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December 3, 2004

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555-0001

Subject: USNRC Docket No. 72-1014, TAC L23657
HI-STORM 100 Certificate of Compliance 1014
HI-STORM License Amendment Request 1014-2, Revision 2, Supplement 7

Reference: Holtec Project 5014

Dear Sir:

We herewith provide Supplement 7 to License Amendment Request (LAR) 1014-2, Revision 2. This supplement is submitted to include several minor changes in the Proposed FSAR text. Only affected subsections of the FSAR are submitted.

The following changes are made in this supplement:

1. One editorial correction is made on page 1.2-2, removing an incorrect statement about the height of the HI-STORM 100S.
2. Table 1.D.1 is modified to list separate temperature limits for the concrete in the HI-STORM lid and the remaining HI-STORM concrete. The lid concrete limit remains a through-thickness section average, while the remaining concrete limit is a local maximum.
3. Dolomite is removed from the list of a priori acceptable concrete aggregate types in the second footnote of Table 1.D.1.
4. Editorial changes are made to the first paragraph of Section 5.0 and the second footnote on page 5.0-1.

Instructions for updating the Proposed FSAR are as follows:

1. Replace pages 1 through 14 of the "List of Effective Pages for HI-STORM 100 FSAR Proposed Revision 2F" with pages 1 through 14 of the attached "List of Effective Pages for HI-STORM 100 FSAR Proposed Revision 2G".
2. Replace pages 1.2-1 through 1.2-41 of Proposed Revision 2F with pages 1.2-1 through 1.2-41 of the attached Proposed Revision 2G.
3. Replace pages 1.D-1 through 1.D-6 of Proposed Revision 2F with pages 1.D-1 through 1.D-6 of the attached Proposed Revision 2G.
4. Replace pages 5.0-1 through 5.0-3 of Proposed Revision 2F with pages 5.0-1 through 5.0-4 of the attached Proposed Revision 2G.

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We appreciate the SFPO's continued diligent review of this amendment. If you have any questions or require additional information, please contact us.

Sincerely,

Evan Rosenbaum, P.E.
Project Manager, LAR 1014-2

Approval:

Stefan Anton, Dr.-Ing.
Licensing Manager

Document ID: 5014547

Attachments: As Stated

emcc: Mr. Christopher Regan, USNRC
HUG Main and Licensing Groups (w/o attachments)
Holtec Groups 1, 2, and 4 (w/o attachments)

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LIST OF EFFECTIVE PAGES FOR HI-STORM 100 FSAR PROPOSED REVISION 2G

<u>Page(s)</u>	<u>Revision</u>
i through ix	2F

LIST OF EFFECTIVE PAGES FOR HI-STORM 100 FSAR PROPOSED REVISION 2G

Page(s)	Revision
1.0-1 through 1.0-31	2E
1.1-1 through 1.1-4	2C
Fig. 1.1.1	0
Fig. 1.1.1A	1
Fig. 1.1.2	0
Fig. 1.1.3 through 1.1.5	1
1.2-1 through 1.2-41	2G
Fig. 1.2.1 through 1.2.2	1
Fig. 1.2.3	2A
Fig. 1.2.4	1
Fig. 1.2.5 through 1.2.6	0
Fig. 1.2.7 through 1.2.9A	1
Fig. 1.2.10 through 1.2.12	0
Fig. 1.2.13 through 1.2.15	Deleted
Fig. 1.2.16a through 1.2.17d	0
Fig. 1.2.18	1
1.3-1	2B
1.4-1 through 1.4-3	1
Fig. 1.4.1 through 1.4.2	0
1.5-1 through 1.5-2	1
Drawings	See Section 1.5
Bills-of-Material	See Section 1.5
1.6-1 through 1.6-2	2C
1.A-1 through 1.A-7	1
Fig. 1.A.1 through 1.A-5	0
1.B-1 through 1.B-3	2B
1.B-4 through 1.B-20	Deleted
1.C-1	1
1.C-2	Deleted
1.C-3 through 1.C-4	0
1.C-5 through 1.C-6	Deleted
1.D-1 through 1.D-6	2G

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Page(s)	Revision
2.0-1 through 2.0-37	2E
2.1-1 through 2.1-69	2E
Fig. 2.1.1	2B
Fig. 2.1.2 through 2.1.2C	1
Fig. 2.1.2D	2B
Fig. 2.1.3 through 2.1.5	0
Fig. 2.1.6 through 2.1.8	Deleted
Fig. 2.1.9	2A
2.2-1 through 2.2-56	2F
2.3-1 through 2.3-22	2F
Fig. 2.3.1 through 2.3.4	0
2.4-1 through 2.4-3	2B
2.5-1	0
2.6-1 through 2.6-3	2C
2A-1 through 2.A-5	1
Fig. 2.A.1	1
2.B-1 through 2.B-4	2E
Fig. 2.B.1	1
2.C-1 through 2.C-2	2F
Fig. 2.C.1	2C

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Page(s)	Revision
3.0-1 through 3.0-10	2B
3.1-1 through 3.1-43	2B
Fig. 3.1.1 through 3.1.3	1
3.2-1 through 3.2-12	1
3.3-1 through 3.3-10	2F
3.4-1 through 3.4-125	2F
Fig. 3.4.1	0
Fig. 3.4.2	1
Fig. 3.4.3 through 3.4.4	0
Fig. 3.4.5	1
Fig. 3.4.6 through 3.4.9	0
Fig. 3.4.10	1
Fig. 3.4.11 through 3.4.29	0
Fig. 3.4.30 through 3.4.49	1
3.5-1 through 3.5-19	0
Fig. 3.5.1 through 3.5.9	0
3.6-1 through 3.6-9	2A
3.7-1 through 3.7-10	2F
3.8-1 through 3.8-2	1
3.A-1 through 3.A-15	1
Fig. 3.A.1 through 3.A.18	0
Appendix 3.B through 3.AS	Deleted

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<u>Page(s)</u>	<u>Revision</u>
4.0-1 through 4.0-3	2E
4.1-1 through 4.1-6	2E
4.2-1 through 4.2-11	2E
Fig. 4.2.1 through 4.2.2	Deleted
Fig. 4.2.3	2
4.3-1 through 4.3-23	2F
Fig. 4.3.1 through 4.3.4	Deleted
4.4-1 through 4.4-70	2F
Fig. 4.4.1 through 4.4.6	0
Fig. 4.4.7	2
Fig. 4.4.8	Deleted
Fig. 4.4.9	1
Fig. 4.4.10	0
Fig. 4.4.11	Deleted
Fig. 4.4.12 through 4.4.13	0
Fig. 4.4.14 through 4.4.15	Deleted
Fig. 4.4.16 through 4.4.17	1
Fig. 4.4.18	Deleted
Fig. 4.4.19 through 4.4.20	1
Fig. 4.4.21 through 4.4.23	Deleted
Fig. 4.4.24	0
Fig. 4.4.25 through 4.4.26	1
Fig. 4.4.27	2E
4.5-1 through 4.5-26	2E
Fig. 4.5.1	0
Fig. 4.5.2	1
Fig. 4.5.3	Deleted
4.6-1 through 4.6-2	2E
4.7-1 through 4.7-3	2E
4.A-1	Deleted
4.B-1 through 4.B-9	2E
Fig. 4.B.1 through 4.B.8	1

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Page(s)	Revision
5.0-1 through 5.0-4	2G
5.1-1 through 5.1-26	2F
Fig. 5.1.1	1
Fig. 5.1.2	0
Fig. 5.1.3	2B
Fig. 5.1.4	0
Fig. 5.1.5	0
Fig. 5.1.6	0
Fig. 5.1.7	0
Fig. 5.1.8	0
Fig. 5.1.9	0
Fig. 5.1.10	0
Fig. 5.1.11	0
Fig. 5.1.12	1
Fig. 5.1.13	2
5.2-1 through 5.2-58	2F
5.3-1 through 5.3-14	2F
Fig. 5.3.1	1
Fig. 5.3.2	0
Fig. 5.3.3	0
Fig. 5.3.4	1
Fig. 5.3.5	0
Fig. 5.3.6	0
Fig. 5.3.7	1
Fig. 5.3.8	0
Fig. 5.3.9	0
Fig. 5.3.10	2
Fig. 5.3.11	1
Fig. 5.3.12	0
Fig. 5.3.13	0
Fig. 5.3.14	1
Fig. 5.3.15	1
Fig. 5.3.16	1
Fig. 5.3.17	1
Fig. 5.3.18	1
Fig. 5.3.19	2
Fig. 5.3.20	1
Fig. 5.3.21	1
Fig. 5.3.22	2
5.4-1 through 5.4-35	2F
5.5-1	0
5.6-1 through 5.6-3	2F
5.A-1 through 5.A-3	0
5.B-1 through 5.B-7	0
5.C-1 through 5.C-61	0
5.D-1 through 5.D-6	1
5.E-1 through 5.E-4	1
5.F-1 through 5.F.11	2F

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Page(s)	Revision
6.1-1 through 6.1-19	2B
6.2-1 through 6.2-64	2B
6.3.1 through 6.3.18	2B
Fig. 6.3.1	1
Fig. 6.3.1A	1
Fig. 6.3.2	1
Fig. 6.3.3	0
Fig. 6.3.4	1
Fig. 6.3.5	1
Fig. 6.3.6	0
Fig. 6.3.7	1
6.4-1 through 6.4-33	2B
Fig. 6.4.1	Deleted
Fig. 6.4.2 through 6.4.15	1
Fig. 6.4.16	2
Fig. 6.4.17	2A
6.5-1	0
6.6-1	0
6.7-1 and 6.7-2	1
6.A-1 through 6.A-20	1
Fig. 6.A.1 through 6.A.6	0
6.B-1 and 6.B-2	0
6.C-1 through 6.C.17	2B
6.D-1 through 6.D.35	1

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Page(s)	Revision
7.0-1	2B
7.1-1 through 7.1-8	2F
Fig. 7.1.1	0
7.2-1	2B
7.2-2 through 7.2-12	Deleted
7.3-1	2B
7.3-2 through 7.3-21	Deleted
7.4-1 through 7.4-2	2B
7.A-1	2
7.A-2 through 7.A-91	Deleted

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Page(s)	Revision
8.0-1 through 8.0-6	2F
8.1-1 through 8.1-42	2F
Fig. 8.1.1	1
Fig. 8.1.2a and 8.1.2b	0
Fig. 8.1.2c and 8.1.2d	1
Fig. 8.1.2e and 8.1.2f	0
Fig. 8.1.3	0
Fig. 8.1.4	1
Fig. 8.1.5 and 8.1.6	0
Fig. 8.1.7	1
Fig. 8.1.8 through 8.1.11	0
Fig. 8.1.12 and 8.1.13	1
Fig. 8.1.14 through 8.1.17	0
Fig. 8.1.18 through 8.1.21	1
Fig. 8.1.22a and 8.1.22b	1
Fig. 8.1.23	1
Fig. 8.1.24	0
Fig. 8.1.25 through 8.1.28	1
Fig. 8.1.29a and 8.1.29b	1
Fig. 8.1.30 and 8.1.31	1
Fig. 8.1.32	0
Fig. 8.1.33 and 8.1.34a	1
Fig. 8.1.34b	Deleted
Fig. 8.1.35 and 8.1.36	0
Fig. 8.1.37	1
8.2-1	2B
8.3-1 through 8.3.11	2E
Fig. 8.3.1 and 8.3.2a	1
Fig. 8.3.2b through 8.3.2d	0
Fig. 8.3.3	0
Fig. 8.3.4	1
8.4-1	2E
8.4-2	2E
Fig. 8.4-1a	0
Fig. 8.4-1b	1
8.5-1 through 8.5-5	2E
Fig. 8.5-1	0
8.6-1	1

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9.0-1	0
9.1-1 through 9.1-30	2F
9.2-1 through 9.2-4	2F
9.3-1	1
9.4-1	0

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<u>Page(s)</u>	<u>Revision</u>
10.1-1 through 10.1-8	1
Fig. 10.1.1	1
10.2-1	2A
10.3-1 through 10.3-3	2C
10.3-4 through 10.3-43	2B
Fig. 10.3.1a	1
Fig. 10.3.1b	1
Fig. 10.3.1c	1
Fig. 10.3.1d	1
Fig. 10.3.1e	1
10.4-1 through 10.4-5	2F
10.5-1	0

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Page(s)	Revision
11.1-1 through 11.1-20	2F
11.2-1 through 11.2-52	2E
Fig. 11.2.1	0
Fig. 11.2.2 through 11.2.5	Deleted
Fig. 11.2.6	1
Fig. 11.2.7	Deleted
11.3-1	1

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12.0-1	0
12.1-1 through 12.1-3	2C
12.2-1 through 12.2-8	2E
12.3-1	0
12.4-1	0
12.5-1	0
Appendix 12.A Cover	2E
TS Bases TOC	2C
B 3.0-1 through B 3.0-9	0
B 3.1.1-1 through B 3.1.1-8	2E
B 3.1.2-1 through B 3.1.2-7	2E
B 3.1.3-1 through B 3.1.3-7	2E
B 3.1.4-1 through B 3.1.4-3	2C
B 3.2.1-1	2A
B 3.2.1-2 through B 3.2.1-3	Deleted
B 3.2.2-1 through B 3.2.2-3	1
B 3.2.3-1 through B 3.2.3-3	Deleted
B 3.3.1-1 through B 3.3.1-5	2B
Appendix 12.B Cover	2E

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Page(s)	Revision
13.0-1 through 13.0-2	2B
13.1-1 through 13.1-2	Deleted
13.2-1	Deleted
13.3-1 through 13.3-17	Deleted
13.4-1	Deleted
13.5-1 through 13.5-2	Deleted
13.6-1	2A
Appendix 13.A	Deleted
Appendix 13.B	Deleted

1.2 GENERAL DESCRIPTION OF HI-STORM 100 System

1.2.1 System Characteristics

The basic HI-STORM 100 System consists of interchangeable MPCs providing a confinement boundary for BWR or PWR spent nuclear fuel, a storage overpack providing a structural and radiological boundary for long-term storage of the MPC placed inside it, and a transfer cask providing a structural and radiological boundary for transfer of a loaded MPC from a nuclear plant spent fuel storage pool to the storage overpack. Figure 1.2.1 provides a cross sectional view of the HI-STORM 100 System with an MPC inserted into a storage overpack. Figure 1.2.1A provides a cross sectional view of the HI-STORM 100 System with an MPC inserted into a HI-STORM 100S storage overpack. Each of these components is described below, including information with respect to component fabrication techniques and designed safety features. All structures, systems, and components of the HI-STORM 100 System which are identified as Important to Safety are specified in Table 2.2.6. This discussion is supplemented with a full set of detailed design drawings in Section 1.5.

The HI-STORM 100 System is comprised of three discrete components:

- i. multi-purpose canister (MPC)
- ii. storage overpack (HI-STORM)
- iii. transfer cask (HI-TRAC)

Necessary auxiliaries required to deploy the HI-STORM 100 System for storage are:

- i. vacuum drying (or other moisture removal) system
- ii. helium (He) backfill system ~~with leakage detector~~
- iii. lifting and handling systems
- iv. welding equipment
- v. transfer vehicles/trailer

All MPCs have identical exterior dimensions that render them interchangeable. The outer diameter of the MPC is 68-3/8 inches[†] and the overall length is 190-1/2 inches. See Section 1.5 for the ~~detailed design MPC~~ drawings. Due to the differing storage contents of each MPC, the maximum loaded weight differs among MPCs. See Table 3.2.1 for each MPC weight. However, the maximum weight of a loaded MPC is approximately 44-1/2 tons. Tables 1.2.1 and 1.2.2 contain the key *system data and parameters* for the MPCs.

A single, base HI-STORM overpack design is provided which is capable of storing each type of MPC. The overpack inner cavity is sized to accommodate the MPCs. The inner diameter of the overpack inner shell is 73-1/2 inches and the height of the cavity is 191-1/2 inches. The overpack

[†] Dimensions discussed in this section are considered nominal values.

inner shell is provided with channels distributed around the inner cavity to present an inside diameter of 69-1/2 inches. The channels are intended to offer a flexible medium to absorb some of the impact during a non-mechanistic tip-over, while still allowing the cooling air flow through the ventilated overpack. The outer diameter of the overpack is 132-1/2 inches. The overall height of the HI-STORM 100 and the HI-STORM 100S is 239-1/2 inches. There are two versions of the HI-STORM 100S overpack, differing only in height and weight. The HI-STORM 100S(232) is 232 inches high, and the HI-STORM 100S(243) is 243 inches high. The HI-STORM 100S(243) is approximately 10,100 lbs heavier, including concrete. Hereafter in the text, these two versions of the HI-STORM 100S overpack will only be referred to as HI-STORM 100S and will be discussed separately only if the design feature being discussed is different between the two overpacks. See Section 1.5 for drawings. The weight of the overpack without an MPC is approximately 135 tons. See Table 3.2.1 for the detailed weights.

Before proceeding to present detailed physical data on the HI-STORM 100 System, it is of contextual importance to summarize the design attributes which enhance the performance and safety of the system. Some of the principal features of the HI-STORM 100 System which enhance its effectiveness as an SNF storage device and a safe SNF confinement structure are:

- the honeycomb design of the MPC fuel basket;
- the effective distribution of neutron and gamma shielding materials within the system;
- the high heat dissipation capability;
- engineered features to promote convective heat transfer;
- the structural robustness of the steel-concrete-steel overpack construction.

The honeycomb design of the MPC fuel baskets renders the basket into a multi-flange plate weldment where all structural elements (i.e., box walls) are arrayed in two orthogonal sets of plates. Consequently, the walls of the cells are either completely co-planar (i.e., no offset) or orthogonal with each other. There is complete edge-to-edge continuity between the contiguous cells.

Among the many benefits of the honeycomb construction is the uniform distribution of the metal mass of the basket over the entire length of the basket. Physical reasoning suggests that a uniformly distributed mass provides a more effective shielding barrier than can be obtained from a nonuniform basket. In other words, the honeycomb basket is a most effective radiation attenuation device. The complete cell-to-cell connectivity inherent in the honeycomb basket structure provides an uninterrupted heat transmission path, making the MPC an effective heat rejection device.

The composite shell construction in the overpack, steel-concrete-steel, allows ease of fabrication and eliminates the need for the sole reliance on the strength of concrete.

A description of each of the components is provided in the following sections, along with information with respect to its fabrication and safety features. This discussion is supplemented with the full set of drawings in Section 1.5.

1.2.1.1 Multi-Purpose Canisters

The MPCs are welded cylindrical structures as shown in cross sectional views of Figures 1.2.2 through 1.2.4. The outer diameter and cylindrical height of each MPC are fixed. Each spent fuel MPC is an assembly consisting of a honeycombed fuel basket, a baseplate, canister shell, a lid, and a closure ring, as depicted in the MPC cross section elevation view, Figure 1.2.5. The number of spent nuclear fuel storage locations in each of the MPCs depends on the fuel assembly characteristics.

There are ~~seven-eight~~ MPC models, distinguished by the type and number of fuel assemblies authorized for loading. *Section 1.2.3 and Table 1.2.1 summarize the allowable contents for each MPC model. Section 2.1.9 provides the detailed specifications for the contents authorized for storage in the HI-STORM 100 System.* ~~The MPC-24 is designed to store up to 24 intact PWR fuel assemblies. The MPC-24E is designed to store up to 24 total PWR fuel assemblies including up to four (4) damaged PWR fuel assemblies. The MPC-24EF is designed to store up to 24 total PWR fuel assemblies including up to four (4) damaged PWR fuel assemblies or fuel classified as fuel debris. The MPC-68 is designed to store up to 68 total BWR fuel assemblies including up to 68 damaged Dresden Unit 1 or Humboldt Bay BWR fuel assemblies. Damaged BWR fuel assemblies other than Dresden Unit 1 and Humboldt Bay are limited to 16 fuel storage locations in the MPC-68 with the remainder being intact BWR fuel assemblies, up to a total of 68. The MPC-68F is designed to store up to 68 intact or damaged Dresden Unit 1 and Humboldt Bay BWR fuel assemblies. Up to four of the 68 fuel storage locations in the MPC-68F may be Dresden Unit 1 and Humboldt Bay BWR fuel assemblies classified as fuel debris. The MPC-68FF is designed to store up to 68 total BWR fuel assemblies including up to 16 damaged BWR fuel assemblies. Up to eight (8) of the 16 BWR damaged fuel assembly storage locations may be filled with BWR fuel classified as fuel debris. In addition, all fuel loading combinations permitted in the MPC-68F are also permitted in the MPC-68FF.~~ Design Drawings for all of the MPCs are provided in Section 1.5.

The MPC provides the confinement boundary for the stored fuel. Figure 1.2.6 provides an elevation view of the MPC confinement boundary. The confinement boundary is defined by the MPC baseplate, shell, lid, port covers, and closure ring. The confinement boundary is a strength-welded enclosure of all stainless steel construction.

The PWR MPC-24, MPC-24E and MPC-24EF differ in construction from the MPC-32 (including the MPC-32F) and the MPC-68 (including the MPC-68F and MPC-68FF) in one important aspect: the fuel storage cells *in the MPC-24 series* are physically separated from one another by a "flux trap", for criticality control. The PWR MPC-32 and -32F are is-designed similar to the MPC-68 (without flux traps) and its design includes credit for soluble boron in the MPC water during wet fuel loading and unloading operations for criticality control.

The MPC fuel baskets of non-flux trap construction (namely, MPC-68, MPC-68F, MPC-68FF, and MPC-32, and MPC-32F) are formed from an array of plates welded to each other at their intersections. In the flux-trap type fuel baskets (MPC-24, MPC-24E, and MPC-24EF), formed angles are interposed onto the orthogonally configured plate assemblage to create the required flux-trap channels (see MPC-24 and MPC-24E design-fuel basket drawings in Section 1.5). In both configurations, two key attributes of the basket are preserved:

- i. The cross section of the fuel basket simulates a multi-flanged closed section beam, resulting in extremely high bending rigidity.
- ii. The principal structural frame of the basket consists of co-planar plate-type members (i.e., no offset).

This structural feature eliminates the source of severe bending stresses in the basket structure by eliminating the offset between the cell walls that must transfer the inertia load of the stored SNF to the basket/MPC interface during the various postulated accident events (e.g., non-mechanistic tipover, uncontrolled lowering of a cask during on-site transfer, or off-site transport events, etc.).

The MPC fuel basket is positioned and supported within the MPC shell by a set of basket supports welded to the inside of the MPC shell. Between the periphery of the basket, the MPC shell, and the basket supports, optional *aluminum* heat conduction elements (AHCEs) may have been installed in the early vintage MPCs fabricated, certified, and loaded under the original version or Amendment 1 of the HI-STORM 100 System CoC. The presence of these aluminum heat conduction elements is acceptable for MPCs loaded under the original CoC or Amendment 1, since the governing thermal analysis for Amendment 1 conservatively modeled the AHCEs as restrictions to convective flow in the basket, but took no credit for heat transfer through them. The heat loads authorized under Amendment 1 bound those for the original CoC, with the same MPC design. For MPCs loaded under Amendment 2 or a later version of the HI-STORM 100 CoC, the aluminum heat conduction elements shall not be installed. MPCs both with and without aluminum heat conduction elements installed are compatible with all HI-STORM overpacks. If used, these heat conduction elements are fabricated from thin aluminum alloy 1100 in shapes and a design that allows a snug fit in the confined spaces and ease of installation. If used, the heat conduction elements are installed along the full length of the MPC basket except at the drain pipe location to create a nonstructural thermal connection that facilitates heat transfer from the basket to shell. In their operating condition, the heat conduction elements contact the MPC shell and basket walls.

Lifting lugs attached to the inside surface of the MPC canister shell serve to permit placement of the empty MPC into the HI-TRAC transfer cask. The lifting lugs also serve to axially locate the MPC lid prior to welding. These internal lifting lugs are not used to handle a loaded MPC. Since the MPC lid is installed prior to any handling of a loaded MPC, there is no access to the lifting lugs once the MPC is loaded.

The top end of the MPC incorporates a redundant closure system. Figure 1.2.6 shows the MPC closure details. The MPC lid is a circular plate (fabricated from one piece, or two pieces - split top and bottom) edge-welded to the MPC outer shell. If the two-piece lid design is employed, only the top piece is analyzed as part of the enclosure vessel pressure boundary. The bottom piece acts as a radiation shield and is attached to the top piece with a non-structural, non-pressure retaining weld. The lid is equipped with vent and drain ports that are utilized to remove moisture and air from the MPC, and backfill the MPC with a specified amount of inert gas (helium). The vent and drain ports are covered and seal welded before the closure ring is installed. The closure ring is a circular ring edge-welded to the MPC shell and lid. The MPC lid provides sufficient rigidity to allow the entire MPC loaded with SNF to be lifted by threaded holes in the MPC lid.

To maintain a constant exterior axial length between the PWR MPCs and the BWR MPCs the thickness of the PWR MPCs' lid is $\frac{1}{2}$ inch thinner than the MPC-68's' lid to accommodate the longest PWR fuel assembly which is approximately a $\frac{1}{2}$ inch longer than the longest BWR fuel assembly. For fuel assemblies that are shorter than the design basis length, upper and lower fuel spacers (as appropriate) maintain the axial position of the fuel assembly within the MPC basket. The upper fuel spacers are threaded into the underside of the MPC lid as shown in Figure 1.2.5. The lower fuel spacers are placed in the bottom of each fuel basket cell. The upper and lower fuel spacers are designed to withstand normal, off-normal, and accident conditions of storage. An axial clearance of approximately 2 inches is provided to account for the irradiation and thermal growth of the fuel assemblies. The suggested values for the upper and lower fuel spacer lengths are listed in Tables 2.1.9 and 2.1.10 for each fuel assembly type. The actual length of fuel spacers will be determined on a site-specific or fuel assembly-specific basis.

The MPC is constructed entirely from stainless steel alloy materials (except for the neutron absorber and optional aluminum heat conduction elements). No carbon steel parts are permitted in the MPC. Concerns regarding interaction of coated carbon steel materials and various MPC operating environments [1.2.1] are not applicable to the MPC. All structural components in a MPC shall be made of Alloy X, a designation which warrants further explanation.

Alloy X is a material that is expected to be acceptable as a Mined Geological Disposal System (MGDS) waste package and which meets the thermophysical properties set forth in this document.

At this time, there is considerable uncertainty with respect to the material of construction for an MPC that would be acceptable as a waste package for the MGDS. Candidate materials being considered for acceptability by the DOE include:

- Type 316
- Type 316LN
- Type 304
- Type 304LN

The DOE material selection process is primarily driven by corrosion resistance in the potential environment of the MGDS. As the decision regarding a suitable material to meet disposal requirements is not imminent, the MPC design allows the use of any one of the four Alloy X materials.

For the MPC design and analysis, Alloy X (as defined in this FSAR) may be one of the following materials. Only a single alloy from the list of acceptable Alloy X materials may be used in the fabrication of a single MPC basket or shell - the basket and shell may be of different alloys in the same MPC.

- Type 316
- Type 316LN
- Type 304
- Type 304LN

The Alloy X approach is accomplished by qualifying the MPC for all mechanical, structural, neutronic, radiological, and thermal conditions using material thermophysical properties that are the least favorable for the entire group for the analysis in question. For example, when calculating the rate of heat rejection to the outside environment, the value of thermal conductivity used is the lowest for the candidate material group. Similarly, the stress analysis calculations use the lowest value of the ASME Code allowable stress intensity for the entire group. Stated differently, we have defined a material, which is referred to as Alloy X, whose thermophysical properties, from the MPC design perspective, are the least favorable of the candidate materials.

The evaluation of the Alloy X constituents to determine the least favorable properties is provided in Appendix 1.A.

The Alloy X approach is conservative because no matter which material is ultimately utilized in the MPC construction, the Alloy X approach guarantees that the performance of the MPC will exceed the analytical predictions contained in this document.

1.2.1.2 Overpacks

1.2.1.2.1 HI-STORM 100 Overpack (Storage)

The HI-STORM 100 and 100S overpacks are rugged, heavy-walled cylindrical vessels. Figures 1.2.7, 1.2.8, and 1.2.8A provide cross sectional views of the HI-STORM 100 System, showing both of the overpack designs, respectively. The HI-STORM 100A is an anchored variant of the same structure and hereinafter is identified by name only when the discussion specifically applies to the anchored overpack. The HI-STORM 100A differs only in the diameter of the overpack baseplate and the presence of bolt holes and associated anchorage hardware (see Figures 1.1.4 and 1.1.5). The main structural function of the storage overpack is provided by carbon steel, and the main shielding function is provided by plain concrete. The overpack plain concrete is enclosed by cylindrical steel shells, a thick steel baseplate, and a top plate. The

overpack lid has appropriate concrete shielding to provide neutron and gamma attenuation in the vertical direction.

The storage overpack provides an internal cylindrical cavity of sufficient height and diameter for housing an MPC. The inner shell of the overpack has channels attached to its inner diameter. The channels provide guidance for MPC insertion and removal and a flexible medium to absorb impact loads during the non-mechanistic tip-over, while still allowing the cooling air flow to circulate through the overpack. Shims may be attached to channels to allow the proper inner diameter dimension to be obtained.

The storage system has air ducts to allow for passive natural convection cooling of the contained MPC. *A minimum of four* air inlets and four air outlets are located at the lower and upper extremities of the storage system, respectively. The location of the air outlets in the HI-STORM 100 and the HI-STORM 100S design differ in that the outlet ducts for the HI-STORM 100 overpack are located in the overpack body and are aligned vertically with the inlet ducts at the bottom of the overpack body. The air outlet ducts in the HI-STORM 100S are integral to the lid assembly and are not in vertical alignment with the inlet ducts. The location of the air inlet ducts is same for both the HI-STORM 100 and the HI-STORM 100S. The air inlets and outlets are covered by a fine mesh screen to reduce the potential for blockage. Routine inspection of the screens (or, alternatively, temperature monitoring) ensures that blockage of the screens themselves will be detected and removed in a timely manner. Analysis, described in Chapter 11 of this FSAR, evaluates the effects of partial and complete blockage of the air ducts.

The ~~four~~ air inlets and ~~four~~ air outlets are penetrations through the thick concrete shielding provided by the HI-STORM 100 overpack. The outlet air ducts for the HI-STORM 100S overpack, integral to the lid, present a similar break in radial shielding. Within the air inlets and outlets, an array of gamma shield cross plates are installed (see Figure 5.3.19 for a pictorial representation of the gamma shield cross plate designs). These gamma shield cross plates are designed to scatter any particles traveling through the ducts. The result of scattering the particles in the ducts is a significant decrease in the local dose rates around the four air inlets and four air outlets. The configuration of the gamma shield cross plates is such that the increase in the resistance to flow in the air inlets and outlets is minimized. The shielding analysis conservatively credits only the mandatory version of the gamma shield cross plate design because they provide less shielding than the optional design. Conversely, the thermal analysis conservatively evaluates the optional gamma shield cross plate design because it conservatively provides greater resistance to flow than the mandatory design.

Four threaded anchor blocks at the top of the overpack are provided for lifting. The anchor blocks are integrally welded to the radial plates which in turn are full-length welded to the overpack inner shell, outer shell, and baseplate (HI-STORM 100) or the inlet air duct horizontal plates (HI-STORM 100S) (see Figure 1.2.7). The four anchor blocks are located on 90° arcs around the circumference of the overpack. The overpack may also be lifted from the bottom using specially-designed lifting transport devices, including hydraulic jacks, air pads, Hillman rollers, or other design based on site-specific needs and capabilities. Slings or other suitable

devices mate with lifting lugs that are inserted into threaded holes in the top surface of the overpack lid to allow lifting of the overpack lid. After the lid is bolted to the storage overpack main body, these lifting bolts shall be removed and replaced with flush plugs.

The plain concrete between the overpack inner and outer steel shells is specified to provide the necessary shielding properties (dry density) and compressive strength. The concrete shall be in accordance with the requirements specified in Appendix 1.D.

The principal function of the concrete is to provide shielding against gamma and neutron radiation. However, in an implicit manner it helps enhance the performance of the HI-STORM overpack in other respects as well. For example, the massive bulk of concrete imparts a large thermal inertia to the HI-STORM overpack, allowing it to moderate the rise in temperature of the system under hypothetical conditions when all ventilation passages are assumed to be blocked. The case of a postulated fire accident at the ISFSI is another example where the high thermal inertia characteristics of the HI-STORM concrete control the temperature of the MPC. Although the annular concrete mass in the overpack shell is not a structural member, it does act as an elastic/plastic filler of the inter-shell space, such that, while its cracking and crushing under a tip-over accident is not of significant consequence, its deformation characteristics are germane to the analysis of the structural members.

Density and compressive strength are the key parameters which delineate the performance of concrete in the HI-STORM System. The density of concrete used in the inter-shell annulus, pedestal, and HI-STORM lid has been set as defined in Appendix 1.D. For evaluating the physical properties of concrete for completing the analytical models, conservative formulations of Reference [1.0.5] are used.

To ensure the stability of the concrete at temperature, the concrete composition has been specified in accordance with NUREG-1536, "Standard Review Plan for Dry Cask Storage Systems" [1.0.3]. Thermal analyses, presented in Chapter 4, show that the temperatures during normal storage conditions do not threaten the physical integrity of the HI-STORM overpack concrete.

There are two base HI-STORM overpack designs - HI-STORM 100 and HI-STORM 100S. The significant differences between the two are overpack height, MPC pedestal height, location of the air outlet ducts, and the vertical alignment of the inlet and outlet air ducts. The HI-STORM 100 overpack is approximately 240 inches high from the bottom of the baseplate to the top of the lid bolts and 227 inches high without the lid installed. There are two versions of the HI-STORM 100S overpack design, differing only in height and weight. The HI-STORM 100S(232) is approximately 232 inches from the bottom of the baseplate to the top of the lid bolts in its final storage configuration and 211 inches high without the lid installed. The HI-STORM 100S(243) is approximately 243 inches from the bottom of the baseplate to the top of the lid bolts in its final storage configuration and 222 inches high without the lid installed.

The anchored embodiment of the HI-STORM overpack is referred to as HI-STORM 100A. As explained in the foregoing, the HI-STORM overpack is a steel weldment, which makes it a relatively simple matter to extend the overpack baseplate, form lugs, and then anchor the cask to the reinforced concrete structure of the ISFSI. In HI-STORM terminology, these lugs are referred to as "sector lugs." The sector lugs, as shown in Figure 1.1.5 and the drawing in Section 1.5, are formed by extending the HI-STORM overpack baseplate, welding vertical gussets to the baseplate extension and to the overpack outer shell and, finally, welding a horizontal lug support ring in the form of an annular sector to the vertical gussets and to the outer shell. The baseplate is equipped with regularly spaced clearance holes (round or slotted) through which the anchor studs can pass. The sector lugs are bolted to the ISFSI pad using anchor studs that are made of a creep-resistant, high-ductility, environmentally compatible material. The bolts are pre-loaded to a precise axial stress using a "stud tensioner" rather than a torque wrench. Pre-tensioning the anchors using a stud tensioner eliminates any shear stress in the bolt, which is unavoidable if a torquing device is employed (Chapter 3 of the text "Mechanical Design of Heat Exchangers and Pressure Vessel Components", by Arcturus Publishers, 1984, K.P. Singh and A.I. Soler, provides additional information on stud tensioners). The axial stress in the anchors induced by pre-tensioning is kept below 75% of the material yield stress, such that during the seismic event the maximum bolt axial stress remains below the limit prescribed for bolts in the ASME Code, Section III, Subsection NF (for Level D conditions). Figures 1.1.4 and 1.1.5 provide visual depictions of the anchored HI-STORM 100A configuration. This configuration also applies to the HI-STORM 100SA.

The anchor studs pass through liberal clearance holes (circular or slotted) in the sector lugs (0.75" minimum clearance) such that the fastening of the studs to the ISFSI pad can be carried out without mechanical interference from the body of the sector lug. The two clearance hole configurations give the ISFSI pad designer flexibility in the design of the anchor embedment in the ISFSI concrete. The axial force in the anchors produces a compressive load at the overpack/pad interface. This compressive force, F , imparts a lateral load bearing capacity to the cask/pad interface that is equal to μF ($\mu \leq 0.53$ per Table 2.2.8). As is shown in Chapter 3 of this FSAR, the lateral load-bearing capacity of the HI-STORM/pad interface (μF) is many times greater than the horizontal (sliding) force exerted on the cask under the postulated DBE seismic event. Thus, the potential for lateral sliding of the HI-STORM 100A System during a seismic event is precluded, as is the potential for any bending action on the anchor studs.

The seismic loads, however, will produce an overturning moment on the overpack that would cause a redistribution of the compressive contact pressure between the pad and the overpack. To determine the pulsation in the tensile load in the anchor studs and in the interface contact pressure, bounding static analysis of the preloaded configuration has been performed. The results of the static analysis demonstrate that the initial preloading minimizes pulsations in the stud load. A confirmatory non-linear dynamic analysis has also been performed using the time-history methodology described in Chapter 3, wherein the principal nonlinearities in the cask system are incorporated and addressed. The calculated results from the dynamic analysis confirm the static analysis results and that the presence of pre-stress helps minimize the pulsation in the anchor stud stress levels during the seismic event, thus eliminating any concern with regard to fatigue failure under extended and repetitive seismic excitations.

The sector lugs in HI-STORM 100A are made of the same steel material as the baseplate and the shell (SA516- Gr. 70) which helps ensure high quality fillet welds used to join the lugs to the body of the overpack. The material for the anchor studs can be selected from a family of allowable stud materials listed in the ASME Code (Section II). A representative sampling of permitted materials is listed in Table 1.2.7. The menu of materials will enable the ISFSI owner to select a fastener material that is resistant to corrosion in the local ISFSI environment. For example, for ISFSIs located in marine environments (e.g., coastal reactor sites), carbon steel studs would not be recommended without concomitant periodic inspection and coating maintenance programs. Table 1.2.7 provides the chemical composition of several acceptable fastener materials to help the ISFSI owner select the most appropriate material for his site. The two mechanical properties, ultimate strength σ_u and yield strength σ_y , are also listed. For purposes of structural evaluations, the lower bound values of σ_u and σ_y from the menu of materials listed in Table 1.2.7 are used (see Table 3.4.10).

As shown in the drawing, the anchor studs are spaced sufficiently far apart such that a practical reinforced concrete pad with embedded receptacles can be designed to carry the axial pull from the anchor studs without overstressing the enveloping concrete monolith. The design specification and supporting analyses in this FSAR are focused on qualifying the overpack structures, including the sector lugs and the anchor studs. The design of the ISFSI pad, and its anchor receptacle will vary from site to site, depending on the geology and seismological characteristics of the sub-terrain underlying the ISFSI pad region. The data provided in this FSAR, however, provide the complete set of factored loads to which the ISFSI pad, its sub-grade, and the anchor receptacles must be designed within the purview of ACI-349-97 [1.0.4]. Detailed requirements on the ISFSI pads for anchored casks are provided in Section 2.0.4.

1.2.1.2.2 HI-TRAC (Transfer Cask) - Standard Design

Like the storage overpack, the HI-TRAC transfer cask is a rugged, heavy-walled cylindrical vessel. The main structural function of the transfer cask is provided by carbon steel, and the main neutron and gamma shielding functions are provided by water and lead, respectively. The transfer cask is a steel, lead, steel layered cylinder with a water jacket attached to the exterior. Figure 1.2.9 provides a typical cross section of the standard design HI-TRAC-125 with the pool lid installed. See Section 1.2.1.2.3 for discussion of the optional HI-TRAC 125D design.

The transfer cask provides an internal cylindrical cavity of sufficient size for housing an MPC. The top lid of the HI-TRAC 125 has additional neutron shielding to provide neutron attenuation in the vertical direction (from SNF in the MPC below). The MPC access hole through the HI-TRAC top lid is provided to allow the lowering/raising of the MPC between the HI-TRAC transfer cask, and the HI-STORM or HI-STAR overpacks. The standard design HI-TRAC (comprised of HI-TRAC 100 and HI-TRAC 125) is provided with two bottom lids, each used separately. The pool lid is bolted to the bottom flange of the HI-TRAC and is utilized during MPC fuel loading and sealing operations. In addition to providing shielding in the axial direction, the pool lid incorporates a seal that is designed to hold clean demineralized water in the HI-TRAC inner cavity, thereby preventing contamination of the exterior of the MPC by the contaminated fuel pool water. After the MPC has been drained, dried, and sealed, the pool lid is removed and the HI-TRAC transfer lid is attached (standard design only). The transfer lid

incorporates two sliding doors that allow the opening of the HI-TRAC bottom for the MPC to be raised/lowered. Figure 1.2.10 provides a cross section of the HI-TRAC with the transfer lid installed.

In the standard design, trunnions are provided for lifting and rotating the transfer cask body between vertical and horizontal positions. The lifting trunnions are located just below the top flange and the pocket trunnions are located above the bottom flange. The two lifting trunnions are provided to lift and vertically handle the HI-TRAC, and the pocket trunnions provide a pivot point for the rotation of the HI-TRAC for downending or upending.

Two standard design HI-TRAC transfer casks of different weights are provided to house the MPCs. The 125 ton HI-TRAC weight does not exceed 125 tons during any loading or transfer operation. The 100 ton HI-TRAC weight does not exceed 100 tons during any loading or transfer operation. The internal cylindrical cavities of the two standard design HI-TRACs are identical. However, the external dimensions are different. The 100ton HI-TRAC has a reduced thickness of lead and water shielding and consequently, the external dimensions are different. The structural steel thickness is identical in the two HI-TRACs. This allows most structural analyses of the 125 ton HI-TRAC to bound the 100 ton HI-TRAC design. Additionally, as the two HI-TRACs are identical except for a reduced thickness of lead and water, the 125 ton HI-TRAC has a larger thermal resistance than the smaller and lighter 100 ton HI-TRAC. Therefore, for normal conditions the 125 ton HI-TRAC thermal analysis bounds that of the 100 ton HI-TRAC. Separate shielding analyses are performed for each HI-TRAC since the shielding thicknesses are different between the two.

1.2.1.2.3 HI-TRAC 125D Transfer Cask

As an option to using either of the standard HI-TRAC transfer cask design, users may choose to use the optional HI-TRAC 125D design. Figure 1.2.9A provides a typical cross section of the standard design HI-TRAC-125 with the pool lid installed. Like the standard design, the HI-TRAC 125D is designed and constructed in accordance with ASME III, Subsection NF, with certain NRC-approved alternatives, as discussed in Section 2.2.4. Functionally equivalent, the major differences between the HI-TRAC 125D design and the standard design are as follows:

- No pocket trunnions are provided for downending/upending
- The transfer lid is not required
- A new ancillary, the HI-STORM mating device (Figure 1.2.18) is required during MPC transfer operations
- A wider baseplate with attachment points for the mating device is provided
- The baseplate incorporates gussets for added structural strength
- The number of pool lid bolts is reduced

The interface between the MPC and the transfer cask is the same between the standard design and the HI-TRAC 125D design. The optional design is capable of withstanding all loads defined in the design basis for the transfer cask during normal, off-normal, and accident modes of

operation with adequate safety margins. In lieu of swapping the pool lid for the transfer lid to facilitate MPC transfer, the pool lid remains on the HI-TRAC 125D until MPC transfer is required. The HI-STORM mating device is located between, and secured with bolting to, the top of the HI-STORM overpack and the HI-TRAC 125D transfer cask. The mating device is used to remove the pool lid to provide a pathway for MPC transfer between the overpack and the transfer cask. Section 1.2.2.2 provides additional detail on the differences between the standard transfer cask design and the HI-TRAC 125D design during operations.

1.2.1.3 Shielding Materials

The HI-STORM 100 System is provided with shielding to ensure the radiation and exposure requirements in 10CFR72.104 and 10CFR72.106 are met. This shielding is an important factor in minimizing the personnel doses from the gamma and neutron sources in the SNF in the MPC for ALARA considerations during loading, handling, transfer, and storage. The fuel basket structure of edge-welded composite boxes and Boral® neutron poison absorber panels attached to the fuel storage cell vertical surfaces provide the initial attenuation of gamma and neutron radiation emitted by the radioactive spent fuel. The MPC shell, baseplate, lid and closure ring provide additional thicknesses of steel to further reduce the gamma flux at the outer canister surfaces.

In the HI-STORM storage overpack, the primary shielding in the radial direction is provided by concrete and steel. In addition, the storage overpack has a thick circular concrete slab attached to the lid, and a thick circular concrete pedestal upon which the MPC rests. These slabs provide gamma and neutron attenuation in the axial direction. The thick overpack lid and concrete shielding integral to the lid provide additional gamma attenuation in the upward direction, reducing both direct radiation and skyshine. Several steel plate and shell elements provide additional gamma shielding as needed in specific areas, as well as incremental improvements in the overall shielding effectiveness. Gamma shield cross plates, as depicted in Figure 5.3.19, provide attenuation of scattered gamma radiation as it exits the inlet and outlet air ducts.

In the HI-TRAC transfer cask radial direction, gamma and neutron shielding consists of steel-lead-steel and water, respectively. In the axial direction, shielding is provided by the top lid, and the pool or transfer lid, as applicable. In the HI-TRAC pool lid, layers of steel-lead-steel provide an additional measure of gamma shielding to supplement the gamma shielding at the bottom of the MPC. In the transfer lid, layers of steel-lead-steel provide gamma attenuation. For the HI-TRAC 125 transfer lid, the neutron shield material, Holtite-A, is also provided. The HI-TRAC 125 and HI-TRAC 125D top lids are composed of steel-neutron shield-steel, with the neutron shield material being Holtite-A. The HI-TRAC 100 top lid is composed of steel only providing gamma attenuation.

1.2.1.3.1 Boral-Fixed Neutron Absorbers

1.2.1.3.1.1 *Boral™*

Boral is a thermal neutron poison material composed of boron carbide and aluminum (aluminum powder and plate). Boron carbide is a compound having a high boron content in a physically stable and chemically inert form. The boron carbide contained in Boral is a fine granulated powder that conforms to ASTM C-750-80 nuclear grade Type III. The Boral cladding is made of alloy aluminum, a lightweight metal with high tensile strength which is protected from corrosion by a highly resistant oxide film. The two materials, boron carbide and aluminum, are chemically compatible and ideally suited for long-term use in the radiation, thermal, and chemical environment of a nuclear reactor, spent fuel pool, or dry cask. See Section 3.4.1 for discussion of the reaction of Boral with spent fuel pool water during fuel loading and unloading operations.

The documented historical applications of Boral, in environments comparable to those in spent fuel pools and fuel storage casks, dates to the early 1950s (the U.S. Atomic Energy Commission's AE-6 Water-Boiler Reactor [1.2.2]). Technical data on the material was first printed in 1949, when the report "Boral: A New Thermal Neutron Shield" was published [1.2.3]. In 1956, the first edition of the Reactor Shielding Design Manual [1.2.4] was published and it contained a section on Boral and its properties.

In the research and test reactors built during the 1950s and 1960s, Boral was frequently the material of choice for control blades, thermal-column shutters, and other items requiring very good thermal-neutron absorption properties. It is in these reactors that Boral has seen its longest service in environments comparable to today's applications.

Boral found other uses in the 1960s, one of which was a neutron poison material in baskets used in the shipment of irradiated, enriched fuel rods from Canada's Chalk River laboratories to Savannah River. Use of Boral in shipping containers continues, with Boral serving as the poison in current British Nuclear Fuels Limited casks and the Storable Transport Cask by Nuclear Assurance Corporation [1.2.5].

Boral has been licensed by the NRC for use in numerous BWR and PWR spent fuel storage racks and has been extensively used in international nuclear installations.

Boral has been exclusively used in fuel storage applications in recent years. Its use in spent fuel pools as the neutron absorbing material can be attributed to its proven performance and several unique characteristics, such as:

- The content and placement of boron carbide provides a very high removal cross section for thermal neutrons.

- Boron carbide, in the form of fine particles, is homogeneously dispersed throughout the central layer of the Boral panels.
- The boron carbide and aluminum materials in Boral do not degrade as a result of long-term exposure to radiation.
- The neutron absorbing central layer of Boral is clad with permanently bonded surfaces of aluminum.
- Boral is stable, strong, durable, and corrosion resistant.

Boral absorbs thermal neutrons without physical change or degradation of any sort from the anticipated exposure to gamma radiation and heat. The material does not suffer loss of neutron attenuation capability when exposed to high levels of radiation dose.

Holtec International's QA Program ensures that Boral is manufactured under the control and surveillance of a Quality Assurance/Quality Control Program that conforms to the requirements of 10CFR72, Subpart G. Holtec International has procured over 200,000 panels of Boral from AAR Advanced Structures in over 30 projects. Boral has always been purchased with a minimum ^{10}B loading requirement. Coupons extracted from production runs were tested using the wet chemistry procedure. The actual ^{10}B loading, out of thousands of coupons tested, has never been found to fall below the design specification. The size of this coupon database is sufficient to provide reasonable assurance that all future Boral procurements will continue to yield Boral with full compliance with the stipulated minimum loading. Furthermore, the surveillance, coupon testing, and material tracking processes which have so effectively controlled the quality of Boral are expected to continue to yield Boral of similar quality in the future. Nevertheless, to add another layer of insurance, only 75% ^{10}B credit of the fixed neutron absorber is assumed in the criticality analysis consistent with Chapter 6.0, IV, 4.c of NUREG-1536, Standard Review Plan for Dry Cask Storage Systems.

The oxide layer that is created from the reaction of the outer aluminum cladding and the edges of the Boral panels with air and water provides a barrier to further reaction of the aluminum cladding with air or the spent fuel pool water during loading and unloading operations. However, with extended submergence in an MPC filled with water or in the plant's spent fuel pool, the hydrodynamic pressure can drive water into the Boral core (comprised of particulate B_4C and aluminum powder) where previously unexposed aluminum powder may react with the water to create hydrogen. The rate of hydrogen generation and the total hydrogen generated is dependent on several variables:

- Aluminum particle size: Aluminum particle size in the Boral core and associated porosity affects the amount of aluminum available for reaction with water. Larger aluminum particles yield less surface area for reaction, but higher porosity for aluminum-water interaction; smaller aluminum particles yield more surface area for reaction, but lower porosity for aluminum-water reaction.

- Presence of trace impurities: The presence of trace impurities in the Boral core due to the manufacturing process (i.e., sodium hydroxide, boron oxide, and iron-oxide) can affect the rate of hydrogen production, both increasing and suppressing the reaction. Sodium dissolved in the water increases the pH and tends to increase the rate of hydrogen production. This is counteracted by the boron oxide, which hydrolyzes to boric acid (H_3BO_3) and reduces the rate of hydrogen production. Trace impurities do not affect the total amount of hydrogen generated.
- Pool water chemistry: Chemicals in the plant spent fuel pool water (e.g., copper, boron) can affect the rate of hydrogen production, both increasing (copper) and suppressing (boron) the reaction.
- MPC loading operations: Operating needs or preferences by individual utilities as to when, and for how long the MPC is kept at varying water depths in the spent fuel pool, and how long the MPC is kept filled with water outside the spent fuel pool can affect the amount of aluminum in the Boral core that may be exposed to water.

Due to the variability in hydrogen generation from the Boral-water reaction, the operating procedures in Chapter 8 require monitoring for combustible gases and either exhausting or purging the space beneath the MPC lid during loading and unloading operations when an ignition event could occur (i.e., when the space beneath the MPC lid is open to the welding or cutting operation).

1.2.1.3.1.2 METAMIC[®]

METAMIC[®] is a neutron absorber material developed by the Reynolds Aluminum Company in the mid-1990s for spent fuel reactivity control in dry and wet storage applications. Metallurgically, METAMIC[®] is a metal matrix composite (MMC) consisting of a matrix of 6061 aluminum alloy reinforced with Type 1 ASTM C-750 boron carbide. METAMIC[®] is characterized by extremely fine aluminum (325 mesh or better) and boron carbide powder. Typically, the average B_4C particle size is between 10 and 15 microns. As described in the U.S. patents held by METAMIC, Inc.^{†}, the high performance and reliability of METAMIC[®] derives from the particle size distribution of its constituents, rendered into a metal matrix composite by the powder metallurgy process. This yields excellent and uniform homogeneity.*

The powders are carefully blended without binders or other additives that could potentially adversely influence performance. The maximum percentage of B_4C that can be dispersed in the aluminum alloy 6061 matrix is approximately 40 wt.%, although extensive manufacturing and testing experience is limited to approximately 31 wt.%. The blend of powders is isostatically compacted into a green billet under high pressure and vacuum sintered to near theoretical density. According to the manufacturer, billets of any size can be produced using this technology. The billet is subsequently extruded into one of a number of product forms, ranging from sheet and plate to

^{*} U.S. Patent No. 5,965,829, "Radiation Absorbing Refractory Composition".

[†] U.S. Patent No. 6,042,779, "Extrusion Fabrication Process for Discontinuous Carbide Particulate Metal Matrix Composites and Super, Hypereutectic Al/Si."

angle, channel, round and square tube, and other profiles. For the METAMIC[®] sheets used in the MPCs, the extruded form is rolled down into the required thickness.

METAMIC[®] has been subjected to an extensive array of tests sponsored by the Electric Power Research Institute (EPRI) that evaluated the functional performance of the material at elevated temperatures (up to 900°F) and radiation levels (1E+11 rads gamma). The results of the tests documented in an EPRI report (Ref. [1.2.11]) indicate that METAMIC[®] maintains its physical and neutron absorption properties with little variation in its properties from the unirradiated state. The main conclusions provided in the above-referenced EPRI report are summarized below:

- The metal matrix configuration produced by the powder metallurgy process with a complete absence of open porosity in METAMIC[®] ensures that its density is essentially equal to the theoretical density.
- The physical and neutronic properties of METAMIC[®] are essentially unaltered under exposure to elevated temperatures (750° F - 900° F).
- No detectable change in the neutron attenuation characteristics under accelerated corrosion test conditions has been observed.

In addition, independent measurements of boron carbide particle distribution show extremely small particle-to-particle distance[†] and near-perfect homogeneity.

An evaluation of the manufacturing technology underlying METAMIC[®] as disclosed in the above-referenced patents and of the extensive third-party tests carried out under the auspices of EPRI makes METAMIC[®] an acceptable neutron absorber material for use in the MPCs. Holtec's technical position on METAMIC[®] is also supported by the evaluation carried out by other organizations (see, for example, USNRC's SER on NUHOMS-61BT, Docket No. 72-1004).

Consistent with its role in reactivity control, all METAMIC[®] material procured for use in the Holtec MPCs will be qualified as important-to-safety (ITS) Category A item. ITS category A manufactured items, as required by Holtec's NRC-approved Quality Assurance program, must be produced to essentially preclude the potential of an error in the procurement of constituent materials and the manufacturing processes. Accordingly, material and manufacturing control processes must be established to eliminate the incidence of errors, and inspection steps must be implemented to serve as an independent set of barriers to ensure that all critical characteristics defined for the material by the cask designer are met in the manufactured product.

[†] Medium measured neighbor-to-neighbor distance is 10.08 microns according to the article, "METAMIC Neutron Shielding", by K. Anderson, T. Haynes, and R. Kazmier, EPRI Boraflex Conference, November 19-20, 1998.

All manufacturing and in-process steps in the production of METAMIC[®] shall be carried out using written procedures. As required by the company's quality program, the material manufacturer's QA program and its implementation shall be subject to review and ongoing assessment, including audits and surveillances as set forth in the applicable Holtec QA procedures to ensure that all METAMIC[®] panels procured meet with the requirements appropriate for the quality genre of the MPCs. Additional details pertaining to the qualification and production tests for METAMIC[®] are summarized in Subsection 9.1.5.3.

Because of the absence of interconnected porosities, the time required to dehydrate a METAMIC[®]-equipped MPC is expected to be less compared to an MPC containing Boral.

NUREG/CR-5661 (Ref. [1.2.14]) recommends limiting poison material credit to 75% of the minimum ¹⁰B loading because of concerns for potential "streaming" of neutrons, and allows for greater percentage credit in criticality analysis "if comprehensive acceptance tests, capable of verifying the presence and uniformity of the neutron absorber, are implemented". The value of 75% is characterized in NUREG/CR-5661 as a very conservative value, based on experiments with neutron poison containing relatively large B₄C particles, such as BORAL with an average particle size in excess of 100 microns. METAMIC[®], however, has a much smaller particle size of typically between 10 and 15 microns on average. Any streaming concerns would therefore be drastically reduced.

Analyses performed by Holtec International show that the streaming due to particle size is practically non-existent in METAMIC[®]. Further, EPRI's neutron attenuation measurements on 31 and 15 B₄C weight percent METAMIC[®] showed that METAMIC[®] exhibits very uniform ¹⁰B areal density. This makes it easy to reliably establish and verify the presence and microscopic and macroscopic uniformity of the ¹⁰B in the material. Therefore, 90% credit is applied to the minimum ¹⁰B areal density in the criticality calculations, i.e. a 10% penalty is applied. This 10% penalty is considered conservative since there are no significant remaining uncertainties in the ¹⁰B areal density. In Chapter 9 the qualification and on production tests for METAMIC[®] to support 90% ¹⁰B credit are specified. With 90% credit, the target weight percent of boron carbide in METAMIC[®] is 31 for all MPCs, as summarized in Table 1.2.8, consistent with the test coupons used in the EPRI evaluations [1.2.11]. The maximum permitted value is 33.0 wt% to allow for necessary fabrication flexibility.

Because METAMIC[®] is a solid material, there is no capillary path through which spent fuel pool water can penetrate METAMIC[®] panels and chemically react with aluminum in the interior of the material to generate hydrogen. Any chemical reaction of the outer surfaces of the METAMIC[®] neutron absorber panels with water to produce hydrogen occurs rapidly and reduces to an insignificant amount in a short period of time. Nevertheless, combustible gas monitoring for METAMIC[®]-equipped MPCs and purging or exhausting the space under the MPC lid during welding and cutting operations, is required until sufficient field experience is gained that confirms that little or no hydrogen is released by METAMIC[®] during these operations.

Mechanical properties of 31 wt.% METAMIC[®] based on coupon tests of the material in the as-fabricated condition and after 48 hours of an elevated temperature state at 900°F are summarized below from the EPRI report [1.2.11].

<i>Mechanical Properties of 31wt.% B₄C METAMIC</i>		
<i>Property</i>	<i>As-Fabricated</i>	<i>After 48 hours of 900°F Temperature Soak</i>
<i>Yield Strength (psi)</i>	<i>32937 ± 3132</i>	<i>28744 ± 3246</i>
<i>Ultimate Strength (psi)</i>	<i>40141 ± 1860</i>	<i>34608 ± 1513</i>
<i>Elongation (%)</i>	<i>1.8 ± 0.8</i>	<i>5.7 ± 3.1</i>

The required flexural strain of the neutron absorber to ensure that it will not fracture when the supporting basket wall flexes due to the worst case lateral inertial loading, has been set at 0.2% for the MPCs. The 1% minimum elongation of 31wt.% B₄C METAMIC[®] indicated by the above table means that METAMIC[®] will have a minimum factor of safety of five against cracking under the most severe postulated mechanical accident conditions for the MPCs.

EPRI's extensive characterization effort [1.2.11], which was focused on 15 and 31 wt.% B₄C METAMIC[®] served as the principal basis for a recent USNRC SER for 31wt.% B₄C METAMIC for used in wet storage [1.2.12]. Additional studies on METAMIC[®] [1.2.13], EPRI's and others work provide the confidence that 31wt.% B₄C METAMIC[®] will perform its intended function in the MPCs.

1.2.1.3.1.3 Locational Fixity of Neutron Absorbers

Both Boral and METAMIC[®] neutron absorber panels are completely enclosed in Alloy X (stainless steel) sheathing that is stitch welded to the MPC basket cell walls along their entire periphery. The edges of the sheathing are bent toward the cell wall to make the edge weld. Thus, the neutron absorber is contained in a tight, welded pocket enclosure. The shear strength of the pocket weld joint, which is an order of magnitude greater than the weight of a fuel assembly, guarantees that the neutron absorber and its enveloping sheathing pocket will maintain their as-installed position under all loading, storage, and transient evolutions. Finally, the pocket joint detail ensures that fuel assembly insertion or withdrawal into or out of the MPC basket will not lead to a disconnection of the sheathing from the cell wall.

1.2.1.3.2 Neutron Shielding

The specification of the HI-STORM overpack and HI-TRAC transfer cask neutron shield material is predicated on functional performance criteria. These criteria are:

- Attenuation of neutron radiation to appropriate levels;
- Durability of the shielding material under normal conditions, in terms of thermal, chemical, mechanical, and radiation environments;
- Stability of the homogeneous nature of the shielding material matrix;

- Stability of the shielding material in mechanical or thermal accident conditions to the desired performance levels; and
- Predictability of the manufacturing process under adequate procedural control to yield an in-place neutron shield of desired function and uniformity.

Other aspects of a shielding material, such as ease of handling and prior nuclear industry use, are also considered, within the limitations of the main criteria. Final specification of a shield material is a result of optimizing the material properties with respect to the main criteria, along with the design of the shield system, to achieve the desired shielding results.

Neutron attenuation in the HI-STORM overpack is provided by the thick walls of concrete contained in the steel vessel, lid, and pedestal. Concrete is a shielding material with a long proven history in the nuclear industry. The concrete composition has been specified to ensure its continued integrity at the long term temperatures required for SNF storage.

The HI-TRAC transfer cask is equipped with a water jacket providing radial neutron shielding. Demineralized water will be utilized in the water jacket. To ensure operability for low temperature conditions, ethylene glycol (25% in solution) will be added to reduce the freezing point for low temperature operations (e.g., below 32°F) [1.2.7].

Neutron shielding in the HI-TRAC 125 and 125D transfer casks in the axial direction is provided by Holtite-A within the top lid. HI-TRAC 125 also contains Holtite-A in the transfer lid. Holtite-A is a poured-in-place solid borated synthetic neutron-absorbing polymer. Holtite-A is specified with a nominal B_4C loading of 1 weight percent for the HI-STORM 100 System. Appendix 1.B provides the Holtite-A material properties germane to its function as a neutron shield. Holtec has performed confirmatory qualification tests on Holtite-A under the company's QA program.

In the following, a brief summary of the performance characteristics and properties of Holtite-A is provided.

Density

The specific gravity of Holtite-A is 1.68 g/cm^3 as specified in Appendix 1.B. To conservatively bound any potential weight loss at the design temperature and any inability to reach the theoretical density, the density is reduced by 4% to 1.61 g/cm^3 . The density used for the shielding analysis is conservatively assumed to be 1.61 g/cm^3 to underestimate the shielding capabilities of the neutron shield.

Hydrogen

The weight concentration of hydrogen is 6.0%. However, all shielding analyses conservatively assume 5.9% hydrogen by weight in the calculations.

Boron Carbide

Boron carbide dispersed within Holtite-A in finely dispersed powder form is present in 1% (nominal) weight concentration. Holtite-A may be specified with a B₄C content of up to 6.5 weight percent. For the HI-STORM 100 System, Holtite-A is specified with a nominal B₄C weight percent of 1%.

Design Temperature

The design temperatures of Holtite-A *are provided in Table 1.B.1. ~~is set at 300°F.~~* The maximum spatial temperatures of Holtite-A under all normal operating conditions must be demonstrated to be below ~~these~~ design temperatures, *as applicable*.

Thermal Conductivity

The Holtite-A neutron shielding material is stable below the design temperature for the long term and provides excellent shielding properties for neutrons. A conservative, lower bound conductivity is stipulated for use in the thermal analyses of Chapter 4 (Section 4.2) based on information in the technical literature.

1.2.1.3.3 Gamma Shielding Material

For gamma shielding, the HI-STORM 100 storage overpack primarily relies on massive concrete sections contained in a robust steel vessel. A carbon steel plate, the shield shell, is located adjacent to the overpack inner shell to provide additional gamma shielding (Figure 1.2.7)[†]. Carbon steel supplements the concrete gamma shielding in most portions of the storage overpack, most notably the baseplate and the lid. To reduce the radiation streaming through the overpack air inlets and outlets, gamma shield cross plates are installed in the ducts (Figures 1.2.8 and 1.2.8A) to scatter the radiation. This scattering acts to significantly reduce the local dose rates adjacent to the overpack air inlets and outlets.

In the HI-TRAC transfer cask, the primary gamma shielding is provided by lead. As in the storage overpack, carbon steel supplements the lead gamma shielding of the HI-TRAC transfer cask.

[†] The shield shell design feature was deleted in June, 2001 after overpack serial number 7 was fabricated. Those overpacks without the shield shell are required to have a higher concrete density in the overpack body to provide compensatory shielding. See Table 1.D.1.

1.2.1.4 Lifting Devices

Lifting of the HI-STORM 100 System may be accomplished either by attachment at the top of the storage overpack ("top lift"), as would typically be done with a crane, or by attachment at the bottom ("bottom lift"), as would be effected by a number of lifting/handling devices.

For a top lift, the storage overpack is equipped with four threaded anchor blocks arranged circumferentially around the overpack. These anchor blocks are used for overpack lifting as well as securing the overpack lid to the overpack body. The anchor blocks are integrally welded to the overpack radial plates which in turn are full-length welded to the overpack inner shell, outer shell, and baseplate (HI-STORM100) or inlet air duct horizontal plates (HI-STORM 100S). The storage overpack may be lifted with a lifting device that engages the anchor blocks with threaded studs and connects to a crane or similar equipment.

A bottom lift of the HI-STORM 100 storage overpack is effected by the insertion of four hydraulic jacks underneath the inlet vent horizontal plates (Figure 1.2.1). A slot in the overpack baseplate allows the hydraulic jacks to be placed underneath the inlet vent horizontal plate. The hydraulic jacks lift the loaded overpack to provide clearance for inserting or removing a device for transportation.

The standard design HI-TRAC transfer cask is equipped with two lifting trunnions and two pocket trunnions. The HI-TRAC 125D is equipped with only lifting trunnions. The lifting trunnions are positioned just below the top forging. The two pocket trunnions are located above the bottom forging and attached to the outer shell. The pocket trunnions are designed to allow rotation of the HI-TRAC. All trunnions are built from a high strength alloy with proven corrosion and non-galling characteristics. The lifting trunnions are designed in accordance with NUREG-0612 and ANSI N14.6. The lifting trunnions are installed by threading into tapped holes just below the top forging.

The top of the MPC lid is equipped with four threaded holes that allow lifting of the loaded MPC. These holes allow the loaded MPC to be raised/lowered through the HI-TRAC transfer cask using lifting cleats. The threaded holes in the MPC lid are designed in accordance with NUREG-0612 and ANSI N14.6.

1.2.1.5 Design Life

The design life of the HI-STORM 100 System is 40 years. This is accomplished by using material of construction with a long proven history in the nuclear industry and specifying materials known to withstand their operating environments with little to no degradation. A maintenance program, as specified in Chapter 9, is also implemented to ensure the HI-STORM 100 System will exceed its design life of 40 years. The design considerations that assure the HI-STORM 100 System performs as designed throughout the service life include the following:

HI-STORM Overpack and HI-TRAC Transfer Cask

- Exposure to Environmental Effects
- Material Degradation
- Maintenance and Inspection Provisions

MPC

- Corrosion
- Structural Fatigue Effects
- Maintenance of Helium Atmosphere
- Allowable Fuel Cladding Temperatures
- Neutron Absorber Boron Depletion

The adequacy of the HI-STORM 100 System for its design life is discussed in Sections 3.4.11 and 3.4.12.

1.2.2 Operational Characteristics

1.2.2.1 Design Features

The HI-STORM 100 System incorporates some unique design improvements. These design innovations have been developed to facilitate the safe long term storage of SNF. Some of the design originality is discussed in Subsection 1.2.1 and below.

The free volume of the MPCs is inerted with 99.995% pure helium gas during the spent nuclear fuel loading operations. Table 1.2.2 specifies the helium fill requirements for the MPC internal cavity.

The HI-STORM overpack has been designed to synergistically combine the benefits of steel and concrete. The steel-concrete-steel construction of the HI-STORM overpack provides ease of fabrication, increased strength, and an optimal radiation shielding arrangement. The concrete is primarily provided for radiation shielding and the steel is primarily provided for structural functions.

The strength of concrete in tension and shear is conservatively neglected. Only the compressive strength of the concrete is accounted for in the analyses.

The criticality control features of the HI-STORM 100 are designed to maintain the neutron multiplication factor k -effective (including uncertainties and calculational bias) at less than 0.95 under all normal, off-normal, and accident conditions of storage as analyzed in Chapter 6. This level of conservatism and safety margins is maintained, while providing the highest storage capacity.

1.2.2.2 Sequence of Operations

Table 1.2.6 provides the basic sequence of operations necessary to defuel a spent fuel pool using the HI-STORM 100 System. The detailed sequence of steps for storage-related loading and handling operations is provided in Chapter 8 and is supported by the Design Drawings in Section 1.5. A summary of the general actions needed for the loading and unloading operations is provided below. Figures 1.2.16 and 1.2.17 provide a pictorial view of typical loading and unloading operations, respectively.

Loading Operations

At the start of loading operations, the HI-TRAC transfer cask is configured with the pool lid installed. The HI-TRAC water jacket is filled with demineralized water or a 25% ethylene glycol solution depending on the ambient temperature conditions. The lift yoke is used to position HI-TRAC in the designated preparation area or setdown area for HI-TRAC inspection and MPC insertion. The annulus is filled with plant demineralized water (~~borated if necessary~~), and an inflatable annulus seal is installed. The inflatable seal prevents contact between spent fuel pool water and the MPC shell reducing the possibility of contaminating the outer surfaces of the MPC. The MPC is then filled with water (*borated if necessary*). Based on the MPC model and fuel enrichment, (~~as required by the CoC~~), this may be borated water or plant demineralized water (*see Section 2.1*). HI-TRAC and the MPC are lowered into the spent fuel pool for fuel loading using the lift yoke. Pre-selected assemblies are loaded into the MPC and a visual verification of the assembly identification is performed.

While still underwater, a thick shielding lid (the MPC lid) is installed. The lift yoke is remotely engaged to the HI-TRAC lifting trunnions and is used to lift the HI-TRAC close to the spent fuel pool surface. As an ALARA measure, dose rates are measured on the top of the HI-TRAC and MPC prior to removal from the pool to check for activated debris on the top surface. The MPC lift bolts (securing the MPC lid to the lift yoke) are removed. As HI-TRAC is removed from the spent fuel pool, the lift yoke and HI-TRAC are sprayed with demineralized water to help remove contamination.

HI-TRAC is removed from the pool and placed in the designated preparation area. The top surfaces of the MPC lid and the upper flange of HI-TRAC are decontaminated. The inflatable annulus seal is removed, and an annulus shield is installed. The annulus shield provides additional personnel shielding at the top of the annulus and also prevents small items from being dropped into the annulus. ~~Dose rates are measured at the MPC lid and around the mid-height circumference of HI-TRAC to ensure that the dose rates are within expected values. The~~ Automated Welding System baseplate shield (if used) is installed to reduce dose rates around the top of the cask. The MPC water level is lowered slightly and the MPC lid is seal-welded using the Automated Welding System (AWS) or other approved welding process. Liquid penetrant examinations are performed on the root and final passes. A multi-layer liquid penetrant or volumetric examination is also performed on the MPC lid-to-shell weld. ~~The water level is raised~~

to the top of the MPC and the weld is hydrostatically tested. Then a small volume of the water is displaced with helium gas. The helium gas is used for leakage testing. A helium leakage rate test is performed on the MPC lid confinement weld (lid to shell) to verify weld integrity and to ensure that leakage rates are within acceptance criteria. The MPC water is displaced from the MPC by blowing pressurized helium or nitrogen gas into the vent port of the MPC, thus displacing the water through the drain line. *At the appropriate time in the sequence of activities, based on the type of test performed (hydrostatic or pneumatic), a pressure test of the MPC enclosure vessel is performed.*

For storage of moderate burnup fuel MPCs containing all moderate burnup fuel, a Vacuum Drying System (VDS) may be used to remove moisture from the MPC cavity. The VDS is connected to the MPC and is used to remove liquid water from the MPC in a stepped evacuation process. The stepped evacuation process is used to preclude the formation of ice in the MPC and Vacuum Drying System lines. The internal pressure is reduced and held for a duration to ensure that all liquid water has evaporated. This process is continued until the pressure in the MPC meets the technical specification limit and can be held there for the required amount of time.

For storage of high burnup fuel, and as an option for storage of moderate burnup fuel, the reduction of residual moisture in the MPC to trace amounts is accomplished using a Forced Helium Dehydration (FHD) system, as described in Appendix 2.B. Relatively warm and dry helium is recirculated through the MPC cavity, which helps maintain the SNF in a cooled condition while moisture is being removed. The warm, dry gas is supplied to the MPC drain port and circulated through the MPC cavity where it absorbs moisture. The humidified gas travels out of the MPC and through appropriate equipment to cool and remove the absorbed water from the gas. The dry gas may be heated prior to its return to the MPC in a closed loop system to accelerate the rate of moisture removal in the MPC. This process is continued until the temperature of the gas exiting the demineralizing module described in Appendix 2.B meets the specified limit. ~~specified in the technical specifications.~~

Following moisture removal, ~~the VDS or FHD system is disconnected and the Helium Backfill System (HBS) is attached and the MPC is backfilled with a predetermined amount of helium gas.~~ The helium backfill ensures adequate heat transfer during storage, and provides an inert atmosphere for long-term fuel integrity, and provides the means of future leakage rate testing of the MPC confinement boundary welds. Cover plates are installed and seal-welded over the MPC vent and drain ports with liquid penetrant examinations performed on the root and final passes. ~~The cover plates are helium leakage tested to confirm that they meet the established leakage rate criteria.~~

The MPC closure ring is then placed on the MPC, aligned, tacked in place, and seal welded, providing redundant closure of the MPC lid and cover plates confinement closure welds. Tack welds are visually examined, and the root and final welds are inspected using the liquid penetrant examination technique to ensure weld integrity. The annulus shield is removed and the remaining water in the annulus is drained. The AWS Baseplate shield is removed. The MPC lid and accessible areas of the top of the MPC shell are smeared for removable contamination and HI-

TRAC dose rates are measured. The HI-TRAC top lid is installed and the bolts are torqued. The MPC lift cleats are installed on the MPC lid. The MPC lift cleats are the primary lifting point of the MPC.

Rigging is installed between the MPC lift cleats and the lift yoke. The rigging supports the MPC within HI-TRAC while the pool lid is replaced with the transfer lid. For the standard design transfer cask, the HI-TRAC is manipulated to replace the pool lid with the transfer lid. The MPC lift cleats and rigging support the MPC during the transfer operations.

MPC transfer from the HI-TRAC transfer cask into the overpack may be performed inside or outside the fuel building. Similarly, HI-TRAC and HI-STORM may be transferred to the ISFSI in several different ways. The loaded HI-TRAC may be handled in the vertical or horizontal orientation. The loaded HI-STORM can only be handled vertically.

For MPC transfers inside the fuel building, the empty HI-STORM overpack is inspected and staged with the lid removed, the alignment device positioned, and, for the HI-STORM 100 overpack, the vent duct shield inserts installed. If using HI-TRAC 125D, the HI-STORM mating device is secured to the top of the empty overpack (Figure 1.2.18). The loaded HI-TRAC is placed using the fuel building crane on top of HI-STORM, or the mating device, as applicable. After the HI-TRAC is positioned atop the HI-STORM or secured to the mating device, as applicable, the MPC is raised slightly. With the standard HI-TRAC design, the transfer lid door locking pins are removed and the doors are opened. With the HI-TRAC 125D, the pool lid is removed using the mating device. The MPC is lowered into HI-STORM. Following verification that the MPC is fully lowered, slings are disconnected and lowered onto the MPC lid. For the HI-STORM 100, the doors are closed and the HI-TRAC is prepared for removal from on top of HI-STORM (with HI-TRAC 125D, the transfer cask must first be disconnected from the mating device). For the HI-STORM 100S, the standard design HI-TRAC may need to be lifted above the overpack to a height sufficient to allow closure of the transfer lid doors without interfering with the MPC lift cleats. The HI-TRAC is then removed and placed in its designated storage location. The MPC lift cleats and slings are removed from atop the MPC. The alignment device, vent duct shield inserts, and/or mating device is/are removed, as applicable. The pool lid is removed from the mating device and re-attached to the HI-TRAC 125D prior to its next use. The HI-STORM lid is installed, and the upper vent screens and gamma shield cross plates are installed. The HI-STORM lid studs are installed and torqued.

For MPC transfers outside of the fuel building, the empty HI-STORM overpack is inspected and staged with the lid removed, the alignment device positioned, and, for the HI-STORM 100, the vent duct shield inserts installed. For HI-TRAC 125D, the mating device is secured to the top of the overpack. The loaded HI-TRAC is transported to the cask transfer facility in the vertical or horizontal orientation. A number of methods may be utilized as long as the handling limitations prescribed in the technical specifications are not exceeded.

To place the loaded HI-TRAC in a horizontal orientation, a transport frame or "cradle" is utilized. If the cradle is equipped with rotation trunnions they are used to engage the HI-TRAC

100 or 125 pocket trunnions. While the loaded HI-TRAC is lifted by the lifting trunnions, the HI-TRAC is lowered onto the cradle rotation trunnions. Then, the crane lowers and the HI-TRAC pivots around the pocket trunnions and is placed in the horizontal position in the cradle.

The HI-TRAC 125D does not include pocket trunnions in its design. Therefore, the user must downend the transfer cask onto the transport frame using appropriately designed rigging in accordance with the site's heavy load control program.

If the loaded HI-TRAC is transferred to the cask transfer facility in the horizontal orientation, the HI-TRAC transport frame and/or cradle are placed on a transport vehicle. The transport vehicle may be an air pad, railcar, heavy-haul trailer, dolly, etc. If the loaded HI-TRAC is transferred to the cask transfer facility in the vertical orientation, the HI-TRAC may be lifted by the lifting trunnions or seated on the transport vehicle. During the transport of the loaded HI-TRAC, standard plant heavy load handling practices shall be applied including administrative controls for the travel path and tie-down mechanisms.

For MPCs containing any HBF, the Supplemental Cooling System (SCS) is required to be operational during the time the loaded and backfilled MPC is in HI-TRAC to ensure fuel cladding temperatures remain within limits. The SCS is discussed in detail in Section 4.5 and the design criteria for the system are provided in Appendix 2.C. The SCS is not required when the MPC is inside the overpack, regardless of decay heat load.

After the loaded HI-TRAC arrives at the cask transfer facility, the HI-TRAC is upended by a crane if the HI-TRAC is in a horizontal orientation. The loaded HI-TRAC is then placed, using the crane located in the transfer area, on top of HI-STORM, which has been inspected and staged with the lid removed, vent duct shield inserts installed, the alignment device positioned, and the mating device installed, as applicable.

After the HI-TRAC is positioned atop the HI-STORM or the mating device, the MPC is raised slightly. In the standard design, the transfer lid door locking pins are removed and the doors are opened. With the HI-TRAC 125D, the pool lid is removed using the mating device. The MPC is lowered into HI-STORM. Following verification that the MPC is fully lowered, slings are disconnected and lowered onto the MPC lid. For the HI-STORM 100, the doors are closed and HI-TRAC is removed from on top of HI-STORM or disconnected from the mating device, as applicable. For the HI-STORM 100S, the standard design HI-TRAC may need to be lifted above the overpack to a height sufficient to allow closure of the transfer lid doors without interfering with the MPC lift cleats. The HI-TRAC is then removed and placed in its designated storage location. The MPC lift cleats and slings are removed from atop the MPC. The alignment device, vent duct shield inserts, and mating device is/are removed, as applicable. The pool lid is removed from the mating device and re-attached to the HI-TRAC 125D prior to its next use. The HI-STORM lid is installed, and the upper vent screens and gamma shield cross plates are installed. The HI-STORM lid studs and nuts are installed.

After the HI-STORM has been loaded either within the fuel building or at a dedicated cask

transfer facility, the HI-STORM is then moved to its designated position on the ISFSI pad. The HI-STORM overpack may be moved using a number of methods as long as the handling limitations listed in the technical specifications are not exceeded. The loaded HI-STORM must be handled in the vertical orientation, and may be lifted from the top by the anchor blocks or from the bottom by the inlet vents. After the loaded HI-STORM is lifted, it may be placed on a transport mechanism or continue to be lifted by the lid studs and transported to the storage location. The transport mechanism may be an air pad, crawler, railcar, heavy-haul trailer, dolly, etc. During the transport of the loaded HI-STORM, standard plant heavy load handling practices shall be applied including administrative controls for the travel path and tie-down mechanisms. Once in position at the storage pad, vent operability testing is performed to ensure that the system is functioning within its design parameters.

In the case of HI-STORM 100A, the anchor studs are installed and fastened into the anchor receptacles in the ISFSI pad in accordance with the design requirements.

Unloading Operations

The HI-STORM 100 System unloading procedures describe the general actions necessary to prepare the MPC for unloading, cool the stored fuel assemblies in the MPC, flood the MPC cavity, remove the lid welds, unload the spent fuel assemblies, and recover HI-TRAC and empty the MPC. Special precautions are outlined to ensure personnel safety during the unloading operations, and to prevent the risk of MPC overpressurization and thermal shock to the stored spent fuel assemblies.

The MPC is recovered from HI-STORM either at the cask transfer facility or the fuel building using any of the methodologies described in Section 8.1. The HI-STORM lid is removed, the alignment device positioned, and, for the HI-STORM 100, the vent duct shield inserts are installed, and the MPC lift cleats are attached to the MPC. For HI-TRAC 125D, the mating device is installed. Rigging is attached to the MPC lift cleats. For the HI-STORM 100S and the standard HI-TRAC design, the transfer doors may need to be opened to avoid interfering with the MPC lift cleats. For HI-TRAC 125D, the mating device (possibly containing the pool lid) is secured to the top of the overpack. HI-TRAC is raised and positioned on top of HI-STORM or secured to the mating device, as applicable. For HI-TRAC 125D, the pool lid is ensured to be out of the transfer path for the MPC. The MPC is raised into HI-TRAC. Once the MPC is raised into HI-TRAC, the standard design HI-TRAC transfer lid doors are closed and the locking pins are installed. For HI-TRAC 125D, the pool lid is installed and the transfer cask is unsecured from the mating device. HI-TRAC is removed from on top of HI-STORM. *As required based on the presence of high burnup fuel, the Supplemental Cooling System is installed and placed into operation.*

The HI-TRAC is brought into the fuel building and, for the standard design, manipulated for bottom lid replacement. The transfer lid is replaced with the pool lid. The MPC lift cleats and rigging support the MPC during lid transfer operations.

HI-TRAC and its enclosed MPC are returned to the designated preparation area and the rigging, MPC lift cleats, and HI-TRAC top lid are removed. The annulus is filled with plant demineralized water (borated, if necessary). The annulus and HI-TRAC top surfaces are protected from debris that will be produced when removing the MPC lid.

The MPC closure ring and vent and drain port cover plates are core drilled. Local ventilation is established around the MPC ports. The RVOAs are attached to the vent and drain port. The RVOAs allow access to the inner cavity of the MPC, while providing a hermetic seal. The MPC is cooled using ~~a closed-loop heat exchanger to~~ *appropriate means, if necessary, to* reduce the MPC internal temperature to allow water flooding. Following the fuel cool-down, the MPC is flooded with borated or unborated water, *as required, in accordance with the CoC.* The MPC lid-to-MPC shell weld is removed. Then, all weld removal equipment is removed with the MPC lid left in place.

The MPC lid is rigged to the lift yoke and the lift yoke is engaged to HI-TRAC lifting trunnions. If weight limitations require, the neutron shield jacket is drained. HI-TRAC is placed in the spent fuel pool and the MPC lid is removed. All fuel assemblies are returned to the spent fuel storage racks and the MPC fuel cells are vacuumed to remove any assembly debris. HI-TRAC and MPC are returned to the designated preparation area where the MPC water is removed. The annulus water is drained and the MPC and HI-TRAC are decontaminated in preparation for re-utilization.

1.2.2.3 Identification of Subjects for Safety and Reliability Analysis

1.2.2.3.1 Criticality Prevention

Criticality is controlled by geometry and neutron absorbing materials in the fuel basket. The MPC-24/24E/24EF, ~~MPC-24E, and 24EF~~ (all with lower enriched fuel) and the MPC-68/68F/68FF do not rely on soluble boron credit during loading or the assurance that water cannot enter the MPC during storage to meet the stipulated criticality limits.

Each MPC model is equipped with ~~Boral~~ neutron absorber plates affixed to the fuel cell walls as shown on the design drawings in *Section 1.5*. The minimum ^{10}B areal density specified for the ~~Boral neutron absorber~~ in each MPC model is shown in Table 1.2.2. These values are chosen to be consistent with the assumptions made in the criticality analyses.

The MPC-24, MPC-24E and 24EF (all with higher enriched fuel) and the MPC-32 and MPC-32F take credit for soluble boron in the MPC water for criticality prevention during wet loading and unloading operations. Boron credit is only necessary for these PWR MPCs during loading and unloading operations that take place under water. During storage, with the MPC cavity dry and sealed from the environment, criticality control measures beyond the fixed neutron poisons affixed to the storage cell walls are not necessary because of the low reactivity of the fuel in the dry, helium filled canister and the design features that prevent water from intruding into the canister during storage.

1.2.2.3.2 Chemical Safety

There are no chemical safety hazards associated with operations of the HI-STORM 100 dry storage system. A detailed evaluation is provided in Section 3.4.

1.2.2.3.3 Operation Shutdown Modes

The HI-STORM 100 System is totally passive and consequently, operation shutdown modes are unnecessary. Guidance is provided in Chapter 8, which outlines the HI-STORM 100 unloading procedures, and Chapter 11, which outlines the corrective course of action in the wake of postulated accidents.

1.2.2.3.4 Instrumentation

As stated earlier, the HI-STORM 100 confinement boundary is the MPC, which is seal welded, *non-destructively examined* and *leakpressure* tested. The HI-STORM 100 is a completely passive system with appropriate margins of safety; therefore, it is not necessary to deploy any instrumentation to monitor the cask in the storage mode. At the option of the user, temperature elements may be utilized to monitor the air temperature of the HI-STORM overpack exit vents in lieu of routinely inspecting the ducts for blockage. See Subsection 2.3.3.2 and the Technical Specifications in Appendix A to the CoC for additional details.

1.2.2.3.5 Maintenance Technique

Because of their passive nature, the HI-STORM 100 System requires minimal maintenance over its lifetime. No special maintenance program is required. Chapter 9 describes the acceptance criteria and maintenance program set forth for the HI-STORM 100.

1.2.3 Cask Contents

The HI-STORM 100 System is designed to house different types of MPCs. The MPCs are designed to store both BWR and PWR spent nuclear fuel assemblies. Tables 1.2.1 and 1.2.2 provide key *system data and design* parameters for the MPCs. A description of acceptable fuel assemblies for storage in the MPCs is provided in Section 2.1. and the *Approved Contents* section of Appendix B to the CoC. This includes fuel assemblies classified as damaged fuel assemblies and fuel debris in accordance with the definitions of these terms in the CoC *Table 1.0.1*. A summary of the types of fuel authorized for storage in each MPC model is provided below. All fuel assemblies, *non-fuel hardware*, and *neutron sources* must meet the fuel specifications provided in *Appendix B to the CoC* *Section 2.1*. All fuel assemblies classified as damaged fuel or fuel debris must be stored in damaged fuel containers.

MPC-24

The MPC-24 is designed to accommodate up to twenty-four (24) PWR fuel assemblies classified

as intact fuel assemblies, with or without non-fuel hardware.

MPC-24E

The MPC-24E is designed to accommodate up to twenty-four (24) PWR fuel assemblies, with or without non-fuel hardware. Up to four (4) fuel assemblies may be classified as damaged fuel assemblies, with the balance being classified as intact fuel assemblies. Damaged fuel assemblies must be stored in fuel storage locations 3, 6, 19, and/or 22 (see Figure 1.2.4).

MPC-24EF

The MPC-24EF is designed to accommodate up to twenty-four (24) PWR fuel assemblies, with or without non-fuel hardware. Up to four (4) fuel assemblies may be classified as damaged fuel assemblies or fuel debris, with the balance being classified as intact fuel assemblies. Damaged fuel assemblies and fuel debris must be stored in fuel storage locations 3, 6, 19, and/or 22 (see Figure 1.2.4).

MPC-32

The MPC-32 is designed to accommodate up to thirty-two (32) PWR fuel assemblies ~~classified as intact fuel assemblies~~, with or without non-fuel hardware. *Up to eight (8) of these assemblies may be classified as damaged fuel assemblies, with the balance being classified as intact fuel assemblies. Damaged fuel assemblies must be stored in fuel storage locations 1, 4, 5, 10, 23, 28, 29, and/or 32 (see Figure 1.2.3).*

MPC-32F

The MPC-32F is designed to store up to thirty two (32) PWR fuel assemblies with or without non-fuel hardware. Up to eight (8) of these assemblies may be classified as damaged fuel assemblies or fuel debris, with the balance being classified as intact fuel assemblies. Damaged fuel assemblies and fuel debris must be stored in fuel storage locations 1, 4, 5, 10, 23, 28, 29, and/or 32 (see Figure 1.2.3).

MPC-68

The MPC-68 is designed to accommodate up to sixty-eight (68) BWR intact and/or damaged fuel assemblies, with or without channels. For the Dresden Unit 1 or Humboldt Bay plants, the number of damaged fuel assemblies may be up to a total of 68. For damaged fuel assemblies from plants other than Dresden Unit 1 and Humboldt Bay, the number of damaged fuel assemblies is limited to sixteen (16) and must be stored in fuel storage locations 1, 2, 3, 8, 9, 16, 25, 34, 35, 44, 53, 60, 61, 66, 67, and/or 68 (see Figure 1.2.2).

MPC-68F

The MPC-68F is designed to accommodate up to sixty-eight (68) Dresden Unit 1 or Humboldt

Bay BWR fuel assemblies (with or without channels) made up of any combination of fuel assemblies classified as intact fuel assemblies, damaged fuel assemblies, and up to four (4) fuel assemblies classified as fuel debris.

MPC-68FF

The MPC-68FF is designed to accommodate up to sixty-eight (68) BWR fuel assemblies with or without channels. Any number of these fuel assemblies may be Dresden Unit 1 or Humboldt Bay BWR fuel assemblies classified as intact fuel or damaged fuel. Dresden Unit 1 and Humboldt Bay fuel debris is limited to eight (8) DFCs. DFCs containing Dresden Unit 1 or Humboldt Bay fuel debris may be stored in any fuel storage location. For BWR fuel assemblies from plants other than Dresden Unit 1 and Humboldt Bay, the total number of fuel assemblies classified as damaged fuel assemblies or fuel debris is limited to sixteen (16), with up to eight (8) of the 16 fuel assemblies classified as fuel debris. These fuel assemblies must be stored in fuel storage locations 1, 2, 3, 8, 9, 16, 25, 34, 35, 44, 53, 60, 61, 66, 67, and/or 68 (see Figure 1.2.2). The balance of the fuel storage locations may be filled with intact BWR fuel assemblies, up to a total of 68.

Table 1.2.1

KEY SYSTEM DATA FOR HI-STORM 100 SYSTEM

ITEM	QUANTITY	NOTES
Types of MPCs included in this revision of the submittal	7 8	4 5 for PWR 3 for BWR
MPC storage capacity [†] :	MPC-24 MPC-24E MPC-24EF	Up to 24 intact Zircaloy -ZR or stainless steel clad PWR fuel assemblies with or without non-fuel hardware. Up to four damaged fuel assemblies may be stored in the MPC-24E and up to four (4) damaged fuel assemblies and/or fuel assemblies classified as fuel debris may be stored in the MPC-24EF OR
	MPC-32 MPC-32F	Up to 32 intact Zircaloy -ZR or stainless steel clad PWR fuel assemblies with or without non-fuel hardware. Up to 8 damaged fuel assemblies may be stored in the MPC-32 and up to 8 damaged fuel assemblies and/or fuel assemblies classified as fuel debris may be stored in the MPC-32F.
	MPC-68	Any combination of Dresden Unit 1 or Humboldt Bay damaged fuel assemblies in damaged fuel containers and intact fuel assemblies, up to a total of 68. For damaged fuel other than Dresden Unit 1 and Humboldt Bay, the number of fuel assemblies is limited to 16, with the balance being intact fuel assemblies. OR

[†] See Section 2.1.2.3 and Appendix B to the CoG for a complete description of cask *authorized cask* contents and fuel specifications, respectively.

Table 1.2.1 (continued)
KEY SYSTEM DATA FOR HI-STORM 100 SYSTEM

ITEM	QUANTITY	NOTES
MPC storage capacity:	MPC-68F	Up to 4 damaged fuel containers with Zircaloy -ZR clad Dresden Unit 1 (D-1) or Humboldt Bay (HB) BWR fuel debris and the complement damaged Zircaloy ZR clad Dresden Unit 1 or Humboldt Bay BWR fuel assemblies in damaged fuel containers or intact Dresden Unit 1 or Humboldt Bay BWR intact fuel assemblies.
	MPC-68FF	OR Up to 68 Dresden Unit 1 or Humboldt Bay intact fuel or damaged fuel and up to 8 damaged fuel containers containing D-1 or HB fuel debris. For other BWR plants, up to 16 damaged fuel containers containing BWR damaged fuel and/or fuel debris with the complement intact fuel assemblies, up to a total of 68. The number of damaged fuel containers containing BWR fuel debris is limited to eight (8) for all BWR plants.

Table 1.2.2
KEY PARAMETERS FOR HI-STORM 100 MULTI-PURPOSE CANISTERS

	PWR	BWR
Pre-disposal service life (years)	40	40
Design temperature, max./min. (°F)	725 [†] /-40 ^{††}	725 [†] /-40 ^{††}
Design internal pressure (psig)		
Normal conditions	100	100
Off-normal conditions	+00/-10	+00/-10
Accident Conditions	200	200
Total heat load, max. (kW)	28.74	28.19
Maximum permissible peak fuel cladding temperature:		
Long Term Normal (°F)	See Table 2.2.3752	See Table 2.2.3752
Short Term Operations (°F)	752 or 1058 ^{†††}	752 or 1058 ^{†††}
Off-normal and Accident (°F)	1058	1058
MPC internal environment helium fill (99.995% fill helium purity)	(all pressure ranges are at a reference temperature of 70°F)	(all pressure ranges are at a reference temperature of 70°F)
MPC-24 (heat load ≤ 27.77 kW)	≥ 29.3 psig and ≤ 33.3 psig OR 0.1212 +/-10% g-moles/liter	
MPC-24E/24EF (heat load ≤ 28.17 kW)	≥ 29.3 psig and ≤ 33.3 psig OR 0.1212 +/-10% g-moles/liter	
MPC-68/68F/68FF (heat load ≤ 28.19 kW)		0.1218 +/-10% g-moles/liter OR ≥ 29.3 psig and ≤ 33.3 psig
MPC-32/32F (heat load ≤ 28.74 kW)	≥ 29.3 psig and ≤ 33.3 psig OR 0.1212 +/-10% g-moles/liter	
Maximum permissible multiplication factor (k _{eff}) including all uncertainties and biases	< 0.95	< 0.95

[†] Maximum normal condition design temperatures for the MPC fuel basket. A complete listing of design temperatures for all components is provided in Table 2.2.3.

^{††} Temperature based on off-normal minimum environmental temperatures specified in Section 2.2.2.2 and no fuel decay heat load.

^{†††} See Section 4.5 for discussion of the applicability of the 1058°F temperature limit during MPC drying.

Table 1.2.2 (cont'd)
KEY PARAMETERS FOR HI-STORM 100 MULTI-PURPOSE CANISTERS

	PWR	BWR .
<i>Fixed Neutron Absorber Boral</i> ¹⁰ B Areal Density (g/cm ²)	0.0267/0.0223 (MPC-24)	0.0372/0.0310 (MPC-68 & MPC-68FF)
<i>Boral/METAMIC</i>	0.0372/0.0310 (MPC-24E, MPC-24EF & MPC-32, & MPC-32F)	0.01/NA (MPC-68F) (<i>See Note 1</i>)
End closure(s)	Welded	Welded
Fuel handling	Opening compatible with standard grapples	Opening compatible with standard grapples
Heat dissipation	Passive	Passive

NOTES:

1. All MPC-68F canisters are equipped with Boral neutron absorber.

Table 1.2.3

INTENTIONALLY DELETED

Table 1.2.4

INTENTIONALLY DELETED

Table 1.2.5

INTENTIONALLY DELETED

Table 1.2.6

HI-STORM 100 OPERATIONS SEQUENCE

Site-specific handling and operations procedures will be prepared, reviewed, and approved by each owner/user.	
1	HI-TRAC and MPC lowered into the fuel pool without lids
2	Fuel assemblies transferred into the MPC fuel basket
3	MPC lid lowered onto the MPC
4	HI-TRAC/MPC assembly moved to the decon pit and MPC lid welded in place, volumetrically or multi-layer PT examined, hydrostatically tested , and leak <i>pressure</i> tested
5	MPC dewatered, moisture removed, backfilled with helium, and the closure ring welded
6	HI-TRAC annulus drained and external surfaces decontaminated
7	MPC lifting cleats installed and MPC weight supported by rigging
8	HI-TRAC pool lid removed and transfer lid attached (not applicable to HI-TRAC 125D)
9	MPC lowered and seated on HI-TRAC transfer lid (not applicable to HI-TRAC 125D)
9a	HI-STORM mating device secured to top of empty HI-STORM overpack (HI-TRAC 125D only)
10	HI-TRAC/MPC assembly transferred to atop HI-STORM overpack or mating device, as applicable
11	MPC weight supported by rigging and transfer lid doors opened (standard design HI-TRAC) or pool lid removed (HI-TRAC 125D)
12	MPC lowered into HI-STORM overpack, and HI-TRAC removed from atop HI-STORM overpack/mating device
12a	HI-STORM mating device removed (HI-TRAC 125D only)
13	HI-STORM overpack lid installed and bolted in place
14	HI-STORM overpack placed in storage at the ISFSI pad
15	For HI-STORM 100A (or 100SA) users, the overpack is anchored to the ISFSI pad by installation of nuts onto studs and torquing to the minimum required torque.

Table 1.2.7

**REPRESENTATIVE ASME BOLTING AND THREADED ROD MATERIALS ACCEPTABLE
FOR THE HI-STORM 100A ANCHORAGE SYSTEM**

ASME MATERIALS FOR BOLTING

Composition	I.D.	Type Grade or UNC No.	Ultimate Strength (ksi)	Yield Strength (ksi)	Code Permitted Size Range [†]
C	SA-354	BC K04100	125	109	$t \leq 2.5''$
¼ Cr	SA-574	51B37M	170	135	$t \geq 5/8''$
1 Cr – 1/5 Mo	SA-574	4142	170	135	$t \geq 5/8''$
1 Cr-1/2 Mo-V	SA-540	B21 (K 14073)	165	150	$t \leq 4''$
5 Cr – ½ Mo	SA-193	B7	125	105	$t \leq 2.5''$
2Ni – ¼ Cr – ¼ Mo	SA-540	B23 (H-43400)	135	120	
2Ni – ¼ Cr – 1/3 Mo	SA-540	B-24 (K-24064)	135	120	
17Cr-4Ni-4Cu	SA-564	630(H-1100)	140	115	
17Cr-4Ni-4Cu	SA-564	630(H-1075)	145	125	
25Ni-15Cr-2Ti	SA-638	660	130	85	
22ER-13Ni-5Mn	SA-479	XM-19(S20910)	135	105	

Note: The materials listed in this table are representative of acceptable materials and have been abstracted from the ASME Code, Section II, Part D, Table 3. Other materials listed in the Code are also acceptable as long as they meet the size requirements, the minimum requirements on yield and ultimate strength (see Table 2.0.4), and are suitable for the environment.

[†] Nominal diameter of the bolt (or rod) as listed in the Code tables. Two-inch diameter studs/rods are specified for the HI-STORM 100A.

Table 1.2.8

METAMIC[®] DATA FOR HOLTEC MPCs

<i>MPC Type</i>	<i>Min. B-10 areal density required by criticality analysis (g/cm²)</i>	<i>Nominal Weight Percent of B₄C and Reference METAMIC[®] Panel Thickness</i>			
		<i>100% Credit</i>	<i>90% Credit</i>	<i>75% Credit</i>	<i>Ref. Thickness (inch)</i>
<i>MPC-24</i>	<i>0.020</i>	<i>27.6</i>	<i>31</i>	<i>37.2</i>	<i>0.075</i>
<i>MPC-68, -68FF, -32, -32F, -24E, and -24EF</i>	<i>0.0279</i>	<i>27.8</i>	<i>31</i>	<i>37.4</i>	<i>0.104</i>

APPENDIX 1.D: Requirements on HI-STORM 100 Shielding Concrete

1.D.1 Introduction

The HI-STORM 100 overpack utilizes plain concrete for neutron and gamma shielding. While most of the shielding concrete used in the HI-STORM 100 overpack is installed in the annulus between the concentric structural shells, smaller quantities of concrete are also present in the pedestal shield and the overpack lid. Because plain concrete has little ability to withstand tensile stresses, but is competent in withstanding compressive and bearing loads, the design of the HI-STORM 100 overpack places no reliance on the tension-competence of the shielding concrete. ACI 318-95 provides formulas for permissible compressive and bearing stresses in plain concrete which incorporate a penalty over the corresponding permissible values in reinforced concrete. The formulas for permissible compressive and bearing stresses set forth in ACI 318-95 are used in calculations supporting this TSAR in load cases involving compression or bearing loads on the overpack concrete. However, since ACI 318-95 is intended for commercial applications and the overpack concrete is designated as an ITS Category B material, it is necessary to invoke provisions of ACI 349 (85) (which is sanctioned by NUREG-1536) for all requirements except for the allowable stress formulas (which do not exist in ACI 349) and load combinations. This appendix provides a complete set of criteria applicable to the plain concrete in the HI-STORM 100 overpack.

1.D.2 Design Requirements

The primary function of the plain concrete is to provide neutron and gamma shielding. As plain concrete is a competent structural member in compression, the plain concrete's effect on the performance of the HI-STORM overpack is included. The formulas for permissible compressive and bearing stresses set forth in ACI 318-95 are used. However, as plain concrete has very limited capabilities in tension, no tensile strength is allotted to the concrete.

The steel structure of the HI-STORM overpack provides the strength to meet all load combinations specified in Chapters 2 and 3. Credit for the structural strength of the plain concrete is limited to the compressive load carrying capability of the concrete in calculations appropriate to handling and transfer operations, and to demonstrate that the HI-STORM 100 System continues to provide functional performance in a post-accident environment. Therefore, the load combinations provided in ACI 349 and NUREG-1536, Table 3-1 are not applied to the plain concrete.

The shielding performance of the plain concrete is maintained by ensuring that the allowable concrete temperature limits are not exceeded. The thermal analyses for normal and off-normal conditions demonstrate that the plain concrete does not exceed the allowable long term temperature limit provided in Table 1.D.1. Under accident conditions, the bulk of the plain concrete in the HI-STORM overpack does not exceed the allowable short term temperature limit provided in Table 1.D.1. Any portion of the plain concrete which exceeds the short term temperature limit under accident conditions is neglected in the post-accident shielding analysis and in any post-accident structural analysis.

1.D.2.1 Test Results to Support Normal Condition Temperature Limit

Note 3 to Table 1.D.1 references Paragraph A.4.3 of ACI-349, which requires that normal condition temperatures in excess of 150 °F bulk and 200 °F local must be supported by test data to demonstrate that strength reductions are acceptable and that concrete deterioration does not occur. Such data are described and discussed in this subsection.

With respect to concrete compressive strength at bulk temperatures up to 300 °F, test studies for elevated temperatures were performed by Carette and Malhorta [1.D.1] that examined conditions very similar to those of the HI-STORM concrete. Their tests were performed on 4" diameter by 8" long test cylinders. The test condition most closely matching the HI-STORM concrete was: 0.6 water-to-cement ratio, limestone aggregate and 300 °F for four months. While the HI-STORM storage period is much greater than 4 months, the investigators state "any major strength loss is found to occur within the first month of exposure." The four-month compressive strength for these conditions was actually determined to be greater than the nominal concrete strengths despite the elevated temperatures. This is attributable to the increase in compressive strength that accompanies concrete aging, which more than offsets the temperature effects.

With respect to concrete shielding performance at local temperatures above 300 °F, a report by Schneider and Horvath [1.D.2] examined weight loss of concrete at elevated temperatures. Tests were performed on 12mm diameter by 40 mm long test cylinders in an apparatus called a thermobalance. A variety of aggregates (i.e., quartz, limestone and basalt) were tested. The test results indicate a worst-case weight loss of 0.424% from 300 °F to 365 °F for quartz aggregates. This maximum level of weight loss would reduce the concrete density from 2.35 gm/cc to 2.34 gm/cc. If the entire weight loss is attributed to water loss, the corresponding limiting reduction in hydrogen content is from 0.6% to 0.555%. As discussed in Section 5.3.2, such reductions are negligible with respect to shielding performance.

1.D.3 Material Requirements

Table 1.D.1 provides the material limitations and requirements applicable to the overpack plain concrete. These requirements are drawn from ACI 349 (85) supplemented by the provisions of NUREG 1536 (page 3-21) and standard good practice. Two different minimum concrete densities are specified for the overpack concrete, based on the presence or absence of the steel shield shell.

1.D.4 Construction Requirements

The HI-STORM 100 overpack is composed of a steel structure that houses plain concrete. The steel structure acts as the framework for the pouring of the concrete. The steel structure defines the dimensions of the concrete which ensures that the required thickness of concrete is provided. The fabrication sequence for the HI-STORM 100 overpack as it pertains to the concrete is provided below. All item numbers are taken from the design drawings. All nomenclature is taken from the bills-of-material.

The steel structure of the HI-STORM 100 overpack body is assembled at a qualified steel fabrication facility. However, access remains to the annulus formed by the overpack inner and outer shells

(Items 3 and 2, respectively); likewise, the pedestal shell (Item 5) is welded to the baseplate (Item 1) and the pedestal platform (Item 24) to form the pedestal cavity, but penetrations exist in the baseplate to allow placement of concrete. The steel structure of the overpack body is transported to the reactor site or a nearby concrete facility.

Once the steel structure of the body is received, the body will be inspected to ensure the steel structure meets the requirements of Sections 5.1 and 6.1 of ACI 349. The concrete shall be mixed, conveyed, and deposited in accordance with Sections 5.2 through 5.4 of ACI 349. Sufficient rigidity in the steel structure overpack body is provided such that all the concrete may be placed in a single pour into each of the four segments formed by the inner shell (Item 3), outer shell (Item 2), and radial plates (Item 14). If more than one pour is performed, the requirements of Section 6.4 of ACI 349 must be met for construction joints. The pedestal shell may require bracing and support in accordance with Section 6.1 of ACI 349 to maintain the proper position and shape.

Mixing and placing of the concrete shall follow the guidance of Sections 5.6 and 5.7 for cold and hot weather conditions, respectively. Consolidation of the plain concrete shall be performed in accordance with ACI 309-87. As no reinforcement is placed in the concrete, the possibility of voids is greatly diminished. Curing of the concrete shall be in accordance with Section 5.5 of ACI 349. Water curing or accelerated curing using sealing materials methods may be used as described in ACI 308-92, Standard Practice for Curing Concrete. This would include the use of either a plastic film or a curing compound.

Non-shrink grout shall be applied as necessary to account for any deviation of the concrete elevation. To fabricate the overpack lid an identical process is followed.

Table 1.D.1 provides the construction limitations and requirements applicable to the overpack plain concrete. These requirements are drawn from ACI 349 (85).

1.D.5 Testing Requirements

Table 1.D.2 provides the testing requirements applicable to the overpack plain concrete. These requirements are drawn from ACI 349 (85).

1.D.6 References

- [1.D.1] *Carette and Malhorta, "Performance of Dolostone and Limestone Concretes at Sustained High Temperatures," Temperature Effects on Concrete, ASTM STP 858.*
- [1.D.2] *Schneider and Horvath, "Behaviour of Ordinary Concrete at High Temperature," Vienna Technical University – Institute for Building Materials and Fire Protection, Research Report Volume 9.*

Table 1.D.1: Requirements for Plain Concrete

ITEM	APPLICABLE LIMIT OR REFERENCE
Density in overpack body (Minimum)	146 lb/ft ³ (HI-STORM 100 up to Serial Number (S/N) 7), 155 lb/ft ³ (HI-STORM 100 S/N 8 and higher, and HI-STORM 100S)
Density in lid and pedestal (Minimum)	146 lb/ft ³
Specified Compressive Strength	3,300 psi (min.)
Compressive and Bearing Stress Limit	Per ACI 318-95
Cement Type and Mill Test Report	Type II; Section 3.2 (ASTM C 150 or ASTM C595)
Aggregate Type	Section 3.3 (including ASTM C33(Note 2))
Nominal Maximum Aggregate Size	1 (inch)
Water Quality	Per Section 3.4
Material Testing	Per Section 3.1
Admixtures	Per Section 3.6
Maximum Water to Cement Ratio	0.5 (Table 4.5.2)
Maximum Water Soluble Chloride Ion Cl in Concrete	1.00 percent by weight of cement (Table 4.5.4)
Concrete Quality	Per Chapter 4 of ACI 349
Mixing and Placing	Per Chapter 5 of ACI 349
Consolidation	Per ACI 309-87
Quality Assurance	Per Holtec Quality Assurance Manual, 10 CFR Part 72, Appendix G commitments
Maximum Local-Through-Thickness Section Average[†] Temperature Limit Under Long Term Conditions for HI-STORM Lid Concrete	3200°F (See Note 3)
Maximum Local Temperature Limit Under Long Term Conditions for HI-STORM Body and Pedestal Concrete	300 °F (See Note 3)
Maximum-Through-Thickness Section Average[†] Temperature Limit Under Short Term Conditions	350°F (Appendix A, Subsection-Paragraph A.4.2)
Aggregate Maximum Value ^{††} of Coefficient of Thermal Expansion (tangent in the range of 70°F to 100°F)	6E-06 inch/inch/°F (NUREG-1536, 3.V.2.b.i.(2)(c)2.b)

[†] The through-thickness section average is the same quantity as that defined in Paragraph A.4.3 of Appendix A to ACI 349 as the mean temperature distribution. A formula for determining this value, consistent with the inner and outer surface averaging used in this FSAR, is presented in Figure A-1 of the commentary on ACI 349. Use of this quantity as an acceptance criterion is, therefore, in accordance with the governing ACI code.

^{††} The following aggregate types are a priori acceptable: limestone, dolomite, marble, basalt, granite, gabbro, or rhyolite. The thermal expansion coefficient limit does not apply when these aggregates are used. Careful consideration shall be given to the potential of long-term degradation of concrete due to chemical reactions between the aggregate and cement selected for HI-STORM 100 overpack concrete.

*Table 1.D.1 (continued)
Requirements for Plain Concrete*

Notes:

1. All section and table references are to ACI 349 (85).
2. The coarse aggregate shall meet the requirements of ASTM C33 for class designation 1S from Table 3. However, if the requirements of ASTM C33 cannot be met, concrete that has been shown by special tests or actual service to produce concrete of adequate strength and durability meeting the requirements of Tables 1.D.1 and 1.D.2 is acceptable in accordance with ACI 349 Section 3.3.2.
3. The 300°F long term temperature limit is specified in accordance with Paragraph A.4.3 of ACI 349 for normal conditions considering the very low maximum stresses calculated and discussed in Section 3.4 of this FSAR for normal conditions. In accordance with this paragraph of the governing code, the specified concrete compressive strength is supported by test data and the concrete is shown not to deteriorate, as evidenced by a lack of reduction in concrete density or durability. ~~The 200°F long term temperature limit is based on (1) the use of Type II cement, specified aggregate criteria, and the specified compressive stress in Table 1.D.1, (2) the relatively small increase in long term temperature limit over the 150°F specified in Paragraph A.4.1, and (23) the very low maximum stresses calculated for normal and off-normal conditions in Section 3.4 of this FSAR.~~

Table 1.D.2: Testing Requirements for Plain Concrete

TEST	SPECIFICATION
Compression Test	ASTM C31, ASTM C39, ASTM C192
Unit Weight (Density)	ASTM C138
Maximum Water Soluble Chloride Ion Concentration	Federal Highway Administration Report FHWA-RD-77-85, "Sampling and Testing for Chloride Ion in Concrete"

CHAPTER 5[†]: SHIELDING EVALUATION

5.0 INTRODUCTION

The shielding analysis of the HI-STORM 100 System, including the HI-STORM 100 overpack, HI-STORM 100S overpack, *HI-STORM 100S Version B overpack*^{††}, and the 100-ton and 125-ton (including the 125D) HI-TRAC transfer casks, is presented in this chapter. The HI-STORM 100 System is designed to accommodate different MPCs within two HI-STORM overpacks (the HI-STORM 100S overpack is a shorter version of the HI-STORM 100 overpack) *The HI-STORM 100S Version B is a variant of the HI-STORM 100S with a height of approximately 218 inches.* The MPCs are designated as MPC-24, MPC-24E and MPC-24EF (24 PWR fuel assemblies), MPC-32 and MPC-32F (32 PWR fuel assemblies), and MPC-68, MPC-68F, and MPC-68FF (68 BWR fuel assemblies). The MPC-24E and MPC-24EF are essentially identical to the MPC-24 from a shielding perspective. Therefore only the MPC-24 is analyzed in this chapter. Likewise, the MPC-68, MPC-68F and MPC-68FF are identical from a shielding perspective *as are the MPC-32 and MPC-32F* and therefore only the MPC-68 and MPC-32 *is* analyzed. Throughout this chapter, unless stated otherwise, MPC-24 refers to either the MPC-24, MPC-24E, or MPC-24EF and MPC-32 refers to either the MPC-32 or MPC-32F and MPC-68 refers to the MPC-68, MPC-68F, and MPC-68FF.

In addition to storing intact PWR and BWR fuel assemblies, the HI-STORM 100 System is designed to store BWR and PWR damaged fuel assemblies and fuel debris. Damaged fuel assemblies and fuel debris are defined in Sections 2.1.3 and ~~the approved contents section of Appendix B to the CoC 2.1.9.~~ Both damaged fuel assemblies and fuel debris are required to be loaded into Damaged Fuel Containers (DFCs) prior to being loaded into the MPC. DFCs containing BWR fuel debris must be stored in the MPC-68F or MPC-68FF. DFCs containing BWR damaged fuel assemblies may be stored in either the MPC-68, the MPC-68F, or the MPC-

[†] This chapter has been prepared in the format and section organization set forth in Regulatory Guide 3.61. However, the material content of this chapter also fulfills the requirements of NUREG-1536. Pagination and numbering of sections, figures, and tables are consistent with the convention set down in *Chapter 1*, Section 1.0, herein. Finally, all terms-of-art used in this chapter are consistent with the terminology of the glossary (Table 1.0.1) and component nomenclature of the Bill-of-Materials (Section 1.5).

^{††} *The HI-STORM 100S Version B was implemented in the HI-STORM FSAR through the 10 CFR 72.48 process. The discussion of the HI-STORM 100S Version B and associated results were added to LAR 1014-2 at the end of the review cycle to support the NRC review of the radiation protection program proposed in the Certificate of Compliance in LAR 1014-2. As the purpose of this discussion is to provide the basis for the radiation protection program only, the HI-STORM 100S Version B is only presented in this chapter of the proposed revised FSAR. The NRC did not review and approve any aspect of the design of the HI-STORM 100S Version B since it has been implemented under the provisions of 10 CFR 72.48.*

68FF. DFCs containing PWR fuel debris must be stored in the MPC-24EF *or* MPC-32F while DFCs containing PWR damaged fuel assemblies may be stored in either the MPC-24E, ~~or~~ MPC-24EF, MPC-32, *or* MPC-32F.

The MPC-68, MPC-68F, and MPC-68FF are also capable of storing Dresden Unit 1 antimony-beryllium neutron sources and the single Thoria rod canister which contains 18 thoria rods that were irradiated in two separate fuel assemblies.

PWR fuel assemblies may contain burnable poison rod assemblies (BPRAs), thimble plug devices (TPDs), control rod assemblies (CRAs) or axial power shaping rod assemblies (APSRs) or similarly named devices. These non-fuel hardware devices are an integral yet removable part of PWR fuel assemblies and therefore the HI-STORM 100 System has been designed to store PWR fuel assemblies with or without these devices. Since each device occupies the same location within a fuel assembly, a single PWR fuel assembly will not contain multiple devices.

In order to offer the user more flexibility in fuel storage, the HI-STORM 100 System offers two different loading patterns in the MPC-24, MPC-24E, MPC-24EF, MPC-32, *MPC-32F*, MPC-68, and the MPC-68FF. These patterns are uniform and regionalized loading as described in Section 2.0.1 and 2.1.6. Since the different loading patterns have different allowable burnup and cooling times combinations, both loading patterns are discussed in this chapter.

The sections that follow will demonstrate that the design of the HI-STORM 100 dry cask storage system fulfills the following acceptance criteria outlined in the Standard Review Plan, NUREG-1536 [5.2.1]:

Acceptance Criteria

1. The minimum distance from each spent fuel handling and storage facility to the controlled area boundary must be at least 100 meters. The "controlled area" is defined in 10CFR72.3 as the area immediately surrounding an ISFSI or monitored retrievable storage (MRS) facility, for which the licensee exercises authority regarding its use and within which ISFSI operations are performed.
2. The cask vendor must show that, during both normal operations and anticipated occurrences, the radiation shielding features of the proposed dry cask storage system are sufficient to meet the radiation dose requirements in Sections 72.104(a). Specifically, the vendor must demonstrate this capability for a typical array of casks in the most bounding site configuration. For example, the most bounding configuration might be located at the minimum distance (100 meters) to the controlled area boundary, without any shielding from other structures or topography.

3. Dose rates from the cask must be consistent with a well established "as low as reasonably achievable" (ALARA) program for activities in and around the storage site.
4. After a design-basis accident, an individual at the boundary or outside the controlled area shall not receive a dose greater than the limits specified in 10CFR 72.106.
5. The proposed shielding features must ensure that the dry cask storage system meets the regulatory requirements for occupational and radiation dose limits for individual members of the public, as prescribed in 10 CFR Part 20, Subparts C and D.

This chapter contains the following information which demonstrates full compliance with the Standard Review Plan, NUREG-1536:

- A description of the shielding features of the HI-STORM 100 System, including the HI-TRAC transfer cask.
- A description of the bounding source terms.
- A general description of the shielding analysis methodology.
- A description of the analysis assumptions and results for the HI-STORM 100 System, including the HI-TRAC transfer cask.
- Analyses are presented for each MPC showing that the radiation dose rates follow As-Low-As-Reasonably-Achievable (ALARA) practices.
- The HI-STORM 100 System has been analyzed to show that the 10CFR72.104 and 10CFR72.106 controlled area boundary radiation dose limits are met during normal, off-normal, and accident conditions of storage for non-effluent radiation from illustrative ISFSI configurations at a minimum distance of 100 meters.
- Analyses are also presented which demonstrate that the storage of damaged fuel and fuel debris in the HI-STORM 100 System is acceptable during normal, off-normal, and accident conditions.

Chapter 2 contains a detailed description of structures, systems, and components important to safety.

Chapter 7 contains *a discussion on the release of radioactive materials from the HI-STORM 100 System.* ~~an analysis of the estimated dose at the controlled area boundary during normal, off-normal, and accident conditions from the release of radioactive materials.~~ Therefore, this chapter only calculates the dose from direct neutron and gamma radiation emanating from the HI-STORM 100 System.

Chapter 10, Radiation Protection, contains the following information:

- A discussion of the estimated occupational exposures for the HI-STORM 100 System, including the HI-TRAC transfer cask.
- A summary of the estimated radiation exposure to the public.