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BY OVERNIGHT MAIL

March 4, 2002

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 1014-2

Reference: Holtec Project 5014

Dear Sir:

On February 12, 2002, Holtec International met with the NRC's Spent Fuel Project Office staff and management to discuss the changes being considered for inclusion in the second amendment request for the HI-STORM 100 System Certificate of Compliance (CoC). Consistent with those discussions, we herewith submit License Amendment Request (LAR) 1014-2 proposing certain changes to the HI-STORM 100 System CoC and Final Safety Analysis Report.

This amendment request is motivated to fulfill the pressing need of the users of the HI-STORM/HI-STAR 100 Systems who seek to load the MPCs with spent nuclear fuel in a manner that minimizes the dose to operations personnel during dry storage implementation as well as the overall site boundary dose from the casks arrayed at the ISFSI. Storing fuel in a regionalized configuration, wherein the high burnup fuel is confined to the core region of the fuel basket (approved by the SFPO in HI-STORM Amendment 1, currently undergoing rulemaking), is recognized as an effective strategy to minimize dose during ISFSI operations and during cask loading activities.

This proposed amendment would permit high burnup fuel with low cooling times to be placed in the core region of high-density baskets such as MPC-32 and MPC-68, throttling the radiation emitted by them by utilizing "colder" fuel in the outer region of the basket for self-shielding. To achieve this objective, the thermal rating of the MPCs has to be updated which, as we demonstrate in the proposed FSAR changes, can be achieved by merely reducing certain elements of conservatism in input data pertaining to the MPC geometry and its contents.

To facilitate the staff's review, a comprehensive summary of all changes contemplated in this amendment request is provided in a document entitled "Summary of Proposed Changes", which is further described below. We have endeavored to present a complete and comprehensive treatment of all requested changes in the body of the proposed FSAR changes (backed by detailed QA-validated analyses in the supporting calculation packages). Because this submittal contains no new designs, our goal in the preparation of this submittal has been to provide sufficient details to obviate the need for formal RAIs.

NM5501 PROP.



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Document ID 5014452
Page 2 of 4

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 change.

Attachment 2: Mark-up of proposed CoC changes.

Attachment 3: Final version of proposed CoC changes.

Attachment 4: Proposed FSAR changes are provided as follows:

- (i) Portions of the HI-STORM 100 FSAR materially affected by the proposed CoC changes, and
- (ii) Those stand-alone FSAR changes requiring prior NRC approval.

The baseline FSAR used for these proposed changes is the version recently reviewed under HI-STORM LAR 1014-1 (Proposed Revision 1). Changes made under proposed FSAR Revision 1 have been incorporated into the attached documents (labeled "Proposed Revision 2") and made transparent to the reader. Judgement has been used in choosing the extent of proposed FSAR changes provided herein. In other words, entire sections have been provided if they are contextually required for the NRC reviewer to completely understand the impact of the change. Otherwise, only the specific pages with material changes have been provided. Editorial, conforming FSAR changes have not been provided but will be incorporated into FSAR Revision2, when it is issued in accordance with 10 CFR 72.248.

This submittal contains information in the proposed FSAR and CoC changes (noted with shading and appropriate proprietary notations) 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) and is considered proprietary to Holtec. The affidavit provided as Attachment 5 herein sets forth the bases for which the information is required to be withheld from public disclosure at this time, 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 until such time as the NRC's preliminary Safety Evaluation Report and draft CoC has been submitted for preparation of the rulemaking package.



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Page 3 of 4

Certain elements of this amendment request are required by our users in order for them to manage the selection of spent fuel for deployment in dry storage most efficiently and in a dose-minimized manner. To that end, we request approval of this amendment (rulemaking complete) by February 28, 2003. If you have any questions or require additional information, please contact us.

Sincerely,

Approved:

Brian Gutherman, P.E.
Licensing Manager

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

Attachments: 1-5, As Stated.

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 Page 4 of 4

Discipline Concurrence*	
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* All Holtec QA-validated submittals on safety significant projects require relevant technical discipline concurrence.	

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