

February 8, 2002

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

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION - HOLTEC
HI-STORM 100 ASME CODE EXCEPTIONS

Dear Mr. Gutherman:

On February 4, 2002, Holtec International (Holtec) submitted a request to the U. S. Nuclear Regulatory Commission (NRC) to include additional ASME Code exceptions in the fabrication of the HI-STORM 100 Cask System. The request was submitted in accordance with Section 3.3.2 of Appendix B to Certificate of Compliance No. 72-1014. Enclosed is the staff's request for additional information (RAI) for the continued review of your request.

Your full and complete response to the enclosed RAI is necessary for the staff to complete its review. Upon receipt of your RAI responses, we will perform an acceptance review to determine if sufficient information has been provided to allow completion of the review and inform you if the information provided is not complete. Per telephone discussion on February 8, 2002, you stated that Holtec would respond to the RAI no later than February 22, 2002. If Holtec meets that commitment, and the staff finds the responses satisfactory, the staff will grant the exception by March 8, 2002.

If you have any comments or questions concerning this request, you may contact me at (301) 415-8538. Please refer to Docket No. 72-1014 and TAC No. L23413 in future correspondence related to this request.

Sincerely,
/RA/

Timothy J. Kobetz, Project Manager
Licensing Section
Spent Fuel Project Office
Office of Nuclear Material Safety
and Safeguards

Docket No. 72-1014
TAC No. L23413

Enclosure: RAI on HI-STORM 100
ASME Code Exceptions

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ASME Code Exceptions

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HI-STORM 100 CASK STORAGE SYSTEM
DOCKET NO. 72-1014
TAC NO. L23413

REQUEST FOR ADDITIONAL INFORMATION

This document, titled Request for Additional Information (RAI), contains a compilation of additional information requirements identified to-date by the U.S. Nuclear Regulatory Commission (NRC) staff, during its review of Holtec International's request to add additional ASME Code exceptions to Certificate of Compliance 72-1014 for the HI-STORM 100 Cask. This RAI is organized by the Reference ASME Code Section/Article column of Table 1, "Proposed New and Revised ASME Code Alternatives for the HI-STORM 100 System," provided by Holtec by letter dated February 4, 2002.

Each individual RAI describes information needed by the staff for it to complete its review of the application and the SAR and to determine whether Holtec International has demonstrated compliance with the regulatory requirements.

Review of ASME Code Alternatives

1. Subsection NCA: Clarify or remove the statement that "Requirements that are not germane to meeting the applicable Code stress limits are not applicable to its certification for cask use under 10 CFR 72."

In the context the statement is used in the request, it is unclear which requirements are not germane to meeting the applicable Code stress limits. This information is required to assure compliance with 10 CFR 72.236 (b).

2. NB-2000, NG-2000 and NF-2000: Clarify why the statements regarding the Holtec Quality Assurance (QA) program were added.

The use of the Holtec QA program is used to ensure appropriate implementation of ASME Code requirements under 10 CFR Part 72, however, the program is not part of any ASME Codes. This information is required to assure compliance with 10 CFR 72.236 (b).

3. NB-3350: Discuss how the requested exception to the code welding requirements still meets the design requirements stated in the FSAR.

The exception request justifies the exceptions based on fabrication difficulties associated with making the weld in accordance with the ASME Code. However, the request does not provide justification that the requested Code exception meets the design requirements stated in the FSAR. The table should include a brief discussion of the purpose of the weld and how the changes in the weld still meet the design requirements stated in the FSAR. This information is required to assure compliance with 10 CFR 72.236 (b).

4. NG-4420: Provide the analysis that demonstrates how the design margins stated in the FSAR are maintained by the new weld design criteria.

The justification states that “The acceptance criteria provided in the foregoing have been established to comport with the objectives of the basket design and preserve the margins demonstrated in the supporting design analysis.” However, no reference to previous or new analysis is provided. This information is required to assure compliance with 10 CFR 72.236 (b).

5. NB-4120, Ng-4120, and NF-4120: Clarify when tensile or impact testing is required for material subjected to heat treatment during fabrication or installation. This information is required to assure compliance with 10 CFR 72.236 (b).
6. NF-4441: Provide justification for eliminating the references to specific margins of safety and deceleration limits in the justification of this exception.

The exception request eliminated margins of safety and deceleration limits that had been previously reviewed and approved by the staff. This information is required to assure compliance with 10 CFR 72.236 (b).