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### BY FAX AND OVERNIGHT MAIL

February 10, 1999

Mr. Mark S. Delligatti
Senior Project Manager
Spent Fuel Licensing Section, SFPO, NMSS
U.S. Nuclear Regulatory Commission
11555 Rockville Pike
Rockville, MD 20852

Subject: USNRC Docket No. 71-9261

HI-STAR 100 Safety Analysis Report, TAC No. L22085

Comment Resolution Letter L

References: 1. Holtec Project No. 5014

2. Comment Resolution Letter D, dated January 27, 1999

Dear Mr. Delligatti,

The purpose of this letter is to provide responses per our previous commitments in Comment Resolution Letter D (Ref. 2) to the Spent Fuel Project Office (SFPO) in support of the ongoing review of our HI-STAR 100 System under 10CFR71. In addition, new commitments resulting from a phone conversation held this morning are included.

### Commitments D.5.2 and D.5.3

Draft Revision 8 SAR Sections 5.2.3 and 5.4.4 are provided in Attachment 1 to this letter. These sections discuss the evaluation of stainless steel clad fuel. Draft Revision 8 SAR Tables 5.2.18 through 5.2.22 and 5.4.22 through 5.4.24 are also provided in Attachment 1. These tables provide the calculated source terms and dose rates for the stainless steel clad fuel.

The minimum <sup>235</sup>U enrichment for the damaged and MOX fuel has been lowered to 1.8 wt.% <sup>235</sup>U. Draft Revision 8 SAR Sections 5.4.2 and 5.4.3 and Tables 5.2.2, 5.2.6, and 5.2.14 through 5.2.17 are provided in Attachment 1. These sections and tables provide the discussion and calculated results for the damaged and MOX fuel.

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#### **NEW ITEMS**

L.1.1: Bolt torque values need to be on the Design Drawings or added as a license condition.

## Commitment

The bolt torques will be added to the Design Drawings included in the proposed Certificate of Compliance to be submitted to the NRC by February 22, 1999.

L.1.2: Drawing 1765, Sheet 7 has a reference to a pin and cap detail to Drawing 1546, which is not included in the SAR.

## Commitment

There are two references to the pin and cap details to which this note is referring. The details of the full scale pin and cap may be found on Sheet 2 of Drawing 1765, which can be found in the SAR. The details for the ¼ scale model are shown on Drawing 1546, Sheet 1. The reference on Drawing 1765, Sheet 7 will be clarified and submitted with SAR Revision 8 by February 22, 1999.

L.1.3: The minimum 6 foot distance between the bottom impact limiter and the edge of the transport vehicle should be specified in the Certificate of Compliance as a condition of transportation.

## Commitment

The 6 foot distance will be added as a condition in the proposed Certificate of Compliance to be submitted to the NRC by February 22, 1999.

If you have any questions or comments, please contact us.

Sincerely,

Bernard Gilligan

Project Manager, HI-STAR/HI-STORM Licensing



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Attachment: As Stated

# **Approvals:**

Brian Gutherman Licensing Manager K. P. Singh, Ph.D. President and CEO

# **Technical Concurrence:**

Dr. Everett Redmond II (Shielding Evaluation)

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