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August 30, 2007

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

Reference: 1. USNRC Docket No. 71-9336 (HI-STAR 60 Model)
2. Holtec Letter 1553017-NRC, dated August 17, 2007, USNRC Docket No. 71-9325, TAC L24076
3. Holtec Project 1630

Subject: License Application for the HI-STAR 60 Type B(U) Transportation Package

Dear Sir or Madam:

We are pleased to submit revision 0 of the HI-STAR 60 SAR in support of a Certificate of Compliance under the provisions of 10CFR71.

The HI-STAR 60 transport package is an anatomical analog of our HI-STAR 100 package licensed in 1999 under Docket No. 71-9261, except that the fuel basket in HI-STAR 60 does not feature an Enclosure Vessel. The fuel basket, however, is of the same rectilinear welded honeycomb configuration used in all presently used Holtec MPCs. The commonality of design configuration between HI-STAR 60 and HI-STAR 100 extends to the impact limiter also. As expected because the HI-STAR 60 is a substantially smaller package compared to HI-STAR 100, the computed factors of safety are substantially larger than those computed for the (licensed) HI-STAR100 package. Finally, the fact that the package contents are limited to moderate burnup fuel (less than 45,000 MWD/MTU) should greatly facilitate the SFST staff's technical review.

We should add that we have made an utmost effort to pro-actively incorporate responses to regulatory positions discerned from our ongoing interactions with SFST on the different dockets. For example, the issue of fuel impact tolerance capacity analysis is based on NUREG-1864 in this submittal.

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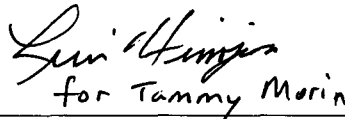
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To ensure that the SFST has access to all proprietary documents that may possibly be consulted during their regulatory review, we herewith provide the entire batch of non-public domain documents under the auspices of 10CFR 2.390, including the Calculation Packages and other supporting information germane to this SAR. A complete listing of supporting documents and supporting (computer) data files being forwarded to the USNRC document control desk and SFST staff as a part of this submittal is presented in Attachment A to this letter.

We trust that the above material facts will help facilitate the SFST's review and approval of this package to support our need date of August 31, 2008.

Sincerely,



Tammy Morin
for Tammy Morin

Tammy Morin
Adjunct Project Manager HI-STAR 60



Stefan Anton

Stefan Anton, Dr.-Ing.
Licensing Manager, Holtec International

cc (with all attachments): Mr. Meraj Rahimi, NRC SFST, Licensing Branch

cc (without attachments): Holtec Groups 1 and 2

Attachment A: Contents of License Application

Attachment B: Affidavit on Proprietary Status



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**Attachment A – Contents of License Application including Supporting Documents
 and Supporting (computer) Data Files**

Attachment 1 - Proposed SAR and CoC on Standard CD Media				
Item No.	Document I.D.	Title	Rev. #	Proprietary Status
1.	HI-2073710	Safety Analysis Report on the HI-STAR 60 Package (includes drawing package) – See note 6 below	0	Proprietary
2.	Proposed CoC	Proposed Certificate of Compliance 9336	0	Non-Proprietary
Attachment 2 – Containment Supporting Documents on Standard CD Media				
Item No.	Document I.D.	Title	Rev. #	Proprietary Status
3.	HI-2073728	HI-STAR 60 Containment Analysis	0	Proprietary
Attachment 3A - Structural Supporting Documents on Standard CD Media				
Item No.	Document I.D.	Title	Rev. #	Proprietary Status
4.	HI-2073716	Structural Calculation Package for HI-STAR 60	1	Proprietary
5.	HI-2073725	Finite Element Impact Analysis Supporting HI-STAR 60 SAR	1	Proprietary
6.	HI-2063591	Benchmarking of LS-DYNA for Simulations of Hypothetical Accident Conditions of Transport (a.k.a. Stage 2 Report) – See notes 4 and 5 below	1	Proprietary
7.	HI-2073743	Benchmarking of LS-DYNA Impact Response Prediction Model for the HI-STAR Transport Package Using the AL-STAR Impact Limiter Test Data (a.k.a. Stage 3 Report) – See notes 4 and 5 below	0	Proprietary
8.	HI-981891	Impact Limiter Drop Test Report – Second Series – See note 4 below	3	Proprietary



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Attachment 3B - Structural Supporting Data Files on Ultrium LT03 Tape				
Item No.	Data File Description		Rev. #	Proprietary Status
9.	All input and output computer data files identified in the input/output file section of supporting document HI-2073725		-	Proprietary
Attachment 4A - Thermal Supporting Documents on Standard CD Media				
Item No.	Document I.D.	Title	Rev. #	Proprietary Status
10.	HI-2073740	Thermal Analysis of the HI-STAR 60	0	Proprietary
Attachment 4B - Thermal Supporting Data Files on Standard DVD Media				
Item No.	Data File Description		Rev. #	Proprietary Status
11.	All input and output computer data files identified in supporting the input/output file section of document HI-2073740		-	Proprietary
Attachment 4C - Thermal Benchmarking Supporting Documents on Standard CD Media				
Item No.	Document I.D.	Title	Rev. #	Proprietary Status
12.	HI-992252	Topical Report on the HI-STAR/HI-STORM Thermal Model and its Benchmarking with Full-Size Cask Test Data - See note 4 below	1	Proprietary
13.	HI-992278	TN-24P Benchmarking and HI-STAR/HI-STORM Thermal Modeling Calculation Package - See note 4 below	1	Proprietary
Attachment 4D Thermal Benchmarking Supporting Data Files on Standard CD Media				
Item No.	Data File Description		Rev. #	Proprietary Status
14.	All input and output computer data files identified in the input/output file section of document HI-992278		-	Proprietary
Attachment 5A - Shielding Supporting Documents on Standard CD Media				
Item No.	Document I.D.	Title	Rev. #	Proprietary Status
15.	HI-2073722	HI-STAR 60 Shielding Evaluation	0	Proprietary



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Attachment 5B – Shielding Supporting Data Files on Standard DVD Media				
Item No.	Data File Description		Rev. #	Proprietary Status
16.	Selected input and output computer data files identified in the input/output file section of supporting documents HI-2073722		-	Proprietary
Attachment 6A – Criticality Supporting Documents on Standard CD Media				
Item No.	Document I.D.	Title	Rev. #	Proprietary Status
17.	HI-2073727	Criticality Analysis for the HI-STAR 60	1	Proprietary
Attachment 6B – Criticality Supporting Data Files on Standard CD Media				
Item No.	Data File Description		Rev. #	Proprietary Status
18.	Selected input and output computer data files identified in the input/output file section of supporting document HI-2073727		-	Proprietary

Attachment A Notes:

1. The license application includes the Safety Analysis Report, the proposed CoC, supporting documents and supporting (computer) data files. Supporting documents include calculation packages, technical reports, test reports, and other documents that are not readily available to the USNRC.
2. Please be informed that supporting documents may reference previous revisions of the latest drawings provided in the drawing package in Section 1.3 of the Safety Analysis Report. Holtec's QA process does not require supporting documents to be revised if they are not materially affected by changes in other project documents. For the convenience of the SFST staff, the last two revisions (revisions 0 and 1) of the drawings in the Drawing Package are provided in Attachment 1 above.
3. Any documents (and drawings) that may be referenced by the supporting documents will be provided promptly upon SFST staff request.
4. Holtec recently submitted document items 6, 7, 8 and 12 via Ref. 2 (Docket No. 71-9325) of this letter. In addition, items 12 and 13 were also previously submitted via Docket No. 72-1014. For the convenience of the SFST staff, these documents are resubmitted in support of this application.



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Attachment A Notes (continued):

5. In lieu of the Ultrium LT03 Tape media of Attachment 3B provided to the USNRC Document Control Desk, we are providing the SFST staff with a 320GB capacity external hard drive with USB capability also containing Attachment 3B. The computer data files associated with document items 6 and 7 above are not resubmitted to the Document Control Desk; however, they have been placed in the same hard drive containing Attachment 3B for the convenience of the SFST staff.

The hard drive has been shipped in its original box with all cables, manual(s), etc included. The hard drive is provided for the convenience of the SFST staff reviewer to facilitate his/her review. It is requested that upon completion of the SFST staff review of the License Application and issuance of the CoC, the hard drive be returned to Holtec International.

6. In addition to the electronic copy provided to the USNRC Document Control Desk and SFST staff, a paper copy of the SAR is provided to the SFST staff for their convenience.
7. For those items indicated as proprietary, Attachment B: Affidavit Pursuant to 10CFR2.390 – Affidavit, requests proprietary information be withheld from public disclosure. HI-STAR 60 Safety Analysis Report text, figures or drawings containing proprietary information are either highlighted in gray or indicated as proprietary by other means.

AFFIDAVIT PURSUANT TO 10CFR2.390

I, Luis E. Hinojsoa, being duly sworn, depose and state as follows:

- (1) I have reviewed the information described in paragraph (2) which is sought to be withheld, and am authorized to apply for its withholding.
- (2) The information sought to be withheld is the proprietary information listed in Attachment A of Holtec Letter ID 1630015-NRC. The information is considered proprietary to Holtec International and is appropriately annotated as such.
- (3) In making this application for withholding of proprietary information of which it is the owner, Holtec International relies upon the exemption from disclosure set forth in the Freedom of Information Act ("FOIA"), 5 USC Sec. 552(b)(4) and the Trade Secrets Act, 18 USC Sec. 1905, and NRC regulations 10CFR Part 9.17(a)(4), 2.390(a)(4), and 2.390(b)(1) for "trade secrets and commercial or financial information obtained from a person and privileged or confidential" (Exemption 4). The material for which exemption from disclosure is here sought is all "confidential commercial information", and some portions also qualify under the narrower definition of "trade secret", within the meanings assigned to those terms for purposes of FOIA Exemption 4 in, respectively, Critical Mass Energy Project v. Nuclear Regulatory Commission, 975F2d871 (DC Cir. 1992), and Public Citizen Health Research Group v. FDA, 704F2d1280 (DC Cir. 1983).

AFFIDAVIT PURSUANT TO 10CFR2.390

- (4) Some examples of categories of information which fit into the definition of proprietary information are:
- a. Information that discloses a process, method, or apparatus, including supporting data and analyses, where prevention of its use by Holtec's competitors without license from Holtec International constitutes a competitive economic advantage over other companies;
 - b. Information which, if used by a competitor, would reduce his expenditure of resources or improve his competitive position in the design, manufacture, shipment, installation, assurance of quality, or licensing of a similar product.
 - c. Information which reveals cost or price information, production, capacities, budget levels, or commercial strategies of Holtec International, its customers, or its suppliers;
 - d. Information which reveals aspects of past, present, or future Holtec International customer-funded development plans and programs of potential commercial value to Holtec International;
 - e. Information which discloses patentable subject matter for which it may be desirable to obtain patent protection.

The information sought to be withheld is considered to be proprietary for the reasons set forth in paragraphs 4.a and 4.b above.

- (5) The information sought to be withheld is being submitted to the NRC in confidence. The information (including that compiled from many sources) is of a sort customarily held in confidence by Holtec International, and is in fact so held. The information sought to be withheld has, to the best of my knowledge and belief, consistently been held in confidence by Holtec International. No public disclosure has been made, and it is not available in public sources. All disclosures to third parties, including any required transmittals to the NRC, have

AFFIDAVIT PURSUANT TO 10CFR2.390

been made, or must be made, pursuant to regulatory provisions or proprietary agreements which provide for maintenance of the information in confidence. Its initial designation as proprietary information, and the subsequent steps taken to prevent its unauthorized disclosure, are as set forth in paragraphs (6) and (7) following.

- (6) Initial approval of proprietary treatment of a document is made by the manager of the originating component, the person most likely to be acquainted with the value and sensitivity of the information in relation to industry knowledge. Access to such documents within Holtec International is limited on a "need to know" basis.
- (7) The procedure for approval of external release of such a document typically requires review by the staff manager, project manager, principal scientist or other equivalent authority, by the manager of the cognizant marketing function (or his designee), and by the Legal Operation, for technical content, competitive effect, and determination of the accuracy of the proprietary designation. Disclosures outside Holtec International are limited to regulatory bodies, customers, and potential customers, and their agents, suppliers, and licensees, and others with a legitimate need for the information, and then only in accordance with appropriate regulatory provisions or proprietary agreements.
- (8) The information classified as proprietary was developed and compiled by Holtec International at a significant cost to Holtec International. This information is classified as proprietary because it contains detailed descriptions of analytical approaches and methodologies not available elsewhere. This information would provide other parties, including competitors, with information from Holtec International's technical database and the results of evaluations performed by Holtec International. A substantial effort has been expended by Holtec International to develop this information. Release of this information would improve a competitor's position because it would enable Holtec's competitor to copy our technology and offer it for sale in competition with our company, causing us financial injury.

AFFIDAVIT PURSUANT TO 10CFR2.390

- (9) Public disclosure of the information sought to be withheld is likely to cause substantial harm to Holtec International's competitive position and foreclose or reduce the availability of profit-making opportunities. The information is part of Holtec International's comprehensive spent fuel storage technology base, and its commercial value extends beyond the original development cost. The value of the technology base goes beyond the extensive physical database and analytical methodology, and includes development of the expertise to determine and apply the appropriate evaluation process.

The research, development, engineering, and analytical costs comprise a substantial investment of time and money by Holtec International.

The precise value of the expertise to devise an evaluation process and apply the correct analytical methodology is difficult to quantify, but it clearly is substantial.

Holtec International's competitive advantage will be lost if its competitors are able to use the results of the Holtec International experience to normalize or verify their own process or if they are able to claim an equivalent understanding by demonstrating that they can arrive at the same or similar conclusions.

The value of this information to Holtec International would be lost if the information were disclosed to the public. Making such information available to competitors without their having been required to undertake a similar expenditure of resources would unfairly provide competitors with a windfall, and deprive Holtec International of the opportunity to exercise its competitive advantage to seek an adequate return on its large investment in developing these very valuable analytical tools.

