

January 8, 2003

Mr. Brian Gutherman
Licensing Manager
Holtec International
555 Lincoln Drive West
Marlton, NJ 08053

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION - HOLTEC
HI-STORM 100 ASME CODE ALTERNATIVE

Dear Mr. Gutherman:

On October 22, 2002, and supplemented by letter dated November 22, 2002, Holtec International submitted a request to the Nuclear Regulatory Commission (NRC) proposing a one-time alternative to the ASME Code, Section III, Subsection NB requirement that certain components of the HI-STORM 100 Cask System be inspected by the ultrasonic method (UT) during fabrication. The affected casks are MPC-68 serial numbers 36 and 37 at Exelon's Dresden Nuclear Station and MPC-68 serial number 23 at Southern Nuclear Operating Company's Plant Hatch Independent Spent Fuel Storage Installation. The request was submitted in accordance with Section 3.3.2 of Appendix B to Certificate of Compliance No. 1014. Enclosed is the staff's request for additional information (RAI) for the continued review of your request.

Your full and complete response to the enclosed RAI is necessary for the staff to complete its review. Upon receipt of your RAI responses, we will perform an acceptance review to determine if sufficient information has been provided to allow completion of the review and inform you if the information provided is not complete. If you respond to the staff's RAI no later than February 25, 2003, and the staff finds the responses satisfactory, the staff will approve your request by early May 2003.

If you have any comments or questions concerning this request, you may contact me at (301) 415-1179. Please refer to Docket No. 72-1014 and TAC No. L23524 in future correspondence related to this request.

Sincerely,
/RA/

Christopher M. Regan, Project Manager
Licensing Section
Spent Fuel Project Office
Office of Nuclear Material Safety
and Safeguards

Docket No. 72-1014
TAC No. L23524

Enclosure: RAI on HI-STORM 100 ASME Code Alternative

January 8, 2003

Mr. Brian Gutherman
Licensing Manager
Holtec International
555 Lincoln Drive West
Marlton, NJ 08053

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION - HOLTEC
HI-STORM 100 ASME CODE EXCEPTIONS

Dear Mr. Gutherman:

On October 22, 2002, and supplemented by letter dated November 22, 2002, Holtec International submitted a request to the Nuclear Regulatory Commission (NRC) proposing a one-time alternative to the ASME Code, Section III, Subsection NB requirement that certain components of the HI-STORM 100 Cask System be inspected by the ultrasonic method (UT) during fabrication. The affected casks are MPC-68 serial numbers 36 and 37 at Exelon's Dresden Nuclear Station and MPC-68 serial number 23 at Southern Nuclear Operating Company's Plant Hatch Independent Spent Fuel Storage Installation. The request was submitted in accordance with Section 3.3.2 of Appendix B to Certificate of Compliance No. 1014. Enclosed is the staff's request for additional information (RAI) for the continued review of your request.

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Sincerely,
/RA/
Christopher M. Regan, Project Manager
Licensing Section
Spent Fuel Project Office
Office of Nuclear Material Safety
and Safeguards

Docket No. 72-1014
TAC No. L23524
Enclosure: RAI on HI-STORM 100 ASME Code Alternative

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**HI-STORM 100 CASK STORAGE SYSTEM
DOCKET NO. 72-1014
TAC NO. L23524**

REQUEST FOR ADDITIONAL INFORMATION

The following Request for Additional Information (RAI) has been identified by the U.S. Nuclear Regulatory Commission (NRC) staff, during its review of Holtec International's proposal for alternative to the requirements of the ASME Code for MPC-68 serial numbers 23, 36, and 37, specifically, relief from one of the provisions of the ASME Code, ultrasonic testing (UT) of plate material. The staff finds that most of the arguments advanced by Holtec International are valid. However, the staff needs additional analyses and information, not initially provided by Holtec International, in order to make a safety determination. Each RAI question describes information needed by the staff for it to complete its review of the request and to determine whether Holtec International has demonstrated compliance with regulatory requirements. The following questions are required for the staff to render a determination of compliance to 10 CFR 72.122.

RAI-1. Provide an analysis demonstrating the confinement/structural capability of the MPC closure ring to perform its intended function(s), assuming that the welds for which it is providing a redundant function were to fail (singly or in combination).

The first paragraph of the confinement discussion argues that the closure ring provides a redundant welded closure for the primary confinement boundary, but is not normally pressure retaining. The analysis must demonstrate that the MPC closure ring and welds would maintain confinement and meet Code stress allowables under normal, abnormal and accident conditions. Stating that the MPC closure ring does not normally perform this function is insufficient for demonstrating confinement/structural integrity under postulated conditions. Consideration of the effect(s) of postulated worst-case laminations upon the closure ring attachment welds should be included. For example, an analysis assuming two half thickness plates, simply stacked and otherwise unattached to each other except at the edge welds, may provide the bounding assumption.

RAI-2. How much area of the material from heat number 893771 has failed UT? The third paragraph of the confinement discussion mentions that 10,000 square inches of material from this heat have passed the Code required UT examination. Describe the nature of any defects discovered during examinations of other plates, lots, or heats of this material?

ROUTING AND TRANSMITTAL SLIP

NAME	INITIALS	DATE
SFPO Secy		
CRegan		
EZiegler		
JMonninger		
Secretary (dispatch)		

 ACTION: _____ APPROVAL: XX FOR YOUR INFO: _____
 NOTE & RETURN: _____ PREPARE REPLY: _____ COORDINATION: _____

EDO/NMSS TICKET NO(s):
 DUE TO DIVISION:
 DUE TO NMSS:
 DUE TO EDO:

 LETTER TO: Mr. Brian Gutherman
 FROM: Christopher M. Regan, Project Manager, SFPO
 SUBJECT: HI-STORM 100, ASME Code Alternative

REMARKS:

 ORIGINATOR: C. Regan PHONE: 415-1179
 SECRETARY: Debra Damiano PHONE: 415-2385
