



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

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May 18, 2001

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

Subject: USNRC Docket No. 72-1014, TAC L23082
HI-STORM 100 LAR 1014-1

References: 1. Holtec Project 5014
2. NRC Letter, C. P. Jackson to Holtec, B. Gutherman, dated May 10, 2001
3. Meeting between Holtec and SFPO held May 15, 2001

Dear Sir:

We thank the Spent Fuel Project Office staff and management for investing their time to meet with us on May 15, 2001 to clarify the recently received Request for Additional Information (RAI) on our License Amendment Request 1014-1. The RAIs are well articulated and the meeting helped us secure additional necessary clarification that will help in preparing and submitting a focused response, obviating the need for further iteration. We hereby commit to submitting our responses by Tuesday, July 3, 2001 for arrival at NRC headquarters on Thursday, July 5, 2001. We hope that the SFPO would be able to reduce the duration of their review schedule accordingly.

As requested by telephone yesterday, we have summarized the additional proposed changes to the submittal, the reason for these changes, and the relationship to the RAIs, if any, in the following table. As we stated in the meeting, we consider these changes to be minor enough in nature to require minimal additional review effort and should have little impact on SFPO's planned resource allocation to complete the review process.

NMSS01 Public.



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CHANGE	AFFECTED DOCUMENT(S)	REASON FOR CHANGE	AFFECTED TECHNICAL DISCIPLINES
Remove figures from TS LCOs 3.2.1 and 3.2.3 and re-word LCO text appropriately	CoC, Appendix A, LCOs 3.2.1 and 3.2.3	The figures are illustrative and include details not germane to compliance with the LCO	Shielding. Editorial change
Restore gm-moles/liter acceptance criterion for MPC helium backfill while maintaining the proposed helium pressure range	CoC, Appendix A, Table 3-1	To ensure the CoC continues to be applicable to those users loading HI-STORM using the currently approved gm-moles/liter criterion.	None. Administrative change
Clarify the definition of TRANSPORT OPERATIONS	CoC, Appendix A, Section 1.1 and Appendix B, Section 1.0	The current definition of TRANSPORT OPERATIONS does not recognize the difference between MPC transfers occurring inside and outside Part 50 facilities. LCOs applicable during TRANSPORT OPERATIONS are not intended to be applicable until the transport vehicle is loaded and leaves the Part 50 facility.	None. Administrative change
Remove unnecessary finite element node description and output detail from FSAR	FSAR Appendices 3.N, 3.O, 3.P, 3.Q, 3.R, 3.S and 3.T	This type of detailed analysis input and output is inappropriate for a SAR document and will be retained in the supporting calculation packages.	None. Administrative change.



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Replace QA program detail in Chapter 13 with a short description of, and reference to the Holtec International QA program manual	FSAR Chapter 13	To eliminate duplication of information and the potential for outdated information being used by the NRC. The Holtec QA manual is the living document governing all safety significant work performed at Holtec. The QA manual has been approved under 10 CFR 71 (Approval No. 0784, Rev. 2 dated August 23, 1999). It is updated from time to time to reflect additional requirements and enhancement to the program	None. Administrative change
Provide an updated drawing set for HI-STORM 100S, including the following changes: 1. Lid rotated 45 degrees axially to take the upper and lower air ducts out of vertical alignment. Radial ribs are moved to be positioned above the bottom ducts. 2. The inner steel shield shell is	Proposed HI-STORM 100S BOMs 3065 and 3066, and proposed drawings 3067 through 3075 will be replaced with new drawing series 3443* Also affects FSAR Chapters 3 and 5 and the dose rate limit in CoC Appendix A, LCO 3.2.3.c	The changes to HI-STORM 100S are improvements based on lessons learned in fabrication HI-STORM 100 and in preparing for deployment of HI-STORM 100S at a user facility. Change number 1 is necessary for orienting the lift brackets during lifting and movement of the loaded overpack with a cask crawler. Change number 2 is necessary due to severe thermal stresses induced by the welding of the shield shell to the inner overpack main shell. The concrete density increase is to compensate for the reduction in shielding due to the removal of the shield shell. Change number 3 is necessary to provide a more	Structural and Shielding



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removed and the plain shielding concrete density is slightly increased. 3. BOM Item 52, shear bar is removed and replaced with an additional steel piece attached to the bottom of the lid. 4. Part-length structural ribs have been added to the top of the overpack.		robust design for resisting shear loads during a cask tipover event. It should be noted that this change is necessary to address RAIs 3.2 through 3.8 and should not be considered a discretionary design change. Change number 4 is necessary to support the addition of new lid holes needed for proper fit-up of ancillary equipment to the top of the overpack Changes 2-4 are currently being evaluated for implementation under 10 CFR 72.48 and we will consider the staff's RAIs as part of that effort. However, we think that keeping NRC-reviewed documents in maximum agreement with as-delivered equipment to the sites will avoid a potential disconnect between NRC regional inspectors and headquarters staff.	

* This drawing series has been produced in Holtec's new drawing software. This software upgrade is intended to eliminate the need for separate fabrication drawings to be developed, thus improving quality by eliminating the potential for errors in transposing design data.



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If you have any questions or require additional information, please contact me at (856) 797-0900, extension 668.

Sincerely,

Brian Gutherman, P.E.
Licensing Manager

Approval:

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

cc: Mr. Christopher Jackson, USNRC

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