., PE
President and CEO

cc: Ms. Marissa Bailey, USNRC
Mr. Bruce Patton, PG&E
Mr. Mark Smith, PG&E

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