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**From:** Paul Narbut, *NMS*  
**To:** M. Wayne Hodges; Timothy Kobetz  
**Date:** 11/23/01 9:38 AM  
**Subject:** Holtec Response to NOVs

I reviewed the attached November 21, 2001, Holtec response to our inspection report and NOVs. I received it by EMail today.

In general it is a thorough response. There are a couple of areas that need TRD review/input.

(1) The first involved Violation E for failure to list ASME Code exceptions. Holtec wishes to have a telephone discussion of their proposed criteria. I find fault with their proposed criteria 3, where the "Code requirement is ambiguous" and "subject to interpretation" and their proposal not to list these exceptions. Could you please have your people review this response for adequacy from the technical review expectation standpoint.

(PS- as an example of an ambiguity, they present some convoluted interpretation of NB-3351 to justify omitting the reinforcing fillets required by NB-4243-1; a hot topic affecting the already fabricated casks at Dresden and Hatch.)

2) Also they reference an October 24, 2001 letter (addressed to 20555 and received 11/21) which proposes criteria for when Holtec should notify NRC of proposed changes to a design under active NRC review. They request a meeting on this subject.

Please have your folks take a look at this response from TRD's standpoint. (I know Bob Shewmaker is examining the weld reinforcement issue, and Geoff Hornseth has been involved with the Code exception issues.)

Tim: Please arrange a call or meeting to discuss it. Please include me in this ... I would be happy to come in from leave to participate.....seriously.

We will write a thank-you-for-your-response letter after these questions are resolved.

Paul

**CC:** Adelaide Giantelli; Charles Miller; Christopher Jackson; Frank Jacobs; Geoffrey Hornseth; Michael Tokar; Robert Shewmaker; Robert Temps

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