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March 25, 2002

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555-0001

Subject: USNRC Docket No. 72-1008
HI-STORM 100 Certificate of Compliance 1008
Alternatives to Codes and Standards

References:
1. Holtec Project 5014, TAC No. L23414
2. Holtec letter to NRC, Code Alternatives for HI-STORM 100 System, dated February 4, 2002
3. NRC letter to Holtec, Request for Additional Information - Holtec HI-STORM 100 ASME Code Exceptions, dated February 8, 2002.
4. Holtec letter to NRC, Response to NRC RAI, dated February 20, 2002.
5. NRC letter to Holtec, ASME Code Alternatives for the HI-STORM 100 and HI-STAR 100 Dry Storage casks, dated March 5, 2002.

Dear Sir:

In response to the NRC's request (Ref. 5), we herewith submit the necessary modifications to the ASME Code alternatives requested in our Reference 2 letter for the HI-STAR 100 System. These modifications are necessary to address those RAIs, received on the ASME Code alternatives requested and approved for the HI-STORM 100 System (Reference 3), that are also applicable to the HI-STAR 100 System. Reference 4 contains the specific responses to the RAIs. Attachment 1 to this letter contains the table of new and revised HI-STAR 100 ASME Code alternatives (Table 1 from Reference 2), modified as necessary to conform to the RAI responses. This table replaces Table 1 in Reference 2 in its entirety. Table 2 in Reference 2 remains applicable. We are requesting approval of these alternatives by May 31, 2002

If you have any questions or require additional information, please contact the undersigned at (856) 797-0900, extension 668.

Sincerely,

Brian Gutherman, P.E.
Licensing Manager

Approved:

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

NMSS01 Public

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Concurrence:

3/25/02
Manufacturing

3/25/02
Quality Assurance

emcc: Mr. Steve O'Connor, USNRC (w/attach.)
Holtec Group 1 (w/attach.)
Holtec NRC Correspondence Distribution (w/attach.)
HUG Licensing Committee (w/attach.)

Document ID: 5014455

Attachment: 1. Proposed new and revised HI-STAR 100 System ASME Code alternatives

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Table 1

PROPOSED NEW AND REVISED ASME CODE ALTERNATIVES FOR THE HI-STAR 100 SYSTEM

Component	Reference ASME Code Section/Article	Code Requirement	Exception, Justification, & Compensatory Measures
MPC, MPC basket assembly, and HI-STAR overpack steel structure.	Subsection NCA	General Requirements. Requires preparation of a Design Specification, Design Report, Overpressure Protection Report, Certification of Construction Report, Data Report, and other administrative controls for an ASME Code stamped vessel.	Because the MPC, overpack, and transfer cask are not ASME Code stamped vessels, none of the specifications, reports, certificates, or other general requirements specified by NCA are required. In lieu of a Design Specification and Design Report, the HI-STAR FSAR includes the design criteria, service conditions, and load combinations for the design and operation of the HI-STAR 100 System as well as the results of the stress analyses to demonstrate that applicable Code stress limits are met. Additionally, the fabricator is not required to have an ASME-certified QA program. All important-to-safety activities are governed by the NRC-approved Holtec QA program. Because the cask components are not certified to the Code, the terms "Certificate Holder" and "Inspector" are not germane to the manufacturing of NRC-certified cask components. To eliminate ambiguity, the responsibilities assigned to the Certificate Holder in the various articles of Subsections NB, NG, and NF of the Code, as applicable, shall be interpreted to apply to the NRC Certificate of Compliance (CoC) holder (and by extension, to the component fabricator) if the requirement must be fulfilled. The Code term "Inspector" means the QA/QC personnel of the CoC holder and its vendors assigned to oversee and inspect the manufacturing process.

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Component	Reference ASME Code Section/Article	Code Requirement	Exception, Justification, & Compensatory Measures
MPC basket supports and lift lugs	NB-1130	NB-1132.2(d) requires that the first connecting weld of a nonpressure-retaining structural attachment to a component shall be considered part of the component unless the weld is more than 2t from the pressure-retaining portion of the component, where t is the nominal thickness of the pressure-retaining material. NB-1132.2(e) requires that the first connecting weld of a welded nonstructural attachment to a component shall conform to NB-4430 if the connecting weld is within 2t from the pressure-retaining portion of the component.	The MPC basket supports (nonpressure-retaining structural attachment)and lift lugs (nonstructural attachments used exclusively for lifting an empty MPC) are welded to the inside of the pressure-retaining MPC shell, but are not designed in accordance with Subsection NB. The basket supports and associated attachment welds are designed to satisfy the stress limits of Subsection NG and the lift lugs and associated attachment welds are designed to satisfy the stress limits of Subsection NF, as a minimum. These attachments and their welds are shown by analysis to meet the respective stress limits for their service conditions. Likewise, non-structural items, such as shield plugs, spacers, etc. if used, can be attached to pressure-retaining parts in the same manner.
MPC, MPC basket assembly, and HI-STAR overpack steel structure.	NB-3100 NG-3100 NF-3100	Provides requirements for determining design loading conditions, such as pressure, temperature, and mechanical loads.	These requirements are not applicable. The HI-STAR FSAR, serving as the Design Specification, establishes the service conditions and load combinations for the storage system.
MPC	NB-3350	NB-3352.3 requires, for Category C joints, that the minimum dimensions of the welds and throat thickness shall be as shown in Figure NB-4243-1.	The MPC shell-to-baseplate weld joint design (designated Category C) does not include a reinforcing fillet weld or a bevel in the MPC baseplate, which makes it different than any of the representative configurations depicted in Figure NB-4243-1. The transverse thickness of this weld is equal to the thickness of the adjoining shell (1/2 inch). The weld is designed as a full penetration weld that receives VT and RT or UT, as well as final surface PT examinations. Because the MPC shell design thickness is considerably larger than the minimum thickness required by the Code, a reinforcing fillet weld that would intrude into the MPC cavity space is not included. Not including this fillet weld provides for a higher quality radiographic examination of the full penetration weld. From the standpoint of stress analysis, the fillet weld serves to reduce the local bending stress (secondary stress) produced by the gross structural discontinuity defined by the flat plate/shell junction. In the MPC design, the shell and baseplate thicknesses are well beyond that required to meet their respective membrane stress intensity limits.

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MPC and HI-STAR overpack steel structure	NB-4220 NF-4220	Requires certain forming tolerances to be met for cylindrical, conical, or spherical shells of a vessel.	The cylindricity measurements on the rolled shells are not specifically recorded in the shop travelers, as would be the case for a Code-stamped pressure vessel. Rather, the requirements on inter-component clearances (such as the MPC-to-overpack) are guaranteed through fixture-controlled manufacturing. The fabrication specification and shop procedures ensure that all dimensional design objectives, including inter-component annular clearances are satisfied. The dimensions required to be met in fabrication are chosen to meet the functional requirements of the dry storage components. Thus, although the post-forming Code cylindricity requirements are not evaluated for compliance directly, they are indirectly satisfied (actually exceeded) in the final manufactured components.
MPC basket assembly	NG-4420	NG-4427(a) requires a fillet weld in any single continuous weld may be less than the specified fillet weld dimension by not more than 1/16 inch, provided that the total undersize portion of the weld does not exceed 10 percent of the length of the weld. Individual undersize weld portions shall not exceed 2 inches in length.	Modify the Code requirement (intended for core support structures) with the following text prepared to accord with the geometry and stress analysis imperatives for the fuel basket: For the longitudinal MPC basket fillet welds, the following criteria apply: 1) The specified fillet weld throat dimension must be maintained over at least 92 percent of the total weld length. All regions of undersized weld must be less than 3 inches long and separated from each other by at least 9 inches. 2) Areas of undercuts and porosity beyond that allowed by the applicable ASME Code shall not exceed 1/2 inch in weld length. The total length of undercut and porosity over any 1-foot length shall not exceed 2 inches. 3) The total weld length in which items (1) and (2) apply shall not exceed a total of 10 percent of the overall weld length. The limited access of the MPC basket panel longitudinal fillet welds makes it difficult to perform effective repairs of these welds and creates the potential for causing additional damage to the basket assembly (e.g., to the neutron absorber and its sheathing) if repairs are attempted. 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 stress analysis. From the structural standpoint, the weld acceptance criteria are established to ensure that any departure from the ideal, continuous fillet weld seam would not alter the primary bending stresses on which the design of the fuel baskets is predicated. Stated differently, the permitted weld discontinuities are limited in size to ensure that they remain classifiable as local stress elevators ("peak stress", F, in the ASME Code for which specific stress intensity limits do not apply).

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MPC, MPC basket assembly, and HI-STAR overpack steel structure	NB-4120 NG-4120 NF-4120	NB-4121.2, NG-4121.2, and NF-4121.2 provide requirements for repetition of tensile or impact tests for material subjected to heat treatment during fabrication or installation.	In-shop operations of short duration that apply heat to a component, such as plasma cutting of plate stock, welding, machining, coating, and pouring of Holtite are not, unless explicitly stated by the Code, defined as heat treatment operations. For the steel parts in the HI-STAR 100 System components, the duration for which a part exceeds the off-normal temperature limit defined in Chapter 2 of the FSAR shall be limited to 24 hours in a particular manufacturing process (such as the Holtite pouring process).
HI-STAR overpack	NF-3320 NF-4720	NF-3324.6 and NF-4720 provide requirements for bolting.	These Code requirements are applicable to linear structures wherein bolted joints carry axial, shear, as well as rotational (torsional) loads. The overpack bolted connections in the structural load path are qualified by design based on the design loadings defined in the FSAR. Bolted joints in these components see no shear or torsional loads under normal storage conditions. Larger clearances between bolts and holes may be necessary to ensure shear interfaces located elsewhere in the structure engage prior to the bolts experiencing shear loadings (which occur only during side impact scenarios). Bolted joints that are subject to shear loads in accident conditions are qualified by appropriate stress analysis. Larger bolt-to-hole clearances help ensure more efficient operations in making these bolted connections, thereby minimizing time spent by operations personnel in a radiation area. Additionally, larger bolt-to-hole clearances allow interchangeability of the lids from one particular fabricated cask to another.