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U. S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Document ID 5014652  
Page 1 of 2

June 12, 2008

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

**Subject:** Response to Request for Additional Information (RAI)  
USNRC Docket No. 72-1014; TAC No. L24085  
HI-STORM 100 System Certificate of Compliance 1014, LAR 1014-6

**Reference:**

1. Holtec Project 5014
2. License Amendment Request (LAR) 1014-6, dated April 27, 2007
3. NRC/SFST Letter, S. Brown to T. Morin, dated February 28, 2008
4. NRC Public Meeting held on March 21, 2008
5. NRC Public Meeting held on March 27, 2008
6. NRC Public Meeting held on April 28, 2008
7. Holtec Letter 5014653, dated June 12, 2008

Dear Sir:

Holtec submitted LAR 1014-6 [2] to add an underground storage overpack to the HI-STORM 100 Cask Storage System. By letter [3], the NRC provided a request for additional information (RAI) to support their review of the proposed changes. In subsequent public meetings, [4],[5],[6], further discussion between the Staff and Holtec occurred to clarify the RAI.

Holtec is pleased to provide the Response to the NRC Staff's Request for Additional Information (RAI) and supporting documents in the Attachments to this letter, as indicated below.

The proposed FSAR (Attachment 3) is marked with Rev. 7.A in the footer to differentiate it from the last submittal [2] which was marked Rev. 4.A. All supplements applicable to the HI-STORM 100U are included in the attachment as well as any main sections which were affected by the LAR/RAI response.

During the time this LAR has been in the review process, LAR 1014-3 (CoC 1014 Amendment #5) has been reviewed and approved by SFST and the final rule has been published with an effective date

NM5501



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Page 2 of 2

of July 14, 2008. The HI-STORM 100 FSAR has been updated to include the approved changes resulting from that amendment and is provided in Attachment 4 as the Pending HI-STORM 100 Cask System FSAR Rev. 7. This is considered our baseline FSAR with respect to this amendment request (LAR 1014-6).

Additionally, the baseline for the proposed Certificate of Compliance (CoC) and Technical Specifications (TS) in Attachment 2 has been updated to reflect the approved changes from LAR 1014-3, CoC 1014 Amendment #5. The revision bars and inserted and deleted text show the proposed changes to CoC 1014 Amendment #5 as a result of LAR 1014-6. Holtec proposes to clarify the description of the HI-TRAC models in Section 1.b of the CoC so that there is no fixed upper limit on the weight of a loaded HI-TRAC. This would allow handling operations when the weight of the HI-TRAC (loaded with fuel and water jackets are filled to achieve ALARA conditions) slightly exceeds the weight designated in the HI-TRAC model number, if supported by site specific load analysis results.

A Holtec proprietary sample input file along with proprietary Holtec reports which will support the review of the RAIs is sent under separate cover [7].

Sincerely,

Tammy S. Morin  
Acting Licensing Manager

Attachments:

- (1) Responses to Request for Additional Information
- (2) Revised Proposed CoC and TS for LAR 1014-6
- (3) Revised proposed FSAR Sections
- (4) HI-STORM 100 Cask System FSAR - Pending Rev. 7

Distribution: NRC Document Control Desk (hardcopy only)  
Mr. Stewart Brown, USNRC (6 CDs containing all Attachments)