

July 16, 2001

Mr. Brian Gutherman
Licensing Manager
Holtec International
555 Lincoln Drive West
Marlton, NJ 08053

SUBJECT: REVISION 2 TO HI-STORM AMENDMENT REQUEST

Dear Mr. Gutherman:

By letter dated July 3, 2001, Holtec International (Holtec) responded to a Nuclear Regulatory Commission (NRC) request for additional information. The NRC acceptance review of this information is underway. However, statements made regarding use of the 10 CFR 72.48 process in Section II of the proposed changes portion of the application do not appear to be correct.

Specifically, proposed change 33 states that Figure 3.2.3-1 in the Certificate of Compliance (CoC) is illustrative and that a change to the outlet air ducts depicted in this figure do not require a CoC change. The change to the outlet air ducts being contemplated is to relocate the outlet air vent from the overpack body to the overpack lid. The interpretation that a CoC change is not needed is not correct because the location of the air vents is material to the CoC required radiation dose measurement. Relocation of the air vents from the overpack body to the overpack lid affects the location of the CoC required dose measurement. As a result, a change to the CoC is required and in accordance with 10 CFR 72.48(c)(1)(ii), that change can not be made under 10 CFR 72.48.

Additionally, the application states that FSAR text revisions are included that do not require NRC review and approval and that these changes are being processed under 10 CFR 72.48. The NRC notes that 10 CFR 72.48 change authority only covers changes to NRC approved cask features and does not cover cask features that have not yet been approved (HI-STORM 100 A, HI-STORM 100 S, MPC 32, MPC 24E, MPC 24EF, MPC 68FF). Any changes to unapproved cask features need to be fully described with a full justification provided in the amendment application.

If you have any questions please call me at 301-415-2947.

Sincerely,

/S/ /RA/

Christopher Jackson, Project Manager
Licensing Section
Spent Fuel Project Office
Office of Nuclear Material Safety
and Safeguards

Docket No. 72-1014
TAC No. L23082

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