HOLTEC INTERNATIONAL

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May 10, 2007

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

Reference:
1. USNRC Docket No. 71-9325 (HI-STAR 180)
2. Holtec Letter to the USNRC dated January 10th, 2007
3. SFST/Holtec Meeting on HI-STAR 180 of March 27th, 2007
4. Holtec Letter to the USNRC dated April 11th, 2007
5. Holtec Letter to the USNRC dated April 17th, 2007

Subject: Clarification of Need Date for NRC Approval of HI-STAR 180 Package on USNRC Docket No. 71-9325

Dear Sir or Madam:

We thank Mr. Stewart Brown of the SFST's Licensing Branch for contacting us on the matter of our need date for the certification of the HI-STAR 180 Package, which was re-submitted on April 11, 2007 (Ref. 4) after the initial submittal made on January 10, 2007 (Ref. 2) had to be recalled by mutual agreement with SFST. Even a cursory review of our submittal would reveal the massive editorial effort by us to revamp the SAR to meet the NRC's expectations. Despite the large volume of work, we maintained the transmittal date of April 11, 2007 so as to provide a full year of regulatory action period on this package before our need date of April 10, 2008. We reiterated the April 2008 need date in our meeting with the SFST of March 27, 2007 (Ref. 3) as well as in our letter of April 17, 2007 (Ref. 5).

We respectfully request that SFST engage its review team forthwith to help us meet our users' needs.

As the SFST is well aware, several HUG (Holtec User Group) member plants have been placing high burnup fuel in dry storage. Our presently certified HI-STAR 100 Package cannot be loaded with high burnup fuel. The HI-STAR 180 Package design for such fuel would lend factual credence to our clients' publicly announced policy of ready off-site transportability for all of their fuel in dry storage. Thus, for our HUG membership, a certified HI-STAR 180 is a real and present need. We should

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thank the SFPO (SFST's predecessor) for recognizing this need and providing us the pre-submittal comment opportunities through a number of public meetings in 2006. These meetings have helped familiarize the essential design features of the cask and the technical content of our submittal to the Staff, which should be a significant resource saver during the NRC's review effort.

We urge the SFST to give priority to reviewing our application because of the needs of our HUG membership and also of the emerging need for the industry at large, which would doubtless benefit from a well articulated regulatory criteria with respect to transport of high burnup fuel that the NRC's work on this docket will accrue.

We appreciate this opportunity to provide our input in this critical matter.

Sincerely,

Luis E. Hinojosa
Project Manager

cc: Mr. Stewart Brown, SFST, Licensing Branch
Ms. Kim Hardin, SFST, Licensing Branch

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