



Holtec Center, 555 Lincoln Drive West, Marlton, NJ 08053

Telephone (856) 797-0900

Fax (856) 797-0909

October 31, 2002

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

Subject: USNRC Docket No. 72-1014, TAC L23424
HI-STORM 100 Certificate of Compliance 1014
HI-STORM License Amendment Request 1014-2

- References:
1. Holtec Project 5014
 2. USNRC Letter, Julia M. Barto, to Holtec, B. Gutherman, "HI-STORM 100, Amendment 2, Acceptance Review", dated August 15, 2002.
 3. Holtec Letter, B. Gutherman, to USNRC Document Control Desk, dated September 25, 2002.

Dear Sir:

In accordance with the commitment made in our Reference 3 letter, we enclose herewith Revision 1 of License Amendment Request (LAR) 1014-2, proposing certain changes to the HI-STORM 100 System Certificate of Compliance (CoC). LAR 1014-2, Revision 1 completely replaces LAR 1014-2, Revision 0. All information necessary for the NRC to continue its review is contained in the enclosed submittal package, with appropriate cross-references to the HI-STORM FSAR, Revision 1. The discussions on the Reference 2 correspondence with the SFPO staff held since receipt of the letter have been most helpful in enabling us to provide this submittal package that addresses all of the issues enumerated in the letter, including those labeled as "Technical Issues for Further Evaluation." Even though no response was required for these issues at this time, we have proactively responded to them so as to expedite the review process.

As discussed in our Reference 3 letter, we have invoked the revised review guidance contained in Interim Staff Guidance (ISG) Document 11, Revision 2 in this amendment request. ISG-11, Revision 2 is a significant move forward for the state-of-the-art in thermal review criteria for dry storage cask systems, particularly in the area of permissible fuel cladding temperatures. The single, 400°C fuel cladding temperature limit for all NRR-approved fuel types for long-term storage and short-term operating conditions during loading, unloading, and onsite transport operations has allowed us to simplify the presentation of material in the FSAR, since the previous calculation of cooling time-specific fuel cladding temperature limits in accordance with the PNNL guidance led to a large amount of tabular data in the licensing documents.

The enclosed LAR package submittal retains the same overall format as the original submittal, with one additional document included as new Attachment 1, as described below. As stated in our Reference 3 letter, because Revision 1 of the HI-STORM FSAR was submitted after our original LAR submittal, FSAR Revision 1 has now become the "baseline" document against which the proposed changes supporting this amendment request are made. This should facilitate the reviewers' work effort in discerning the differences between the existing approved FSAR, Revision 1 and the proposed FSAR Revision 2A modifications that support the proposed CoC changes. The specific contents of each attachment in the LAR package are provided below. Each document has been

NM5501



Holtec Center, 555 Lincoln Drive West, Marlton, NJ 08053

Telephone (856) 797-0900

Fax (856) 797-0909

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Document ID 5014469
Page 2 of 3

revised as appropriate to address the issues raised in the acceptance review letter, consistent with our telephone conversations with the SFPO.

Attachment 1: Response to issues raised in the NRC's August 15, 2002 acceptance review letter. This attachment is presented in the manner of a response to an NRC Request for Additional Information.

Attachment 2: Summary of Proposed Changes, including a description, reason, and justification for each proposed change. This document has been appropriately revised to reflect modifications to the submittal made in response to the NRC's acceptance review.

Attachment 3: Mark-up of proposed CoC changes¹.

Attachment 4: Final version of proposed CoC changes¹.

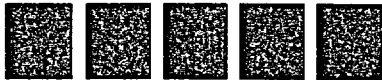
Attachment 5: Proposed FSAR changes are provided as follows:

- (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 HI-STORM FSAR, Revision 1, issued September 6, 2002. Sections and figures that include proposed changes made in support of this amendment request are labeled "Proposed Revision 2A" Sections and figures that are unaffected are not included in the LAR submittal package. 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. Certain editorial, conforming changes will be incorporated into FSAR Revision 2 at the next update.

Finally, 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 6 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 have been submitted for preparation of the rulemaking package.

¹ CoC sections that are not proposed to be changed are not included



HOLTEC INTERNATIONAL

Holtec Center, 555 Lincoln Drive West, Marlton, NJ 08053

Telephone (856) 797-0900

Fax (856) 797-0909

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Document ID 5014469
Page 3 of 3

We thank the SFPO for their continued diligent work on this amendment request, which is focused on reducing the overall radiation exposure to plant workers and the public from dry spent fuel storage activities. If you have any questions or require additional information, please contact the undersigned.

Sincerely,

Approved:

Brian Gutherman, P.E.
Licensing Manager

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

Attachments: 1-6, As Stated.

Document ID: 5014469

Discipline Concurrence	
Structural Mechanics Mr. Charles W. Bullard II	Thermal/Hydraulics Dr. Indresh Rampall:
Shielding Evaluation Dr. Everett Redmond II:	Criticality Evaluation Dr. Stefan Anton:
Confinement Evaluation Mr. Kris Cummings:	Operations and Radiation Protection Mr. John Griffiths:
Accident Evaluation Mr. Evan Rosenbaum:	Quality Assurance Mr. Mark Soler:

Distribution: Ms. Julia Barto, USNRC (2 proprietary hard copies, 6 proprietary CDs, 1 non-proprietary hard copy, and 1 nonproprietary CD, including attachments)

NRC Document Control Desk (original proprietary and non-proprietary hard copy versions, 1 proprietary CD and 1 non-proprietary CD, including attachments)

emcc: Mr. E.W. Brach (cover letter only)
Dr. Charles Miller, USNRC (cover letter only)
Mr. John Monninger, USNRC (cover letter only)
HUG Licensing Committee (cover letter only)
Holtec NRC Correspondence Distribution (cover letter only)
Holtec Groups 1, 2, and 4 (cover letter only)