

June 24, 2009

MEMORANDUM TO: Mark S. Delligatti, Chief
Rulemaking Branch B
Division of Intergovernmental Liaison and Rulemaking, FSME

FROM: Eric J. Benner, Chief */RA/*
Licensing Branch
Division of Spent Fuel Storage and Transportation, NMSS

SUBJECT: HOLTEC INTERNATIONAL HI-STORM 100 CASK SYSTEM,
AMENDMENT NO. 7, RULEMAKING (TAC. NO. L24085)

We have completed our technical review of the proposed Certificate of Compliance (CoC) No. - 1014, Amendment No. 7, the proposed Technical Specifications (TS), and have provided the preliminary Safety Evaluation Report (SER) for the HI-STORM 100 Cask System. The proposed changes to the CoC, including the TS Appendices A and B, are indicated by single vertical lines in the margin. Appendices A-100U and B-100U are new in their entirety, and therefore do not contain vertical lines in the margin. We are forwarding these documents to you for inclusion in the proposed rulemaking package for this canister system.

By letter dated April 27, 2007, as supplemented June 5, 12, July 14, December 19, 2008, January 16, 21, February 6, April 6, April 22, 2009, May 13, and June 23, 2009, Holtec International, Inc. submitted an application to the U.S. Nuclear Regulatory Commission to amend CoC-1014 for the HI-STORM 100 Cask System. The amendment proposes to add the HI-STORM 100U System to the list of approved HI-STORM 100 Cask Systems. The HI-STORM 100U System allows for the underground storage of dry spent fuel by utilizing an underground Vertical Ventilated Module (VVM) that can accept certain multipurpose canisters (MPCs) previously certified for storage in aboveground overpacks. The HI-STORM 100U System includes the following major components:

- an alternative underground VVM,
- a Support Foundation,
- a VVM interface Pad,
- and a Top Surface Pad.

The amendment also proposes to

- Incorporate a mandatory radiation protection perimeter around loaded VVMs,
- Reinstate the decay heat limits for damaged fuel and fuel debris in the aboveground system from previously approved CoC-1014, Amendment No. 3, TS Appendix B, Section 2.4. Due to an administrative oversight, these had been inadvertently deleted from CoC-1014, Amendments 5 and 6,
- Incorporate the previously approved provisions of CoC-1014, Amendment 6, that add instrument tube tie rods to the approved contents of MPC-24 and MPC-32 models,
- Provide separate TS Appendices A and B for the aboveground system and for the HI-STORM 100U System,
- Revise Appendix B and B-100U, TS 3.4.5 to be consistent with the intent of Holtec's original submittal and the NRC Staff's original SER, and

- Incorporate editorial corrections.

The proposed CoC and TS, and preliminary SER have been placed in ADAMS (see reference below) and are available for your use in the rulemaking package. The Division of Spent Fuel Storage and Transportation will designate these documents as Official Agency Records after the Executive Director for Operations has approved the package (ADAMS Package No. ML091680333).

Docket No. 72-1014
TAC No. L24085

ADAMS References:

1. Proposed CoC No. 1014, Amendment 7 (ML091680370)
2. Proposed TS Appendix A (ML091680399)
3. Proposed TS Appendix B (ML091680462)
4. Proposed TS Appendix A-100U (ML091680479)
5. Proposed TS Appendix B-100U (ML091680486)
6. Preliminary SER (ML091680493)

CONTACTS: Daniel Huang, NMSS/STST/LB (301) 492-3315
John Goshen, NMSS/STST/LB (301) 492-3325

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Distribution: (Closes TAC No. L24085)
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ADAMS Accession No. **ML091680333**

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