

December 20, 5005

MEMORANDUM TO: William H. Ruland, Deputy Director
Licensing and Inspection Directorate
Spent Fuel Project Office, NMSS

FROM: Christopher M. Regan, Senior Project Manager /RA/
Licensing Section
Licensing and Inspection Directorate
Spent Fuel Project Office, NMSS

SUBJECT: SUMMARY OF DECEMBER 15, 2005, MEETING WITH HOLTEC
INTERNATIONAL REGARDING PROPOSED AMENDMENT 3 TO THE
HI-STORM 100 CERTIFICATE OF COMPLIANCE 1014 (TAC NO.
L23850)

On December 15, 2005, the Nuclear Regulatory Commission (NRC) staff from the Spent Fuel Project Office and the Office of Nuclear Regulatory Research met with representatives of Holtec International (Holtec) at NRC Headquarters in Rockville, Maryland. The purpose of the meeting was to provide Holtec the opportunity to discuss the NRC Request for Additional Information (RAI) dated November 30, 2005, regarding the Holtec 10 CFR Part 72 Certificate of Compliance (CoC) amendment request 3 for the HI-STORM 100 dry cask storage system. The meeting was noticed on December 5, 2005. Attachment 1 is a list of attendees, Attachment 2 contains the Holtec presentation slides.

Holtec began the meeting by presenting an overview and background of the HI-STORM 100 CoC amendment request 3 submittal and NRC review. Holtec stated that it was not necessary to request clarification of every RAI and indicated that RAIs 1-4, 3-5, 4-9 and 4-10, 4-5 and 4-6, 10-1, 8-2 and 12-1, and the RAIs of section 5 be the focus of the meeting's discussion. After clarification of RAI 1-4 Holtec proposed a slightly modified definition of damaged fuel to provide better clarity with respect to the term "impaired." The staff agreed this appeared to be consistent with the intent of the definition of damaged fuel. For RAI 3-5, Holtec presented a new approach to providing for corrosion protection of the cavity enclosure container (CEC), which included cathodic protection, a concrete blanket and additional specificity of the coatings used on the CEC. The staff agreed that these additional details would address the staff concerns but that the staff would need to see the final proposed changes to the Final Safety Analysis Report (FSAR) and Technical Specifications before making a final determination of acceptability regarding this new approach. Discussion of RAIs 4-5, 4-6, 4-9, and 4-10 continued the dialogue regarding thermal analyses. Holtec agreed to provide the requested calculation of RAI 4-6. It was noted that by answering RAI 4-6, RAI 4-5 would also be addressed. The staff clarified that the question pertaining to thermal testing noted in RAI 4-9 and 4-10 would apply to both the above ground and below ground designs. Holtec also agreed to clarify the language addressing the methods of measuring cask temperature. The staff clarified the concerns regarding loading operations that prompted RAI 10-1. Holtec agreed to provide additional discussion in the FSAR to address RAI 10-1. Holtec recognized the difficulties of implementation of the TS regarding vent and drain port cover plate helium leak

testing resulting from approval of HI-STORM 100 CoC amendment 2. In response to RAIs 8-2 and 12-1, Holtec proposed to add clarifying language to the FSAR and commit to a "leak tight" acceptance criteria in the TS.

The RAIs pertaining to Chapter 5 of the FSAR were then discussed. It was recognized that the bulk of these RAIs pertained indirectly to the proposed deletion of the footnote on Page 5.0-1 of the FSAR associated with the shielding analysis for the HI-STORM 100S Version B design. The Version B design was incorporated per the requirements of 10 CFR 72.48 with only a bounding shielding analysis being proposed and approved in CoC amendment 2. The footnote clarified the distinction that only the shielding analyses, which would bound the Version B design, was reviewed and approved by the staff and as such the removal of the footnote would lead to confusion over the licensing basis for the Version B design as a whole at a later date. The staff had posed several of the RAIs based on the premise the footnote would be removed. Upon clarifying the intent of the footnote, Holtec agreed to keep the Chapter 5 FSAR footnote. This would negate the need to fully respond to several of the Chapter 5 RAIs. Clarification of the remaining RAIs pertaining to Chapter 5 was provided in addition to RAIs 12-3 and 12-4.

In summary, the staff thanked Holtec for the material that was presented. The staff noted Holtec's request for an accelerated RAI response date and subsequent staff review. Holtec cited client pressure for an expedited review and approval. The staff stated accelerating review of the amendment 3 application and RAI response would impact review of the Holtec CoC amendment request 4 scheduled to start in mid January. Changes in other staff review commitments would also have to be considered. In addition, the staff suggested it might be prudent to schedule a public meeting to discuss the draft Holtec RAI responses prior to official submittal to the NRC. Given the time constraints and staff availability over the holiday season the scheduling of this public meeting might prove deleterious to an accelerated RAI response submittal schedule. The question of an accelerated schedule, the potential for scheduling a public meeting, and the impacts on review of the proposed CoC amendment 4 request was tabled for Holtec's consideration.

No regulatory decisions were made by the NRC during the meeting on the material presented. No members of the public were present at the meeting.

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Enclosures: 1. Attendance List
2. Presentation Slides

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NAME	CRegan		EZiegler		RNelson	
DATE	12/19 /05		12/20/05		12/20/05	

Official Record Copy

Attachment 1

Attendee List

**Meeting with Holtec International
HI-STORM 100 Amendment 3 RAI Overview
December 15, 2005**

ATTENDANCE LIST

<u>Name</u>	<u>Affiliation</u>
Wayne Hodges	NRC/NMSS/SFPO
Christopher Regan	NRC/NMSS/SFPO
Michel Call	NRC/NMSS/SFPO
Dan Forsyth	NRC/NMSS/SFPO
Larry Campbell	NRC/NMSS/SFPO
Ben Wilson	NRC/NMSS/SFPO
Jorge Solis	NRC/NMSS/SFPO
Geoff Hornseth	NRC/NMSS/SFPO
Bob Shewmaker	NRC/NMSS/SFPO
Bob Nelson	NRC/NMSS/SFPO
Ghani Zigh	NRC/RES
Stephan Anton	Holtec International
Everett Redmond II	Holtec International
Kris Cummings	Holtec International
Debu Mitra-Majumdar	Holtec International
Lius Hinojosa	Holtec International
Marko Maucec	Holtec International
William Woodward	Holtec International
Eric G. Lewis	Holtec International
Pierre Oneid	Holtec International
Evan Rosenbaum	Holtec International (via video conference)
Indresh Rampall	Holtec International (via video conference)
Kris Singh	Holtec International

Attachment 2

Presentation Slides