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November 7, 2005

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

Reference: 1. USNRC Docket No. 72-1014 (HI-STORM 100)
2. Holtec Project 5014
3. Holtec Letter 5014568, dated 16 May 2005

Subject: Submittal of License Amendment Request #4 to HI-STORM 100 CoC

Dear Sir:

We are pleased to submit a request to amend the Certificate of Compliance for the HI-STORM 100 System (CoC 72-1014). This amendment request adds additional fuel debris and non-fuel hardware to the approved contents and streamlines several loading operations, reducing occupational exposures in accordance with ALARA principles. A summary of the proposed changes, with detailed references to both the CoC and the HI-STORM 100 System FSAR, is attached. Given the small number of proposed changes in this license amendment request, we request an expedited review by the SFPO. It is our hope that the review and approval process for this focused amendment could be completed by April 2006.

We note that license amendment request #3 to the HI-STORM CoC (Reference 3) is currently undergoing review by the SFPO. We have ensured that the changes requested in amendment #4 do not rely upon the changes requested in amendment #3 and that the changes requested in amendment #3 do not become invalid if amendment #4 is approved first. It should, therefore, be possible for the SFPO to review these two amendment requests independently and in parallel. If the SFPO cannot perform the requested parallel review, then we would request that the ongoing review of amendment #3 take priority.

The following attachments are provided in electronic (Adobe PDF) format on the CD-ROM that accompanies this letter:

Attachment 1: Summary of Proposed Changes

Attachment 2: Proposed CoC Sections in Markup Format – Deletions are shown in strikeout and insertions are marked by vertical bars in the right margin. Only changed portions of the CoC are included.

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Attachment 3: Proposed Revised FSAR Sections – Deletions are shown in ~~strikeout~~ and insertions are shown in *italics*. Only changed portions of the FSAR are included.

Both the proposed CoC sections and the proposed revised FSAR sections are based on the latest official revisions of these documents and not on the proposed changed documents for amendment #3. We would call specific attention to one section of the proposed revised FSAR, which includes the effects of one change made via 10 CFR 72.48. In the bases for technical specification 3.1.1 in Appendix A to Chapter 12, the next to last paragraph of the BACKGROUND section was added after FSAR revision 3 was issued. This was necessary due to the last-minute restoration of the vent and drain port cover plates helium leak test at the end of the approval process for amendment #2. Because the proposed changes in amendment #4 required a change to this paragraph, it was necessary to include the one 72.48 change.

We appreciate the SFPO's attention to this application.

Sincerely,

Evan Rosenbaum, P.E.
Project Manager, LAR 1014-4

Approved:

Stefan Anton, Dr.-Ing.
Licensing Manager

cc: Mr. Christopher Regan, NRC