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October 24, 2001

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

Subject: USNRC Docket No. 72-1014
Follow-up Item from September, 2001 Inspection

Reference: NRC Inspection 0721014/2001-201

Dear Sir:

As suggested by the SFPO inspection team during our recent inspection, we herewith submit our criteria for determining whether proposed changes to information on our certified dry storage systems should be submitted to the NRC when the NRC is conducting a coincident review of that, or related information. The criteria that we presently utilize are listed below: we look forward to discussing them in an upcoming meeting with the SFPO.

1. We verbally inform the NRC project manager and submit the change to the NRC on a mutually agreeable schedule if any of the following are true:

- The change involves the modification of a proposed change to the Certificate of Compliance, including appendices, under review.
- The change involves a significant modification to the safety factor or safety margin reported in the FSAR supporting a proposed change under review.
- Materially incomplete or inaccurate information is discovered in the information under review.
- The change significantly revises a method, input, or assumption specifically recognized in the NRC's current SER for the cask system.
- The change involves the replacement of a major design feature under review that will never be used if the change is implemented.

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

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2. If the change involves a significant enhancement of a design feature that does not change the design function of the affected component, it is discussed with the NRC project manager to determine whether to submit it as part of the next normal update to the submittal under review (e.g., RAI response), or hold the change in-house and perform the 10 CFR 72.48 evaluation after the CoC amendment request under review is approved by the NRC.
3. If the change does not meet any of the criteria in Items 1 and 2 above, we would hold the change in-house and perform the 10 CFR 72.48 evaluation after the CoC amendment request under review is approved by the NRC.

Please contact me at (856) 797-0900, extension 668 if you require additional information.

Sincerely,

Brian Gutherman, P.E.
Licensing Manager

Approved:

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

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