



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

Telephone (856) 797-0900

Fax (856) 797-0909

BY OVERNIGHT MAIL

August 31, 2000

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

Subject: USNRC Docket No. 72-1014
HI-STORM 100 Certificate of Compliance 1014
HI-STORM License Amendment Request 1014-1, Revision 1

References: 1. Holtec Project 5014
2. Holtec Letter, K.P. Singh, to NRC Public Document Room, dated April 14, 2000

Dear Sir:

On April 14, 2000 Holtec International submitted License Amendment Request (LAR) 1014-1 proposing certain changes to the HI-STORM 100 System Part 72 Certificate of Compliance (CoC) and Topical Safety Analysis Report (Ref. 2). Recognizing the heavy review work load of the SFPO staff for other licensing actions, we consented to utilizing the summer months to further enlarge the scope of our LAR package and re-submit the LAR to enable the SFPO to initiate its review starting in September, 2000. This submittal fulfills our commitment to expand the scope of LAR 1014-1 with additional technical material by the promised date of August 31, 2000. The material added in Revision 1 pertains to the following areas:

1. Design features and appropriate site seismic acceleration limits are proposed to permit deployment of the HI-STORM-100 System at ISFSIs located in high-seismic regions.
2. The heat emission limits for fuel assemblies are modified with due recognition of convection heat transfer in the MPCs.
3. The MPCs are proposed to be permitted to store high burnup spent nuclear fuel with appropriate post-core decay time (PCDT) restrictions.

The information describing and justifying these proposed changes is contained in the following attachments:

Attachment 1: Summary of Proposed Changes, including a description, reason, and justification for each proposed CoC change.

Attachment 2: Mark-up of proposed CoC changes.

Attachment 3: Final version of proposed CoC changes.

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Attachment 4: Drawings, including Bills-of-Material, for MPC-24E, MPC-24EF, MPC-68FF, MPC-32, HI-STORM 100S, and HI-STORM 100A.

Attachment 5: Proposed TSAR changes¹.

To eliminate the burden on the SFPO staff to compile the contents of the first and this second submittal on this LAR, we herewith provide a complete amendment request package that includes information from both submittals in one document. Thus, our initial submittal of April, 2000 is *completely superseded* by the attached package. In compiling this package, we have further streamlined the information by removing, as discussed with SFPO project management, those changes to the TSAR text and drawings that can be handled under the provisions of 10 CFR 72.48.

Among the areas covered in this LAR, certification of MPC-32 (submitted in the first installment of this LAR in April, 2000) is most critical. Holtec is under contract to supply MPC-32 canisters to several utilities for use under the general license provisions of 10 CFR 72, Subpart K. This makes MPC-32 the "critical path" for this LAR for our customers. The need for MPC-32, which would reduce the number of cask by one third compared to our MPC-24 technology, should receive high NRC priority. TVA's Sequoyah and Entergy's ANO are slated to be among the near term beneficiaries of the MPC-32 technology. PG&E's Diablo Canyon is also considering the MPC-32 technology and was a participant in the development of the cask deployment technology for high seismic sites. MPC-32, it should be noted, was included in the certification pipeline until two months before the issuance of the HI-STAR 100 System SER in August, 1998. We hope that the SFPO would be able to resurrect its previous review effort from the ca 1996 – 1998 period to help expedite MPC-32's certification.

We have reviewed our fabrication and delivery schedules, including an estimate of the time needed to design, manufacture, and construct the fabrication fixturing for MPC-32. With due consideration of the lengthy rulemaking process and the above-mentioned delivery and fabrication schedules, we would greatly appreciate a focused review by the SFPO and approval of the CoC amendment by September, 2001 to allow us to support our customers' dry fuel storage needs. To support this objective, we have provided in the attached package a Change Summary Document as a "road map" for the LAR package, and a set of revised drawings and fully reviewed draft TSAR changes pertinent to the proposed CoC changes. The LAR package contents, in our view, are comprehensive and accurate such that any requests for additional information should be minimal. Further, we believe a

¹ The HI-STORM 100 Final Safety Analysis Report (FSAR) was issued on July 19, 2000. However, for continuity with original LAR 1014-1 (issued in April 2000), the proposed changes in this LAR submittal include the term "TSAR Rev. 11" in the footer. All proposed TSAR changes ultimately will be included in FSAR Revision 1 after final approval of the CoC amendment.



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meeting between our respective technical and management staffs at the earliest possible date would be helpful to ensure that the proposed changes and their underlying technical bases are clearly understood by the SFPO review team.

This submittal contains information in the proposed TSAR text and on drawings that is commercially sensitive to Holtec International and is treated by us with strict confidentiality. This information is of the type described in 10 CFR 2.790(b)(4). This information is considered proprietary to Holtec. The affidavit provided as Attachment 6 herein sets forth the bases for which the information is required to be withheld from public disclosure, consistent with these considerations and pursuant to the provisions of 10 CFR 2.790(b)(1). It is therefore requested that the proprietary information enclosed be withheld from public disclosure in accordance with applicable NRC regulations. A non-proprietary version of this LAR will be submitted under separate cover.

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

Sincerely,

Brian Gutherman, P.E.

Licensing Manager

Approval:

K.P. Singh, Ph.D., P.E.

President and CEO

cc: Ms. Virginia Tharpe, USNRC (10 copies w/attach. and floppy disk)
Mr. E.W. Brach (cover letter only)
Ms. Susan Frant-Shankman (cover letter only)
Mr. Randy Hall (cover letter only)

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Attachments: 1-5, As Stated.
6. Affidavit Pursuant to 10 CFR 2.790



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Dr. Indresh Rampall (Thermal Evaluation)

Dr. Everett Redmond II (Shielding Evaluation)

Dr. Stefan Anton (Criticality Evaluation)

Mr. Kris Cummings (Confinement Evaluation)

Mr. Stephen Agace (Operations)

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