



H O L T E C
I N T E R N A T I O N A L

December 31, 2001

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United States Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555-0001

Subject: Supplement to Reply to a Notice of Violation
NRC Inspection Report 72-1014/01-201

Reference: Holtec Response to Notice of Violation dated November 21, 2001

Dear Sir:

Pursuant to our telephone discussion on December 19, 2001, we herewith provide amended responses to one item each in Violations D and E.

Violation D, Example 5

There is a "check block" on the Holtec Engineering Change Order (ECO) form indicating whether or not prior NRC approval of a design change is required. However, this "check block" is currently only marked "yes" for those changes where the response to one of the criteria in 10 CFR 72.48(c) is "yes." Further, there is currently no electronic link to prevent certification of a component with a design change requiring prior NRC approval before that approval is obtained. The following additional actions will be taken:

- a. The "check block" on the ECO form will be modified so that it will be checked "yes" if prior NRC approval of the change is required for *any* reason.
- b. The NRC Certificate of Compliance will be included in the list of affected documents on the ECO form to an additional electronic barrier to ensure that, if a CoC change is required pursuant to a change, then the affected component cannot be certified for storage of spent nuclear fuel (with the change implemented) until the CoC is amended.
- c. A network-based database of all pending CoC changes, and their source, will be created to formalize tracking of pending CoC changes for each CoC docket and to make the pending CoC changes available to company personnel through the network.

We believe these actions will address the NRC's concern with respect to control of design changes that require prior NRC approval before implementation. Applicable Holtec Quality Procedures will be modified as required to implement these changes by January 31, 2002.

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Violation E

Case 3 in the table that classifies potential ASME Code exceptions defines those issues where the Code requirement may be ambiguous with respect to dry storage casks and compliance is subject to interpretation. The action required for "Case 3" in the table is modified as follows:

"The item will be included in the Code exception table(s)."

We believe this action addresses the NRC's concern regarding the potential for different interpretations of such Code requirements between the NRC and Holtec. This modified action is being included in the governing procedure and will be implemented by January 31, 2002.

We trust that the responses provided in the forgoing meet with NMSS's approval. However, should the NRC require any additional information concerning this response, please contact our Licensing Manager, Brian Gutherman at (856) 797-0900, extension 668 or brian_gutherman@holtec.com.

Sincerely,

Mark Soler
QA Manager

Concurrence:

Brian Gutherman, P.E.
Licensing Manager

Approval:

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

Document I.D.: 5014445

Emcc: Mr. Paul Narbut, USNRC
Mr. Timothy Kobetz, USNRC
Holtec Groups 1 and 4
HUG Group N
HUG Licensing Committee