

HOLTEC INTERNATIONAL HI-STORM 100

CoC 1014, PROPOSED AMENDMENT 2

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HI-STORM 100 CoC 1014

LAR 2 Background

- LAR 2 – March 4, 2002 submittal to NRC
- Revised:
 - October 31, 2002 (Revision 1)
 - August 6, 2003, (Revision 2)
- Supplements:
 - November 14, 2003 (Supplement 1)
 - February 20, 2004 (Supplement 2)
 - April 23, 2004 (Supplement 3)
 - July 22, 2004 (Supplement 4)
 - August 13, 2004 (Supplement 5)
 - October 14, 2004 (Supplement 6)
 - December 3, 2004 (Supplement 7)
- Submittals based on FSAR Revision 1

HI-STORM CoC 1014

LAR 2 Background

- Preliminary Amendment 2/SER to Holtec – 12/06/04
- SFPO letter to NMSS for rulemaking – 12/21/04
 - Proposed rule held pending security review
- Published as direct-final rule – 2/28/05
 - Noticed for public comment 30 days ending 3/30/05
 - Absent significant adverse comments, effective date of rule – 5/16/05
 - Comments received docketed 3/30/05
- NRC extended comment period until 4/30/05
 - Additional comments docketed 5/5/05
- Based on receipt of comments, direct-final rule withdrawn – 5/12/05

Need for CoC 1014 Amendment 2 / Exemption

- **ANO**
 - Loss of full core offload capability
 - Insufficient space to stage fresh fuel in Unit 2 SFP
 - Results in extending Unit 2 outage
 - Cask loading scheduled around Fall 2005 Unit 1 outage
 - S/G and RPV head replacement outage
- **Casks fabricated to proposed LAR 2**
 - Incorporate Metamic
 - Require high burn-up
 - Shorter cooling periods
- **Adequate time appeared available for NRC approval when selected by Entergy for use**
- **Loading campaign begins – June 17, 2005**

Need for CoC 1014 Amendment 2 / Exemption

- Farley
 - Spring 2006 Unit 1 refueling outage
 - 6 vacant cells after full core off-load
 - Insufficient space to stage fresh fuel in SFP
 - Results in extending Unit 1 outage
 - Cask loading scheduled around Fall 2005 Unit 2 outage
- Three casks fabricated to proposed LAR 2
 - Incorporate Metamic
- Adequate time appeared available for NRC approval when selected by SNC for use
- NRC demonstration – Scheduled June 13, 2005
- Loading campaign begins July 1, 2005

Proposed Exemption Request

- Specific Exemption -- § 72.7
 - § 72.212(a)(2) – Use of approved casks
 - § 72.214 – List of approved casks
- Permit the use of CoC 1014, Proposed Amendment 2:
 - As modified in accordance with § 72.48
 - Exception of the change to revise the TS to remove the helium leakage test requirement
- Temporary pending approval of CoC 1014, Amendment 2

Proposed Exemption Request

(Continued)

Proposed Licensing Bases:

- **CoC 1014, Proposed Amendment 2**
 - Proposed Technical Specifications (Appendix A)
 - Proposed Design Requirements (Appendix B)
- **Pending FSAR Revision 3**
 - Reflects following changes:
 - CoC 1014, Amendment 2
 - FSAR Revision 2
 - Subsequent Holtec changes in accordance with § 72.48
 - Incorporate into § 72.212 Report

Proposed Exemption Request

(Continued)

- Upon NRC approval of Amendment 2:
 - Casks verified to meet CoC 1014, Amendment 2
 - Recertified to approved CoC 1014, Amendment 2
 - Holtec issues as FSAR Revision 3
 - Holtec recertifies to FSAR Revision 3
 - Eliminate continued need for exemption

Basis for Exemption

- NRC completion of Technical Review for CoC 1014, Amendment 2
- No safety issues
- Issued for direct-final rulemaking
 - Draft CoC
 - SER
- Helium leak detection methods for cask closure welds will be performed in accordance with current CoC requirements

NRC Feedback ?