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

Telephone (609) 797-0900
Fax (609) 797-0909

March 30, 1998

Mr. Charles Haughney
Acting Director
Spent Fuel Project Office, NMSS
Mail Stop O-6F18
U.S. Nuclear Regulatory Commission
11555 Rockville Pike
Rockville, MD 20852

Subject: HI-STAR™ Safety Analysis Report, Holtec Report HI-951251
NRC Docket No. 71-9261

HI-STAR™ Topical Safety Analysis Report, Holtec Report HI-941184
NRC Docket No. 72-1008

HI-STORM™ 100 Topical Safety Analysis Report, Holtec Report HI-951312
NRC Docket No. 72-1014

Dear Mr. Haughney:

Holtec has reviewed the Spent Fuel Project Office (SFPO) March 2, 1998, presentation to Private Fuel Storage (PFS) which included a projected date for the HI-STAR draft SER of February 1999, with the HI-STORM SER scheduled for sometime after the year 2000. Holtec is concerned that the scheduled presented to PFS by the NRC is not consistent with the Spring 1998 date for the HI-STAR SER previously provided to Holtec by the NRC. Holtec requests that you advise us of the actual date of the SER for the HI-STAR now that Holtec has submitted the last of the required documentation. Further, Holtec requests that the SFPO provide information regarding its expected review and milestone dates for the HI-STORM docket activities as well. These two items of information will be required to assess Holtec's ability to supply the storage technology necessary to support the operational needs of our existing clients.

As the result of the July 11, 1997, NRC meeting with Commonwealth Edison and Holtec, Holtec incorporated recommendations made by the Spent Fuel Project Office (SFPO) necessary to expedite the review process and assure that the HI-STAR SER would be issued by Spring 1998. These included:

- removal of "high seismic" analyses from TSAR;
- removal of credit for the thermosiphon (convective) effect in heat transfer calculations;

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- reanalysis of handling accidents to comply with the just-published Lawrence Livermore National Laboratory (LLNL) report; and
- penalize ^{10}B loading in Boral by 25%.

Although incorporation of the above recommendations resulted in the removal of methodology enhancements that were based on sound technical information from the HI-STAR design, Holtec incorporated these recommendations in order to assure that the SER for the HI-STAR would be issued by Spring 1998 to meet the needs of its lead customer, Commonwealth Edison. Furthermore, in meetings with the SFPO that Holtec attended in support of other customers, one of the primary concerns discussed has been the NRC review priority categories. Holtec's customers were assured by the SFPO in these meetings that the NRC review priority for their particular circumstances would support the 1998 SER schedule for the HI-STAR if Holtec incorporated the above described changes and no significant issues remained which would constitute the need for another Request for Additional Information (RAI). Holtec has worked closely with the NRC and its customers to assure that the response to the second round of RAIs were comprehensive and complete in addressing the issues identified by the NRC. To the best of our knowledge, there are no significant open issues that preclude certification of the HI-STAR design. For this reason, Holtec's customers are also very concerned with the SFPO review schedule presented to PFS.

With failure of the Department of Energy to meet its obligations to begin receiving spent nuclear fuel in 1998 and the resulting increased number of utilities that will require dry fuel storage, Holtec recognizes that the SFPO's work load has increased sharply. Additionally, it is recognized that the SFPO resources are limited and that budget constraints, in conjunction with other NRC priorities, continue to hamper your effort to achieve the staffing level necessary to address the increased work load. However, failure of the NRC to commit the sufficient resources to complete the review of the HI-STAR and HI-STORM designs in a timely manner will have serious impacts on both Holtec's customers and the nuclear industry as a whole. In view of the above, Holtec requests that the SFPO give the utmost priority to the HI-STAR and HI-STORM review. Moreover, Holtec requests that the



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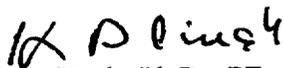
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SFPO provide an indication of its schedule expectations with regard to the HI-STAR and HI-STORM applications. This information is necessary to allow for adequate planning on the part of Holtec and its utility customer base to address serious issues with respect to nuclear power plant operation and spent fuel storage.

Sincerely,


K.P. Singh, Ph.D., PE
President and CEO
KPS:nlm

Distribution:

	<u>Utility/Organization</u>	<u>Holtec Project</u>
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