



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

May 8, 2002

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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
Alternatives to Codes and Standards – Cask Transfer Facility

References: 1. Holtec Projects 50438 and 5014
2. NRC Inspection Report 07200037/2001-002 (DNMS), dated August 13, 2001
3. NRC letter, Cynthia Pederson to Mr. Oliver Kingsley, Exelon Nuclear, dated May 3, 2002
4. Holtec letter, B. Gutherman to NRC Document Control Desk, dated May 6, 2002

Dear Sir:

As committed in today's telephone conversation with the Spent Fuel Project Office staff, we hereby submit this supplement to the Reference 4 request for approval of an alternative to the ASME Code pertaining to the Dresden Nuclear Power Station Cask Transfer Facility (CTF). This supplement corrects a typographical error in the cited Code articles, provides additional information regarding applicable codes and standards for the welding activities on the CTF, and makes a commitment to following Subsection NCA of the Code for future CTF weld records.

I. Correction of Typographical Error

The correct Code articles under which approval of the alternative means of compliance are requested are:

NCA-4134.9(b) and NCA 4134.10(b)

The text of the Code requirements as quoted in the Reference 4 letter remains correct.

II. Applicable Codes and Standards for CTF Weld Activities

This information is provided to supplement the "Alternative, Justification, and Compensatory Measures" section of the alternative request. The following codes and standards were used to govern the applicable activities pertaining to CTF welding (all ASME Code references are to the 1995 edition of the Code, including 1996 and 1997 addenda):

- a. Welder qualification and weld procedure qualifications: ASME Section IX
- b. Non-destructive examination: Performed in accordance with ASME Section V with acceptance criteria in accordance with ASME Section III, Subsection NF
- c. Weld inspector qualification: SNT-TC-1A, 1992 edition

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III. Future CTF Construction

We recognize that approval of the Reference 4 Code alternative request would be a one-time approval, applicable only to the Dresden CTF. Weld recordkeeping for any future CTF construction by Holtec will be in accordance with Subsection NCA of the ASME Code, Section III.

We thank the SFPO for their prompt action on this licensing action, which is required for Exelon to continue their ongoing fuel loading campaign at Dresden Station. 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

Concurrence:

Manufacturing

Quality Assurance

emcc: Mr. S. O'Connor, USNRC
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Document ID: 5014461