April 23, 2009

MEMORANDUM TO: Nader Mamish, Deputy Director
Licensing and Inspection Directorate
Division of Spent Fuel Storage and Transportation
Office of Nuclear Material Safety
and Safeguards

FROM: John Goshen, Project Manager **/RA/**
Licensing Branch
Division of Spent Fuel Storage and Transportation
Office of Nuclear Material Safety
and Safeguards

SUBJECT: SUMMARY OF MARCH 30, 2009 MEETING WITH HOLTEC INTERNATIONAL, INC., TO DISCUSS HOLTEC RESPONSES TO SECOND REQUEST FOR ADDITIONAL INFORMATION FOR THE HI-STORM 100U AMENDMENT REQUEST 1014-6 (TAC NO. L24085)

PURPOSE:

To provide Holtec International, Inc. (Holtec), an opportunity to discuss its second request for additional information (RAI) responses with the NRC staff.

MEETING SUMMARY:

The meeting took place on March 30, 2009, from 10:00 a.m. to 1:00 p.m., at the NRC's Executive Boulevard Building in Rockville, MD. Attendees included Holtec staff, NRC's Division of Spent Fuel Storage and Transportation (SFST) staff, and one member of the public. An attendance list is enclosed (Enclosure 1). The meeting began with introductions, introductory remarks by SFST staff and Holtec staff, and then moved into a discussion of Holtec's responses provided in its January 16 and 21, 2009, submittals to the NRC, and the NRC's acceptance review of those responses provided in its March 26, 2009, letter to Holtec.

The staff stated that Title 10, U. S. Code of Federal Regulations (10 CFR) Part 72.3, 72.24(d) and 72.212(b)(3) require the applicant to analyze and evaluate a design and determine the specific controlling parameters for that design, so that the general licensee can determine whether the site specific parameters are enveloped by the design parameters. These requirements must be contained in the applicant's Final Safety Analysis Report (FSAR). After two series of RAIs the staff finds that the application did not adequately meet these requirements in the three areas identified in its March 26, 2009, letter to Holtec. Specifically, Holtec did not analyze and evaluate some of the components important to safety within the design to determine all of the controlling parameters for the design, without which, the general licensee will be unable to determine if the site parameters are enveloped by the controlling parameters for the design. The staff re-stated that Holtec's responses were generally acceptable but that they could only complete the evaluation by providing specific constraints and conditions in the amendment 7 Certificate of Compliance (CoC) and Technical Specifications (TS).

Holtec presented several options to remove the CoC and TS constraints and conditions that would require additional time and analysis. These are provided in Enclosure 2. The staff responded that due to limited resources and time constraints, the only way to complete the licensing evaluation for this specific amendment request was by incorporating the constraints and conditions provided in the March 26, 2009, letter. The staff stated that Holtec did have the option of withdrawing the amendment request and submitting it at a later time. They also have the option to submit a future amendment request that supplies the evaluations required to remove the constraints and conditions. The staff indicated that a future amendment request that provided these analyses would require significantly less effort to review because the baseline evaluations had already been acceptably evaluated. The staff re-stated the March 26, 2009, request for Holtec to provide a supplemental analysis and evaluation of the top surface pad for all applicable loads for the selected bounding parameters of the substrate material by April 6, 2009. Holtec agreed to this request.

There was then a discussion between the staff and Holtec on the intent to maintain CoC 1014 Amendment 7 applicable only to the HI-STORM 100U System. The staff recommended that Holtec maintain the HI-STORM 100 FSAR in a similar fashion to prevent the confusion that exists in the review of different types of systems in the current FSAR. Holtec responded that it did not want to maintain two separate FSARs. The staff responded that they did not believe that was necessary, but a better method than currently used by Holtec needs to be provided to clearly identify and compartmentalize the descriptions and evaluations of different types of HI-STORM 100 Systems. Additionally, the HI-STORM 100U System includes additional structures, such as the top and lower concrete pads, that are not part of other HI-STORM 100 Systems.

The members of the public in attendance did not have any questions or comments.

No regulatory decisions were made at the meeting.

If you have any questions or comments, please contact John Goshen at (301) 492-3325 or John.goshen@nrc.gov.

Docket No. 72-1014
TAC No. L24085

Enclosures:
As stated

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| **OFC:** | SFST | SFST | SFST |
|---|---|---|---|
| **NAME:** | JGoshen | WWheatley | EBenner |
| **DATE:** | 4/21/2009 | 4/23/2009 | 4/23/2009 |

**OFFICIAL RECORD COPY**

# ENCLOSURE 1

March 30, 2009
ATTENDANCE LIST

| Name | Affiliation |
|---|---|
| Ray Lorson | NRC/SFST |
| Gordon Bjorkman | NRC/SFST |
| Christopher Regan | NRC/SFST |
| Bob Tripathi | NRC/SFST |
| John Goshen | NRC/SFST |
| David Tang | NRC/SFST |
| Shana Helton | NRC/SFST |
| Michel Call | NRC/SFST |
| Gordon Bjorkman | NRC/SFST |
| Stefan Anton | Holtec International |
| Tammy Morin | Holtec International |
| Alan Soler | Holtec International |
| Chuck Bullard | Holtec International |
| Maureen Conley | Platts/McGraw-Hill |

# ENCLOSURE 2

# HI-STORM 100U
# LAR 1014-6
# RAI #2 ACCEPTANCE REVIEW

# HOLTEC PRESENTATION