CERTIFICATE OF COMPLIANCE NO. 1032

APPENDIX B

APPROVED CONTENTS AND DESIGN FEATURES

FOR THE HI-STORM FW MPC STORAGE SYSTEM

TABLE OF CONTENTS

1.0 Definitions

Refer to Appendix A for Definitions.

2.0 APPROVED CONTENTS

2.1 Fuel Specifications and Loading Conditions

2.1.1 Fuel to Be Stored in the HI-STORM FW MPC Storage System

a. UNDAMAGED FUEL ASSEMBLIES, DAMAGED FUEL ASSEMBLIES, FUEL DEBRIS, and NON-FUEL HARDWARE meeting the limits specified in Table 2.1-1 and other referenced tables may be stored in the HI-STORM FW MPC Storage System.

b. All BWR fuel assemblies may be stored with or without ZR channels.

2.1.2 Fuel Loading

Figures 2.1-1 and 2.1-2 define the regions for the MPC-37 and MPC-89 models, respectively. Fuel assembly decay heat limits are specified in Section 2.3.1. Fuel assemblies shall meet all other applicable limits specified in Tables 2.1-1 through 2.1-3.

2.2 Violations

If any Fuel Specifications or Loading Conditions of 2.1 are violated, the following actions shall be completed:

2.2.1 The affected fuel assemblies shall be placed in a safe condition.

2.2.2 Within 24 hours, notify the NRC Operations Center.

2.2.3 Within 30 days, submit a special report which describes the cause of the violation, and actions taken to restore compliance and prevent recurrence.

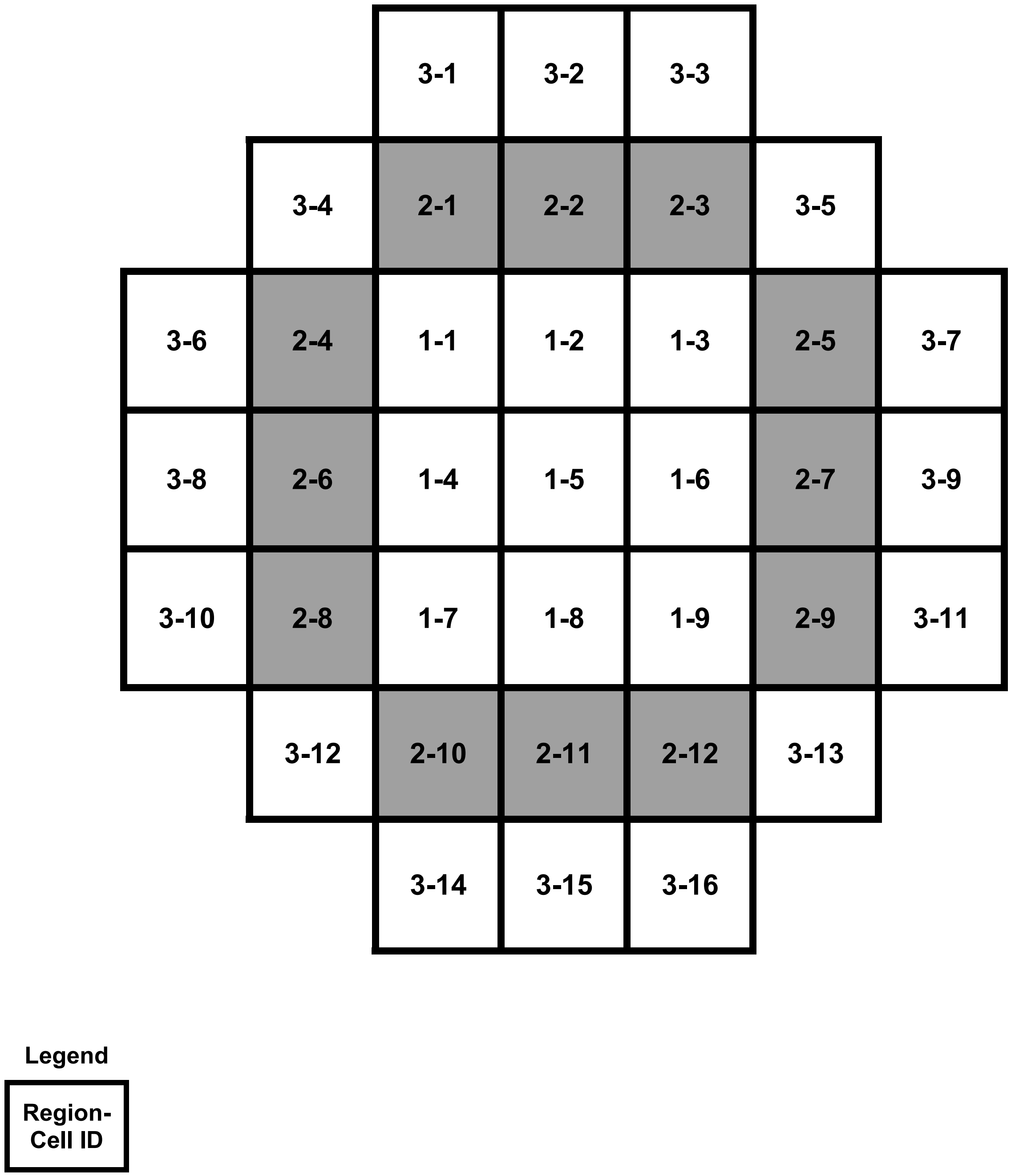

Figure 2.1-1
MPC-37 Region-Cell Identification

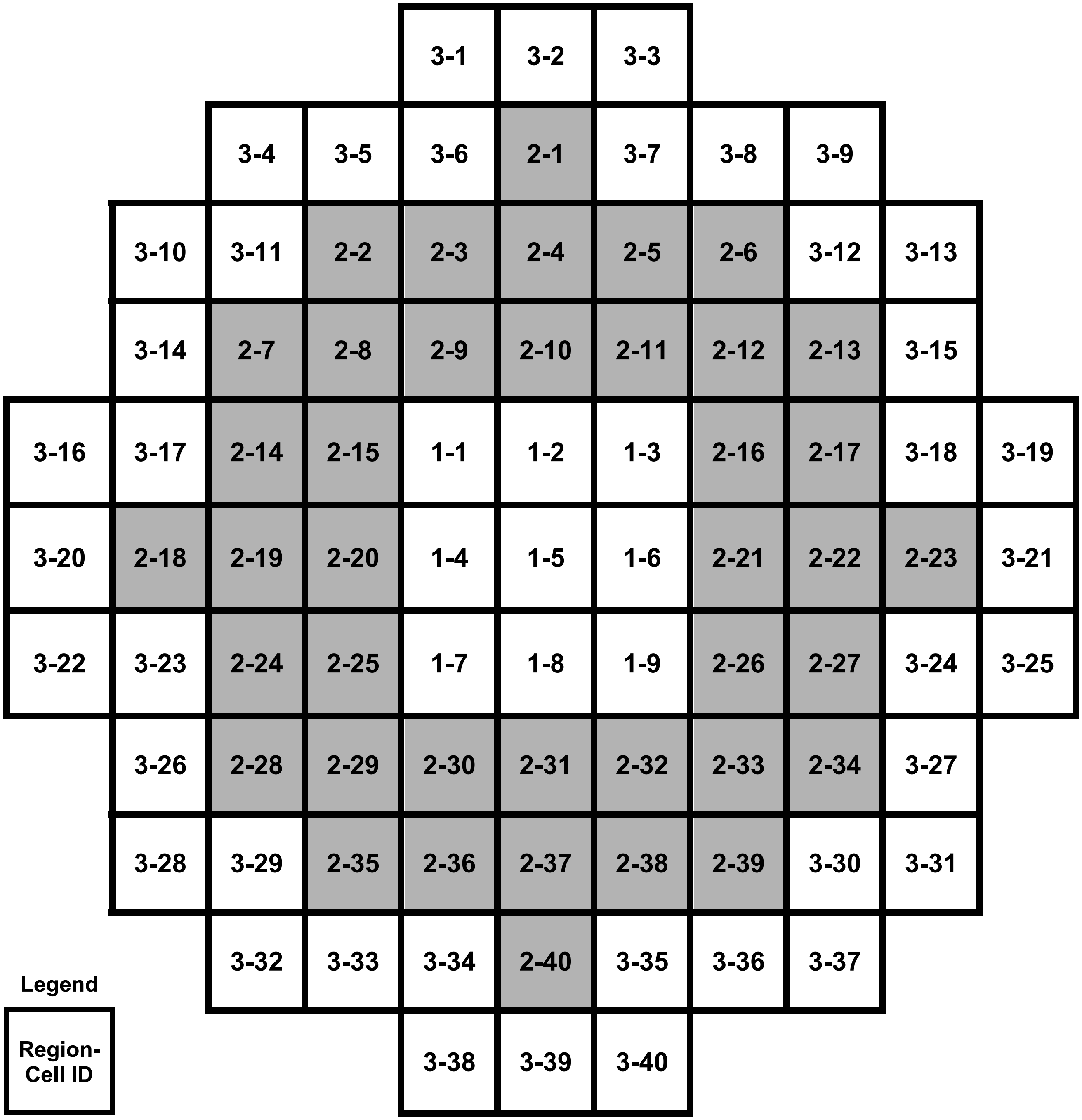

Figure 2.1-2
MPC-89 Region-Cell Identification

Table 2.1-1 (page 1 of 4)
Fuel Assembly Limits

I. MPC MODEL: MPC-37

A. Allowable Contents

1. Uranium oxide PWR UNDAMAGED FUEL ASSEMBLIES, DAMAGED FUEL ASSEMBLIES, and/or FUEL DEBRIS meeting the criteria in Table 2.1-2, with or without NON-FUEL HARDWARE and meeting the following specifications (Note 1):

a. Cladding Type:	ZR
b. Maximum Initial Enrichment:	5.0 wt. % U-235 with soluble boron credit per LCO 3.3.1~~As specified in Table 2.1-2 for the applicable fuel assembly array/class.~~
c. Post-irradiation Cooling Time and Average Burnup Per Assembly:	Cooling Time ≥ 3 years Assembly Average Burnup ≤ 68.2 GWD/MTU
d. Decay Heat Per Fuel Storage Location:	As specified in Section 2.3
e. Fuel Assembly Length:	≤ 199.2 inches (nominal design including NON-FUEL HARDWARE and DFC)
f. Fuel Assembly Width:	≤ 8.54 inches (nominal design)
g. Fuel Assembly Weight:	≤ 2050 lbs (including NON-FUEL HARDWARE and DFC)

Table 2.1-1 (page 2 of 4)
Fuel Assembly Limits

I. MPC MODEL: MPC-37 (continued)

B. Quantity per MPC: 37 FUEL ASSEMBLIES with up to twelve (12) DAMAGED FUEL ASSEMBLIES or FUEL DEBRIS in DAMAGED FUEL CONTAINERS (DFCs). DFCs may be stored in fuel storage locations 3-1, 3-3 through 3-7, 3-10 through 3-14, and 3-16 (see Figure 2.1-1). The remaining fuel storage locations may be filled with PWR UNDAMAGED FUEL ASSEMBLIES meeting the applicable specifications.

C. One (1) Neutron Source Assembly (NSA) is authorized for loading in the MPC-37.

D. Up to thirty (30) BRPAs are authorized for loading in the MPC-37.

Note 1: Fuel assemblies containing BPRAs, TPDs, WABAs, water displacement guide tube plugs, orifice rod assemblies, or vibration suppressor inserts, with or without ITTRs, may be stored in any fuel storage location. Fuel assemblies containing APSRs, RCCAs, CEAs, CRAs, or NSAs may only be loaded in fuel storage Regions 1 and 2 (see Figure 2.1-1).

Table 2.1-1 (page 3 of 4)
Fuel Assembly Limits

II. MPC MODEL: MPC-89

A. Allowable Contents

1. Uranium oxide BWR UNDAMAGED FUEL ASSEMBLIES, DAMAGED FUEL ASSEMBLIES, and/or FUEL DEBRIS meeting the criteria in Table 2.1-3, with or without channels and meeting the following specifications:

a. Cladding Type:	ZR
b. Maximum PLANAR-AVERAGE INITIAL ENRICHMENT(Note 1):	As specified in Table 2.1-3 for the applicable fuel assembly array/class.
c. Initial Maximum Rod Enrichment	5.0 wt. % U-235
d. Post-irradiation Cooling Time and Average Burnup Per Assembly	
i. Array/Class 8x8F	Cooling time ≥ 10 years and an assembly average burnup ≤ 27.5 GWD/MTU.
ii. All Other Array Classes	Cooling Time ≥ 3 years and an assembly average burnup ≤ 65 GWD/MTU
e. Decay Heat Per Assembly	
i. Array/Class 8x8F	≤ 183.5 Watts
ii. All Other Array Classes	As specified in Section 2.3
f. Fuel Assembly Length	≤ 176.5 inches (nominal design)
g. Fuel Assembly Width	≤ 5.95 inches (nominal design)
h. Fuel Assembly Weight	≤ 850 lbs, including channels

Table 2.1-1 (page 4 of 4)
Fuel Assembly Limits

II. MPC MODEL: MPC-89 (continued)

B. Quantity per MPC: 89 FUEL ASSEMBLIES with up to sixteen (16) DAMAGED FUEL ASSEMBLIES or FUEL DEBRIS in DAMAGED FUEL CONTAINERS (DFCs). DFCs may be stored in fuel storage locations 3-1, 3-3, 3-4, 3-9, 3-10, 3-13, 3-16, 3-19, 3-22, 3-25, 3-28, 3-31, 3-32, 3-37, 3-38, and 3-40 (see Figure 2.1-2). The remaining fuel storage locations may be filled with BWR UNDAMAGED FUEL ASSEMBLIES meeting the applicable specifications.

Note 1: The lowest allowable enrichment of any fuel assembly, based on fuel array class and fuel classification, is the maximum allowable for all assemblies loaded in each MPC-89.

Table 2.1-2 (page 1 of 3)
PWR FUEL ASSEMBLY CHARACTERISTICS
(Note 1)

Fuel Assembly Array/ Class	**14x14 A**	**14x14 B**	**14x14 C**	**15x15 B**	**15x15 C**
No. of Fuel Rod Locations	179	179	176	204	204
Fuel Clad O.D. (in.)	≥ 0.400	≥ 0.417	≥ 0.440	≥ 0.420	≥ 0.417
Fuel Clad I.D. (in.)	≤ 0.3514	≤ 0.3734	≤ 0.3880	≤ 0.3736	≤ 0.3640
Fuel Pellet Dia. (in.) (Note 3)	≤ 0.3444	≤ 0.3659	≤ 0.3805	≤ 0.3671	≤ 0.3570
Fuel Rod Pitch (in.)	≤ 0.556	≤ 0.556	≤ 0.580	≤ 0.563	≤ 0.563
Active Fuel Length (in.)	≤ 150	≤ 150	≤ 150	≤ 150	≤ 150
No. of Guide and/or Instrument Tubes	17	17	5 (Note 2)	21	21
Guide/Instrument Tube Thickness (in.)	≥ 0.017	≥ 0.017	≥ 0.038	≥ 0.015	≥ 0.0165

Table 2.1-2 (page 2 of 3)
PWR FUEL ASSEMBLY CHARACTERISTICS
(Note 1)

Fuel Assembly Array/Class	**15x15 D**	**15x15 E**	**15x15 F**	**15x15 H**	**15x15 I**
No. of Fuel Rod Locations	208	208	208	208	216
Fuel Clad O.D. (in.)	≥ 0.430	≥ 0.428	≥ 0.428	≥ 0.414	≥ 0.413
Fuel Clad I.D. (in.)	≤ 0.3800	≤ 0.3790	≤ 0.3820	≤ 0.3700	≤ 0.3670
Fuel Pellet Dia. (in.) (Note 3)	≤ 0.3735	≤ 0.3707	≤ 0.3742	≤ 0.3622	≤ 0.3600
Fuel Rod Pitch (in.)	≤ 0.568	≤ 0.568	≤ 0.568	≤ 0.568	≤ 0.550
Active Fuel Length (in.)	≤ 150	≤ 150	≤ 150	≤ 150	≤ 150
No. of Guide and/or Instrument Tubes	17	17	17	17	9 (Note 4)
Guide/Instrument Tube Thickness (in.)	≥ 0.0150	≥ 0.0140	≥ 0.0140	≥ 0.0140	≥ 0.0140

Table 2.1-2 (page 3 of 3) PWR FUEL ASSEMBLY CHARACTERISTICS (Note 1)						
Fuel Assembly Array and Class	**16x16 A**	**17x17A**	**17x17 B**	**17x17 C**	**17x17 D**	**17x17 E**
No. of Fuel Rod Locations	236	264	264	264	264	265
Fuel Clad O.D. (in.)	≥ 0.382	≥ 0.360	≥ 0.372	≥ 0.377	≥ 0.372	≥ 0.372
Fuel Clad I.D. (in.)	≤ 0.3350	≤ 0.3150	≤ 0.3310	≤ 0.3330	≤ 0.3310	≤ 0.3310
Fuel Pellet Dia. (in.) (Note 3)	≤ 0.3255	≤ 0.3088	≤ 0.3232	≤ 0.3252	≤ 0.3232	≤ 0.3232
Fuel Rod Pitch (in.)	≤ 0.506	≤ 0.496	≤ 0.496	≤ 0.502	≤ 0.496	≤ 0.496
Active Fuel length (in.)	≤ 150	≤ 150	≤ 150	≤ 150	≤ 170	≤ 170
No. of Guide and/or Instrument Tubes	5 (Note 2)	25	25	25	25	24
Guide/Instrument Tube Thickness (in.)	≥ 0.0350	≥ 0.016	≥ 0.014	≥ 0.020	≥ 0.014	≥ 0.014

Notes:

1. All dimensions are design nominal values. Maximum and minimum dimensions are specified to bound variations in design nominal values among fuel assemblies within a given array/class.
2. Each guide tube replaces four fuel rods.
3. Annular fuel pellets are allowed in the top and bottom 12” of the active fuel length.
4. One Instrument Tube and eight Guide Bars (Solid ZR)

Table 2.1-3 (page 1 of 4)
BWR FUEL ASSEMBLY CHARACTERISTICS
(Note 1)

Fuel Assembly Array and Class	**7x7 B**	**8x8 B**	**8x8 C**	**8x8 D**	**8x8 E**
Maximum Planar-Average Initial Enrichment (wt.% ^{235}U)	≤ 4.8	≤ 4.8	≤ 4.8	≤ 4.8	≤ 4.8
No. of Fuel Rod Locations (Full Length or Total/Full Length)	49	63 or 64	62	60 or 61	59
Fuel Clad O.D. (in.)	≥ 0.5630	≥ 0.4840	≥ 0.4830	≥ 0.4830	≥ 0.4930
Fuel Clad I.D. (in.)	≤ 0.4990	≤ 0.4295	≤ 0.4250	≤ 0.4230	≤ 0.4250
Fuel Pellet Dia. (in.)	≤ 0.4910	≤ 0.4195	≤ 0.4160	≤ 0.4140	≤ 0.4160
Fuel Rod Pitch (in.)	≤ 0.738	≤ 0.642	≤ 0.641	≤ 0.640	≤ 0.640
Design Active Fuel Length (in.)	≤ 150	≤ 150	≤ 150	≤ 150	≤ 150
No. of Water Rods (Note 10)	0	1 or 0	2	1 - 4 (Note 6)	5
Water Rod Thickness (in.)	N/A	≥ 0.034	> 0.00	> 0.00	≥ 0.034
Channel Thickness (in.)	≤ 0.120	≤ 0.120	≤ 0.120	≤ 0.120	≤ 0.100

Table 2.1-3 (2 of 4)
BWR FUEL ASSEMBLY CHARACTERISTICS
(Note 1)

Fuel Assembly Array and Class	**8x8F**	**9x9 A**	**9x9 B**	**9x9 C**	**9x9 D**
Maximum Planar-Average Initial Enrichment (wt.% ^{235}U)	≤ 4.5 (Note 124)	≤ 4.8	≤ 4.8	≤ 4.8	≤ 4.8
No. of Fuel Rod Locations	64	74/66 (Note 4)	72	80	79
Fuel Clad O.D. (in.)	≥ 0.4576	≥ 0.4400	≥ 0.4330	≥ 0.4230	≥ 0.4240
Fuel Clad I.D. (in.)	≤ 0.3996	≤ 0.3840	≤ 0.3810	≤ 0.3640	≤ 0.3640
Fuel Pellet Dia. (in.)	≤ 0.3913	≤ 0.3760	≤ 0.3740	≤ 0.3565	≤ 0.3565
Fuel Rod Pitch (in.)	≤ 0.609	≤ 0.566	≤ 0.572	≤ 0.572	≤ 0.572
Design Active Fuel Length (in.)	≤ 150	≤ 150	≤ 150	≤ 150	≤ 150
No. of Water Rods (Note 10)	N/A (Note 2)	2	1 (Note 5)	1	2
Water Rod Thickness (in.)	≥ 0.0315	> 0.00	> 0.00	≥ 0.020	≥ 0.0300
Channel Thickness (in.)	≤ 0.055	≤ 0.120	≤ 0.120	≤ 0.100	≤ 0.100

Table 2.1-3 (page 3 of 4)
BWR FUEL ASSEMBLY CHARACTERISTICS
(Note 1)

Fuel Assembly Array and Class	**9x9 E (Note 2)**	**9x9 F (Note 2)**	**9x9 G**	**10x10 A**	**10x10 B**
Maximum Planar-Average Initial Enrichment (wt.% ^{235}U)	≤ 4.5 (Note 124)	≤ 4.5 (Note 124)	≤ 4.8	≤ 4.8	≤ 4.8
No. of Fuel Rod Locations	76	76	72	92/78 (Note 7)	91/83 (Note 8)
Fuel Clad O.D. (in.)	≥0.4170	≥0.4430	≥0.4240	≥0.4040	≥0.3957
Fuel Clad I.D. (in.)	≤0.3640	≤0.3860	≤0.3640	≤ 0.3520	≤ 0.3480
Fuel Pellet Dia. (in.)	≤0.3530	≤0.3745	≤0.3565	≤ 0.3455	≤ 0.3420
Fuel Rod Pitch (in.)	≤ 0.572	≤ 0.572	≤ 0.572	≤ 0.510	≤ 0.510
Design Active Fuel Length (in.)	≤ 150	≤ 150	≤ 150	≤ 150	≤ 150
No. of Water Rods (Note 10)	5	5	1 (Note 5)	2	1 (Note 5)
Water Rod Thickness (in.)	≥0.0120	≥0.0120	≥0.0320	≥0.0300	> 0.00
Channel Thickness (in.)	≤ 0.120	≤ 0.120	≤ 0.120	≤ 0.120	≤ 0.120

Table 2.1-3 (page 4 of 4)
BWR FUEL ASSEMBLY CHARACTERISTICS
(Note 1)

Fuel Assembly Array and Class	**10x10 C**	**10x10 F**	**10x10 G**
Maximum Planar-Average Initial Enrichment (wt.% ^{235}U)	≤ 4.8	≤ 4.7 (Note 13~~5~~)	≤ 4.6~~8~~ (Note 12~~4~~)
No. of Fuel Rod Locations	96	92/78 (Note 7)	96/84
Fuel Clad O.D. (in.)	≥ 0.3780	≥ 0.4035	≥ 0.387
Fuel Clad I.D. (in.)	≤ 0.3294	≤ 0.3570	≤ 0.340
Fuel Pellet Dia. (in.)	≤ 0.3224	≤ 0.3500	≤ 0.334
Fuel Rod Pitch (in.)	≤ 0.488	≤ 0.510	≤ 0.512
Design Active Fuel Length (in.)	≤ 150	≤ 150	≤ 150
No. of Water Rods (Note 10)	5 (Note 9)	2	5 (Note 9)
Water Rod Thickness (in.)	≥ 0.031	≥ 0.030	≥ 0.031
Channel Thickness (in.)	≤ 0.055	≤ 0.120	≤ 0.060

NOTES:

1. All dimensions are design nominal values. Maximum and minimum dimensions are specified to bound variations in design nominal values among fuel assemblies within a given array/class.
2. This assembly is known as "QUAD+." It has four rectangular water cross segments dividing the assembly into four quadrants.
3. For the SPC 9x9-5 fuel assembly, each fuel rod must meet either the 9x9E or the 9x9F set of limits or clad O.D., clad I.D., and pellet diameter.
4. This assembly class contains 74 total rods; 66 full length rods and 8 partial length rods.
5. Square, replacing nine fuel rods.
6. Variable.
7. This assembly contains 92 total fuel rods; 78 full length rods and 14 partial length rods.
8. This assembly class contains 91 total fuel rods; 83 full length rods and 8 partial length rods.
9. One diamond-shaped water rod replacing the four center fuel rods and four rectangular water rods dividing the assembly into four quadrants.
10. These rods may also be sealed at both ends and contain ZR material in lieu of water.

11~~3~~. Not used.

12~~4~~. Fuel assemblies classified as DAMAGED FUEL are limited to 4.0 wt.% U-235.

13~~5~~. Fuel assemblies classified as DAMAGED FUEL are limited to 4.6 wt.% U-235.

2.3 Decay Heat Limits

This section provides the limits on fuel assembly decay heat for storage in the HI-STORM FW System. The method to verify compliance, including examples, is provided in Chapter 13 of the HI-STORM FW FSAR.

2.3.1 Fuel Loading Decay Heat Limits

Table 2.3-1 provides the maximum allowable decay heat per fuel storage location for MPC-37. Table 2.3-2 provides the maximum allowable decay heat per fuel storage location for MPC-89. The limits in these tables are applicable when using FHD to dry moderate or high burnup fuel and when using VDS to dry moderate burnup fuel only. Tables 2.3-3 and 2.3-4 provide the maximum allowable decay heat per fuel storage location for MPC-37 and MPC-89, respectively, when using VDS to dry high burnup fuel.

TABLE 2.3-1
MPC-37 HEAT LOAD DATA (See Figure 2.1-1)

Number of Regions: 3			
Number of Storage Cells: 37			
Maximum Heat Load: 47.05			
Region No.	Decay Heat Limit per Cell, kW	Number of Cells per Region	Decay Heat Limit per Region, kW
1	1.13	9	10.17
2	1.78	12	21.36
3	0.97	16	15.52

TABLE 2.3-2
MPC-89 HEAT LOAD DATA (See Figure 2.1-2)

Number of Regions: 3			
Number of Storage Cells: 89			
Maximum Heat Load: 46.36 kW			
Region No.	Decay Heat Limit per Cell, kW	Number of Cells per Region	Decay Heat Limit per Region, kW
1	0.44	9	3.96
2	0.62	40	24.80
3	0.44	40	17.60

TABLE 2.3-3 MPC-37 HEAT LOAD DATA (See Figure 2.1-1)			
Number of Regions: 3			
Number of Storage Cells: 37			
Maximum Heat Load: 34.36			
Region No.	Decay Heat Limit per Cell, kW	Number of Cells per Region	Decay Heat Limit per Region, kW
1	0.80	9	7.2
2	0.97	12	11.64
3	0.97	16	15.52

TABLE 2.3-4 MPC-89 HEAT LOAD DATA (See Figure 2.1-2)			
Number of Regions: 3			
Number of Storage Cells: 89			
Maximum Heat Load: 34.75 kW			
Region No.	Decay Heat Limit per Cell, kW	Number of Cells per Region	Decay Heat Limit per Region, kW
1	0.35	9	3.15
2	0.35	40	14.00
3	0.44	40	17.60

2.3.2 When complying with the maximum fuel storage location decay heat limits, users must account for the decay heat from both the fuel assembly and any NON-FUEL HARDWARE, as applicable for the particular fuel storage location, to ensure the decay heat emitted by all contents in a storage location does not exceed the limit.

3.0 DESIGN FEATURES

3.1 Site

3.1.1 Site Location

The HI-STORM FW Cask System is authorized for general use by 10 CFR Part 50 license holders at various site locations under the provisions of 10 CFR 72, Subpart K.

3.2 Design Features Important for Criticality Control

3.2.1 MPC-37

1. Basket cell ID: 8.92 in. (nom.)
2. Basket cell wall thickness: 0.57 in. (nom.)
3. B_4C in the Metamic-HT: 10.0 wt % (min.)

3.2.2 MPC-89

1. Basket cell ID: 5.99 in. (nom.)
2. Basket cell wall thickness: 0.38 in. (nom.)
3. B_4C in the Metamic-HT: 10.0 wt % (min.)

3.2.3 Neutron Absorber Tests

Section 10.1.67.3 of the HI-STORM FW FSAR is hereby incorporated by reference into the HI-STORM FW CoC.

3.3 Codes and Standards

The American Society of Mechanical Engineers Boiler and Pressure Vessel Code (ASME Code), 2007 Edition, is the governing Code for the HI-STORM FW System MPC as clarified in Specification 3.3.1 below, except for Code Sections V and IX. The ASME Code paragraphs applicable to the HI-STORM FW OVERPACK and TRANSFER CASK are listed in Table 3-2. The latest effective editions of ASME Code Sections V and IX, including addenda, may be used for activities governed by those sections, provided a written reconciliation of the later edition against the 2007 Edition, including any addenda, is performed by the certificate holder. American Concrete Institute (ACI) 349-85 is the governing Code for plain concrete as clarified in Appendix 1.D of the Final Safety Analysis Report for the HI-STORM 100 Cask System.

3.3.1 Alternatives to Codes, Standards, and Criteria

Table 3-1 lists approved alternatives to the ASME Code for the design of the MPCs of the HI-STORM FW Cask System.

3.3.2 Construction/Fabrication Alternatives to Codes, Standards, and Criteria

Proposed alternatives to the ASME Code, Section III, 2007 Edition, including modifications to the alternatives allowed by Specification 3.3.1 may be used on a case-specific basis when authorized by the Director of the Office of Nuclear Material Safety and Safeguards or designee. The request for such alternative should demonstrate that:

1. The proposed alternatives would provide an acceptable level of quality and safety, or
2. Compliance with the specified requirements of the ASME Code, Section III, 2007 Edition, would result in hardship or unusual difficulty without a compensating increase in the level of quality and safety.

Requests for alternatives shall be submitted in accordance with 10 CFR 72.4.

(continued)

3.0 DESIGN FEATURES (continued)

TABLE 3-1
List of ASME Code Alternatives for Multi-Purpose Canisters (MPCs)

MPC Enclosure Vessel	Subsection NCA	General Requirements. Requires preparation of a Design Specification, Design Report, Overpressure Protection Report, Certification of Construction Report, Data Report, and other administrative controls for an ASME Code stamped vessel.	Because the MPC is not an ASME Code stamped vessel, none of the specifications, reports, certificates, or other general requirements specified by NCA are required. In lieu of a Design Specification and Design Report, the HI-STORM FSAR includes the design criteria, service conditions, and load combinations for the design and operation of the MPCs as well as the results of the stress analyses to demonstrate that applicable Code stress limits are met. Additionally, the fabricator is not required to have an ASME-certified QA program. All important-to-safety activities are governed by the NRC-approved Holtec QA program. Because the cask components are not certified to the Code, the terms "Certificate Holder" and "Inspector" are not germane to the manufacturing of NRC-certified cask components. To eliminate ambiguity, the responsibilities assigned to the Certificate Holder in the Code, as applicable, shall be interpreted to apply to the NRC Certificate of Compliance (CoC) holder (and by extension, to the component fabricator) if the requirement must be fulfilled. The Code term "Inspector" means the QA/QC personnel of the CoC holder and its vendors assigned to oversee and inspect the manufacturing process.
MPC Enclosure Vessel	NB-1100	Statement of requirements for Code stamping of components.	MPC Enclosure Vessel is designed and will be fabricated in accordance with ASME Code, Section III, Subsection NB to the maximum practical extent, but Code stamping is not required.

TABLE 3-1
List of ASME Code Alternatives for Multi-Purpose Canisters (MPCs)

MPC basket supports and lift lugs	NB-1130	NB-1132.2(d) requires that the first connecting weld of a non-pressure retaining structural attachment to a component shall be considered part of the component unless the weld is more than 2t from the pressure retaining portion of the component, where t is the nominal thickness of the pressure retaining material. NB-1132.2(e) requires that the first connecting weld of a welded nonstructural attachment to a component shall conform to NB-4430 if the connecting weld is within 2t from the pressure retaining portion of the component.	The lugs that are used exclusively for lifting an empty MPC are welded to the inside of the pressure-retaining MPC shell, but are not designed in accordance with Subsection NB. The lug-to-Enclosure Vessel Weld is required to meet the stress limits of Reg. Guide 3.61 in lieu of Subsection NB of the Code.
MPC Enclosure Vessel	NB-2000	Requires materials to be supplied by ASME-approved material supplier.	Materials will be supplied by Holtec approved suppliers with Certified Material Test Reports (CMTRs) in accordance with NB-2000 requirements.
MPC Enclosure Vessel	NB-3100 NF-3100	Provides requirements for determining design loading conditions, such as pressure, temperature, and mechanical loads.	These requirements are subsumed by the HI-STORM FW FSAR, serving as the Design Specification, which establishes the service conditions and load combinations for the storage system.
MPC Enclosure Vessel	NB-4120	NB-4121.2 and NF-4121.2 provide requirements for repetition of tensile or impact tests for material subjected to heat treatment during fabrication or installation.	In-shop operations of short duration that apply heat to a component, such as plasma cutting of plate stock, welding, machining, and coating are not, unless explicitly stated by the Code, defined as heat treatment operations.

TABLE 3-1
List of ASME Code Alternatives for Multi-Purpose Canisters (MPCs)

MPC Enclosure Vessel	NB-4220	Requires certain forming tolerances to be met for cylindrical, conical, or spherical shells of a vessel.	The cylindricity measurements on the rolled shells are not specifically recorded in the shop travelers, as would be the case for a Code-stamped pressure vessel. Rather, the requirements on inter-component clearances (such as the MPC-to-transfer cask) are guaranteed through fixture-controlled manufacturing. The fabrication specification and shop procedures ensure that all dimensional design objectives, including inter-component annular clearances are satisfied. The dimensions required to be met in fabrication are chosen to meet the functional requirements of the dry storage components. Thus, although the post-forming Code cylindricity requirements are not evaluated for compliance directly, they are indirectly satisfied (actually exceeded) in the final manufactured components.
MPC Enclosure Vessel	NB-4122	Implies that with the exception of studs, bolts, nuts and heat exchanger tubes, CMTRs must be traceable to a specific piece of material in a component.	MPCs are built in lots. Material traceability on raw materials to a heat number and corresponding CMTR is maintained by Holtec through markings on the raw material. Where material is cut or processed, markings are transferred accordingly to assure traceability. As materials are assembled into the lot of MPCs being manufactured, documentation is maintained to identify the heat numbers of materials being used for that item in the multiple MPCs being manufactured under that lot. A specific item within a specific MPC will have a number of heat numbers identified as possibly being used for the item in that particular MPC of which one or more of those heat numbers (and corresponding CMTRS) will have actually been used. All of the heat numbers identified will comply with the requirements for the particular item.
MPC Lid and Closure Ring Welds	NB-4243	Full penetration welds required for Category C Joints (flat head to main shell per NB-3352.3)	MPC lid and closure ring are not full penetration welds. They are welded independently to provide a redundant seal.

TABLE 3-1
List of ASME Code Alternatives for Multi-Purpose Canisters (MPCs)

MPC Closure Ring, Vent and Drain Cover Plate Welds	NB-5230	Radiographic (RT) or ultrasonic (UT) examination required.	Root (if more than one weld pass is required) and final liquid penetrant examination to be performed in accordance with NB-5245. The closure ring provides independent redundant closure for vent and drain cover plates. Vent and drain port cover plate welds are helium leakage tested.
MPC Lid to Shell Weld	NB-5230	Radiographic (RT) or ultrasonic (UT) examination required.	Only progressive liquid penetrant (PT) examination is permitted. PT examination will include the root and final weld layers and each approx. 3/8" of weld depth.
MPC Enclosure Vessel and Lid	NB-6111	All completed pressure retaining systems shall be pressure tested.	The MPC vessel is seal welded in the field following fuel assembly loading. The MPC vessel shall then be pressure tested as defined in Chapter 10. Accessibility for leakage inspections preclude a Code compliant pressure test. All MPC enclosure vessel welds (except closure ring and vent/drain cover plate) are inspected by volumetric examination. The MPC lid-to-shell weld shall be verified by progressive PT examination. PT must include the root and final layers and each approximately 3/8 inch of weld depth. The inspection results, including relevant findings (indications) shall be made a permanent part of the user's records by video, photographic, of other means which provide an equivalent record of weld integrity. The video or photographic records should be taken during the final interpretation period described in ASME Section V, Article 6, T-676. The vent/drain cover plate and the closure ring welds are confirmed by liquid penetrant examination. The inspection of the weld must be performed by qualified personnel and shall meet the acceptance requirements of ASME Code Section III, NB-5350.

TABLE 3-1
List of ASME Code Alternatives for Multi-Purpose Canisters (MPCs)

MPC Enclosure Vessel	NB-7000	Vessels are required to have overpressure protection.	No overpressure protection is provided. Function of MPC enclosure vessel is to contain radioactive contents under normal, off-normal, and accident conditions of storage. MPC vessel is designed to withstand maximum internal pressure considering 100% fuel rod failure and maximum accident temperatures.
MPC Enclosure Vessel	NB-8000	States requirements for nameplates, stamping and reports per NCA-8000.	The HI-STORM FW system is to be marked and identified in accordance with 10CFR71 and 10CFR72 requirements. Code stamping is not required. QA data package to be in accordance with Holtec approved QA program.

TABLE 3-2
REFERENCE ASME CODE PARAGRAPHS FOR HI-STORM FW OVERPACK and HI-TRAC VW TRANSFER CASK, PRIMARY LOAD BEARING PARTS

	Item	Code Paragraph†	Notes, Explanation and Applicability
1.	Definition of primary and secondary members	NF-1215	-
2.	Jurisdictional boundary	NF-1133	The "intervening elements" are termed interfacing SSCs in this FSAR.
3.	Certification of material	NF-2130 (b) and (c)	Materials for ITS components shall be certified to the applicable Section II of the ASME Code or equivalent ASTM Specification.
4.	Heat treatment of material	NF-2170 and NF-2180	-
5.	Storage of welding material	NF-2440, NF-4411	-
6.	Welding procedure specification	Section IX	Acceptance Criteria per Subsection NF
7.	Welding material	Section II	-
8.	Definition of Loading conditions	NF-3111	-
9.	Allowable stress values	NF-3112.3	-
10.	Rolling and sliding supports	NF-3124	-
11.	Differential thermal expansion	NF-3127	-
12.	Stress analysis	NF-3143 NF-3380 NF-3522 NF-3523	Provisions for stress analysis for Class 3 linear structures is applicable for overpack top lid and the overpack and transfer cask shells.
13.	Cutting of plate stock	NF-4211 NF-4211.1	-
14.	Forming	NF-4212	-
15.	Forming tolerance	NF-4221	All cylindrical parts.
16.	Fitting and Aligning Tack Welds	NF-4231 NF-4231.1	-
17.	Alignment	NF-4232	-
18.	Cleanliness of Weld Surfaces	NF-4412	Applies to structural and non-structural welds
19.	Backing Strips, Peening	NF-4421 NF-4422	Applies to structural and non-structural welds
20.	Pre-heating and Interpass Temperature	NF-4611 NF-4612 NF-4613	Applies to structural and non-structural welds
21.	Non-Destructive Examination	NF-5360	Invokes Section V, Applies to Code welds only
22.	NDE Personnel Certification	NF-5522 NF-5523 NF-5530	Applies to Code welds only

† All references to the ASME Code refer to applicable sections of the 2007 edition.

3.0 DESIGN FEATURES (continued)

3.4 Site-Specific Parameters and Analyses

Site-specific parameters and analyses that will require verification by the system user are, as a minimum, as follows:

1. The temperature of 80^o F is the maximum average yearly temperature.

2. The allowed temperature extremes, averaged over a 3-day period, shall be greater than -40^o F and less than 125^o F.

3. a. The resultant horizontal acceleration (vectorial sum of two horizontal Zero Period Accelerations (ZPAs) at a three-dimensional seismic site), a_H, and vertical ZPA, a_V, on the top surface of the ISFSI pad, expressed as fractions of a, shall satisfy the following inequalities:

$$a_H \leq f\ (1 - a_V);\ \text{and}$$

$$a_H \leq r\ (1 - a_V)\ /\ h$$

where f is the Coulomb friction coefficient for the cask/ISFSI pad interface, r is the radius of the cask, and h is the height of the cask center-of-gravity above the ISFSI pad surface. Unless demonstrated by appropriate testing that a higher coefficient of friction value is appropriate for a specific ISFSI, the value used shall be 0.53. If acceleration time-histories on the ISFSI pad surface are available, a_H and a_V may be the coincident values of the instantaneous net horizontal and vertical accelerations. If instantaneous accelerations are used, the inequalities shall be evaluated at each time step in the acceleration time history over the total duration of the seismic event.

If this static equilibrium based inequality cannot be met, a dynamic analysis of the cask/ISFSI pad assemblage with appropriate recognition of soil/structure interaction effects shall be performed to ensure that the casks will not tip over or undergo excessive sliding under the site's Design Basis Earthquake.

b. Under environmental conditions that may degrade the pad/cask interface friction (such as due to icing) the response of the casks under the site's Design Basis Earthquake shall be established using the best estimate of the friction coefficient in an appropriate analysis model. The analysis should demonstrate that the earthquake will not result in cask tipover or cause a cask to slide. In addition, impact between casks should be precluded, or should be considered an accident for which the maximum g-load experienced by the stored fuel shall be limited to the maximum deceleration under the non-mechanistic tipover event in the FSAR.

4. The maximum permitted depth of submergence under water shall not exceed 125 feet.

5. The maximum permissible velocity of floodwater, V, for a flood of height, h, shall be the lesser of V_1 or V_2, where:

$$V_1 = (1.876\ W^*)^{1/2} / h$$

$$V_2 = (1.876\ f\ W^* / D\ h)^{1/2}$$

and W* is the apparent (buoyant weight) of the loaded overpack (in pounds force), D is the diameter of the overpack (in feet), and f is the interface coefficient of friction between the ISFSI pad and the overpack, as used in step 3.a above. Use the height of the overpack, H, if h>H.

6. The potential for fire and explosion while handling a loaded OVERPACK or TRANSFER CASK shall be addressed, based on site-specific considerations. The user shall demonstrate that the site-specific potential for fire is bounded by the fire conditions analyzed by the Certificate Holder, or an analysis of the site-specific fire considerations shall be performed.

7. The user shall demonstrate that the ISFSI pad parameters used in the non-mechanistic tipover analysis are bounding for the site or a site specific non-mechanistic tipover analysis shall be performed using the dynamic model described in FSAR Section 3.4. The maximum total deflection, d, in the active fuel region of the basket panels shall be limited by the following inequality: $d \leq 0.005\, l$, where l is basket cell inside dimension.

8. In cases where engineered features (i.e., berms and shield walls) are used to ensure that the requirements of 10CFR72.104(a) are met, such features are to be considered important-to-safety and must be evaluated to determine the applicable quality assurance category.

9. LOADING OPERATIONS, TRANSPORT OPERATIONS, and UNLOADING OPERATIONS shall only be conducted with working area ambient temperatures $\geq 0^{o}$ F.

10. For those users whose site-specific design basis includes an event or events (e.g., flood) that result in the blockage of any OVERPACK inlet or

outlet air ducts for an extended period of time (i.e, longer than the total Completion Time of LCO 3.1.2), an analysis or evaluation may be performed to demonstrate adequate heat removal is available for the duration of the event. Adequate heat removal is defined as fuel cladding temperatures remaining below the short term temperature limit. If the analysis or evaluation is not performed, or if fuel cladding temperature limits are unable to be demonstrated by analysis or evaluation to remain below the short term temperature limit for the duration of the event, provisions shall be established to provide alternate means of cooling to accomplish this objective.

11. Users shall establish procedural and/or mechanical barriers to ensure that during LOADING OPERATIONS and UNLOADING OPERATIONS, either the fuel cladding is covered by water, or the MPC is filled with an inert gas.

12. The entire haul route shall be evaluated to ensure that the route can support the weight of the loaded system and its conveyance.

13. The loaded system and its conveyance shall be evaluated to ensure under the site specific Design Basis Earthquake the system does not tipover or slide off the haul route.

14. The HI-STORM FW/HI-TRAC VW stack which occurs during MPC TRANSFER shall be evaluated to ensure under the site specific Design Basis Earthquake the system does not tipover. A probabilistic risk assessment cannot be used to rule out the occurrence of the earthquake during MPC TRANSFER.

(continued)

3.0 DESIGN FEATURES (continued)

3.5 Combustible Gas Monitoring During MPC Lid Welding and Cutting

During MPC lid-to-shell welding and cutting operations, combustible gas monitoring of the space under the MPC lid is required, to ensure that there is no combustible mixture present.