SAFETY EVALUATION REPORT

Docket No. 72-8
Calvert Cliffs Nuclear Power Plant
Independent Spent Fuel Storage Installation
Materials License No. 2505
Amendment No. 6

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1.0 Introduction and General Description of Installation

This Safety Evaluation Report (SER) documents the U.S. Nuclear Regulatory Commission (NRC) staff's review and evaluation of an amendment to the license for the Calvert Cliffs Independent Spent Fuel Storage Installation (ISFSI). The application for an amended 10 CFR Part 72 license under the provisions of 10 CFR 72.56 was filed by Calvert Cliffs Nuclear Power Plant, Inc., on December 12, 2003, and supplemented with additional information dated May 12, 2004, and June, 7, 2005. The staff reviewed the application and prepared the SER in accordance with the following guidelines and associated references:

- NUREG-1536, "Standard Review Plan for Dry Cask Storage Systems," January 1997
- NUREG-1567, "Standard Review Plan for Spent Fuel Storage Facilities," March 2000

Calvert Cliffs Nuclear Power Plant, Inc., is in the process of upgrading portions of its ISFSI to use a modified Transnuclear NUHOMS-24P Dry Shielded Canister (DSC): the NUHOMS-32P. The NUHOMS-32P DSC will store eight more assemblies than the current NUHOMS-24P DSC using the same external and internal shell dimensions. The storage capacity is optimized by removing the space between the locations of each fuel assembly and by slightly reducing the size of the storage locations.

The applicant requested the following changes to the Calvert Cliffs ISFSI TS:

(1) TS 2.1 - adding a new neutron source per assembly value for 32P canisters;

(2) Limiting Condition for Operation (LCO) 3.1.1(4) - re-wording to indicate its applicability only to 24P canisters;

(3) LCO 3.2.1.1 - increasing the required spent fuel pool boron concentration from 1800 ppm to 2450 ppm;

(4) Surveillance Requirement (SR) 4.2.1.1 - increase time between taking boron sample and insertion of first assembly from 1 hour to 4 hours;

(5) SR 4.2.1.2 - increase time between taking boron sample and flooding the DSC cavity for unloading from 1 hour to 4 hours;

(6) LCO 3.1.1(7) - increase the assembly weight that can be stored from 1,300 pounds (lbs.) to 1,450 lbs.;

(7) LCO 3.1.1(5) and (6) - correction of an inaccurate statement; and

(8) TS 5.2 - Add a TS to include the minimum required B10 areal density for the borated aluminum canister neutron absorber plates for the NUHOMS-32P DSC.

The staff's review of the proposed revisions to the Calvert Cliffs ISFSI TS primarily addressed the safety aspects and long term impacts associated with the change from the NUHOMS DSC holding 24 fuel assemblies to 32 assemblies. The staff evaluated the proposed revision to the Calvert Cliffs ISFSI TS and license application against the applicable requirements of 10 CFR Part 72 for spent fuel storage and 10 CFR Part 20 for radiation protection.

The existing Calvert Cliffs ISFSI is a NUHOMS-24P dry storage system designed by Transnuclear, Inc. The NUHOMS-24P system uses a reinforced concrete horizontal storage module (HSM) to store spent fuel that is sealed in a stainless steel DSC. Currently, each DSC holds 24 spent fuel assemblies. The Calvert Cliffs ISFSI is licensed for 120 HSMs. A total of 48 HSMs will be loaded with the NUHOMS-24P DSC.

To optimize the storage of spent fuel assemblies at Calvert Cliffs ISFSI, modifications were made to the NUHOMS-24P DSC. The modified system will store eight more assemblies and will allow Calvert Cliffs to reduce the minimum number of canister loadings each year from four to three.

The staff's evaluation is based on the descriptions provided in the amendment application. This upgrade included evaluations performed under 10 CFR 72.48 for the NUHOMS-32P which were not reviewed by the staff. This safety evaluation does not recommend the Transnuclear NUHOMS-32P as an approved cask design. It approves amendments to the ISFSI TSs to incorporate changes required to support NUHOMS-24P upgrade, and changes that support the operation of both the existing NUHOMS-24P and the NUHOMS-32P systems.

In addition to the changes identified by the applicant, the staff identified the need to make a change to the license. Specifically, in license amendment 3 to SNM-2505 license condition 6, "Byproduct, Source, and/or Special Nuclear Material," license condition 7, "Chemical and/or Physical Form," and license condition 8, "Maximum Amount That Licensee May Possess at Any One Time Under This License," inadvertently had the "A" paragraph designation removed from the descriptive part of these license conditions. Because license condition 9 refers to license condition 6.A and 7.A the "A" designation have been restored to the descriptive part of license condition 6 and 7. The "A" designation was also restored to license condition 8 to be consistent with license condition 6 and 7. Because these changes are administrative in nature they are not discussed further in this SER.

2.0 Structural Evaluation

One of the changes to support the NUHOMS-24P upgrade is the Limiting Condition for Operations (LCO) 3.1.1(7): increase the assembly weight that can be stored from 1,300 lbs. (590 kg) to 1,450 lbs. (658 kg). Per the amendment application, due to the design improvements in the fuel assemblies and longer cycle lengths, the calculated weights of the discharged fuel assemblies have increased over the last 15 years of operation at Calvert Cliffs Nuclear Power Plant (CCNPP). The staff reviewed the proposed changes to the TSs to verify that the design meets the requirements of the following subsections of Title 10 CFR Part 72: 72.24(b), 72.24(c), 72.24(d), 72.40(a)(13), 72.56, 72.122.

1) CCNPP submitted a proposal to the staff to increase the assembly weight limit from 1,300 lbs. to 1,450 lbs. substantiated with the calculations performed during the ISFSI NUHOMS-24P design basis reconstitution project in the year 2001. The applicable ISFSI calculations were validated or revised using a 1,450 lbs. per assembly weight limit. The weight of 1,450 lbs. per assembly was also used in the design basis calculations for the NUHOMS-32P canisters. The staff concluded that the structural integrity of the NUHOMS 24-P and NUHOMS 32-P canisters was evaluated for all normal operations, off-normal operations and accident analysis and the stresses evaluated were found to be within the allowable structural limits.

2) Additionally, the staff has noted that the calculations supporting the Transnuclear's Certificate of Compliance for its NUHOMS-24P system (certificate number 1004), which is similar to the CCNPP's NUHOMS-24P system, used the maximum assembly weight of 1,682 lbs. (which is 382 lbs. more than the current limit of 1,300 lbs.) to demonstrate the structural integrity of the 24P canister for required design and operation conditions (Ref. Table 3.1-1 of the Topical Report for NUHOMS-24P NUH-002, Rev. 2A, April 1991).

Based on the discussions above, the staff concludes that the requirements of the provisions mentioned above have been met, and the proposed change to increase the weight per assembly from the current 1,300 lbs. to 1,450 lbs. for the NUHOMS-24P upgrade to the NUHOMS-32P at CCNPP, is within the weight limit previously reviewed and accepted by the staff.

3.0 Thermal Evaluation

The Calvert Cliffs ISFSI license application request includes a revision to the TSs to support the ISFSI NUHOMS-24P upgrade. The proposed changes to the Calvert Cliffs ISFSI TSs include (but are not limited to):

1 Increase of the neutron source per assembly from a maximum of 2.23×10^8 n/sec/assembly (for the NUHOMS-24P storage canister) to a maximum of 3.3×10^8 n/sec/assembly (for the NUHOMS-32P storage canister).

2 Fuel shall have cooled as specified in ISFSI SAR Table 9.4.1

3 Maximum assembly mass including control components shall not exceed 1450 lb (658 kg).

In Calvert Cliffs response to the staff's request for additional information, the applicant stated that the maximum allowable decay heat generation rate can be held constant even when the neutron source term is increased by about 50% because a combination of neutron source, gamma source, and heat source is selected to bound all assemblies that will be stored at the ISFSI site. Also, at the staff's request, the impact on the calculated total decay heat per assembly with respect to the increase in the maximum fuel assembly weight from 1,300 lbs. to

1,450 lbs., the applicant responded that the increase in fuel assembly weight from 1,300 to 1,450 lbs. does not include any increase in uranium mass. The increase in assembly weight is to be used for structural calculations only and accounts for weight increases caused by other materials such as corrosion products and control rod storage.

As a result of the staff's request to clarify whether the assumed assembly loading of 0.386 MTU used in decay heat calculations has been verified for the intended fuel to be stored at the ISFSI in both the NUHOMS-24P and NUHOMS-32P storage designs, the applicant responded that in accordance with Calvert Cliffs ISFSI Updated SAR (USAR) Table 3.1-1, the design basis value of 0.386 MTU/assembly for the NUHOMS-24P system was nominal and not bounding. The applicant stated that for the NUHOMS-32P system, a proposed limiting assembly mass of 0.4 MTU would bound all the standard CE 14x14 fuel assemblies used at Calvert Cliffs. The ISFSI fuel loading procedures for the NUHOMS-32P canister will include tables that are independently verified by individuals to ensure all spent fuel assemblies meet all the applicable TSs including TS 3.1.1(5), that limits the maximum heat generation rate to 0.66 kW per fuel assembly. At the staff's request to clarify whether the calculation of decay heat provided in the amendment application considers the uncertainties of calculated values, the applicant stated that uncertainties in the calculated decay heat were included by reducing the burnup value limit of Limiting Condition for Operation 3.1.1(3), which limits the maximum assembly average burnup to 47,000 Mwd/MTU by the uncertainty reported in the topical report for the core physics code. The applicant documents the lower burnup limit value in the ISFSI fuel loading procedure tables that record the spent fuel assembly acceptance values.

Based on review of the statements and representations in the amendment application and on the applicant's response to the staff's request for additional information, the staff concludes that the changes to the Calvert Cliffs TSs have been adequately described and justified, and therefore, the amendment application has demonstrated compliance with the design conditions and acceptance criteria described in 10 CFR Part 72 for this type of storage facility.

4.0 Shielding Evaluation

In this amendment request, the licensee is proposing to change Technical Specification (TS) 2.1 to support using the NUHOMS-32P canister as well as the NUHOMS-24P canister. The NUHOMS-32P will store 32 spent fuel assemblies, eight more than can be stored in the NUHOMS-24P.

The NUHOMS-32P has 32 stainless steel guide sleeves and uses an egg-crate design made of stainless steel and aluminum to support the guide sleeves. The guide sleeves and egg-crate components run the length of the canister.

TS 2.1 currently limits spent fuel stored in the NUHOMS-24P to have a neutron source per assembly of $\leq$2.23E8 neutrons/second/assembly and a gamma source term of $\leq$1.53E15 MeV/second/assembly. The proposed change to TS 2.1 would indicate that the neutron source per assembly of $\leq$2.23E8 neutrons/second/assembly would be for the NUHOMS-24P and a neutron source per assembly of $\leq$3.3E8 neutrons/second/assembly would be added for the NUHOMS-32P. The gamma source per assembly would be the same for both the NUHOMS-24P and the NUHOMS-32P.

According to the information submitted by the licensee in the amendment request, the higher neutron source term is being added for the NUHOMS-32P because of the possibility that fuel waiting to be stored will exceed the current criteria of $\leq$2.23E8 neutrons/second/assembly. The higher neutron source per assembly will allow the fuel to be stored in the NUHOMS-32P because it can not be stored in the NUHOMS-24P.

The contact dose rate for the NUHOMS-32P in a loss of neutron shielding accident is 1517 mrem/hour, which is approximately 35 percent higher than the contact dose rate determined for the NUHOMS-24P of 1126 mrem/hour. The dose rate increase from a loss of neutron shielding for the NUHOMS-32P would be a minimal change from the dose rate from a loss of neutron shielding accident for a NUHOMS-24P.

The staff has reviewed the amendment request, Transnuclear, Inc. proprietary dose rate calculations, and additional information submitted by the licensee. The staff performed confirmatory calculations using ORIGEN-ARP to verify the source term. The staff has reasonable assurance the NUHOMS-32P will maintain the doses less than specified in 10 CFR 72.104 and 72.106.

5.0 Materials Evaluation

The staff reviewed the Calvert Cliffs amendment request and response to the NRC's request for additional information relative to taking 90% credit for minimum ^{10}B areal density of 0.0100g/cm^2.

A new Technical Specification has been added; 5.2 <u>NUHOMS-32P Dry Shielded Canister (DSC)</u> "The NUHOMS-32P DSC poison plates shall have a minimum ^{10}B areal density of 0.0100g/cm^2."

In their response to the request for additional information the applicant provided a detailed description of the program justifying the use of 90% ^{10}B credit in the areal density. This includes taking coupons contiguous to every finished plate for neutronic inspection. Statistical evaluation of the neutron transmission results demonstrates that the ^{10}B areal density will meet or exceed the minimum 0.0100g/cm^2 with 95% confidence and 95% probability. The use of neutron transmission and neutron radioscopy/radiography of the coupons satisfies the uniformity specified in NUREG/CR-5661 on both the microscopic and macroscopic scales. Also, the boride particles are 5-10 microns, which are finer than the 85 micron boron carbide average particle specified in the NUREG/CR-5661.

Based on review of the statements and representations in the amendment application and on the applicant's response to the staff's request for additional information, the staff concludes that the changes to the Calvert Cliffs TSs have been adequately described and justified, and therefore, the amendment application has demonstrated compliance with the design conditions and acceptance criteria described in 10 CFR Part 72 for this type of storage facility.

6.0 Criticality Evaluation

The staff's review of the revised criticality evaluation for the Calvert Cliffs Independent Spent Fuel Storage Installation (ISFSI) included the revised TSs contained in the CCNPP amendment request dated December 12, 2003, Attachment 10 of that request, “Criticality Analysis of the NUHOMS-32P for Calvert Cliffs ISFSI,” CCNPP’s May 12, 2004, response to a request for additional information, and CCNPP’s June 7, 2005, letter regarding boron sampling. The purpose of the criticality review is to ensure that the stored materials remain subcritical under normal, off-normal, and accident conditions during all operations, transfers, and storage at the Calvert Cliffs ISFSI. The licensee proposes to use the NUHOMS-32P canister along with the same storage module and auxiliary equipment used for the NUHOMS-24P canister currently in use at the Calvert Cliffs ISFSI. This review considered how the information in the amendment request addresses the following regulatory requirements: 10 CFR 72.40(a)(13), 10 CFR 72.124(a), and 10 CFR 72.124(b).

6.1 Criticality Design Criteria and Features

The conditions for criticality safety of the Calvert Cliffs ISFSI with the NUHOMS-32P canister are based on acceptance criteria outlined in NUREG–1567, Chapter 8, “Criticality Evaluation” (U.S. Nuclear Regulatory Commission, 2000). The Calvert Cliffs ISFSI design criteria and features are described in Section 3 of the updated SAR. Attachment 10 of the CCNPP amendment request dated December 12, 2003, “Criticality Analysis of the NUHOMS-32P for Calvert Cliffs ISFSI,” addresses criticality safety of the NUHOMS-32P canister for the Calvert Cliffs ISFSI. The licensee did not rely on the use of burnup credit or fuel-related burnable neutron absorbers for the criticality safety analysis. In the analysis, the licensee took 90% credit for the minimum ^{10}B content in the fixed neutron absorbers. Enclosure 3 to the CCNPP letter dated May 12, 2004, “Acceptance Tests and Criteria for the Canister Neutron Absorber Plates for Inclusion in the Updated Safety Analysis Report,” provides the justification for this level of ^{10}B credit.

The design criterion for criticality safety is that the effective multiplication factor, k_{eff}, including statistical biases and uncertainties, shall not exceed 0.95 during all credible normal, off-normal, and accident conditions and events. The design criterion for criticality safety is consistent with the 10 CFR 72.124(a) requirement that at least two unlikely, independent, and concurrent or sequential changes to the conditions essential to criticality safety, under normal, off-normal, and accident conditions must occur before an accidental criticality is possible (adequate protection against accidental criticality is defined as maintaining k_{eff} below 0.95 at a 95-percent confidence level).

This cask system maintains the stored materials in a subcritical configuration independent of the ISFSI design. For criticality prevention, the cask system relies on the NUHOMS-32P canister, which provides the confinement system for the stored fuel, as well as 2,450 ppm soluble boron present in the spent fuel pool. At the Calvert Cliffs ISFSI, the fuel will be dry and sealed within a welded NUHOMS-32P canister. Thus, there are no credible accidents in which fresh water could enter the canister during transportation inside the Transfer Cask, reloading into the Horizontal Storage Module (HSM), and storage on the pad inside the HSM.

The licensee proposes to use the NUHOMS-32P canister in addition to the previously approved NUHOMS-24P canister at the Calvert Cliffs ISFSI. Each canister type can be stored within the same HSM, and transferred with the same Transfer Cask. The criticality safety features of the NUHOMS-32P canister are the inherent geometry of the fuel basket design within the canister that provides sufficient separation of stored fuel assemblies, and the permanent borated aluminum neutron-absorbing panels fixed to the egg-crate basket structure. As discussed in Section 5 of this report TS 5.2 provides that the NUHOMS-32P DSC poison plates shall have a minimum ^{10}B areal density of 0.0100g/cm^2. The NUHOMS-24P does not have a criticality safety feature design associated with fixed neutron absorbers. Instead TS LCO 3.1.1(4) provides that the minimum burnup for the spent fuel to be stored in a NUHOM-24P design shall exceed the minimum specified in SAR 3.3-1.

CCNPP proposed in its December 12, 2003, submittal to increase the boron sampling time for TS SR 4.2.1.1, and 4.2.1.2 from 1 hour to 24 hours. These proposed TS SR sampling times are not consistent with analogous TS SRs found in the Certificate of Compliance (CoC) No. 1004 for the Standardized NUHOMS® System. (CCNPP's ISFSI is based on the Standardized NUHOMS® System.) The analagous TS SRs associated with CoC No. 1004 require that within 4 hours prior to insertion of the first spent fuel assembly in the DSC, or prior to flooding the DSC cavity for unloading the fuel assemblies, that the dissolved boron concentration be determined to be within the TS limit. In a letter dated June 7, 2005, CCNPP amended its request to change the boron sampling time for TS SR 4.2.1.1 and 4.2.1.2 from 1 hour to 4 hours. The 4 hour sampling time is consistent with the approved TS SRs for CoC No. 1004, therefore, the staff finds the change for TS SR 4.2.1.1, and 4.2.1.2 acceptable.

The staff found that the design features important to nuclear criticality safety are clearly identified and adequately described, that the stored material will be maintained in a subcritical configuration, and that the design-basis, off-normal, and postulated accident events will not have an adverse effect on the design features important to criticality safety. Therefore, the staff concludes that the design features meet the requirements of 10 CFR 72.124(b) and 10 CFR 72.40(a)(13).

6.2 Stored Material Specifications

The proposed stored materials specifications are described in Section 3.1.1 of the Calvert Cliffs ISFSI SAR, as well as in Section 4.0 of Attachment 10 to the CCNPP amendment request dated December 12, 2003. The materials are identical to those stored in the previously approved NUHOMS-24P canister, and include intact Calvert Cliffs Nuclear Power Plant (CCNPP) CE 14x14 PWR fuel assemblies containing UO_2 fuel enriched up to 4.5 weight-% ^{235}U.

The staff finds that the proposed material specifications are adequate to ensure that the contents will be maintained subcritical and that, before a nuclear criticality accident is possible, at least two unlikely, independent, and concurrent or sequential changes must occur in the conditions essential to nuclear criticality safety, in compliance with 10 CFR 72.124(a).

6.3 Analytical Means

The staff reviewed the analytical means used by the licensee to demonstrate that the materials stored in the ISFSI will remain subcritical. Attachment 10 and Attachment 12 to the CCNPP amendment request dated December 12, 2003, contains relevant information.

The composition and density of the materials used in the licensee's criticality analysis, including the borated aluminum neutron absorber panels, are provided in Section 4.0 of Attachment 10 of the CCNPP amendment request dated December 12, 2003. The minimum required ^{10}B content in the neutron absorber panels is verified through the acceptance testing programs described in Enclosure 3 to the CCNPP letter dated May 12, 2004. As previously stated, the maximum ^{10}B credit taken is 90% of the minimum value of 0.010 g/cm^2 required by TS 5.2.

The continued efficacy of the neutron absorber materials over a 20-year storage period is assured by the design of the NUHOMS-32P canister, which ensures that the neutron absorbers will remain in place during accident conditions. Additionally, the neutron flux from the irradiated fuel will result in a negligible depletion of the ^{10}B content in the neutron absorber materials over the life of the storage system. The staff notes that these materials are not unique and are commonly used in other spent fuel storage and transportation applications.

The staff reviewed the composition and number densities for the materials used in the Calvert Cliffs ISFSI with the NUHOMS-32P canister and found them to be acceptable. Based on the information provided on the neutron absorber material, the staff agrees that the Calvert Cliffs ISFSI with the NUHOMS-32P canister meets the requirements of 10 CFR 72.124(b) regarding continued efficacy of neutron absorbers.

6.4 Criticality Analysis

The licensee performed the criticality analyses for the Calvert Cliffs ISFSI with the NUHOMS-32P canister using the CSAS25 module of the SCALE 4.4 code system[3], with KENO V.a and the 44-group ENDF/B-V cross-section library. Staff confirmatory calculations were performed using the 4.4a version of the SCALE code. KENO V.a is a three-dimensional Monte Carlo multi-group neutron transport code used by the SCALE system to calculate k_{eff}. This code is a standard in the nuclear industry for performing criticality analyses. The staff agrees that the codes and cross-section sets used in the criticality analysis are appropriate for this particular application.

All results of the licensee's analyses for all proposed fuel loadings yielded values for k_{eff}, less than the calculated upper subcritical limit (USL) for normal, off-normal, and accident conditions. These results are discussed in Section 7 of both Attachment 10 and Attachment 12 to the CCNPP amendment request dated December 12, 2003. The maximum k_{eff} was found to be 0.9412 under normal conditions, 0.9413 under the accident conditions drop scenario, 0.9377 for a misloading of up to two assemblies with 5.0 weight-% enrichment with varying moderator density, and 0.9385 for a misloading of up to eight assemblies with 5.0 weight-% enrichment with full moderator density.

The staff reviewed the licensee's calculated k_{eff} values and agrees that they have been appropriately adjusted to include all biases and uncertainties at a 95% confidence level or better.

The licensee performed benchmark calculations on critical experiments selected, as much as possible, to bound the range of variables in the NUHOMS-32P canister design. The parameters in the 121 benchmark experiments selected bounded the parameters in the analysis with respect to fuel enrichment, fuel rod pitch, assembly separation distance, and soluble boron concentration. The minimum value of k_{eff} over the parameter range for assembly separation distance, 0.9422, was selected as the most limiting USL. This USL incorporates the biases and uncertainties of the model and computer code into a value that has a 95% confidence level such that any k_{eff} less than the USL is less than 0.95, which is the design criterion.

The staff reviewed the benchmark comparisons in the SAR and agrees that the computer code used for the analysis was adequately benchmarked using representative critical experiments. The staff also reviewed the licensee's method for determining the USL and found it to be acceptable and conservative.

The staff performed independent criticality calculations for the Calvert Cliffs ISFSI with the NUHOMS-32P canister. The modeling assumptions used by the staff were similar to those used by the licensee. The staff's model considered the most reactive conditions in modeling the spent fuel configurations described in Attachment 10 to the CCNPP amendment request dated December 12, 2003. The results of the staff's confirmatory analyses were in close agreement with the licensee's results.

6.5 Evaluation Findings

Based on a review of the analyses in the amendment request and the presentations and information supplied by CCNPP, the staff finds, with reasonable assurance, that:

- The design, procedures, and materials to be stored in the NUHOMS-32P at the Calvert Cliffs ISFSI provide reasonable assurance that the activities authorized by the license can be conducted without endangering the health and safety of the public in compliance with 10 CFR 72.40(a)(13).

- The design and proposed use of the Calvert Cliffs ISFSI with the NUHOMS-32P canister handling, packaging, transfer, and storage systems for the radioactive materials to be stored provide reasonable assurance that the materials will remain subcritical and, that, before a nuclear criticality accident is possible, at least two unlikely, independent, and concurrent or sequential changes must occur in the conditions essential to nuclear criticality safety. Confirmatory analyses performed for that system by the NRC staff adequately show that acceptable margins of safety will be maintained in the nuclear criticality parameters commensurate with uncertainties in the data and methods used in calculations. The analyses demonstrated that adequate safety will be maintained for the handling, packaging, transfer, and storage of spent fuel during normal, off-normal, and accident conditions in compliance with 10 CFR 72.124(a) and 10 CFR 72.124(b).

7.0 Requirements for Noticing Proposed Action

The staff considered the amendment's potential impact on the health and safety of the public. The staff finds that this license amendment does not involve any changes in the scope or type of operations presently authorized by the license. The staff has determined that the amendment does not present a genuine issue as to whether public health and safety will be significantly affected.

Accordingly, pursuant to 10 CFR 72.46(b)(2), immediate action on this amendment may be taken without notice of the proposed action or a notice of opportunity for hearing.

8.0 Environmental Review

Pursuant to Part 51 of the Code of Federal Regulations, an Environmental Assessment (EA) has been prepared for this action and a Finding of No Significant Impact (FONSI) was issued. The EA and FONSI were published in the Federal Register on May 24, 2005 (70 FR 29784).

9.0 Conclusion

The proposed revision to the TSs and commensurate changes to the ISFSI license do not affect prior staff conclusions and findings made in granting approval of Amendment 5. Based on the information provided in the application, as supplemented, the staff concludes that SNM-2505, as amended, meets the requirements of 10 CFR Part 72.

Issued with Materials License No. SNM-2505, Amendment No. 6, on 10 June 2005