

June 28, 2006

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 JUNE 28, 2006, MEETING WITH HOLTEC
INTERNATIONAL REGARDING PROPOSED AMENDMENT 3 TO THE
HI-STORM 100 CERTIFICATE OF COMPLIANCE 1014 (TAC NO.
L23850)

On June 28, 2006, 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 present proposed responses to the NRC second Request for Additional Information (RAI) dated June 6, 2006, 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 June 8, 2006. Enclosure 1 is a list of attendees, Enclosure 2 contains the Holtec presentation slides.

Holtec began the meeting by presenting proposed responses to RAIs G-1, 12-1, 12-2, 12-3, and 12-4. The staff considered the proposed responses appropriate. In the interest of staff availability the RAIs relevant to the thermal review were presented next. Considering the difficulties with providing the staff with the materials requested by RAI 4-1, Holtec provided the staff the opportunity to examine the information requested in the RAI at the meeting. This satisfied the intent of the RAI. In response to RAI 4-2 Holtec proposed to add additional discussion in the cited calculation package of the post processing performed in the model analyses results. The staff stressed that the methods of post processing should be as clearly described as possible such that the staff could independently verify the calculation. The staff considered the proposed response to RAI 4-3 appropriate. The staff also felt that the proposed responses to the RAIs related to chapter 6 were also appropriate as was the proposed response to RAI 9-1.

The bulk of the RAIs centered around materials and structural issues. Holtec presented proposed responses to RAIs 1-1, 1-2, 2-1, and 2-2. The staff considered the proposed responses appropriate with due caution to the response to RAI 1-1. The staff was concerned that use of a definition might be too generic allowing for use of materials that may not have been approved if specifically cited. Holtec agreed to make the definition of "equivalent" materials as specific as possible. Information proposed in response to RAIs 3-1, 3-2, 3-3, and 3-12 were revisions to reintroduce previously removed information or to add clarifying discussion. The staff considered the proposed responses appropriate. Similarly the staff

agreed that the proposed responses to RAIs 3-9, 3-14, 3-15, 3-16, and 3-17, adequately address the RAI. Holtec presented a new approach for performance of the seismic analysis a user would need to perform to determine if the design would be acceptable for use at their site location. This new approach responds to RAIs 3-4, 3-5, 3-6, 3-7, 3-8, 3-11, and 3-13. The staff questioned Holtec regarding the basis for the analysis method which uses a single concrete enclosure cavity/vertically ventilated module on a foundation pad. It is this analysis method that Holtec is proposing each potential user apply to determine viability of the HI-STORM 100U for use at their site. The staff indicated that reliance on a method only would not be sufficient and that acceptance criteria would also need to be defined if this approach was taken. The staff indicated it could not make a finding based on a method of analysis only and that sufficient criteria needed to be proposed such that the finding could be made based on the design itself. Holtec agreed to consider the staff's concerns in developing their RAI response.

In summary, the staff thanked Holtec for the material that was presented. Holtec has targeted, July 5, 2006, to submit the RAI response, as requested by the NRC, but indicated that a delay might occur pending completion of computer analyses that were still being conducted in support of the structural RAI responses. No regulatory decisions were made by the NRC during the meeting on the material presented. There were no questions from the members of the public.

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Enclosures: 1. Attendance List
2. Presentation Slides

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DATE	06/28/06	06/28/06		06/28/06		

Official Record Copy

Enclosure 1

Attendee List

**Meeting with Holtec International
HI-STORM 100 Amendment 3 Proposed RAI2 Response
June 28, 2006**

ATTENDANCE LIST

<u>Name</u>	<u>Affiliation</u>
Ed Hackett	NRC/NMSS/SFPO
Christopher Regan	NRC/NMSS/SFPO
Jorge Solis	NRC/NMSS/SFPO
Geoff Hornseth	NRC/NMSS/SFPO
Bob Shewmaker	NRC/NMSS/SFPO
Larry Campbell	NRC/NMSS/SFPO
Gordon Bjorkman	NRC/NMSS/SFPO
Michel Call	NRC/NMSS/SFPO
Stephan Anton	Holtec International
Lius Hinojosa	Holtec International
Alan Soler	Holtec International
Thecla Fabian	Fuel Cycle Week
Maureen Conley	Platts/McGraw-Hill

Enclosure 2

Presentation Slides