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November 18, 2009

Mr. E. William Brach
Director, Division of Spent Fuel Storage and Transportation
Office of Nuclear Material Safety and Safeguards
U.S. Nuclear Regulatory Commission
c/o: Document Control Desk
Washington, DC 20555-0001

Subject: Request for Expedited Review of HI-STORM FW MPC Storage System Licensing Application

Reference: USNRC Docket 72-1032
USNRC TAC No. L24321
[1] Holtec Letter 5018004, dated September 18, 2009

Dear Mr. Brach:

On September 18, Holtec International submitted the request for certification of the HI-STORM FW MPC Storage System, in accordance with 10CFR72.230 under the provisions of 10CFR72 Subpart L, with appropriate supporting safety analyses [1]. In the cover letter of the September 18 submittal, Holtec International requested an expedited SFST review by assigning a dedicated team to perform the reviews. The reason for this request is to make the technological advances of the HI-STORM FW MPC Storage System available to our current and prospective clients at the earliest possible date so they can take advantage of the many features and capabilities unique to this system.

Among the unique benefits of the HI-STORM FW MPC Storage System that we cited in the above mentioned letter is the ability to store boiling water reactor (BWR) fuel with up to 4.8 weight percent U-235 initial planar average enrichment without recourse to credit for gadolinium or burnup.

In some BWR plants with a significant amount of fuel already in dry storage, the inventory of lower enriched fuel in the spent fuel pools is dwindling, requiring the loading of fuel with a higher enrichment. Additionally, the initial enrichment of the fuel being burned in the reactors has been steadily increasing and our HI-STORM 100 system does not meet the emerging needs of our clients with respect to the higher initial enrichment.

While the increased fuel enrichment is a big driver for an expedited review one must also consider, in this post-Yucca age, that interim dry storage at nuclear plants will be for longer terms and will require larger areas to store the fuel. The higher capacity of the HI-

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STORM FW System (15 to 30 % increases over HI-STORM 100) means a decrease in the amount of casks resulting in more fuel within less space at the dry storage installation. The decrease in the amount of casks needed also translates into a reduction in dose associated with each loading campaign. In a related area, the HI-STORM FW transfer cask (HI-TRAC VW) permits the user to maximize the weight of the transfer cask, up to the limits of the crane at the site, by adding extra shielding to the transfer cask to keep dose rates as low as reasonably achievable (ALARA).

A major client, PSEG, has notified us that to meet their operational needs the utility will use HI-STORM FW for its Salem and Hope Creek plants in New Jersey after its 2010 loading campaign. To support PSEG's needs, Holtec must begin the material procurement and fabrication activities on HI-STORM FW System beginning in November 2010. PSEG managers responsible for the Salem/Hope Creek dry storage program are Mr. Brian Gustems (phone: 856-339-1278, email: brian.gustems@pseg.com) and Mr. Matthew Eyre (phone: 856-339-1807, email: matthew.eyre@pseg.com).

Having the certificate of compliance (CoC) by November 2010 will assist us in meeting PSEG's need. We believe that this certification schedule is achievable if SFST assigns a dedicated review team to this effort. As we wrote in our September 18 letter, we believe that the NRC reviewers engaged in the ongoing acceptance review will attest to the comprehensiveness and high quality of the submitted safety analysis report which is a necessary predicate for a successful licensing outcome on an expedited schedule.

In light of the above mentioned specific client need ,we respectfully request that SFST assign the appropriate priority to the HI-STORM FW licensing application request under its prioritization procedure.

We appreciate your kind consideration of this request.

Sincerely,

Tammy S. Morin,
Licensing Manager
Holtec International

cc: Mr. Eric Benner, USNRC
Mr. Steven Baggett, USNRC
Mr. John Goshen, USNRC
Holtec Group 1
Mr. Brian Gustems, PSEG
Mr. Matthew Eyre, PSEG