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April 15, 2008

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

Reference: 1. USNRC Docket No. 72-1014 (HI-STORM 100)
2. Holtec Project 5014

Subject: License Amendment Request #7 (LAR 1014-7) to HI-STORM 100 Certificate of Compliance

Dear Sir:

Holtec International is pleased to submit a request to amend the Certificate of Compliance (CoC) for our HI-STORM 100 Dry Cask Storage System. This licensing amendment request (LAR) seeks to add instrument tube tie rods (ITTRs) to the approved contents of the MPC-24 and MPC-32 models presently included in the HI-STORM 100 CoC.

The ITTR is a stainless steel tube which weighs approximately 7 lbs and extends from the top nozzle adapter plate through the instrument tube to the bottom nozzle. It is designed to carry the weight of the assembly during lifting/handling when using the standard handling tool.

ITTRs have already been installed (under 10CFR50.59) in approximately 100 PWR fuel assemblies, which have been identified as having the potential for top nozzle stress corrosion cracking, in order to reinforce the connection between the top nozzle and the rest of the fuel assembly. It is planned for at least 200 more ITTRs to be installed in January 2009.

Since LAR 1014-3 (to be CoC Amendment #5) has been reviewed by SFST, is currently in rulemaking, and expected to become effective in July 2008, the Final Safety Analysis Report (FSAR) changes resulting from LAR 1014-3 are considered pending FSAR Revision 7. This pending FSAR has been used as the baseline for LAR 1014-7. Therefore the FSAR sections provided with this LAR are marked with "Rev. 7A" in the footer and include the changes already reviewed and approved by the SFST in LAR 1014-3. Additionally, the proposed CoC and Technical Specifications include the pending changes from LAR 1014-3.

A summary of the proposed changes, with detailed references to both the CoC and the HI-STORM 100 System FSAR, is attached. If this amendment is effective by next spring, it will allow our client to better manage the loading of the individual casks not only for 2009 but for future years. It will give a larger population of fuel assemblies from which to choose, so that positioning of the assemblies will be optimized to provide self-shielding. Without this amendment, the ability to optimize such positioning is reduced. Given our client's need to move the fuel assemblies with Document ID: 5014649

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Page 2 of 2

ITTRs into dry cask storage and the small number of proposed changes in this license amendment request, we request an expedited review by the SFST. It is our hope that the review and approval process for this focused amendment be completed and submitted to rulemaking by January 1, 2009.

The following attachments are provided on CD-ROM.

Attachment 1: Summary of Proposed Changes (3 pages)

Attachment 2: Proposed Revised CoC/TS in Markup Format – Only applicable sections are submitted. Deletions are shown in strikeout. Insertions are shown in *italics*. All changes are marked by vertical revision bars in the right margin. (75 pages)

Attachment 3: Proposed Revised FSAR – Revised pages notated as Rev. 7A in the footer, in Markup Format - Only applicable sections are submitted. Deletions are shown in strikeout. Insertions are shown in *italics*. All changes are marked by vertical revision bars in the right margin. (163 pages)

Attachment 4: PDF file, containing Attachment 1, and only the applicable pages from Attachments 2 and 3 that contain proposed changes. (22 pages)

Please contact us if you have any questions.

Sincerely,

Tammy S. Morin
Acting Licensing Manager
Holtec International

cc: Mr. Stewart Brown, USNRC (letter w/Attachments by email and CD)
Mr. Robert Nelson, USNRC (letter w/Attachment 4 by email only)
Dr. Edwin Hackett, USNRC (letter w/Attachment 4 by email only)
Mr. Nader Mamish, USNRC (letter w/Attachment 4 by email only)
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