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March 30, 2007

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

- Reference:
1. USNRC Docket No. 72-1014 (HI-STORM 100), TAC L23850
  2. Holtec Project 5014
  3. USNRC Letter from Christopher Regan (SFST) to Evan Rosenbaum (Holtec), dated 6 March 2007.
  4. Holtec Letter 5014616, dated 20 March 2007.

Subject: License Amendment Request #3 to HI-STORM 100 CoC

Dear Sir:

Via letter (Reference 3) the NRC Staff informed us of areas where they believed that inconsistencies might exist in our third request to amend the Certificate of Compliance for our HI-STORM 100 cask system. We have examined the areas identified by the Staff, and determined that it is prudent to make several minor modifications to our submittal documents to eliminate the Staff's concerns. Affected portions of the Revised Proposed CoC, along with specific responses to the Staff's written items, have already been submitted (Reference 4).

We herein submit the affected portions of the Proposed Revised FSAR (Attachment 1, electronic format only on accompanying CD-ROM). Revisions are made on the section level, with revised sections notated as Rev. 3.J in the footer. If any text or tables in a section are affected, the entire section text and tables are provided. Only those portions of the FSAR that are changed to address the Staff's concerns are included herein.

Changes related to cask system shielding analyses are made in Tables 2.1.17, 2.1.20 and 2.1.24 and in Sections 5.1 through 5.4. These include changes to the numbers of Control Rod Assemblies (CRAs) that can be stored in the various MPC variants. Some plants have a relatively high number of these components, specifically if they have already loaded large numbers of spent fuel storage casks with assemblies that do not contain any of these components. The previous limit of four CRAs is not sufficient for some of these plants. However, to address the Staff's concerns, CRAs are no longer permitted in all cells of the MPC fuel baskets, but are limited to the 12 center locations. With this reduction, the BPRAs remain the limiting condition with one exception: the surface dose rate at the bottom of the cask (compare Table 5.4.15 and revised Table 5.4.16). A discussion to alert users to

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the possibly increased dose rates and a recommendation to keep the number of control rod assemblies per MPC low have been added in Section 5.4.6.

Changes in Table 2.2.3 are made to “roll back” previous changes to the Off-Normal and Accident Condition temperature limits for stainless steel MPC components. These temperature limits are restored to the currently approved values. All other changes are to reinstate the Supplemental Cooling System.

Please contact us if you have any questions.

Sincerely,

Evan Rosenbaum, P.E.  
Project Manager, LAR 1014-3

cc: Mr. Christopher Regan, NRC  
Holtec Groups 1, 2 and 4