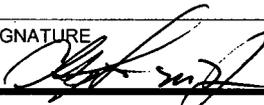


NRC FORM 699 (9-2003)		U.S. NUCLEAR REGULATORY COMMISSION		DATE
<b>CONVERSATION RECORD</b>				08/02/2007
				TIME
				3:45pm
NAME OF PERSON(S) CONTACTED OR IN CONTACT WITH YOU		TELEPHONE NO.		TYPE OF CONVERSATION <input type="checkbox"/> VISIT <input type="checkbox"/> CONFERENCE <input checked="" type="checkbox"/> TELEPHONE <input checked="" type="checkbox"/> INCOMING <input type="checkbox"/> OUTGOING
Alan Soler, Kris Singh, Evan Rosenbaum, Lius Hinojosa		856-797-0900		
ORGANIZATION				
Holtec International				
SUBJECT				
HI-STORM 100 Emergent Structural Fuel Buckling Analysis Issue				
SUMMARY (Continue on Page 2)				
NRC Attendees: Christopher Regan, William Brach, Ed Hackett, Robert Nelson, Gordon Bjorkman, Robert Einzinger, Joe Sebrosky				
Holtec International called NRC to follow-up on an emergent issue the staff had identified associated with the fuel rod buckling analysis described in the Holtec HI-STORM 100 FSAR that was introduced in a conference call held 07/31/07.				
Holtec presented several items in response to the staffs concern regarding the fuel buckling analyses presented in Section 3.5 of the FSAR. Holtec suggested that they never claimed that the fuel will remain intact after a drop accident - that there was no reliance on fuel integrity as part of the Part 72 licensing basis under accident conditions. They rely on the containment boundary to exclude releases. Holtec also argued that fuel exits the reactor after being used with significant internal stresses and changes in configuration including bowing and twisting. As such the spirit of the calculation presented in the FSAR is essentially to address a regulatory position - similar to presenting an analysis to address regulatory requirements for the fuel cladding temperature limits. Holtec noted the analysis cannot fully characterize the fuel exiting the reactor as fuel in new, perfect condition because this is not a true reflection of the actual condition of the used fuel.				
The NRC indicated that the fuel rod cladding provides the first containment boundary as indicated by Part 50 regulation. However, Holtec argued that given the location of the fuel when fuel buckling analysis is applied, i.e., in the fuel handling building, fuel drop accidents are governed by Part 50 regulations and should not be confused with Part 72 requirements. Nonetheless the NRC pointed out that Indian Point Unit 1 (IP1) is relying on the Holtec analysis, presented in the FSAR licensed under Part 72, as the basis to demonstrate fuel cladding integrity in a drop accident inside the fuel building.				
The staff then agreed that it may not be necessary for the analysis to remain in the FSAR if it is not relied upon to support a Part 72 licensing decision/finding. Holtec added that all of the IP1 fuel is placed into damaged fuel containers. Holtec stated that the analysis in question was placed in the FSAR during initial HI-STORM 100 licensing to address an unrelated issue and in				
<b>Continue on Page 2</b>				
ACTION REQUIRED				
None				
NAME OF PERSON DOCUMENTING CONVERSATION		SIGNATURE		DATE
C. Regan				08/03/2007
ACTION TAKEN				
None				
TITLE OF PERSON TAKING ACTION		SIGNATURE OF PERSON TAKING ACTION		DATE

**CONVERSATION RECORD (Continued)**

SUMMARY (Continue on Page 3)

hindsight should not have remained in the FSAR. The staff proposed that the solution for the purposes of approving the Part 72 Certificate of Compliance (CoC) amendment request was simply to remove the analysis in FSAR section 3.5 and any reference to it. Issues with the analysis will have to be addressed by applying Part 50 regulations and through more direct communication with IP1.

Holtec agreed to provide the staff with a revised FSAR as soon as possible in support of the two CoC amendment applications being prepared for rulemaking. The staff would follow-up with the NRC Office of Nuclear Reactor Regulation to ensure that dialogue continued regarding resolution of this issue.

*Continue on Page 3*