HOLTEC
INTERNATIONAL

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November 22, 2002

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
One-Time Alternative to Codes and Standards - Additional Affected Components

References: 1. Holtec Projects 5014, 1108, and 71188
2. Holtec Letter to NRC dated October 22, 2002

Dear Sir:

In the Reference 2 submittal, Holtec International requested a one-time approval of an alternative to the ASME Code due to a missed ultrasonic (UT) inspection on plate material used to fabricate a closure ring for MPC-68 Serial Number 36, which is in service at the Dresden Nuclear Station ISFSI. During a review of nonconformance reports by the MPC fabricator, U.S. Tool and Die (UST&D), to close this issue, it was discovered that the closure rings on two more in-service MPCs were affected: MPC-68 Serial Numbers 23 and 37. Holtec has since independently confirmed UST&D's review to ensure all affected components have now been identified.

The purpose of this correspondence it to request that MPC-68 Serial Number 23 (currently in service at Southern Nuclear Operating Company's Plant Hatch ISFSI) and MPC-68 Serial Number 37 (currently in service at Exelon's Dresden Nuclear Station ISFSI) be added to the list of applicable components for which this Code alternative is requested.

There is no change to the justification for this Code alternative as documented in the Reference 2 letter. Approval of this one-time ASME Code alternative is necessary to complete corrective actions associated with this material, but there is no safety significance to the deviation as described in the attachment to the Reference 2 letter. All affected in-service cask systems remain operable and fully able to perform their design functions. Therefore, we request approval of this one-time code alternative by January 31, 2003.

NMSS01

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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

Concurrence:

11/22/02
Manufacturing

11/22/02
Quality Assurance

emcc: Mr. Christopher Regan, USNRC
Mr. Ken Ainger, Exelon Nuclear
Mr. Terry Sides, Southern Nuclear
Mr. Bernard Gilligan, Holtec

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