

**CERTIFICATE OF COMPLIANCE
FOR RADIOACTIVE MATERIAL PACKAGES**

| 1. | a. CERTIFICATE NUMBER | b. REVISION NUMBER | c. DOCKET NUMBER | d. PACKAGE IDENTIFICATION NUMBER | PAGE | PAGES |
|----|-----------------------|--------------------|------------------|----------------------------------|------|-------|
| | 9261 | 5 | 71-9261 | USA/9261/B(U)F-85 | 1 | OF 10 |

2. PREAMBLE

- a. This certificate is issued to certify that the package (packaging and contents) described in Item 5 below meets the applicable safety standards set forth in Title 10, Code of Federal Regulations, Part 71, "Packaging and Transportation of Radioactive Material."
- b. This certificate does not relieve the consignor from compliance with any requirement of the regulations of the U.S. Department of Transportation or other applicable regulatory agencies, including the government of any country through or into which the package will be transported.
3. THIS CERTIFICATE IS ISSUED ON THE BASIS OF A SAFETY ANALYSIS REPORT OF THE PACKAGE DESIGN OR APPLICATION

a. ISSUED TO (*Name and Address*)

Holtec International
Holtec Center
555 Lincoln Drive West
Marlton, NJ 08053

b. TITLE AND IDENTIFICATION OF REPORT OR APPLICATION

Holtec International Report No. HI-951251, *Safety Analysis Report for the Holtec International Storage, Transport, And Repository Cask System (HI-STAR 100 Cask System) Revision 12, dated October 9, 2006.*

4. CONDITIONS

This certificate is conditional upon fulfilling the requirements of 10 CFR Part 71, as applicable, and the conditions specified below.

5.

(a) Packaging

(1) Model No.: HI-STAR 100 System

(2) Description

The HI-STAR 100 System is a canister system comprising a Multi-Purpose Canister (MPC) inside of an overpack designed for both storage and transportation (with impact limiters) of irradiated nuclear fuel. The HI-STAR 100 System consists of interchangeable MPCs that house the spent nuclear fuel and an overpack that provides the containment boundary, helium retention boundary, gamma and neutron radiation shielding, and heat rejection capability. The outer diameter of the overpack of the HI-STAR 100 is approximately 96 inches without impact limiters and approximately 128 inches with impact limiters. Maximum gross weight for transportation (including overpack, MPC, fuel, and impact limiters) is 282,000 pounds. Specific tolerances germane to the safety analyses are called out in the drawings listed below.

Multi-Purpose Canister

There are six Multi-Purpose Canister (MPC) models designated as the MPC-24, MPC-24E, MPC-24EF, MPC-32, MPC-68, and MPC-68F. All MPCs are designed to have identical exterior dimensions, except those MPC-24E/EFs custom-designed for the Trojan plant, which are approximately nine inches shorter than the generic Holtec MPC design. A single overpack design is provided that is capable of containing each type of MPC. The two digits after the MPC designate the number of reactor fuel assemblies for which the respective MPCs are designed. The MPC-24 series is designed to contain up to 24 Pressurized Water Reactor (PWR) fuel assemblies; the MPC-32 is designed to contain up to intact 32 PWR assemblies; and the MPC-68 and MPC-68F are designed to contain up to 68 Boiling Water Reactor (BWR) fuel assemblies. BWR fuel debris may be shipped only in the MPC-68F.

**CERTIFICATE OF COMPLIANCE
FOR RADIOACTIVE MATERIAL PACKAGES**

| 1. | a. CERTIFICATE NUMBER | b. REVISION NUMBER | c. DOCKET NUMBER | d. PACKAGE IDENTIFICATION NUMBER | PAGE | PAGES |
|----|-----------------------|--------------------|------------------|----------------------------------|------|-------|
| | 9261 | 5 | 71-9261 | USA/9261/B(U)F-85 | 2 | OF 10 |

5.(a) (2) Description (continued)

PWR spent fuel assemblies classified as fuel debris may be loaded only in MPC-24EF.

The HI-STAR 100 MPC is a welded cylindrical structure with flat ends. Each MPC is an assembly consisting of a honeycombed fuel basket, baseplate, canister shell, lid, and closure ring. The outer diameter and cylindrical height of each generic MPC is fixed. The outer diameter of the Trojan MPCs is the same as the generic MPC, but the height is approximately nine inches shorter than the generic MPC design. A steel spacer is used with the Trojan plant MPCs to ensure the MPC-overpack interface is bounded by the generic design. The fuel basket designs vary based on the MPC model. The MPC pressure boundary is a welded enclosure constructed entirely of a stainless steel alloy.

Overpack

The HI-STAR 100 overpack is a multi-layer steel cylinder with a welded baseplate and bolted lid (closure plate). The inner shell of the overpack forms an internal cylindrical cavity for housing the MPC. The outer surface of the overpack inner shell is buttressed with intermediate steel shells for radiation shielding. The overpack closure plate incorporates a dual O-ring design to ensure its containment function. The containment system consists of the overpack inner shell, bottom plate, top flange, top closure plate, top closure inner O-ring seal, vent port plug and seal, and drain port plug and seal.

Impact Limiters

The HI-STAR 100 overpack is fitted with two impact limiters fabricated of aluminum honeycomb completely enclosed by an all-welded austenitic stainless steel skin. The two impact limiters are attached to the overpack with 20 and 16 bolts at the top and bottom, respectively.

(3) Drawings

The package shall be constructed and assembled in accordance with the following drawings or figures in Holtec International Report No. HI-951251, *Safety Analysis Report for the Holtec International Storage, Transport, And Repository Cask System (HI-STAR 100 Cask System)*, Revision 12:

- | | |
|---------------------------------|-----------------------------------|
| (a) HI-STAR 100 Overpack | Drawing 3913, Sheets 1-9, Rev. 7 |
| (b) MPC Enclosure Vessel | Drawing 3923, Sheets 1-5, Rev. 14 |
| (c) MPC-24E/EF Fuel Basket | Drawing 3925, Sheets 1-4, Rev. 5 |
| (d) MPC-24 Fuel Basket Assembly | Drawing 3926, Sheets 1-4, Rev. 5 |
| (e) MPC-68/68F/68FF Fuel Basket | Drawing 3928, Sheets 1-4, Rev. 5 |

**CERTIFICATE OF COMPLIANCE
FOR RADIOACTIVE MATERIAL PACKAGES**

| 1. | a. CERTIFICATE NUMBER | b. REVISION NUMBER | c. DOCKET NUMBER | d. PACKAGE IDENTIFICATION NUMBER | PAGE | PAGES |
|----|-----------------------|--------------------|------------------|----------------------------------|------|-------|
| | 9261 | 5 | 71-9261 | USA/9261/B(U)F-85 | 3 | OF 10 |

5.(a) (3) Drawings (continued)

- (f) HI-STAR 100 Impact Limiter
CoC No. 9261, Appendix B Drawing C1765, Sheets 1 and 2, Rev. 2;
Sheet 3, Rev. 1, Sheet 4, Rev. 2; Sheets 5 and
6, Rev. 1; and Sheet 7, Rev. 0.
- (g) HI-STAR 100 Assembly
for Transport Drawing 3930, Sheets 1-3, Rev. 1
- (h) Trojan MPC-24E/EF Spacer Ring Drawing 4111, Sheets 1-2, Rev. 0
- (i) Damaged Fuel Container
for Trojan Plant SNF Drawing 4119, Sheet 1-4, Rev. 1
- (j) Spacer for Trojan Failed Fuel Can Drawing 4122, Sheets 1-2, Rev. 0
- (k) Failed Fuel Can for Trojan SNC Drawings PFFC-001, Rev. 8 and
PFFC-002, Sheets 1 and 2, Rev. 70
- (l) HI-STAR 100 MPC-32 Drawing 3927, Sheets 1-4, Rev. 6

5.(b) Contents

(1) Type, Form, and Quantity of Material

- (a) Fuel assemblies meeting the specifications and quantities provided in Appendix A to this Certificate of Compliance and meeting the requirements provided in Conditions 5.b(1)(b) through 5.b(1)(i) below are authorized for transportation.
- (b) The following definitions apply:

Damaged Fuel Assemblies are fuel assemblies with known or suspected cladding defects, as determined by review of records, greater than pinhole leaks or hairline cracks, missing fuel rods that are not replaced with dummy fuel rods, missing structural components such as grid spacers, assemblies whose structural integrity have been impaired, or those that cannot be handled by normal means. Fuel assemblies which cannot be handled by normal means due to fuel cladding damage are considered fuel debris.

Damaged Fuel Containers (or Canisters)(DFCs) are specially designed fuel containers for damaged fuel assemblies or fuel debris that permit gaseous and liquid media to escape while minimizing dispersal of gross particulates. The DFC designs authorized for use in the HI-STAR 100 are shown in Figures 1.2.10 and 1.2.11 of the HI-STAR 100 System SAR, Rev. 12.

Fuel Debris is ruptured fuel rods, severed rods, loose fuel pellets, and fuel assemblies with known or suspected defects which cannot be handled by normal means due to fuel cladding damage. Fuel debris also includes certain Trojan plant-specific fuel material contained in Trojan Failed Fuel Cans.

**CERTIFICATE OF COMPLIANCE
FOR RADIOACTIVE MATERIAL PACKAGES**

| 1. | a. CERTIFICATE NUMBER | b. REVISION NUMBER | c. DOCKET NUMBER | d. PACKAGE IDENTIFICATION NUMBER | PAGE | PAGES |
|----|-----------------------|--------------------|------------------|----------------------------------|------|-------|
| | 9261 | 5 | 71-9261 | USA/9261/B(U)F-85 | 4 | OF 10 |

5.(b)(1)(b) Definitions (continued)

Incore Grid Spacers are fuel assembly grid spacers located within the active fuel region (i.e., not including top and bottom spacers).

Intact Fuel Assemblies are fuel assemblies without known or suspected cladding defects greater than pinhole leaks or hairline cracks and which can be handled by normal means. Fuel assemblies without fuel rods in fuel rod locations shall not be classified as intact fuel assemblies unless dummy fuel rods are used to displace an amount of water greater than or equal to that displaced by the original fuel rod(s). Trojan fuel assemblies not loaded into DFCs or FFCs are classified as intact assemblies.

Minimum Enrichment is the minimum assembly average enrichment. Natural uranium blankets are not considered in determining minimum enrichment.

Non-Fuel Hardware is defined as Burnable Poison Rod Assemblies (BPRA), Thimble Plug Devices (TDPs), and Rod Cluster Control Assemblies (RCCAs).

Planar-Average Initial Enrichment is the average of the distributed fuel rod initial enrichments within a given axial plane of the assembly lattice.

Trojan Damaged Fuel Containers (or Canisters) are Holtec damaged fuel containers custom-designed for Trojan plant damaged fuel and fuel debris as depicted in Drawing 4119, Rev. 1.

Trojan Failed Fuel Cans are non-Holtec designed Trojan plant-specific damaged fuel containers that may be loaded with Trojan plant damaged fuel assemblies, Trojan fuel assembly metal fragments (e.g., portions of fuel rods and grid assemblies, bottom nozzles, etc.), a Trojan fuel rod storage container, a Trojan Fuel Debris Process Can Capsule, or a Trojan Fuel Debris Process Can. The Trojan Failed Fuel Can is depicted in Drawings PFFC-001, Rev. 8 and PFFC-002, Rev. 7.

Trojan Fuel Debris Process Cans are Trojan plant-specific canisters containing fuel debris (metal fragments) and were used to process organic media removed from the Trojan plant spent fuel pool during cleanup operations in preparation for spent fuel pool decommissioning. Trojan Fuel Debris Process Cans are loaded into Trojan Fuel Debris Process Can Capsules or directly into Trojan Failed Fuel Cans. The Trojan Fuel Debris Process Can is depicted in Figure 1.2.10B of the HI-STAR100 System SAR, Rev. 12.

Trojan Fuel Debris Process Can Capsules are Trojan plant-specific canisters that contain up to five Trojan Fuel Debris Process Cans and are vacuumed, purged, backfilled with helium and then seal-welded closed. The Trojan Fuel Debris Process Can Capsule is depicted in Figure 1.2.10C of the HI-STAR 100 System SAR, Rev. 12.

**CERTIFICATE OF COMPLIANCE
FOR RADIOACTIVE MATERIAL PACKAGES**

| 1. | a. CERTIFICATE NUMBER | b. REVISION NUMBER | c. DOCKET NUMBER | d. PACKAGE IDENTIFICATION NUMBER | PAGE | PAGES |
|----|-----------------------|--------------------|------------------|----------------------------------|------|-------|
| | 9261 | 5 | 71-9261 | USA/9261/B(U)F-85 | 5 | OF 10 |

5.(b)(1)(b) Definitions (continued)

ZR means any zirconium-based fuel cladding materials authorized for use in a commercial nuclear power plant reactor.

- (c) For MPCs partially loaded with stainless steel clad fuel assemblies, all remaining fuel assemblies in the MPC shall meet the more restrictive of the decay heat limits for the stainless steel clad fuel assemblies or the applicable ZR clad fuel assemblies.
- (d) For MPCs partially loaded with damaged fuel assemblies or fuel debris, all remaining ZR clad intact fuel assemblies in the MPC shall meet the more restrictive of the decay heat limits for the damaged fuel assemblies or the intact fuel assemblies.
- (e) For MPC-68s partially loaded with array/class 6x6A, 6x6B, 6x6C, or 8x8A fuel assemblies, all remaining ZR clad intact fuel assemblies in the MPC shall meet the more restrictive of the decay heat limits for the 6x6A, 6x6B, 6x6C, and 8x8A fuel assemblies or the applicable Zircaloy clad fuel assemblies.
- (f) PWR non-fuel hardware and neutron sources are not authorized for transportation except as specifically provided for in Appendix A to this CoC.
- (g) BWR stainless-steel channels and control blades are not authorized for transportation.
- (h) For spent fuel assemblies to be loaded into MPC-32s, core average soluble boron, assembly average specific power, and assembly average moderator temperature in which the fuel assemblies were irradiated, shall be determined according to Section 1.2.3.7.1 of the SAR, and the values shall be compared against the limits specified in Part VI of Table A.1 in Appendix A of this Certificate of Compliance.
- (i) For spent fuel assemblies to be loaded into MPC 32s, the reactor records on spent fuel assemblies average burnup shall be confirmed through physical burnup measurements as described in Section 1.2.3.7.2 of the SAR.

5.(c) Criticality Safety Index (CSI)= 0.0

6. For operating controls and procedures, in addition to the requirements of Subpart G of 10 CFR Part 71:

- (a) Each package shall be both prepared for shipment and operated in accordance with detailed written operating procedures. Procedures for both preparation and operation shall be developed. At a minimum, those procedures shall include the following provisions:

**CERTIFICATE OF COMPLIANCE
FOR RADIOACTIVE MATERIAL PACKAGES**

| 1. | a. CERTIFICATE NUMBER | b. REVISION NUMBER | c. DOCKET NUMBER | d. PACKAGE IDENTIFICATION NUMBER | PAGE | PAGES |
|----|-----------------------|--------------------|------------------|----------------------------------|------|-------|
| | 9261 | 5 | 71-9261 | USA/9261/B(U)F-85 | 6 | OF 10 |

6.(a) (continued)

- (1) Identification of the fuel to be loaded and independent verification that the fuel meets the specifications of Condition 5.(b) above.
- (2) Before each shipment, the licensee or shipper shall verify and document that each requirement of 10 CFR 71.87 has been satisfied.
- (3) The package must satisfy the following leak testing requirements:
 - (a) All overpack containment boundary seals shall be leak tested to show a total leak rate of not greater than 4.3×10^{-6} atm cm³/sec (helium). The leak test shall have a minimum sensitivity of 2.15×10^{-6} atm cm³/sec (helium) and shall be performed:
 - (i) within the 12-month period prior to each shipment;
 - (ii) after detensioning one or more overpack lid bolts, drain port, or the vent port plug; and
 - (iii) after each seal replacement.
 - (b) Within 30 days before each shipment, all overpack containment boundary seals shall be leak tested using a test with a minimum sensitivity of 1×10^{-3} atm cm³/sec. If leakage is detected on a seal, then the seal must be replaced and leak tested per Condition 6.(a)(3)(a) above.
 - (c) Each overpack containment boundary seal must be replaced after each use of the seal.
- (4) The relief devices on the neutron shield vessel shall be replaced every 5 years.
- (5) MPC-68F and MPC-24EF shall be leak tested prior to shipment to show a leak rate of no greater than 5×10^{-6} atm cm³/sec (helium). The leak test shall have a minimum sensitivity of 2.5×10^{-6} atm cm³/sec (helium).
- (6) MPCs deployed at an ISFSI under 10 CFR Part 72 prior to transportation may be dried using the vacuum drying method or the Forced Helium Dehydration (FHD) method. MPCs placed directly into transportation service under 10 CFR 71 without first being deployed at an ISFSI must be dried using the FHD method. Water and residual moisture shall be removed from the MPC in accordance with the following specifications:

For those MPCs vacuum dried:

- (a) The MPC shall be evacuated to a pressure of less than or equal to 3 torr.
- (b) The MPC cavity shall hold a stable pressure of less than or equal to 3 torr for at least 30 minutes.

**CERTIFICATE OF COMPLIANCE
FOR RADIOACTIVE MATERIAL PACKAGES**

| | | | | | |
|--------------------------|--------------------|------------------|----------------------------------|------|-------|
| 1. a. CERTIFICATE NUMBER | b. REVISION NUMBER | c. DOCKET NUMBER | d. PACKAGE IDENTIFICATION NUMBER | PAGE | PAGES |
| 9261 | 5 | 71-9261 | USA/9261/B(U)F-85 | 7 | OF 10 |

6.(a) (continued)

For those MPCs dried using the FHD System:

- (a) Following bulk moisture removal, the temperature of the gas exiting the demoisturizer shall be $\leq 21^{\circ}\text{F}$ for ≥ 30 minutes.
- (7) Following drying, the MPC shall be backfilled with 99.995% minimum purity helium: > 0 psig and ≤ 44.8 psig at a reference temperature of 70°F .
- (8) Water and residual moisture shall be removed from the HI-STAR 100 overpack in accordance with the following specifications:
- (a) The overpack annulus shall be evacuated to a pressure of less than or equal to 3 torr.
- (b) The overpack annulus shall hold a stable pressure of less than or equal to 3 torr for at least 30 minutes.
- (9) Following vacuum drying, the overpack shall be backfilled with helium to ≥ 10 psig and ≤ 14 psig.
- (10) The following fasteners shall be tightened to the torque values specified below:
- | <u>Fastener</u> | <u>Torque (ft-lbs)</u> |
|--|------------------------|
| Overpack Closure Plate Bolts | 2895 \pm 90 |
| Overpack Vent and Drain Port Plugs | 45 +5/-2 |
| Top Impact Limiter Attachment Bolts | 256 +10/-0 |
| Bottom Impact Limiter Attachment Bolts | 1500 +45/-0 |
- (11) Verify that the appropriate fuel spacers, as necessary, are used to position the active fuel zone within the neutron absorber plates of the MPC, and limit axial movement of fuel assemblies in the MPC cavity.
- (12) Appropriate monitoring for combustible gas concentration shall be performed prior to, and during MPC lid welding and weld cutting operations. The space below the MPC lid shall be exhausted or purged with inert gas prior to, and during MPC lid welding and weld cutting operations to provide additional assurance that flammable gas concentrations will not develop in this space.
- (b) All acceptance tests and maintenance shall be performed in accordance with detailed written procedures. Procedures for fabrication, acceptance testing, and maintenance shall be developed and shall include the following provisions:
- (1) The overpack lifting trunnions shall be tested at 300% of the maximum design lifting load.
- (2) The MPC shall be pressure tested in accordance with ASME Section III, Subsection NB, Article NB-6110 and applicable sub-articles. If hydrostatic testing is used, the

**CERTIFICATE OF COMPLIANCE
FOR RADIOACTIVE MATERIAL PACKAGES**

| 1. | a. CERTIFICATE NUMBER | b. REVISION NUMBER | c. DOCKET NUMBER | d. PACKAGE IDENTIFICATION NUMBER | PAGE | PAGES |
|----|-----------------------|--------------------|------------------|----------------------------------|------|-------|
| | 9261 | 5 | 71-9261 | USA/9261/B(U)F-85 | 8 | OF 10 |

6.(b) (continued)

MPC shall be pressure tested to 125% of the design pressure. The minimum hydrostatic test pressure shall be 125 psig. If pneumatic testing is used, the MPC shall be pressure tested to 120% of the design pressure. The minimum pneumatic test pressure shall be 120 psig.

- (3) The overpack shall be pressure tested to 150% of the Maximum Normal Operating Pressure (MNOP). The minimum test pressure shall be 150 psig.
- (4) The MPC lid-to-shell (LTS) weld shall be verified by either volumetric examination using the ultrasonic (UT) method or multi-layer liquid penetrant (PT) examination. The root and final weld layers shall be PT examined in either case. If PT alone is used, additional intermediate PT examination(s) shall be conducted after each approximately 3/8 inch of the weld is completed. The inspection of the weld must be performed by qualified personnel and shall meet the acceptance requirements of ASME B&PV Section III, NB-5350. The inspection results, including all relevant indications shall be made a permanent part of the licensee's records by video, photographic, or other means providing an equivalent retrievable record of weld integrity.
- (5) The radial neutron shield shall have a minimum thickness of 4.3 inches and the impact limiter neutron shields shall have a minimum thickness of 2.5 inches. Before first use, the neutron shielding integrity shall be confirmed through a combination of fabrication process control and radiation measurements with either loaded contents or a check source. Measurements shall be performed over the entire exterior surface of the radial neutron shield and each impact limiter using, at a maximum, a 6 x 6 inch test grid.
- (6) Periodic verification of the neutron shield integrity shall be performed within 5 years prior to each shipment. The periodic verification shall be performed by radiation measurements with either loaded contents or a check source. Measurements shall be taken at three cross sectional planes through the radial shield and at four points along each plane's circumference. The average measurement results from each sectional plane shall be compared to calculated values to assess the continued effectiveness of the neutron shield. The calculated values shall be representative of the loaded contents (i.e., fuel type, enrichment, burnup, cooling time, etc.) or the particular check source used for the measurements.
- (7) The first fabricated HI-STAR 100 overpack shall be tested to confirm its heat transfer capability. The test shall be conducted after the radial channels, enclosure shell panels, and neutron shield material have been installed and all inside and outside surfaces are painted per the Design Drawings specified in Section 5.(a)(3) of this Certificate of Compliance. A test cover plate shall be used to seal the overpack cavity. Testing shall be performed in accordance with written and approved procedures. The test must demonstrate that the overpack is fabricated adequately to meet the design heat transfer capability.

**CERTIFICATE OF COMPLIANCE
FOR RADIOACTIVE MATERIAL PACKAGES**

| 1. | a. CERTIFICATE NUMBER | b. REVISION NUMBER | c. DOCKET NUMBER | d. PACKAGE IDENTIFICATION NUMBER | PAGE | PAGES |
|----|-----------------------|--------------------|------------------|----------------------------------|------|-------|
| | 9261 | 5 | 71-9261 | USA/9261/B(U)F-85 | 9 | OF 10 |

6.(b) (continued)

- (8) For each package, a periodic thermal performance test shall be performed within every 5 years or prior to next use, if the package has not been used for transport for greater than 5 years, to demonstrate that the thermal capabilities of the cask remain within its design basis.
- (9) The neutron absorber's minimum acceptable ^{10}B loading is 0.0267 g/cm^2 for the MPC-24 and 0.0372 g/cm^2 for the MPC-24E, MPC-24EF, and MPC-68, and 0.01 g/cm^2 for the MPC-68F. The ^{10}B loading shall be verified by chemistry or neutron attenuation techniques.
- (10) Flux trap sizes:
- (a) The minimum flux trap size for the MPC-24 is 1.09 inches.
- (b) The minimum flux trap sizes for the generic MPC-24E and MPC-24EF are 0.776 inch for cells 3, 6, 19, and 22; and 1.076 inch for the remaining cells.
- (c) The minimum flux trap sizes for the Trojan MPC-24E and MPC-24EF are 0.526 inch for cells 3, 6, 19, and 22; and 1.076 inch for the remaining cells.
- (11) The minimum fuel cell pitch for the MPC-68 and MPC-68F is 6.43 inches.
- (12) The package containment verification leak test shall be per ANSI 14.5-1997.
7. The maximum gross weight of the package as presented for shipment shall not exceed 282,000 pounds.
8. The package shall be located on the transport vehicle such that the bottom surface of the bottom impact limiter is at least 9 feet (along the axis of the overpack) from the edge of the vehicle.
9. The personnel barrier shall be installed at all times while transporting a loaded overpack.
10. The package authorized by this certificate is hereby approved for use under the general license provisions of 10 CFR 71.17.
11. Revision No. 4 of this certificate may be used until October 12, 2007.
12. Expiration Date: March 31, 2009

Attachment: Appendix A

**CERTIFICATE OF COMPLIANCE
FOR RADIOACTIVE MATERIAL PACKAGES**

| 1. | a. CERTIFICATE NUMBER | b. REVISION NUMBER | c. DOCKET NUMBER | d. PACKAGE IDENTIFICATION NUMBER | PAGE | PAGES |
|----|-----------------------|--------------------|------------------|----------------------------------|------|-------|
| | 9261 | 5 | 71-9261 | USA/9261/B(U)F-85 | 10 | OF 10 |

REFERENCES:

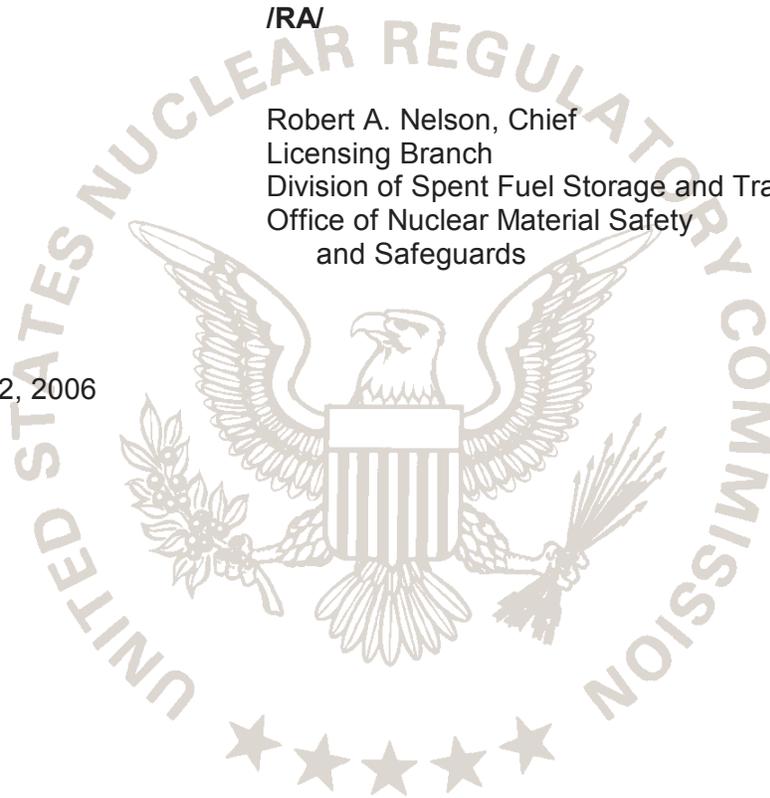
Holtec International Report No. HI-951251, *Safety Analysis Report for the Holtec International Storage, Transport, And Repository Cask System (HI-STAR 100 Cask System)*, Revision 12, dated October 9, 2006. |

FOR THE U.S. NUCLEAR REGULATORY COMMISSION

/RA/

Robert A. Nelson, Chief
Licensing Branch
Division of Spent Fuel Storage and Transportation
Office of Nuclear Material Safety
and Safeguards

Date: October 12, 2006



APPENDIX A

CERTIFICATE OF COMPLIANCE NO. 9261, REVISION 5

MODEL NO. HI-STAR 100 SYSTEM

INDEX TO APPENDIX A

| Page: | Table: | Description: |
|------------------|-----------|---|
| Page A-1 to A-19 | Table A.1 | Fuel Assembly Limits |
| Page A-1 | | MPC-24: Uranium oxide, PWR intact fuel assemblies listed in Table A.2. |
| A-2 | | MPC-68: Uranium oxide, BWR intact fuel assemblies listed in Table A.3 with or without Zircaloy channels. |
| A-3 | | MPC-68: Uranium oxide, BWR damaged fuel assemblies, with or without Zircaloy channels, placed in damaged fuel containers. Uranium oxide BWR damaged fuel assemblies shall meet the criteria specified in Table A.3 for fuel assembly array/class 6x6A, 6X6C, 7x7A, or 8x8A. |
| A-4 | | MPC-68: Mixed oxide (MOX), BWR intact fuel assemblies, with or without Zircaloy channels. MOX BWR intact fuel assemblies shall meet the criteria specified in Table A.3 for fuel assembly array/class 6x6B. |
| A-5 | | MPC-68: Mixed oxide (MOX), BWR damaged fuel assemblies, with or without Zircaloy channels, placed in damaged fuel containers. MOX BWR damaged fuel assemblies shall meet the criteria specified in Table A.3 for fuel assembly array/class 6x6B. |
| A-6 | | MPC-68: Thoria rods (ThO ₂ and UO ₂) placed in Dresden Unit 1 Thoria Rod Canisters |
| A-7 | | MPC-68F: Uranium oxide, BWR intact fuel assemblies, with or without Zircaloy channels. Uranium oxide BWR intact fuel assemblies shall meet the criteria specified in Table A.3 for fuel assembly array/class 6x6A, 6x6C, 7x7A, or 8x8A. |
| A-8 | | MPC-68F: Uranium oxide, BWR damaged fuel assemblies, with or without Zircaloy channels, placed in damaged fuel containers. Uranium oxide BWR damaged fuel assemblies shall meet the criteria specified in Table A.3 for fuel assembly array/class 6x6A, 6x6C, 7x7A, or 8x8A. |
| A-9 | | MPC-68F: Uranium oxide, BWR fuel debris, with or without Zircaloy channels, placed in damaged fuel containers. The original fuel assemblies for the uranium oxide BWR fuel debris shall meet the criteria specified in Table A.3 for fuel assembly array/class 6x6A, 6x6C, 7x7A, or 8x8A. |

INDEX TO APPENDIX A

| Page: | Table: | Description: |
|--------------|------------------------|--|
| A-10 | Table A. 1 (Cont'd) | MPC-68F: Mixed oxide (MOX), BWR intact fuel assemblies, with or without Zircaloy channels. MOX BWR intact fuel assemblies shall meet the criteria specified in Table A.3 for fuel assembly array/class 6x6B. |
| A-11 | | MPC-68F: Mixed oxide (MOX), BWR damaged fuel assemblies, with or without Zircaloy channels, placed in damaged fuel containers. MOX BWR damaged fuel assemblies shall meet the criteria specified in Table A.3 for fuel assembly array/class 6x6B. |
| A-12 | | MPC-68F: Mixed Oxide (MOX), BWR fuel debris, with or without Zircaloy channels, placed in damaged fuel containers. The original fuel assemblies for the MOX BWR fuel debris shall meet the criteria specified in Table A.3 for fuel assembly array/class 6x6B. |
| A-13 | | MPC-68F: Thoria rods (ThO ₂ and UO ₂) placed in Dresden Unit 1 Thoria Rod Canisters. |
| A-15 | | MPC-24E: Uranium oxide, PWR intact fuel assemblies listed in Table A.2. |
| A-16 | | MPC-24E: Trojan plant damaged fuel assemblies. |
| A-17 | | MPC-24EF: Uranium oxide, PWR intact fuel assemblies listed in Table A.2. |
| A-18 | | MPC-24EF: Trojan plant damaged fuel assemblies. |
| A-19 | | MPC-24EF: Trojan plant Fuel Debris Process Can Capsules and/or Trojan plant fuel assemblies classified as fuel debris. |
| A-20 to A-21 | | MPC-32: Uranium oxide, PWR intact fuel assemblies in array classes 15X15D, E, F, and H and 17X17A, B, and C as listed in Table A.2. |
| A-22 to A-25 | Table A.2 | PWR Fuel Assembly Characteristics |
| A-26 to A-30 | Table A.3 | BWR Fuel Assembly Characteristics |
| A-31 | Table A.4 | Fuel Assembly Cooling, Average Bumup, and Minimum Enrichment MPC-24/24E/24EF PWR Fuel with Zircaloy Clad and With Non-Zircaloy In-Core Grid Spacers. |
| A-31 | Table A.5 | Fuel Assembly Cooling, Average Bumup, and Minimum Enrichment MPC-24/24E/24EF PWR Fuel with Zircaloy and with Zircaloy In-Core Grid Spacers. |

INDEX TO APPENDIX A

| Page: | Table: | Description: |
|-------|------------|---|
| A-32 | Table A.6 | Fuel Assembly Cooling, Average Burnup, and Minimum Enrichment MPC-24/24E/24EF PWR Fuel with Stainless Steel Clad. |
| A-32 | Table A.7 | Fuel Assembly Cooling, Average Burnup, and Minimum Enrichment-MPC-68. |
| A-33 | Table A.8 | Trojan Plant Fuel Assembly Cooling, Average Burnup, and Minimum Enrichment Limits. |
| A-33 | Table A.9 | Trojan Plant Non-Fuel Hardware and Neutron Source Cooling and Burnup Limits. |
| A-34 | Table A.10 | Fuel Assembly Cooling, Average Burnup, and Minimum Enrichment MPC-32 PWR Fuel with Zircaloy Clad and with Non-Zircaloy In-Core Grid Spacers |
| A-34 | Table A.11 | Fuel Assembly Cooling, Average Burnup, and Minimum Enrichment MPC-32 PWR Fuel with Zircaloy Clad and with Zircaloy In-Core Grid Spacers |
| A-35 | Table A.12 | Fuel Assembly Maximum Enrichment and Minimum Burnup Requirement for Transportation in MPC-32 |
| A-36 | Table A.13 | Loading Configurations for the MPC-32 |
| A-36 | | References |

Table A.1 (Page 1 of 21)
Fuel Assembly Limits

I. MPC MODEL: MPC-24

A. Allowable Contents

1. Uranium oxide, PWR intact fuel assemblies listed in Table A.2 and meeting the following specifications:

- a. Cladding type: ZR or stainless steel (SS) as specified in Table A.2 for the applicable fuel assembly array/class
- b. Maximum initial enrichment: As specified in Table A.2 for the applicable fuel assembly array/class.
- c. Post-irradiation cooling time, average burnup, and minimum initial enrichment per assembly
 - i. ZR clad: An assembly post-irradiation cooling time, average burnup, and minimum initial enrichment as specified in Table A.4 or A.5, as applicable.
 - ii. SS clad: An assembly post-irradiation cooling time, average burnup, and minimum initial enrichment as specified in Table A.6, as applicable.
- d. Decay heat per assembly:
 - i. ZR Clad: ≤ 833 Watts
 - ii. SS Clad: ≤ 488 Watts
- e. Fuel assembly length: ≤ 176.8 inches (nominal design)
- f. Fuel assembly width: ≤ 8.54 inches (nominal design)
- g. Fuel assembly weight: $\leq 1,680$ lbs

B. Quantity per MPC: Up to 24 PWR fuel assemblies.

C. Fuel assemblies shall not contain non-fuel hardware or neutron sources.

D. Damaged fuel assemblies and fuel debris are not authorized for transport in the MPC-24.

E. Trojan plant fuel is not permitted to be transported in the MPC-24.

Table A.1 (Page 2 of 21)
Fuel Assembly Limits

II. MPC MODEL: MPC-68

A. Allowable Contents

1. Uranium oxide, BWR intact fuel assemblies listed in Table A.3, with or without Zircaloy channels, and meeting the following specifications:
 - a. Cladding type: ZR or stainless steel (SS) as specified in Table A.3 for the applicable fuel assembly array/class.
 - b. Maximum planar-average initial enrichment: As specified in Table A.3 for the applicable fuel assembly array/class.
 - c. Initial maximum rod enrichment: As specified in Table A.3 for the applicable fuel assembly array/class.
 - d. Post-irradiation cooling time, average burnup, and minimum initial enrichment per assembly:
 - i. ZR clad: An assembly post-irradiation cooling time, average burnup, and minimum initial enrichment as specified in Table A.7, except for (1) array/class 6x6A, 6x6C, 7x7A, and 8x8A fuel assemblies, which shall have a cooling time ≥ 18 years, an average burnup $\leq 30,000$ MWD/MTU, and a minimum initial enrichment ≥ 1.8 wt% ^{235}U , and (2) array/class 8x8F fuel assemblies, which shall have a cooling time ≥ 10 years, an average burnup $\leq 27,500$ MWD/MTU, and a minimum initial enrichment ≥ 2.4 wt% ^{235}U .
 - ii. SS clad: An assembly cooling time after discharge ≥ 16 years, an average burnup $\leq 22,500$ MWD/MTU, and a minimum initial enrichment ≥ 3.5 wt% ^{235}U .
 - e. Decay heat per assembly:
 - i. ZR Clad: ≤ 272 Watts, except for array/class 8X8F fuel assemblies, which shall have a decay heat ≤ 183.5 Watts.
 - ii. SS Clad: ≤ 83 Watts
 - f. Fuel assembly length: ≤ 176.2 inches (nominal design)
 - g. Fuel assembly width: ≤ 5.85 inches (nominal design)
 - h. Fuel assembly weight: ≤ 700 lbs, including channels

Table A.1 (Page 3 of 21)
Fuel Assembly Limits

II. MPC MODEL: MPC-68 (continued)

A. Allowable Contents (continued)

2. Uranium oxide, BWR damaged fuel assemblies, with or without Zircaloy channels, placed in damaged fuel containers. Uranium oxide BWR damaged fuel assemblies shall meet the criteria specified in Table A.3 for fuel assembly array/class 6x6A, 6x6C, 7x7A, or 8x8A, and meet the following specifications:

| | |
|--|--|
| a. Cladding type: | ZR |
| b. Maximum planar-average initial enrichment: | As specified in Table A.3 for the applicable fuel assembly array/class. |
| c. Initial maximum rod enrichment: | As specified in Table A.3 for the applicable fuel assembly array/class. |
| d. Post-irradiation cooling time, average burnup, and minimum initial enrichment per assembly: | An assembly post-irradiation cooling time ≥ 18 years, an average burnup $\leq 30,000$ MWD/MTU, and a minimum initial enrichment ≥ 1.8 wt% ^{235}U . |
| e. Fuel assembly length: | ≤ 135.0 inches (nominal design) |
| f. Fuel assembly width: | ≤ 4.70 inches (nominal design) |
| g. Fuel assembly weight: | ≤ 550 lbs, including channels and damaged fuel container |

Table A.1 (Page 4 of 21)
Fuel Assembly Limits

II. MPC MODEL: MPC-68 (continued)

A. Allowable Contents (continued)

3. Mixed oxide (MOX), BWR intact fuel assemblies, with or without Zircaloy channels. MOX BWR intact fuel assemblies shall meet the criteria specified in Table A.3 for fuel assembly array/class 6x6B and meet the following specifications:

- | | |
|--|--|
| a. Cladding type: | ZR |
| b. Maximum planar-average initial enrichment: | As specified in Table A.3 for fuel assembly array/class 6x6B. |
| c. Initial maximum rod enrichment: | As specified in Table A.3 for fuel assembly array/class 6x6B. |
| d. Post-irradiation cooling time, average burnup, and minimum initial enrichment per assembly: | An assembly post-irradiation cooling time ≥ 18 years, an average burnup $\leq 30,000$ MWD/MTIHM, and a minimum initial enrichment ≥ 1.8 wt% ^{235}U for the UO_2 rods. |
| e. Fuel assembly length: | ≤ 135.0 inches (nominal design) |
| f. Fuel assembly width: | ≤ 4.70 inches (nominal design) |
| g. Fuel assembly weight: | ≤ 400 lbs, including channels |

Table A.1 (Page 5 of 21)
Fuel Assembly Limits

II. MPC MODEL: MPC-68 (continued)

A. Allowable Contents (continued)

4. Mixed oxide (MOX), BWR damaged fuel assemblies, with or without Zircaloy channels, placed in damaged fuel containers. MOX BWR damaged fuel assemblies shall meet the criteria specified in Table A.3 for fuel assembly array/class 6x6B and meet the following specifications:

- | | |
|--|--|
| a. Cladding type: | ZR |
| b. Maximum planar-average initial enrichment: | As specified in Table A.3 for array/class 6x6B. |
| c. Initial maximum rod enrichment: | As specified in Table A.3 for array/class 6x6B. |
| d. Post-irradiation cooling time, average burnup, and minimum initial enrichment per assembly: | An assembly post-irradiation cooling time ≥ 18 years, an average burnup $\leq 30,000$ MWD/MTIHM, and a minimum initial enrichment ≥ 1.8 wt% ^{235}U for the UO_2 rods. |
| e. Fuel assembly length: | ≤ 135.0 inches (nominal design) |
| f. Fuel assembly width: | ≤ 4.70 inches (nominal design) |
| g. Fuel assembly weight: | ≤ 550 lbs, including channels |

Table A.1 (Page 6 of 21)
Fuel Assembly Limits

II. MPC MODEL: MPC-68 (continued)

A. Allowable Contents (continued)

5. Thoria rods (ThO_2 and UO_2) placed in Dresden Unit 1 Thoria Rod Canisters (as shown in Figure 1.2.11A of the HI-STAR 100 System SAR, Revision 12) and meeting the following specifications:

- a. Cladding type: ZR
- b. Composition: 98.2 wt.% ThO_2 , 1.8 wt. % UO_2 with an enrichment of 93.5 wt. % ^{235}U .
- c. Number of rods per Thoria Rod Canister: ≤ 18
- d. Decay heat per Thoria Rod Canister: ≤ 115 Watts
- e. Post-irradiation fuel cooling time and average burnup per Thoria Rod Canister: A fuel post-irradiation cooling time ≥ 18 years and an average burnup $\leq 16,000$ MWD/MTIHM.
- f. Initial heavy metal weight: ≤ 27 kg/canister
- g. Fuel cladding O.D.: ≥ 0.412 inches
- h. Fuel cladding I.D.: ≤ 0.362 inches
- i. Fuel pellet O.D.: ≤ 0.358 inches
- j. Active fuel length: ≤ 111 inches
- k. Canister weight: ≤ 550 lbs, including fuel

B. Quantity per MPC: Up to one (1) Dresden Unit 1 Thoria Rod Canister plus any combination of damaged fuel assemblies in damaged fuel containers and intact fuel assemblies, up to a total of 68.

C. Fuel assemblies with stainless steel channels are not authorized for loading in the MPC-68.

D. Dresden Unit 1 fuel assemblies (fuel assembly array/class 6x6A, 6x6B, 6x6C, or 8x8A) with one Antimony-Beryllium neutron source are authorized for loading in the MPC-68. The Antimony-Beryllium source material shall be in a water rod location.

Table A.1 (Page 7 of 21)
Fuel Assembly Limits

III. MPC MODEL: MPC-68F

A. Allowable Contents

1. Uranium oxide, BWR intact fuel assemblies, with or without Zircaloy channels. Uranium oxide BWR intact fuel assemblies shall meet the criteria specified in Table A.3 for fuel assembly array/class 6x6A, 6x6C, 7x7A, or 8x8A and meet the following specifications:
 - a. Cladding type: ZR
 - b. Maximum planar-average initial enrichment: As specified in Table A.3 for the applicable fuel assembly array/class.
 - c. Initial maximum rod enrichment: As specified in Table A.3 for the applicable fuel assembly array/class.
 - d. Post-irradiation cooling time, average burnup, and minimum initial enrichment per assembly: An assembly post-irradiation cooling time ≥ 18 years, an average burnup $\leq 30,000$ MWD/MTU, and a minimum initial enrichment ≥ 1.8 wt% ^{235}U .
 - e. Fuel assembly length: ≤ 176.2 inches (nominal design)
 - f. Fuel assembly width: ≤ 5.85 inches (nominal design)
 - g. Fuel assembly weight: ≤ 400 lbs, including channels

Table A.1 (Page 8 of 21)
Fuel Assembly Limits

III. MPC MODEL: MPC-68F (continued)

A. Allowable Contents (continued)

2. Uranium oxide, BWR damaged fuel assemblies, with or without Zircaloy channels, placed in damaged fuel containers. Uranium oxide BWR damaged fuel assemblies shall meet the criteria specified in Table A.3 for fuel assembly array/class 6x6A, 6x6C, 7x7A, or 8x8A, and meet the following specifications:

| | |
|--|--|
| a. Cladding type: | ZR |
| b. Maximum planar-average initial enrichment: | As specified in Table A.3 for the applicable fuel assembly array/class. |
| c. Initial maximum rod enrichment: | As specified in Table A.3 for the applicable fuel assembly array/class. |
| d. Post-irradiation cooling time, average burnup, and minimum initial enrichment per assembly: | An assembly post-irradiation cooling time ≥ 18 years, an average burnup $\leq 30,000$ MWD/MTU, and a minimum initial enrichment ≥ 1.8 wt% ^{235}U . |
| e. Fuel assembly length: | ≤ 135.0 inches (nominal design) |
| f. Fuel assembly width: | ≤ 4.70 inches (nominal design) |
| g. Fuel assembly weight: | ≤ 550 lbs, including channels |

Table A.1 (Page 9 of 21)
Fuel Assembly Limits

III. MPC MODEL: MPC-68F (continued)

A. Allowable Contents (continued)

3. Uranium oxide, BWR fuel debris, with or without Zircaloy channels, placed in damaged fuel containers. The original fuel assemblies for the uranium oxide BWR fuel debris shall meet the criteria specified in Table A.3 for fuel assembly array/class 6x6A, 6x6C, 7x7A, or 8x8A, and meet the following specifications:

- | | |
|--|--|
| a. Cladding type: | ZR |
| b. Maximum planar-average initial enrichment: | As specified in Table A.3 for the applicable original fuel assembly array/class. |
| c. Initial maximum rod enrichment: | As specified in Table A.3 for the applicable original fuel assembly array/class. |
| d. Post-irradiation cooling time, average burnup, and minimum initial enrichment per assembly: | An assembly post-irradiation cooling time ≥ 18 years, an average burnup $\leq 30,000$ MWD/MTU, and a minimum initial enrichment ≥ 1.8 wt% ^{235}U for the original fuel assembly. |
| e. Fuel assembly length: | ≤ 135.0 inches (nominal design) |
| f. Fuel assembly width: | ≤ 4.70 inches (nominal design) |
| g. Fuel assembly weight: | ≤ 550 lbs, including channels |

Table A.1 (Page 10 of 21)
Fuel Assembly Limits

III. MPC MODEL: MPC-68F (continued)

A. Allowable Contents (continued)

4. Mixed oxide(MOX), BWR intact fuel assemblies, with or without Zircaloy channels. MOX BWR intact fuel assemblies shall meet the criteria specified in Table A.3 for fuel assembly array/class 6x6B and meet the following specifications:

- | | |
|--|--|
| a. Cladding type: | ZR |
| b. Maximum planar-average initial enrichment: | As specified in Table A.3 for fuel assembly array/class 6x6B. |
| c. Initial maximum rod enrichment: | As specified in Table A.3 for fuel assembly array/class 6x6B. |
| d. Post-irradiation cooling time, average burnup, and minimum initial enrichment per assembly: | An assembly post-irradiation cooling time ≥ 18 years, an average burnup $\leq 30,000$ MWD/MTIHM, and a minimum initial enrichment ≥ 1.8 wt% ^{235}U for the UO_2 rods. |
| e. Fuel assembly length: | ≤ 135.0 inches (nominal design) |
| f. Fuel assembly width: | ≤ 4.70 inches (nominal design) |
| g. Fuel assembly weight: | ≤ 400 lbs, including channels |

Table A.1 (Page 11 of 21)
 Fuel Assembly Limits

III. MPC MODEL: MPC-68F (continued)

A. Allowable Contents (continued)

5. Mixed oxide (MOX), BWR damaged fuel assemblies, with or without Zircaloy channels, placed in damaged fuel containers. MOX BWR intact fuel assemblies shall meet the criteria specified in Table A.3 for fuel assembly array/class 6x6B and meet the following specifications:

- | | |
|--|--|
| a. Cladding type: | ZR |
| b. Maximum planar-average initial enrichment: | As specified in Table A.3 for array/class 6x6B. |
| c. Initial maximum rod enrichment: | As specified in Table A.3 for array/class 6x6B. |
| d. Post-irradiation cooling time, average burnup, and minimum initial enrichment per assembly: | An assembly post-irradiation cooling time ≥ 18 years, an average burnup $\leq 30,000$ MWD/MTIHM, and a minimum initial enrichment ≥ 1.8 wt% ^{235}U for the UO_2 rods. |
| e. Fuel assembly length: | ≤ 135.0 inches (nominal design) |
| f. Fuel assembly width: | ≤ 4.70 inches (nominal design) |
| g. Fuel assembly weight: | ≤ 550 lbs, including channels |

Table A.1 (Page 12 of 21)
Fuel Assembly Limits

III. MPC MODEL: MPC-68F (continued)

A. Allowable Contents (continued)

6. Mixed oxide (MOX), BWR fuel debris, with or without Zircaloy channels, placed in damaged fuel containers. The original fuel assemblies for the MOX BWR fuel debris shall meet the criteria specified in Table A.3 for fuel assembly array/class 6x6B and meet the following specifications:

- | | |
|--|--|
| a. Cladding type: | ZR |
| b. Maximum planar-average initial enrichment: | As specified in Table A.3 for original fuel assembly array/class 6x6B. |
| c. Initial maximum rod enrichment: | As specified in Table A.3 for original fuel assembly array/class 6x6B. |
| d. Post-irradiation cooling time, average burnup, and minimum initial enrichment per assembly: | An assembly post-irradiation cooling time ≥ 18 years, an average burnup $\leq 30,000$ MWD/MTIHM, and a minimum initial enrichment ≥ 1.8 wt% ^{235}U for the UO_2 rods in the original fuel assembly. |
| e. Fuel assembly length: | ≤ 135.0 inches (nominal design) |
| f. Fuel assembly width: | ≤ 4.70 inches (nominal design) |
| g. Fuel assembly weight: | ≤ 550 lbs, including channels |

Table A.1 (Page 13 of 21)
Fuel Assembly Limits

III. MPC MODEL: MPC-68F (continued)

A. Allowable Contents (continued)

7. Thoria rods (ThO_2 and UO_2) placed in Dresden Unit 1 Thoria Rod Canisters (as shown in Figure 1.2.11A of the HI-STAR 100 System SAR, Revision 12) and meeting the following specifications:

- | | |
|---|--|
| a. Cladding Type: | ZR |
| b. Composition: | 98.2 wt.% ThO_2 , 1.8 wt. % UO_2 with an enrichment of 93.5 wt. % ^{235}U . |
| c. Number of rods per Thoria Rod Canister: | ≤ 18 |
| d. Decay heat per Thoria Rod Canister: | ≤ 115 Watts |
| e. Post-irradiation fuel cooling time and average burnup per Thoria Rod Canister: | A fuel post-irradiation cooling time ≥ 18 years and an average burnup $\leq 16,000$ MWD/MTIHM. |
| f. Initial heavy metal weight: | ≤ 27 kg/canister |
| g. Fuel cladding O.D.: | ≥ 0.412 inches |
| h. Fuel cladding I.D.: | ≤ 0.362 inches |
| i. Fuel pellet O.D.: | ≤ 0.358 inches |
| j. Active fuel length: | ≤ 111 inches |
| k. Canister weight: | ≤ 550 lbs, including fuel |

Table A.1 (Page 14 of 21)
Fuel Assembly Limits

III. MPC MODEL: MPC-68F (continued)

B. Quantity per MPC:

Up to four (4) damaged fuel containers containing uranium oxide or MOX BWR fuel debris. The remaining MPC-68F fuel storage locations may be filled with array/class 6x6A, 6x6B, 6x6C, 7x7A, and 8x8A fuel assemblies of the following type, as applicable:

1. Uranium oxide BWR intact fuel assemblies;
2. MOX BWR intact fuel assemblies;
3. Uranium oxide BWR damaged fuel assemblies placed in damaged fuel containers;
4. MOX BWR damaged fuel assemblies placed in damaged fuel containers; or
5. Up to one (1) Dresden Unit 1 Thoria Rod Canister.

C. Fuel assemblies with stainless steel channels are not authorized for loading in the MPC-68F.

D. Dresden Unit 1 fuel assemblies (fuel assembly array/class 6x6A, 6x6B, 6x6C or 8x8A) with one Antimony-Beryllium neutron source are authorized for loading in the MPC-68F. The Antimony-Beryllium neutron source material shall be in a water rod location.

Table A.1 (Page 15 of 21)
Fuel Assembly Limits

IV. MPC MODEL: MPC-24E

A. Allowable Contents

1. Uranium oxide, PWR intact fuel assemblies listed in Table A.2 and meeting the following specifications:
 - a. Cladding type: ZR or stainless steel (SS) as specified in Table A.2 for the applicable fuel assembly array/class
 - b. Maximum initial enrichment: As specified in Table A.2 for the applicable fuel assembly array/class.
 - c. Post-irradiation cooling time, average burnup, and minimum initial enrichment per assembly
 - i. ZR clad: Except for Trojan plant fuel, an assembly post-irradiation cooling time, average burnup, and minimum initial enrichment as specified in Table A.4 or A.5, as applicable.
 - ii. SS clad: An assembly post-irradiation cooling time, average burnup, and minimum initial enrichment as specified in Table A.6, as applicable.
 - iii Trojan plant fuel An assembly post-irradiation cooling time, average burnup, and minimum initial enrichment as specified in Table A.8.
 - iv Trojan plant non-fuel hardware and neutron sources Post-irradiation cooling time, and average burnup as specified in Table A.9
 - d. Decay heat per assembly
 - i. ZR Clad: Except for Trojan plant fuel, decay heat \leq 833 Watts. Trojan plant fuel decay heat: \leq 725 Watts
 - ii. SS Clad: \leq 488 Watts
 - e. Fuel assembly length: \leq 176.8 inches (nominal design)
 - f. Fuel assembly width: \leq 8.54 inches (nominal design)
 - g. Fuel assembly weight: \leq 1,680 lbs, including non-fuel hardware and neutron sources

Table A.1 (Page 16 of 21)
Fuel Assembly Limits

IV. MPC MODEL: MPC-24E

A. Allowable Contents (continued)

2. Trojan plant damaged fuel assemblies meeting the applicable criteria listed in Table A.2 and meeting the following specifications:

- | | |
|---|---|
| a. Cladding type: | ZR |
| b. Maximum initial enrichment: | 3.7% ²³⁵ U |
| c. Fuel assembly post-irradiation cooling time, average burnup, decay heat, and minimum initial enrichment per assembly | An assembly post-irradiation cooling time, average burnup, and initial enrichment as specified in Table A.8 Decay Heat: \leq 725 Watts |
| d. Fuel assembly length: | \leq 169.3 inches (nominal design) |
| e. Fuel assembly width: | \leq 8.43 inches (nominal design) |
| f. Fuel assembly weight: | \leq 1,680 lbs, including DFC or Failed Fuel Can |

- B. Quantity per MPC: Up to 24 PWR intact fuel assemblies. For Trojan plant fuel only, up to four (4) damaged fuel assemblies may be stored in fuel storage locations 3, 6, 19, and/or 22. The remaining MPC-24E fuel storage locations may be filled with Trojan plant intact fuel assemblies.
- C. Trojan plant fuel must be transported in the custom-designed Trojan MPCs with the MPC spacer installed. Fuel from other plants is not permitted to be transported in the Trojan MPCs.
- D. Except for Trojan plant fuel, the fuel assemblies shall not contain non-fuel hardware or neutron sources. Trojan intact fuel assemblies containing non-fuel hardware may be transported in any fuel storage location.
- E. Trojan plant damaged fuel assemblies must be transported in a Trojan Failed Fuel Can or a Holtec damaged fuel container designed for Trojan Plant fuel.
- F. One (1) Trojan plant Sb-Be and /or up to two (2) Cf neutron sources in a Trojan plant intact fuel assembly (one source fuel assembly) may be transported in any one MPC. Each fuel assembly neutron source may be transported in any fuel storage location.
- G. Fuel debris is not authorized for transport in the MPC-24E.
- H. Trojan plant non-fuel hardware and neutron sources may not be transported in the same fuel storage location as a damaged fuel assembly.

Table A.1 (Page 17 of 21)
Fuel Assembly Limits

V. MPC MODEL: MPC-24EF

A. Allowable Contents

1. Uranium oxide, PWR intact fuel assemblies listed in Table A.2 and meeting the following specifications:
 - a. Cladding type: ZR or stainless steel (SS) as specified in Table A.2 for the applicable fuel assembly array/class.
 - b. Maximum initial enrichment: As specified in Table A.2 for the applicable fuel assembly array/class.
 - c. Post-irradiation cooling time, average burnup, and minimum initial enrichment per assembly
 - i. ZR clad: Except for Trojan plant fuel, an assembly post-irradiation cooling time, average burnup, and minimum initial enrichment as specified in Table A.4 or A.5, as applicable.
 - ii. SS clad: An assembly post-irradiation cooling time, average burnup, and minimum initial enrichment as specified in Table A.6, as applicable.
 - iii Trojan plant fuel: An assembly post-irradiation cooling time, average burnup, and minimum initial enrichment as specified in Table A.8.
 - iv Trojan plant non-fuel hardware and neutron sources: Post-irradiation cooling time, and average burnup as specified in Table A.9.
 - d. Decay heat per assembly:
 - a. ZR Clad: Except for Trojan plant fuel, decay heat \leq 833 Watts. Trojan plant fuel decay heat: \leq 725 Watts.
 - b. SS Clad: \leq 488 Watts
 - e. Fuel assembly length: \leq 176.8 inches (nominal design)
 - f. Fuel assembly width: \leq 8.54 inches (nominal design)
 - g. Fuel assembly weight: \leq 1,680 lbs, including non-fuel hardware and neutron sources.

Table A.1 (Page 18 of 21)
 Fuel Assembly Limits

V. MPC MODEL: MPC-24EF

A. Allowable Contents (continued)

2. Trojan plant damaged fuel assemblies meeting the applicable criteria listed in Table A.2 and meeting the following specifications:

- | | |
|--|---|
| a. Cladding type: | ZR |
| b. Maximum initial enrichment: | 3.7% ²³⁵ U |
| c. Fuel assembly post-irradiation cooling time, average burnup, decay heat, and minimum initial enrichment per assembly: | An assembly post-irradiation cooling time, average burnup, and initial enrichment as specified in Table A.8. Decay Heat: ≤ 725 Watts |
| d. Fuel assembly length: | ≤ 169.3 inches (nominal design) |
| e. Fuel assembly width: | ≤ 8.43 inches (nominal design) |
| f. Fuel assembly weight: | ≤ 1,680 lbs, including DFC or Failed Fuel Can. |

Table A.1 (Page 19 of 21)
Fuel Assembly Limits

V. MPC MODEL: MPC-24EF

A. Allowable Contents (continued)

3. Trojan Fuel Debris Process Can Capsules and/or Trojan plant fuel assemblies classified as fuel debris, for which the original fuel assemblies meet the applicable criteria listed in Table A.2 and meet the following specifications:

- | | |
|--|---|
| a. Cladding type: | ZR |
| b. Maximum initial enrichment: | 3.7% ²³⁵ U |
| c. Fuel debris post-irradiation cooling time, average burnup, decay heat, and minimum initial enrichment per assembly: | Post-irradiation cooling time, average burnup, and initial enrichment as specified in Table A.8. Decay Heat: ≤ 725 Watts |
| d. Fuel assembly length: | ≤ 169.3 inches (nominal design) |
| e. Fuel assembly width: | ≤ 8.43 inches (nominal design) |
| f. Fuel assembly weight: | ≤ 1,680 lbs, including DFC or Failed Fuel Can. |

- B. Quantity per MPC: Up to 24 PWR intact fuel assemblies. For Trojan plant fuel only, up to four (4) damaged fuel assemblies, fuel assemblies classified as fuel debris, and/or Trojan Fuel Debris Process Can Capsules may be stored in fuel storage locations 3, 6, 19, and/or 22. The remaining MPC-24EF fuel storage locations may be filled with Trojan plant intact fuel assemblies.
- C. Trojan plant fuel must be transported in the custom-designed Trojan MPCs with the MPC spacer installed. Fuel from other plants is not permitted to be transported in the Trojan MPCs.
- D. Except for Trojan plant fuel, the fuel assemblies shall not contain non-fuel hardware or neutron sources. Trojan intact fuel assemblies containing non-fuel hardware may be transported in any fuel storage location.
- E. Trojan plant damaged fuel assemblies, fuel assemblies classified as fuel debris, and Fuel Debris Process Can Capsules must be transported in a Trojan Failed Fuel Can or a Holtec damaged fuel container designed for Trojan Plant fuel.
- F. One (1) Trojan plant Sb-Be and /or up to two (2) Cf neutron sources in a Trojan plant intact fuel assembly (one source fuel assembly) may be transported in any one MPC. Each fuel assembly neutron source may be transported in any fuel storage location.
- G. Trojan plant non-fuel hardware and neutron sources may not be transported in the same fuel storage location as a damaged fuel assembly.

Table A.1 (Page 20 of 21)
Fuel Assembly Limits

VI. MPC MODEL: MPC-32

A. Allowable Contents

1. Uranium oxide, PWR intact fuel assemblies in array/classes 15x15D, E, F, and H and 17x17A, B, and C listed in Table A.2 and meeting the following specifications:
 - a. Cladding type: ZR
 - b. Maximum initial enrichment: As specified in Table A.2 for the applicable fuel assembly array/class.
 - c. Post-irradiation cooling time, maximum average burnup, and minimum initial enrichment per assembly: An assembly post-irradiation cooling time, average burnup, and minimum initial enrichment as specified in Table A.10 or A.11, as applicable.
 - d. Minimum average burnup per assembly (Assembly Burnup shall be confirmed per Subsection 1.2.3.7.2 of the SAR, which is hereby included by reference) Calculated value as a function of initial enrichment. See Table A.12.
 - e. Decay heat per assembly: ≤ 625 Watts
 - f. Fuel assembly length: ≤ 176.8 inches (nominal design)
 - g. Fuel assembly width: ≤ 8.54 inches (nominal design)
 - h. Fuel assembly weight: $\leq 1,680$ lbs
 - i. Operating parameters during irradiation of the assembly (Assembly operating parameters shall be determined per Subsection 1.2.3.7.1 of the SAR, which is hereby included by reference)

| | |
|--|---|
| Core ave. soluble boron concentration: | $\leq 1,000$ ppmb |
| Assembly ave. moderator temperature: | ≤ 601 K for array/classes 15x15D, E, F, and H ≤ 610 K for array/classes 17x17A, B, and C |
| Assembly ave. specific power: | ≤ 47.36 kW/kg-U for array/classes 15x15D, E, F, and H ≤ 61.61 kW/kg-U for array/classes 17x17A, B, and C |

Table A.1 (Page 21 of 21)
Fuel Assembly Limits

VI. MPC MODEL: MPC-32 (continued)

- B. Quantity per MPC: Up to 32 PWR intact fuel assemblies.
- C. Fuel assemblies shall not contain non-fuel hardware.
- D. Damaged fuel assemblies and fuel debris are not authorized for transport in MPC-32.
- E. Trojan plant fuel is not permitted to be transported in the MPC-32.

Appendix A - Certificate of Compliance 9261, Revision 5

Table A.2 (Page 1 of 4)
PWR FUEL ASSEMBLY CHARACTERISTICS (Note 1)

| Fuel Assembly Array/Class | 14x14A | 14x14B | 14x14C | 14x14D | 14x14E |
|--|------------------------------|------------------------------|------------------------------|------------------------------|----------|
| Clad Material (Note 2) | ZR | ZR | ZR | SS | Zr |
| Design Initial U (kg/assy.) (Note 3) | ≤ 407 | ≤ 407 | ≤ 425 | ≤ 400 | ≤ 206 |
| Initial Enrichment (MPC-24, 24E, and 24EF) (wt % ²³⁵ U) | ≤ 4.6 (24) ≤ 5.0 (24E/EF) | ≤ 4.6 (24) ≤ 5.0 (24E/EF) | ≤ 4.6 (24) ≤ 5.0 (24E/EF) | ≤ 4.0 (24) ≤ 5.0 (24E/EF) | ≤ 5.0 |
| No. of Fuel Rod Locations | 179 | 179 | 176 | 180 | 173 |
| Fuel Clad O.D. (in.) | ≥ 0.400 | ≥ 0.417 | ≥ 0.440 | ≥ 0.422 | ≥ 0.3415 |
| Fuel Clad I.D. (in.) | ≤ 0.3514 | ≤ 0.3734 | ≤ 0.3880 | ≤ 0.3890 | ≤ 0.3175 |
| Fuel Pellet Dia. (in.) | ≤ 0.3444 | ≤ 0.3659 | ≤ 0.3805 | ≤ 0.3835 | ≤ 0.3130 |
| Fuel Rod Pitch (in.) | ≤ 0.556 | ≤ 0.556 | ≤ 0.580 | ≤ 0.556 | Note 6 |
| Active Fuel Length (in.) | ≤ 150 | ≤ 150 | ≤ 150 | ≤ 144 | ≤ 102 |
| No. of Guide Tubes | 17 | 17 | 5 (Note 4) | 16 | 0 |
| Guide Tube Thickness (in.) | ≥ 0.017 | ≥ 0.017 | ≥ 0.038 | ≥ 0.0145 | N/A |

Appendix A - Certificate of Compliance 9261, Revision 5

Table A.2 (Page 2 of 4)
PWR FUEL ASSEMBLY CHARACTERISTICS (Note 1)

| Fuel Assembly Array/Class | 15x15A | 15x15B | 15x15C | 15x15D | 15x15E | 15x15F |
|---|------------------------------|------------------------------|------------------------------|------------------------------|------------------------------|------------------------------|
| Clad Material (Note 2) | ZR | ZR | ZR | ZR | ZR | ZR |
| Design Initial U (kg/assy.) (Note 3) | ≤ 464 | ≤ 464 | ≤ 464 | ≤ 475 | ≤ 475 | ≤ 475 |
| Initial Enrichment (MPC-24, 24E, and 24EF) (wt. % ²³⁵ U) | ≤ 4.1 (24) ≤ 4.5 (24E/EF) |
| Initial Enrichment (MPC-32) (wt. % ²³⁵ U) (Note 5) | N/A | N/A | N/A | (Note 5) | (Note 5) | (Note 5) |
| No. of Fuel Rod Locations | 204 | 204 | 204 | 208 | 208 | 208 |
| Fuel Clad O.D. (in.) | ≥ 0.418 | ≥ 0.420 | ≥ 0.417 | ≥ 0.430 | ≥ 0.428 | ≥ 0.428 |
| Fuel Clad I.D. (in.) | ≤ 0.3660 | ≤ 0.3736 | ≤ 0.3640 | ≤ 0.3800 | ≤ 0.3790 | ≤ 0.3820 |
| Fuel Pellet Dia. (in.) | ≤ 0.3580 | ≤ 0.3671 | ≤ 0.3570 | ≤ 0.3735 | ≤ 0.3707 | ≤ 0.3742 |
| Fuel Rod Pitch (in.) | ≤ 0.550 | ≤ 0.563 | ≤ 0.563 | ≤ 0.568 | ≤ 0.568 | ≤ 0.568 |
| Active Fuel Length (in.) | ≤ 150 | ≤ 150 | ≤ 150 | ≤ 150 | ≤ 150 | ≤ 150 |
| No. of Guide and/or Instrument Tubes | 21 | 21 | 21 | 17 | 17 | 17 |
| Guide/Instrument Tube Thickness (in.) | ≥ 0.015 | ≥ 0.015 | ≥ 0.0165 | ≥ 0.0150 | ≥ 0.0140 | ≥ 0.0140 |

Appendix A - Certificate of Compliance 9261, Revision 5

Table A.2 (Page 3 of 4)
PWR FUEL ASSEMBLY CHARACTERISTICS (Note 1)

| Fuel Assembly Array/ Class | 15x15G | 15x15H | 16x16A | 17x17A | 17x17B | 17x17C |
|---|---------------------------------|---------------------------------|---------------------------------|---------------------------------|---|---------------------------------|
| Clad Material (Note 2) | SS | ZR | ZR | ZR | ZR | ZR |
| Design Initial U (kg/assy.) (Note 3) | ≤ 420 | ≤ 475 | ≤ 443 | ≤ 467 | ≤ 467 | ≤ 474 |
| Initial Enrichment (MPC-24, 24E, and 24EF) (wt % ²³⁵ U) | ≤ 4.0 (24) ≤ 4.5 (24E/EF) | ≤ 3.8 (24) ≤ 4.2 (24E/EF) | ≤ 4.6 (24) ≤ 5.0 (24E/EF) | ≤ 4.0 (24) ≤ 4.4 (24E/EF) | ≤ 4.0 (24) ≤ 4.4 (24E/EF) (Note 7) | ≤ 4.0 (24) ≤ 4.4 (24E/EF) |
| Initial Enrichment (MPC-32) (wt. % ²³⁵ U) (Note 5) | N/A | (Note 5) | N/A | (Note 5) | (Note 5) | (Note 5) |
| No. of Fuel Rod Locations | 204 | 208 | 236 | 264 | 264 | 264 |
| Fuel Clad O.D. (in.) | ≥ 0.422 | ≥ 0.414 | ≥ 0.382 | ≥ 0.360 | ≥ 0.372 | ≥ 0.377 |
| Fuel Clad I.D. (in.) | ≤ 0.3890 | ≤ 0.3700 | ≤ 0.3320 | ≤ 0.3150 | ≤ 0.3310 | ≤ 0.3330 |
| Fuel Pellet Dia. (in.) | ≤ 0.3825 | ≤ 0.3622 | ≤ 0.3255 | ≤ 0.3088 | ≤ 0.3232 | ≤ 0.3252 |
| Fuel Rod Pitch (in.) | ≤ 0.563 | ≤ 0.568 | ≤ 0.506 | ≤ 0.496 | ≤ 0.496 | ≤ 0.502 |
| Active Fuel Length (in.) | ≤ 144 | ≤ 150 | ≤ 150 | ≤ 150 | ≤ 150 | ≤ 150 |
| No. of Guide and/or Instrument Tubes | 21 | 17 | 5 (Note 4) | 25 | 25 | 25 |
| Guide/Instrument Tube Thickness (in.) | ≥ 0.0145 | ≥ 0.0140 | ≥ 0.0400 | ≥ 0.016 | ≥ 0.014 | ≥ 0.020 |

Table A.2 (Page 4 of 4)
PWR FUEL ASSEMBLY CHARACTERISTICS (Note 1)

Notes:

1. All dimensions are design nominal values. Maximum and minimum dimensions are specified to bound variations in design nominal values among fuel assemblies within a given array/class.
2. ZR Designates cladding material made of Zirconium or Zirconium alloys.
3. Design initial uranium weight is the nominal uranium weight specified for each assembly by the fuel manufacturer or reactor user. For each PWR fuel assembly, the total uranium weight limit specified in this table may be increased up to 2.0 percent for comparison with users' fuel records to account for manufacturer tolerances.
4. Each guide tube replaces four fuel rods.
5. Minimum burnup and maximum initial enrichment as specified in Table A.12.
6. This fuel assembly array/class includes only the Indian Point Unit 1 fuel assembly. This fuel assembly has two pitches in different sectors of the assembly. These pitches are 0.441 inches and 0.453 inches
7. Trojan plant-specific fuel is governed by the limits specified for array/class 17x17B and will be transported in the custom-designed Trojan MPC-24E/EF canisters. The Trojan MPC-24E/EF design is authorized to transport only Trojan plant fuel with a maximum initial enrichment of 3.7 wt.% ²³⁵U.

Appendix A - Certificate of Compliance 9261, Revision 5

Table A.3 (Page 1 of 5)
BWR FUEL ASSEMBLY CHARACTERISTICS (Note 1)

| Fuel Assembly Array/Class | 6x6A | 6x6B | 6x6C | 7x7A | 7x7B | 8x8A |
|--|----------|---|----------|----------|----------|----------|
| Clad Material (Note 2) | ZR | ZR | ZR | ZR | ZR | ZR |
| Design Initial U (kg/assy.) (Note 3) | ≤ 110 | ≤ 110 | ≤ 110 | ≤ 100 | ≤ 195 | ≤ 120 |
| Maximum planar-average initial enrichment (wt. % ²³⁵ U) | ≤ 2.7 | ≤ 2.7 for the UO ₂ rods. See Note 4 for MOX rods | ≤ 2.7 | ≤ 2.7 | ≤ 4.2 | ≤ 2.7 |
| Initial Maximum Rod Enrichment (wt. % ²³⁵ U) | ≤ 4.0 | ≤ 4.0 | ≤ 4.0 | ≤ 5.5 | ≤ 5.0 | ≤ 4.0 |
| No. of Fuel Rod Locations | 35 or 36 | 35 or 36 (up to 9 MOX rods) | 36 | 49 | 49 | 63 or 64 |
| Fuel Clad O.D. (in.) | ≥ 0.5550 | ≥ 0.5625 | ≥ 0.5630 | ≥ 0.4860 | ≥ 0.5630 | ≥ 0.4120 |
| Fuel Clad I.D. (in.) | ≤ 0.5105 | ≤ 0.4945 | ≤ 0.4990 | ≤ 0.4204 | ≤ 0.4990 | ≤ 0.3620 |
| Fuel Pellet Dia. (in.) | ≤ 0.4980 | ≤ 0.4820 | ≤ 0.4880 | ≤ 0.4110 | ≤ 0.4910 | ≤ 0.3580 |
| Fuel Rod Pitch (in.) | ≤ 0.710 | ≤ 0.710 | ≤ 0.740 | ≤ 0.631 | ≤ 0.738 | ≤ 0.523 |
| Active Fuel Length (in.) | ≤ 120 | ≤ 120 | ≤ 77.5 | ≤ 80 | ≤ 150 | ≤ 120 |
| No. of Water Rods (Note 11) | 1 or 0 | 1 or 0 | 0 | 0 | 0 | 1 or 0 |
| Water Rod Thickness (in.) | ≥ 0 | ≥ 0 | N/A | N/A | N/A | ≥ 0 |
| Channel Thickness (in.) | ≤ 0.060 | ≤ 0.060 | ≤ 0.060 | ≤ 0.060 | ≤ 0.120 | ≤ 0.100 |

Appendix A - Certificate of Compliance 9261, Revision 5

Table A.3 (Page 2 of 5)
 BWR FUEL ASSEMBLY CHARACTERISTICS (Note 1)

| Fuel Assembly Array/Class | 8x8B | 8x8C | 8x8D | 8x8E | 8x8F | 9x9A |
|---|-------------|-------------|----------------|-------------|---------------|----------------|
| Clad Material (Note 2) | ZR | ZR | ZR | ZR | ZR | ZR |
| Design Initial U (kg/assy.) (Note 3) | ≤ 185 | ≤ 185 | ≤ 185 | ≤ 185 | ≤ 185 | ≤ 177 |
| Maximum planar-average initial enrichment (wt.% ²³⁵ U) | ≤ 4.2 | ≤ 4.2 | ≤ 4.2 | ≤ 4.2 | < 4.0 | ≤ 4.2 |
| Initial Maximum Rod Enrichment (wt.% ²³⁵ U) | ≤ 5.0 | ≤ 5.0 | ≤ 5.0 | ≤ 5.0 | ≤ 5.0 | ≤ 5.0 |
| No. of Fuel Rod Locations | 63 or 64 | 62 | 60 or 61 | 59 | 64 | 74/66 (Note 5) |
| Fuel Clad O.D. (in.) | ≥ 0.4840 | ≥ 0.4830 | ≥ 0.4830 | ≥ 0.4930 | ≥ 0.4576 | ≥ 0.4400 |
| Fuel Clad I.D. (in.) | ≤ 0.4295 | ≤ 0.4250 | 0.4230 | ≤ 0.4250 | ≤ 0.3996 | ≤ 0.3840 |
| Fuel Pellet Dia. (in.) | ≤ 0.4195 | ≤ 0.4160 | ≤ 0.4140 | ≤ 0.4160 | ≤ 0.3913 | ≤ 0.3760 |
| Fuel Rod Pitch (in.) | ≤ 0.642 | ≤ 0.641 | ≤ 0.640 | ≤ 0.640 | ≤ 0.609 | ≤ 0.566 |
| Design Active Fuel Length (in.) | ≤ 150 | ≤ 150 | ≤ 150 | ≤ 150 | ≤ 150 | ≤ 150 |
| No. of Water Rods (Note 11) | 1 or 0 | 2 | 1 - 4 (Note 7) | 5 | N/A (Note 12) | 2 |
| Water Rod Thickness (in.) | ≥ 0.034 | > 0.00 | > 0.00 | ≥ 0.034 | ≥ 0.0315 | > 0.00 |
| Channel Thickness (in.) | ≤ 0.120 | ≤ 0.120 | ≤ 0.120 | ≤ 0.100 | ≤ 0.055 | ≤ 0.120 |

Appendix A - Certificate of Compliance 9261, Revision 5

Table A.3 (Page 3 of 5)
 BWR FUEL ASSEMBLY CHARACTERISTICS (Note 1)

| Fuel Assembly Array/Class | 9x9B | 9x9C | 9x9D | 9x9E (Note 13) | 9x9F (Note 13) | 9x9G |
|---|------------|----------|----------|----------------|----------------|------------|
| Clad Material (Note 2) | ZR | ZR | ZR | ZR | ZR | ZR |
| Design Initial U (kg/assy.) (Note 3) | ≤ 177 | ≤ 177 | ≤ 177 | ≤ 177 | ≤ 177 | ≤ 177 |
| Maximum planar-average initial enrichment (wt.% ²³⁵ U) | ≤ 4.2 | ≤ 4.2 | ≤ 4.2 | ≤ 4.0 | ≤ 4.0 | ≤ 4.2 |
| Initial Maximum Rod Enrichment (wt.% ²³⁵ U) | ≤ 5.0 | ≤ 5.0 | ≤ 5.0 | ≤ 5.0 | ≤ 5.0 | ≤ 5.0 |
| No. of Fuel Rods | 72 | 80 | 79 | 76 | 76 | 72 |
| Fuel Clad O.D. (in.) | ≥ 0.4330 | ≥ 0.4230 | ≥ 0.4240 | ≥ 0.4170 | ≥ 0.4430 | ≥ 0.4240 |
| Fuel Clad I.D. (in.) | ≤ 0.3810 | ≤ 0.3640 | ≤ 0.3640 | ≤ 0.3640 | ≤ 0.3860 | ≤ 0.3640 |
| Fuel Pellet Dia. (in.) | ≤ 0.3740 | ≤ 0.3565 | ≤ 0.3565 | ≤ 0.3530 | ≤ 0.3745 | ≤ 0.3565 |
| Fuel Rod Pitch (in.) | ≤ 0.572 | ≤ 0.572 | ≤ 0.572 | ≤ 0.572 | ≤ 0.572 | ≤ 0.572 |
| Design Active Fuel Length (in.) | ≤ 150 | ≤ 150 | ≤ 150 | ≤ 150 | ≤ 150 | ≤ 150 |
| No. of Water Rods (Note 11) | 1 (Note 6) | 1 | 2 | 5 | 5 | 1 (Note 6) |
| Water Rod Thickness (in.) | > 0.00 | ≥ 0.020 | ≥ 0.0300 | ≥ 0.0120 | ≥ 0.0120 | ≥ 0.0320 |
| Channel Thickness (in.) | ≤ 0.120 | ≤ 0.100 | ≤ 0.100 | ≤ 0.120 | ≤ 0.120 | ≤ 0.120 |

Appendix A - Certificate of Compliance 9261, Revision 5

Table A.3 (Page 4 of 5)
BWR FUEL ASSEMBLY CHARACTERISTICS (Note 1)

| Fuel Assembly Array/Class | 10x10A | 10x10B | 10x10C | 10x10D | 10x10E |
|---|----------------|----------------|-------------|----------|----------|
| Clad Material (Note 2) | ZR | ZR | ZR | SS | SS |
| Design Initial U (kg/assy.) (Note 3) | ≤ 186 | ≤ 186 | ≤ 186 | ≤ 125 | ≤ 125 |
| Maximum planar-average initial enrichment (wt.% ²³⁵ U) | ≤ 4.2 | ≤ 4.2 | ≤ 4.2 | ≤ 4.0 | ≤ 4.0 |
| Initial Maximum Rod Enrichment (wt.% ²³⁵ U) | ≤ 5.0 | ≤ 5.0 | ≤ 5.0 | ≤ 5.0 | ≤ 5.0 |
| No. of Fuel Rod Locations | 92/78 (Note 8) | 91/83 (Note 9) | 96 | 100 | 96 |
| Fuel Clad O.D. (in.) | ≥ 0.4040 | ≥ 0.3957 | ≥ 0.3780 | ≥ 0.3960 | ≥ 0.3940 |
| Fuel Clad I.D. (in.) | ≤ 0.3520 | ≤ 0.3480 | ≤ 0.3294 | ≤ 0.3560 | ≤ 0.3500 |
| Fuel Pellet Dia. (in.) | ≤ 0.3455 | ≤ 0.3420 | ≤ 0.3224 | ≤ 0.3500 | ≤ 0.3430 |
| Fuel Rod Pitch (in.) | ≤ 0.510 | ≤ 0.510 | ≤ 0.488 | ≤ 0.565 | ≤ 0.557 |
| Design Active Fuel Length (in.) | ≤ 150 | ≤ 150 | ≤ 150 | ≤ 83 | ≤ 83 |
| No. of Water Rods (Note 11) | 2 | 1 (Note 6) | 5 (Note 10) | 0 | 4 |
| Water Rod Thickness (in.) | ≥ 0.0300 | > 0.00 | ≥ 0.031 | N/A | ≥ 0.022 |
| Channel Thickness (in.) | ≤ 0.120 | ≤ 0.120 | ≤ 0.055 | ≤ 0.080 | ≤ 0.080 |

Table A.3 (Page 5 of 5)
BWR FUEL ASSEMBLY CHARACTERISTICS (Note 1)

Notes:

1. All dimensions are design nominal values. Maximum and minimum dimensions are specified to bound variations in design nominal values among fuel assemblies within a given array/class.
2. ZR designates cladding material made from Zirconium or Zirconium alloys.
3. Design initial uranium weight is the uranium weight specified for each assembly by the fuel manufacturer or reactor user. For each BWR fuel assembly, the total uranium weight limit specified in this table may be increased up to 1.5% for comparison with users' fuel records to account for manufacturer's tolerances.
4. ≤ 0.635 wt. % ^{235}U and ≤ 1.578 wt. % total fissile plutonium (^{239}Pu and ^{241}Pu), (wt. % of total fuel weight, i.e., UO_2 plus PuO_2).
5. This assembly class contains 74 total fuel rods; 66 full length rods and 8 partial length rods.
6. Square, replacing nine fuel rods.
7. Variable
8. This assembly class contains 92 total fuel rods; 78 full length rods and 14 partial length rods.
9. This assembly class contains 91 total fuel rods, 83 full length rods and 8 partial length rods.
10. One diamond-shaped water rod replacing the four center fuel rods and four rectangular water rods dividing the assembly into four quadrants.
11. These rods may be sealed at both ends and contain Zr material in lieu of water.
12. This assembly is known as "QUAD+" and has four rectangular water cross segments dividing the assembly into four quadrants.
13. For the SPC 9x9-5 fuel assembly, each fuel rod must meet either the 9x9E or 9x9F set of limits for clad O.D., clad I.D., and pellet diameter.

Table A.4

FUEL ASSEMBLY COOLING, AVERAGE BURNUP, AND MINIMUM ENRICHMENT
MPC-24/24E/24/EF PWR FUEL WITH ZIRCALOY CLAD AND
WITH NON-ZIRCALOY IN-CORE GRID SPACERS

| Post-irradiation Cooling Time (years) | Assembly Burnup (MWD/MTU) | Assembly Initial Enrichment (wt. % U-235) |
|---------------------------------------|---------------------------|---|
| ≥ 9 | ≤ 24,500 | ≥ 2.3 |
| ≥ 11 | ≤ 29,500 | ≥ 2.6 |
| ≥ 13 | ≤ 34,500 | ≥ 2.9 |
| ≥ 15 | ≤ 39,500 | ≥ 3.2 |
| > 18 | < 44,500 | > 3.4 |

Table A.5

FUEL ASSEMBLY COOLING, AVERAGE BURNUP, AND MINIMUM ENRICHMENT
MPC-24/24E/24EF PWR FUEL WITH ZIRCALOY CLAD AND
WITH ZIRCALOY IN-CORE GRID SPACERS

| Post-irradiation Cooling Time (years) | Assembly Burnup (MWD/MTU) | Assembly Initial Enrichment (wt. % U-235) |
|---------------------------------------|---------------------------|---|
| ≥ 6 | ≤ 24,500 | ≥ 2.3 |
| ≥ 7 | ≤ 29,500 | ≥ 2.6 |
| ≥ 9 | ≤ 34,500 | ≥ 2.9 |
| ≥ 11 | ≤ 39,500 | ≥ 3.2 |
| ≥ 14 | ≤ 44,500 | ≥ 3.4 |

Table A.6

FUEL ASSEMBLY COOLING, AVERAGE BURNUP, AND MINIMUM ENRICHMENT
MPC-24/24E/24EF PWR FUEL WITH STAINLESS STEEL CLAD

| Post-irradiation Cooling Time (years) | Assembly Burnup (MWD/MTU) | Assembly Initial Enrichment (wt. % U-235) |
|---------------------------------------|---------------------------|---|
| ≥ 19 | ≤ 30,000 | ≥ 3.1 |
| > 24 | < 40,000 | > 3.1 |

|

Table A.7

FUEL ASSEMBLY COOLING, AVERAGE BURNUP, AND MINIMUM ENRICHMENT
MPC-68

| Post-irradiation Cooling Time (years) | Assembly Burnup (MWD/MTU) | Assembly Initial Enrichment (wt. % U-235) |
|---------------------------------------|---------------------------|---|
| ≥ 8 | ≤ 24,500 | ≥ 2.1 |
| ≥ 9 | ≤ 29,500 | ≥ 2.4 |
| ≥ 11 | ≤ 34,500 | ≥ 2.6 |
| ≥ 14 | ≤ 39,500 | ≥ 2.9 |
| ≥ 19 | ≤ 44,500 | ≥ 3.0 |

|

Appendix A - Certificate of Compliance 9261, Revision 5

Table A.8

TROJAN PLANT FUEL ASSEMBLY COOLING, AVERAGE BURNUP,
AND MINIMUM ENRICHMENT LIMITS (Note 1)

| Post-irradiation Cooling Time (years) | Assembly Burnup (MWD/MTU) | Assembly Initial Enrichment (wt.% ²³⁵ U) |
|---------------------------------------|---------------------------|---|
| ≥ 16 | ≤ 42,000 | ≥ 3.09 |
| ≥ 16 | ≤ 37,500 | ≥ 2.6 |
| ≥ 16 | ≤ 30,000 | ≥ 2.1 |

NOTES:

1. Each fuel assembly must only meet one set of limits (i.e., one row)

Table A.9

TROJAN PLANT NON-FUEL HARDWARE AND NEUTRON SOURCES
COOLING AND BURNUP LIMITS

| Type of Hardware or Neutron Source | Burnup (MWD/MTU) | Post-irradiation Cooling Time (Years) |
|---|------------------|---------------------------------------|
| BPRAs | ≤ 15,998 | ≥ 24 |
| TPDs | ≤ 118,674 | ≥ 11 |
| RCCAs | ≤ 125,515 | ≥ 9 |
| Cf neutron source | ≤ 15,998 | ≥ 24 |
| Sb-Be neutron source with 4 source rods, 16 burnable poison rods, and 4 thimble plug rods | ≤ 45,361 | ≥ 19 |
| Sb-Be neutron source with 4 source rods, 20 thimble plug rods | ≤ 88,547 | ≥ 9 |

Appendix A - Certificate of Compliance 9261, Revision 5

Table A.10

FUEL ASSEMBLY COOLING, AVERAGE BURNUP, AND MINIMUM ENRICHMENT MPC-32 PWR FUEL WITH ZIRCALOY CLAD AND WITH NON-ZIRCALOY IN-CORE GRID SPACERS

| Post-irradiation cooling time (years) | Assembly burnup (MWD/MTU) | Assembly Initial Enrichment (wt. % U-235) |
|--|----------------------------------|--|
| ≥ 12 | ≤ 24,500 | ≥ 2.3 |
| ≥ 14 | ≤ 29,500 | ≥ 2.6 |
| ≥ 16 | ≤ 34,500 | ≥ 2.9 |
| ≥ 19 | ≤ 39,500 | ≥ 3.2 |
| ≥ 20 | ≤ 42,500 | ≥ 3.4 |

Table A.11

FUEL ASSEMBLY COOLING, AVERAGE BURNUP, AND MINIMUM ENRICHMENT MPC-32 PWR FUEL WITH ZIRCALOY CLAD AND WITH ZIRCALOY IN-CORE GRID SPACERS

| Post-irradiation cooling time (years) | Assembly burnup (MWD/MTU) | Assembly Initial Enrichment (wt.% U-235) |
|--|----------------------------------|---|
| ≥ 8 | ≤ 24,500 | ≥ 2.3 |
| ≥ 9 | ≤ 29,500 | ≥ 2.6 |
| ≥ 12 | ≤ 34,500 | ≥ 2.9 |
| ≥ 14 | ≤ 39,500 | ≥ 3.2 |
| ≥ 19 | ≤ 44,500 | ≥ 3.4 |

Appendix A - Certificate of Compliance 9261, Revision 5

Table A.12

FUEL ASSEMBLY MAXIMUM ENRICHMENT AND MINIMUM BURNUP REQUIREMENTS FOR TRANSPORTATION IN MPC-32

| Fuel Assembly Array/Class | Configuration (Note 2) | Maximum Enrichment (wt.% U-235) | Minimum Burnup (B) as a Function of Initial Enrichment (E) (Note 1) (GWD/MTU) |
|----------------------------------|-------------------------------|--|--|
| 15x15D, E, F, H | A | 4.65 | $B = (1.6733)*E^3 - (18.72)*E^2 + (80.5967)*E - 88.3$ |
| | B | 4.38 | $B = (2.175)*E^3 - (23.355)*E^2 + (94.77)*E - 99.95$ |
| | C | 4.48 | $B = (1.9517)*E^3 - (21.45)*E^2 + (89.1783)*E - 94.6$ |
| | D | 4.45 | $B = (1.93)*E^3 - (21.095)*E^2 + (87.785)*E - 93.06$ |
| 17x17A,B,C | A | 4.49 | $B = (1.08)*E^3 - (12.25)*E^2 + (60.13)*E - 70.86$ |
| | B | 4.04 | $B = (1.1)*E^3 - (11.56)*E^2 + (56.6)*E - 62.59$ |
| | C | 4.28 | $B = (1.36)*E^3 - (14.83)*E^2 + (62.27)*E - 72.93$ |
| | D | 4.16 | $B = (1.4917)*E^3 - (16.26)*E^2 + (72.9883)*E - 79.7$ |

NOTES:

1. E = Initial enrichment (e.g., for 4.05 wt.%, E = 4.05).
2. See Table A.13.
3. Fuel Assemblies must be cooled 5 years or more.

Appendix A - Certificate of Compliance 9261, Revision 5

Table A.13

LOADING CONFIGURATIONS FOR THE MPC-32

| CONFIGURATION | ASSEMBLY SPECIFICATIONS |
|----------------------|--|
| A | <ul style="list-style-type: none"> • Assemblies that have not been located in any cycle under a control rod bank that was permitted to be inserted during full power operation (per plant operating procedures); or • Assemblies that have been located under a control rod bank that was permitted to be inserted during full power operation (per plant operating procedures), but where it can be demonstrated, based on operating records, that the insertion never exceeded 8 inches from the top of the active length during full power operation. |
| B | <ul style="list-style-type: none"> • Of the 32 assemblies in a basket, up to 8 assemblies can be from core locations where they were located under a control rod bank, that was permitted to be inserted more than 8 inches during full power operation. There is no limit on the duration (in terms of burnup) under this bank. • The remaining assemblies in the basket must satisfy the same conditions as specified for configuration A. |
| C | <ul style="list-style-type: none"> • Of the 32 assemblies in a basket, up to 8 assemblies can be from core locations where they were located under a control rod bank, that was permitted to be inserted more than 8 inches during full power operation. Location under such a control rod bank is limited to 20 GWD/MTU of the assembly. • The remaining assemblies in the basket must satisfy the same conditions as specified for configuration A. |
| D | <ul style="list-style-type: none"> • Of the 32 assemblies in a basket, up to 8 assemblies can be from core locations where they were located under a control rod bank, that was permitted to be inserted more than 8 inches during full power operation. Location under such a control rod bank is limited to 30 GWD/MTU of the assembly. • The remaining assemblies in the basket must satisfy the same conditions as specified for configuration A. |

REFERENCES:

Holtec International Report No. HI-951251, *Safety Analysis Report for the Holtec International Storage, Transport, And Repository Cask System (HI-STAR 100 Cask System)*, Revision 12, dated October 6, 2006.