CERTIFICATE OF COMPLIANCE NO. 1014

APPENDIX A

TECHNICAL SPECIFICATIONS

FOR THE HI-STORM 100 CASK SYSTEM

DRAFT

TABLE OF CONTENTS

1.0 USE AND APPLICATION 1.1-1
1.1 Definitions 1.1-1
1.2 Logical Connectors 1.2-1
1.3 Completion Times 1.3-1
1.4 Frequency 1.4-1

2.0 NOT USED 2.0-1

3.0 LIMITING CONDITION FOR OPERATION (LCO) APPLICABILITY 3.0-1
3.0 SURVEILLANCE REQUIREMENT (SR) APPLICABILITY 3.0-2

3.1 SFSC INTEGRITY 3.1.1-1
3.1.1 Multi-Purpose Canister (MPC) 3.1.1-1
3.1.2 SFSC Heat Removal System 3.1.2-1
3.1.3 MPC Cavity Reflooding 3.1.3-1
3.1.4 Supplemental Cooling System 3.1.4-1

3.2 SFSC RADIATION PROTECTION 3.2.1-1
3.2.1 Deleted 3.2.1-1
3.2.2 TRANSFER CASK Surface Contamination 3.2.2-2
3.2.3 Deleted 3.2.3-1

3.3 SFSC CRITICALITY CONTROL 3.3.1-1
3.3.1 Boron Concentration 3.3.1-1

Table 3-1 MPC Cavity Drying Limits 3.4-1
Table 3-2 MPC Helium Backfill Limits 3.4-2

4.0 NOT USED 4.0-1

5.0 ADMINISTRATIVE CONTROLS 5.0-1
5.1 Deleted 5.0-1
5.2 Deleted 5.0-1
5.3 Deleted 5.0-1
5.4 Radioactive Effluent Control Program 5.0-1
5.5 Cask Transport Evaluation Program 5.0-2
5.6 Deleted 5.0-4
5.7 Radiation Protection Program 5.0-5

Table 5-1 TRANSFER CASK and Free Standing OVERPACK Lifting Requirements 5.0-4

DRAFT

1.0 USE AND APPLICATION

1.1 Definitions

----------NOTE----------
The defined terms of this section appear in capitalized type and are applicable throughout these Technical Specifications and Bases.

Term	Definition
ACTIONS	ACTIONS shall be that part of a Specification that prescribes Required Actions to be taken under designated Conditions within specified Completion Times.
CASK TRANSFER FACILITY (CTF)	A CASK TRANSFER FACILITY is an optional aboveground or underground system used during the transfer of a loaded MPC between a transfer cask and a storage OVERPACK external to 10 CFR Part 50 controlled structures. The CASK TRANSFER FACILITY includes the following components and equipment: (1) a Cask Transfer Structure used to stabilize the OVERPACK, TRANSFER CASK and/or MPC during lifts involving spent fuel not bounded by the regulations of 10 CFR Part 50, and (2) Either a stationary lifting device or a mobile lifting device used in concert with the stationary structure to lift the OVERPACK, TRANSFER CASK, and/or MPC.
DAMAGED FUEL ASSEMBLY	DAMAGED FUEL ASSEMBLIES are fuel assemblies with known or suspected cladding defects, as determined by a review of records, greater than pinhole leaks or hairline cracks, empty fuel rod locations that are not filled with dummy fuel rods, missing structural components such as grid spacers, whose structural integrity has been impaired such that geometric rearrangement of fuel or gross failure of the cladding is expected based on engineering evaluations, or that cannot be handled by normal means. Fuel assemblies that cannot be handled by normal means due to fuel cladding damage are considered FUEL DEBRIS.

(continued)

DRAFT

1.1 Definitions (continued)

DAMAGED FUEL CONTAINER (DFC)	DFCs are specially designed enclosures for DAMAGED FUEL ASSEMBLIES or FUEL DEBRIS which permit gaseous and liquid media to escape while minimizing dispersal of gross particulates. DFCs authorized for use in the HI-STORM 100 System are as follows: 1. Holtec Dresden Unit 1/Humboldt Bay design 2. Transnuclear Dresden Unit 1 design 3. Holtec Generic BWR design 4. Holtec Generic PWR design
FUEL DEBRIS	FUEL DEBRIS is ruptured fuel rods, severed rods, loose fuel pellets, containers or structures that are supporting these loose fuel assembly parts, or fuel assemblies with known or suspected defects which cannot be handled by normal means due to fuel cladding damage.
FUEL BUILDING	The FUEL BUILDING is the site-specific power plant facility, governed by the regulations of 10 CFR Part 50, where the loaded OVERPACK or TRANSFER CASK is transferred to or from the transporter.
INTACT FUEL ASSEMBLY	INTACT FUEL ASSEMBLIES are fuel assemblies without known or suspected cladding defects greater than pinhole leaks or hairline cracks and which can be handled by normal means. Fuel assemblies without fuel rods in fuel rod locations shall not be classified as INTACT FUEL ASSEMBLIES unless dummy fuel rods are used to displace an amount of water greater than or equal to that displaced by the fuel rod(s). INTACT FUEL ASSEMBLIES may contain integral fuel absorber rods (IFBA) in PWR fuel, or burnable poison rods in BWR fuel.

(continued)

DRAFT

1.1 Definitions (continued)

LOADING OPERATIONS	LOADING OPERATIONS include all licensed activities on an OVERPACK or TRANSFER CASK while it is being loaded with fuel assemblies. LOADING OPERATIONS begin when the first fuel assembly is placed in the MPC and end when the OVERPACK or TRANSFER CASK is suspended from or secured on the transporter. LOADING OPERATIONS does not include MPC TRANSFER.
MINIMUM ENRICHMENT	MINIMUM ENRICHMENT is the minimum assembly average enrichment. Natural uranium blankets are not considered in determining minimum enrichment.
MULTI-PURPOSE CANISTER (MPC)	MPCs are the sealed spent nuclear fuel canisters which consist of a honeycombed fuel basket contained in a cylindrical canister shell which is welded to a baseplate, lid with welded port cover plates, and closure ring. The MPC provides the confinement boundary for the contained radioactive materials.
MPC TRANSFER	MPC TRANSFER begins when the MPC is lifted off the TRANSFER CASK bottom lid and ends when the MPC is supported from beneath by the OVERPACK or VVM (or the reverse).
NON-FUEL HARDWARE	NON-FUEL HARDWARE is defined as Burnable Poison Rod Assemblies (BPRAs), Thimble Plug Devices (TPDs), Control Rod Assemblies (CRAs), Axial Power Shaping Rods (APSRs), Wet Annular Burnable Absorbers (WABAs), Rod Cluster Control Assemblies (RCCAs), Control Element Assemblies (CEAs), Neutron Source Assemblies (NSAs), water displacement guide tube plugs, orifice rod assemblies, instrument tube tie rods (ITTRs), vibration suppressor inserts, and components of these devices such as individual rods.

(continued)

DRAFT

1.1 Definitions (continued)

OVERPACK	OVERPACKs are the casks which receive and contain the sealed MPCs for interim storage on the ISFSI. They provide gamma and neutron shielding, and provide for ventilated air flow to promote heat transfer from the MPC to the environs. The term OVERPACK does not include the TRANSFER CASK.
PLANAR-AVERAGE INITIAL ENRICHMENT	PLANAR AVERAGE INITIAL ENRICHMENT is the average of the distributed fuel rod initial enrichments within a given axial plane of the assembly lattice.
SPENT FUEL STORAGE CASKS (SFSCs)	SFSCs are containers approved for the storage of spent fuel assemblies at the ISFSI. The HI-STORM 100 SFSC System consists of the OVERPACK/VVM and its integral MPC.
STORAGE OPERATIONS	STORAGE OPERATIONS include all licensed activities that are performed at the ISFSI while an SFSC containing spent fuel is situated within the ISFSI perimeter. STORAGE OPERATIONS does not include MPC TRANSFER.
TRANSFER CASK	TRANSFER CASKs are containers designed to contain the MPC during and after loading of spent fuel assemblies and to transfer the MPC to or from the OVERPACK/VVM. The HI-STORM 100 System employs either the 125-Ton or the 100-Ton HI-TRAC TRANSFER CASK.

(continued)

DRAFT

1.1 Definitions (continued)

TRANSPORT OPERATIONS	TRANSPORT OPERATIONS include all licensed activities performed on an OVERPACK or TRANSFER CASK loaded with one or more fuel assemblies when it is being moved after LOADING OPERATIONS or before UNLOADING OPERATIONS. TRANSPORT OPERATIONS begin when the OVERPACK or TRANSFER CASK is first suspended from or secured on the transporter and end when the OVERPACK or TRANSFER CASK is at its destination and no longer secured on or suspended from the transporter. TRANSPORT OPERATIONS includes MPC TRANSFER.
UNLOADING OPERATIONS	UNLOADING OPERATIONS include all licensed activities on an SFSC to be unloaded of the contained fuel assemblies. UNLOADING OPERATIONS begin when the OVERPACK or TRANSFER CASK is no longer suspended from or secured on the transporter and end when the last fuel assembly is removed from the SFSC. UNLOADING OPERATIONS does not include MPC TRANSFER.
VERTICAL VENTILATED MODULE (VVM) (HI-STORM 100U SYSTEM ONLY)	The VVM is a subterranean type overpack which receives and contains the sealed MPC for interim storage at the ISFSI. The VVM supports the MPC in a vertical orientation and provides air flow through cooling passages to promote heat transfer from the MPC to the environs.
ZR	ZR means any zirconium-based fuel cladding or fuel channel material authorized for use in a commercial nuclear power plant reactor.

DRAFT

1.0 USE AND APPLICATION

1.2 Logical Connectors

PURPOSE	The purpose of this section is to explain the meaning of logical connectors. Logical connectors are used in Technical Specifications (TS) to discriminate between, and yet connect, discrete Conditions, Required Actions, Completion Times, Surveillances, and Frequencies. The only logical connectors that appear in TS are AND and OR. The physical arrangement of these connectors constitutes logical conventions with specific meanings.
BACKGROUND	Several levels of logic may be used to state Required Actions. These levels are identified by the placement (or nesting) of the logical connectors and by the number assigned to each Required Action. The first level of logic is identified by the first digit of the number assigned to a Required Action and the placement of the logical connector in the first level of nesting (i.e., left justified with the number of the Required Action). The successive levels of logic are identified by additional digits of the Required Action number and by successive indentions of the logical connectors. When logical connectors are used to state a Condition, Completion Time, Surveillance, or Frequency, only the first level of logic is used, and the logical connector is left justified with the statement of the Condition, Completion Time, Surveillance, or Frequency.

(continued)

DRAFT

1.2 Logical Connectors

EXAMPLES

The following examples illustrate the use of logical connectors.

EXAMPLE 1.2-1

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. LCO not met.	A.1 VERIFY . . . AND A.2 Restore . . .	

In this example the logical connector AND is used to indicate that when in Condition A, both Required Actions A.1 and A.2 must be completed.

(continued)

DRAFT

1.2 Logical Connectors

EXAMPLES (continued)

EXAMPLE 1.2-2

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. LCO not met.	A.1 Stop . . . OR A.2.1 Verify . . . AND A.2.2.1 Reduce . . . OR A.2.2.2 Perform . . . OR A.3 Remove . . .	

This example represents a more complicated use of logical connectors. Required Actions A.1, A.2, and A.3 are alternative choices, only one of which must be performed as indicated by the use of the logical connector OR and the left justified placement. Any one of these three ACTIONS may be chosen. If A.2 is chosen, then both A.2.1 and A.2.2 must be performed as indicated by the logical connector AND. Required Action A.2.2 is met by performing A.2.2.1 or A.2.2.2. The indented position of the logical connector OR indicates that A.2.2.1 and A.2.2.2 are alternative choices, only one of which must be performed.

DRAFT

1.0 USE AND APPLICATION

1.3 Completion Times

PURPOSE	The purpose of this section is to establish the Completion Time convention and to provide guidance for its use.
BACKGROUND	Limiting Conditions for Operation (LCOs) specify the lowest functional capability or performance levels of equipment required for safe operation of the facility. The ACTIONS associated with an LCO state Conditions that typically describe the ways in which the requirements of the LCO can fail to be met. Specified with each stated Condition are Required Action(s) and Completion Times(s).
DESCRIPTION	The Completion Time is the amount of time allowed for completing a Required Action. It is referenced to the time of discovery of a situation (e.g., equipment or variable not within limits) that requires entering an ACTIONS Condition unless otherwise specified, providing the HI-STORM 100 System is in a specified condition stated in the Applicability of the LCO. Required Actions must be completed prior to the expiration of the specified Completion Time. An ACTIONS Condition remains in effect and the Required Actions apply until the Condition no longer exists or the HI-STORM 100 System is not within the LCO Applicability. Once a Condition has been entered, subsequent subsystems, components, or variables expressed in the Condition, discovered to be not within limits, will <u>not</u> result in separate entry into the Condition unless specifically stated. The Required Actions of the Condition continue to apply to each additional failure, with Completion Times based on initial entry into the Condition.

(continued)

DRAFT

1.3 Completion Times (continued)

EXAMPLES

The following examples illustrate the use of Completion Times with different types of Conditions and changing Conditions.

EXAMPLE 1.3-1

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
B. Required Action and associated Completion Time not met.	B.1 Perform Action B.1 AND B.2 Perform Action B.2	12 hours 36 hours

Condition B has two Required Actions. Each Required Action has its own separate Completion Time. Each Completion Time is referenced to the time that Condition B is entered.

The Required Actions of Condition B are to complete action B.1 within 12 hours AND complete action B.2 within 36 hours. A total of 12 hours is allowed for completing action B.1 and a total of 36 hours (not 48 hours) is allowed for completing action B.2 from the time that Condition B was entered. If action B.1 is completed within 6 hours, the time allowed for completing action B.2 is the next 30 hours because the total time allowed for completing action B.2 is 36 hours.

(continued)

DRAFT

1.3 Completion Times (continued)

EXAMPLES (continued)

EXAMPLE 1.3-2

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One system not within limit.	A.1 Restore system to within limit.	7 days
B. Required Action and associated Completion Time not met.	B.1 Complete action B.1. AND B.2 Complete action B.2.	12 hours 36 hours

When a system is determined not to meet the LCO, Condition A is entered. If the system is not restored within 7 days, Condition B is also entered and the Completion Time clocks for Required Actions B.1 and B.2 start. If the system is restored after Condition B is entered, Conditions A and B are exited, and therefore, the Required Actions of Condition B may be terminated.

(continued)

DRAFT

1.3 Completion Times (continued)

EXAMPLES (continued)

EXAMPLE 1.3-3

ACTIONS

----------NOTE----------
Separate Condition entry is allowed for each component.

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. LCO not met.	A.1 Restore compliance with LCO.	4 hours
B. Required Action and associated Completion Time not met.	B.1 Complete action B.1. AND B.2 Complete action B.2.	6 hours 12 hours

The Note above the ACTIONS table is a method of modifying how the Completion Time is tracked. If this method of modifying how the Completion Time is tracked was applicable only to a specific Condition, the Note would appear in that Condition rather than at the top of the ACTIONS Table.

The Note allows Condition A to be entered separately for each component, and Completion Times tracked on a per component basis. When a component is determined to not meet the LCO, Condition A is entered and its Completion Time starts. If subsequent components are determined to not meet the LCO, Condition A is entered for each component and separate Completion Times start and are tracked for each component.

(continued)

DRAFT

1.3 Completion Times (continued)

IMMEDIATE COMPLETION TIME	When "Immediately" is used as a Completion Time, the Required Action should be pursued without delay and in a controlled manner.

DRAFT

1.0 USE AND APPLICATION

1.4 Frequency

PURPOSE	The purpose of this section is to define the proper use and application of Frequency requirements.
DESCRIPTION	Each Surveillance Requirement (SR) has a specified Frequency in which the Surveillance must be met in order to meet the associated Limiting Condition for Operation (LCO). An understanding of the correct application of the specified Frequency is necessary for compliance with the SR. The "specified Frequency" is referred to throughout this section and each of the Specifications of Section 3.0, Surveillance Requirement (SR) Applicability. The "specified Frequency" consists of the requirements of the Frequency column of each SR. Situations where a Surveillance could be required (i.e., its Frequency could expire), but where it is not possible or not desired that it be performed until sometime after the associated LCO is within its Applicability, represent potential SR 3.0.4 conflicts. To avoid these conflicts, the SR (i.e., the Surveillance or the Frequency) is stated such that it is only "required" when it can be and should be performed. With an SR satisfied, SR 3.0.4 imposes no restriction.

(continued)

DRAFT

1.4 Frequency (continued)

EXAMPLES

The following examples illustrate the various ways that Frequencies are specified.

EXAMPLE 1.4-1

SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
Verify pressure within limit	12 hours

Example 1.4-1 contains the type of SR most often encountered in the Technical Specifications (TS). The Frequency specifies an interval (12 hours) during which the associated Surveillance must be performed at least one time. Performance of the Surveillance initiates the subsequent interval. Although the Frequency is stated as 12 hours, an extension of the time interval to 1.25 times the interval specified in the Frequency is allowed by SR 3.0.2 for operational flexibility. The measurement of this interval continues at all times, even when the SR is not required to be met per SR 3.0.1 (such as when the equipment or variables are outside specified limits, or the facility is outside the Applicability of the LCO). If the interval specified by SR 3.0.2 is exceeded while the facility is in a condition specified in the Applicability of the LCO, the LCO is not met in accordance with SR 3.0.1.

If the interval as specified by SR 3.0.2 is exceeded while the facility is not in a condition specified in the Applicability of the LCO for which performance of the SR is required, the Surveillance must be performed within the Frequency requirements of SR 3.0.2 prior to entry into the specified condition. Failure to do so would result in a violation of SR 3.0.4

(continued)

DRAFT

1.4 Frequency (continued)

EXAMPLES (continued)

EXAMPLE 1.4-2

SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
Verify flow is within limits.	Once within 12 hours prior to starting activity AND 24 hours thereafter

Example 1.4-2 has two Frequencies. The first is a one time performance Frequency, and the second is of the type shown in Example 1.4-1. The logical connector "AND" indicates that both Frequency requirements must be met. Each time the example activity is to be performed, the Surveillance must be performed within 12 hours prior to starting the activity.

The use of "once" indicates a single performance will satisfy the specified Frequency (assuming no other Frequencies are connected by "AND"). This type of Frequency does not qualify for the 25% extension allowed by SR 3.0.2.

"Thereafter" indicates future performances must be established per SR 3.0.2, but only after a specified condition is first met (i.e., the "once" performance in this example). If the specified activity is canceled or not performed, the measurement of both intervals stops. New intervals start upon preparing to restart the specified activity.

DRAFT

2.0

This section is intentionally left blank

DRAFT

3.0 LIMITING CONDITIONS FOR OPERATION (LCO) APPLICABILITY

LCO 3.0.1	LCOs shall be met during specified conditions in the Applicability, except as provided in LCO 3.0.2.
LCO 3.0.2	Upon discovery of a failure to meet an LCO, the Required Actions of the associated Conditions shall be met, except as provided in LCO 3.0.5. If the LCO is met or is no longer applicable prior to expiration of the specified Completion Time(s), completion of the Required Action(s) is not required, unless otherwise stated.
LCO 3.0.3	Not applicable.
LCO 3.0.4	When an LCO is not met, entry into a specified condition in the Applicability shall not be made except when the associated ACTIONS to be entered permit continued operation in the specified condition in the Applicability for an unlimited period of time. This Specification shall not prevent changes in specified conditions in the Applicability that are required to comply with ACTIONS or that are related to the unloading of an SFSC.
LCO 3.0.5	Equipment removed from service or not in service in compliance with ACTIONS may be returned to service under administrative control solely to perform testing required to demonstrate it meets the LCO or that other equipment meets the LCO. This is an exception to LCO 3.0.2 for the system returned to service under administrative control to perform the testing.

DRAFT

3.0 SURVEILLANCE REQUIREMENT (SR) APPLICABILITY

SR 3.0.1	SRs shall be met during the specified conditions in the Applicability for individual LCOs, unless otherwise stated in the SR. Failure to meet a Surveillance, whether such failure is experienced during the performance of the Surveillance or between performances of the Surveillance, shall be failure to meet the LCO. Failure to perform a Surveillance within the specified Frequency shall be failure to meet the LCO except as provided in SR 3.0.3. Surveillances do not have to be performed on equipment or variables outside specified limits.
SR 3.0.2	The specified Frequency for each SR is met if the Surveillance is performed within 1.25 times the interval specified in the Frequency, as measured from the previous performance or as measured from the time a specified condition of the Frequency is met. For Frequencies specified as “once,” the above interval extension does not apply. If a Completion Time requires periodic performance on a “once per...” basis, the above Frequency extension applies to each performance after the initial performance. Exceptions to this Specification are stated in the individual Specifications.
SR 3.0.3	If it is discovered that a Surveillance was not performed within its specified Frequency, then compliance with the requirement to declare the LCO not met may be delayed, from the time of discovery, up to 24 hours or up to the limit of the specified Frequency, whichever is less. This delay period is permitted to allow performance of the Surveillance. If the Surveillance is not performed within the delay period, the LCO must immediately be declared not met, and the applicable Condition(s) must be entered.

(continued)

DRAFT

3.0 SURVEILLANCE REQUIREMENT (SR) APPLICABILITY

SR 3.0.3 (continued)	When the Surveillance is performed within the delay period and the Surveillance is not met, the LCO must immediately be declared not met, and the applicable Condition(s) must be entered.
SR 3.0.4	Entry into a specified condition in the Applicability of an LCO shall not be made unless the LCO's Surveillances have been met within their specified Frequency. This provision shall not prevent entry into specified conditions in the Applicability that are required to comply with Actions or that are related to the unloading of an SFSC.

DRAFT

3.1 SFSC INTEGRITY

3.1.1 Multi-Purpose Canister (MPC)

LCO 3.1.1 The MPC shall be dry and helium filled.

Table 3-1 provides decay heat and burnup limits for forced helium dehydration (FHD) and vacuum drying. FHD is not subject to time limits. Vacuum drying of the MPC-68M is not subject to time limits. Vacuum drying, for all other MPCs, is subject to the following time limits, from the end of bulk water removal until the start of helium backfill:

MPC Total Decay Heat (Q)	Vacuum Drying Time Limit
Q ≤ 23 kW	None
23 kW < Q ≤28.74 kW	40 hours
Q > 28.74 kW	Not Permitted (see Table 3-1)

APPLICABILITY: During TRANSPORT OPERATIONS and STORAGE OPERATIONS.

ACTIONS

----------NOTES----------

Separate Condition entry is allowed for each MPC.

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. MPC cavity vacuum drying pressure or demoisturizer exit gas temperature limit not met.	A.1 Perform an engineering evaluation to determine the quantity of moisture left in the MPC. AND A.2 Develop and initiate corrective actions necessary to return the MPC to compliance with Table 3-1.	7 days 30 days

DRAFT

ACTIONS (continued)

B. MPC cavity vacuum drying acceptance criteria not met during allowable time.	B.1 Backfill the MPC cavity with helium to a pressure of at least 0.5 atm.	6 hours
C. MPC helium backfill limit not met.	C.1 Perform an engineering evaluation to determine the impact of helium differential. AND C.2.1 Develop and initiate corrective actions necessary to return the MPC to an analyzed condition by adding helium to or removing helium from the MPC. OR C.2.2 Develop and initiate corrective actions necessary to demonstrate through analysis, using the models and methods from the HI-STORM FSAR, that all limits for cask components and contents will be met.	72 hours 14 days
D. MPC helium leak rate limit for vent and drain port cover plate welds or cover plate base metal not met.	D.1 Perform an engineering evaluation to determine the impact of increased helium leak rate on heat removal capability and offsite dose. AND D.2 Develop and initiate corrective actions necessary to return the MPC to compliance with SR 3.1.1.3.	24 hours 7 days

DRAFT

E.	Required Actions and associated Completion Times not met.	E.1	Remove all fuel assemblies from the SFSC.	30 days

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.1.1.1	Verify that the MPC cavity has been dried in accordance with the applicable limits in Table 3-1, within the specified vacuum drying time limits as applicable.	Once, prior to TRANSPORT OPERATIONS
SR 3.1.1.2	Verify MPC helium backfill quantity is within the limit specified in Table 3-2 for the applicable MPC model. Re-performance of this surveillance is not required upon successful completion of Action C.2.2.	Once, prior to TRANSPORT OPERATIONS
SR 3.1.1.3	Verify that the helium leak rate through the MPC vent and drain port cover plates (confinement welds and the base metal) meets the leaktight criteria of ANSI N14.5-1997.	Once, prior to TRANSPORT OPERATIONS

DRAFT

3.1 SFSC INTEGRITY

3.1.2 SFSC Heat Removal System

LCO 3.1.2 The SFSC Heat Removal System shall be operable

----------NOTE----------
The SFSC Heat Removal System is operable when 50% or more of the inlet and outlet vent areas are unblocked and available for flow or when air temperature requirements are met.

APPLICABILITY: During STORAGE OPERATIONS.

ACTIONS

----------NOTE----------
Separate Condition entry is allowed for each SFSC.

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. SFSC Heat Removal System operable, but partially (<50%) blocked.	A.1 Remove blockage.	N/A
B. SFSC Heat Removal System inoperable.	B.1 Restore SFSC Heat Removal System to operable status.	8 hours
C. Required Action B.1 and associated Completion Time not met.	C.1 Measure SFSC dose rates in accordance with the Radiation Protection Program. AND C.2.1 Restore SFSC Heat Removal System to operable status. OR C.2.2 Transfer the MPC into a TRANSFER CASK.	Immediately and once per 12 hours thereafter 64 hours (MPC heat ≤ 28.74 kW) 24 hours (MPC heat >28.74 kW) 64 hours (MPC heat ≤ 28.74 kW) 24 hours (MPC heat >28.74 kW)

DRAFT

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.1.2	Verify all OVERPACK inlets and outlets are free of blockage from solid debris or floodwater.	24 hours
	OR For OVERPACKS with installed temperature monitoring equipment, verify that the difference between the average OVERPACK air outlet temperature and ISFSI ambient temperature is ≤ 155°F for OVERPACKS containing PWR MPCs, ≤ 137°F for OVERPACKS containing BWR MPCs.	24 hours

DRAFT

3.1 SFSC INTEGRITY

3.1.3 MPC Cavity Reflooding

LCO 3.1.3 The MPC cavity pressure shall be < 100 psig

----------NOTE----------
The LCO is only applicable to wet UNLOADING OPERATIONS.

APPLICABILITY: UNLOADING OPERATIONS prior to and during re-flooding.

ACTIONS

----------NOTE----------
Separate Condition entry is allowed for each MPC.

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. MPC cavity pressure not within limit.	A.1 Stop re-flooding operations until MPC cavity pressure is within limit. AND A.2 Ensure MPC vent port is not closed or blocked.	Immediately Immediately

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.1.3.1	Ensure via analysis or direct measurement that MPC cavity pressure is within limit.	Once, prior to MPC re-flooding operations. AND Once every 1 hour thereafter when using direct measurement.

DRAFT

3.1 SFSC INTEGRITY

3.1.4 Supplemental Cooling System

LCO 3.1.4 A supplemental cooling system (SCS) shall be operable

----------NOTE----------
Upon reaching steady state operation, the SCS may be temporarily disabled for a short duration (≤ 7 hours) to facilitate necessary operational evolutions, such as movement of the TRANSFER CASK through a door way, or other similar operation.

APPLICABILITY: This LCO is not applicable to the MPC-68M. For all other MPCs this LCO is applicable when the loaded MPC is in the TRANSFER CASK and:

a. Within 4 hours of the completion of MPC drying operations in accordance with LCO 3.1.1 or within 4 hours of transferring the MPC into the TRANSFER CASK if the MPC is to be unloaded

AND

b1. The MPC contains one or more fuel assemblies with an average burnup > 45,000 MWD/MTU

OR

b2. The MPC decay heat load exceeds 28.74 kW.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. SFSC Supplemental Cooling System inoperable.	A.1 Restore SFSC Supplemental Cooling System to operable status.	7 days
B. Required Action A.1 and associated Completion Time not met.	B.1 Remove all fuel assemblies from the SFSC.	30 days

DRAFT

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.1.4.1	Verify SCS is operable.	2 hours

DRAFT

3.2 SFSC RADIATION PROTECTION.

3.2.1 Deleted.

LCO 3.2.1 Deleted.

DRAFT

3.2 SFSC RADIATION PROTECTION.

3.2.2 TRANSFER CASK Surface Contamination.

LCO 3.2.2 Removable contamination on the exterior surfaces of the TRANSFER CASK and accessible portions of the MPC shall each not exceed:

a. 1000 dpm/100 cm^2 from beta and gamma sources

b. 20 dpm/100 cm^2 from alpha sources.

----------NOTE----------
This LCO is not applicable to the TRANSFER CASK if MPC TRANSFER operations occur inside the FUEL BUILDING.

APPLICABILITY: During TRANSPORT OPERATIONS.

ACTIONS

----------NOTE----------
Separate Condition entry is allowed for each TRANSFER CASK.

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. TRANSFER CASK or MPC removable surface contamination limits not met.	A.1 Restore removable surface contamination to within limits.	7 days

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.2.2.1	Verify that the removable contamination on the exterior surfaces of the TRANSFER CASK and accessible portions of the MPC containing fuel is within limits.	Once, prior to TRANSPORT OPERATIONS

DRAFT

3.2 SFSC RADIATION PROTECTION.

3.2.3 Deleted.

LCO 3.2.3 Deleted.

DRAFT

3.3 SFSC CRITICALITY CONTROL

3.3.1 Boron Concentration

LCO 3.3.1 As required by CoC Appendix B, Table 2.1-2, the concentration of boron in the water in the MPC shall meet the following limits for the applicable MPC model and the most limiting fuel assembly array/class and classification to be stored in the MPC:

a. MPC-24 with one or more fuel assemblies having an initial enrichment greater than the value in Table 2.1-2 for no soluble boron credit and ≤ 5.0 wt% ^{235}U: ≥ 400 ppmb

b. MPC-24E or MPC-24EF (all INTACT FUEL ASSEMBLIES) with one or more fuel assemblies having an initial enrichment greater than the value in Table 2.1-2 for no soluble boron credit and ≤ 5.0 wt% ^{235}U: ≥ 300 ppmb

c. Deleted.

d. Deleted.

e. MPC-24E or MPC-24EF (one or more DAMAGED FUEL ASSEMBLIES or FUEL DEBRIS) with one or more fuel assemblies having an initial enrichment > 4.0 wt% ^{235}U and ≤ 5.0 wt% ^{235}U: ≥ 600 ppmb

f. MPC-32/32F: Minimum soluble boron concentration as required by the table below[†].

Array/Class	All INTACT FUEL ASSEMBLIES		One or more DAMAGED FUEL ASSEMBLIES or FUEL DEBRIS	
	Maximum Initial Enrichment ≤ 4.1 wt% ^{235}U (ppmb)	Maximum Initial Enrichment 5.0 wt% ^{235}U (ppmb)	Maximum Initial Enrichment ≤ 4.1 wt% ^{235}U (ppmb)	Maximum Initial Enrichment 5.0 wt% ^{235}U (ppmb)
14x14A/B/C/D/E	1,300	1,900	1,500	2,300
15x15A/B/C/G/I	1,800	2,500	1,900	2,700
15x15D/E/F/H	1,900	2,600	2,100	2,900
16x16A	1,400	2,000	1,500	2,300
17x17A/B/C	1,900	2,600	2,100	2,900

[†] For maximum initial enrichments between 4.1 wt% and 5.0 wt% ^{235}U, the minimum soluble boron concentration may be determined by linear interpolation between the minimum soluble boron concentrations at 4.1 wt% and 5.0 wt%.

DRAFT

APPLICABILITY: During PWR fuel LOADING OPERATIONS with fuel and water in the MPC

AND

During PWR fuel UNLOADING OPERATIONS with fuel and water in the MPC.

ACTIONS

----------NOTE----------
Separate Condition entry is allowed for each MPC.

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. Boron concentration not within limit.	A.1 Suspend LOADING OPERATIONS or UNLOADING OPERATIONS.	Immediately
	AND	
	A.2 Suspend positive reactivity additions.	Immediately
	AND	
	A.3 Initiate action to restore boron concentration to within limit.	Immediately

SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
----------NOTE---------- This surveillance is only required to be performed if the MPC is submerged in water or if water is to be added to, or recirculated through the MPC. ----------	Once, within 4 hours prior to entering the Applicability of this LCO.
	AND
SR 3.3.1.1 Verify boron concentration is within the applicable limit using two independent measurements.	Once per 48 hours thereafter.

DRAFT

Table 3-1
MPC Cavity Drying Limits (Note 3)

Fuel Burnup (MWD/MTU)	**MPC Heat Load (kW)**	**Method of Moisture Removal (Notes 1 and 2)**
All Assemblies ≤ 45,000	≤ 28.74 (MPC-24/24E/24EF, MPC-32/32F, MPC-68/68F/68FF) ≤ 36.9 (MPC-68M)	VDS or FHD
All Assemblies ≤ 45,000	> 28.74 (MPC-24/24E/24EF, MPC-32/32F, MPC-68/68F/68FF)	FHD
One or more assemblies > 45,000	≤ 29 (MPC-68M)	VDS (Note 4) or FHD
One or more assemblies > 45,000	≤ 36.9 (MPC-24/24E/24EF) ≤ 36.9 (MPC-32/32F) ≤ 36.9 (MPC-68/68F/68FF) ≤36.9 (MPC-68M)	FHD

Notes:

1. VDS means a vacuum drying system. The acceptance criterion when using a VDS is MPC cavity pressure shall be ≤ 3 torr for ≥ 30 minutes.

2. FHD means a forced helium dehydration system. The acceptance criterion when using an FHD system is the gas temperature exiting the demoisturizer shall be ≤ 21°F for ≥ 30 minutes or the gas dew point exiting the MPC shall be ≤ 22.9°F for ≥ 30 minutes.

3. For total decay heat loads up to and including 20.88 kW for the MPC-24 and 21.52 kW for the MPC-68, vacuum drying of the MPC must be performed with the annular gap between the MPC and the HI-TRAC filled with water. For higher total decay heat loads in the MPC-24 and MPC-68 or for any decay heat load in an MPC-24E or MPC-32, the annular gap must be continuously flushed with water with sufficient flow to keep the exit water temperature below 125°F. For total decay heat loads up to and including 36.9 kW for the MPC-68M, vacuum drying of the MPC, when permitted as described above, must be performed with the annular gap between the MPC and HI-TRAC filled with water.

4. The maximum allowable decay heat per fuel storage location is 0.426 kW

DRAFT

Table 3-2
MPC Helium Backfill Limits[1]

MPC MODEL	LIMIT
MPC-24/24E/24EF	
i. Cask Heat Load ≤ 27.77 kW (MPC-24) or ≤ 28.17 kW (MPC-24E/EF)	0.1212 +/-10% g-moles/l OR ≥ 29.3 psig and ≤ 48.5 psig
ii. Cask Heat Load >27.77 kW (MPC-24) or > 28.17 kW (MPC-24E/EF)	≥ 45.5 psig and ≤ 48.5 psig
MPC-68/68F/68FF/68M	
i. Cask Heat Load ≤ 28.19 kW	0.1218 +/-10% g-moles/l OR ≥ 29.3 psig and ≤ 48.5 psig
ii. Cask Heat Load > 28.19 kW	≥ 45.5 psig and ≤ 48.5 psig
MPC-32/32F	
i. Cask Heat Load ≤ 28.74 kW	≥ 29.3 psig and ≤ 48.5 psig
ii. Cask Heat Load >28.74 kW	≥ 45.5 psig and≤ 48.5 psig

DRAFT

[1] Helium used for backfill of MPC shall have a purity of ≥ 99.995%. Pressure range is at a reference temperature of 70°F

4.0

This section is intentionally left blank

DRAFT

5.0 ADMINISTRATIVE CONTROLS AND PROGRAMS

The following programs shall be established, implemented and maintained.

5.1 Deleted.

5.2 Deleted.

5.3 Deleted.

5.4 Radioactive Effluent Control Program

This program implements the requirements of 10 CFR 72.44(d).

a. The HI-STORM 100 Cask System does not create any radioactive materials or have any radioactive waste treatment systems. Therefore, specific operating procedures for the control of radioactive effluents are not required. Specification 3.1.1, Multi-Purpose Canister (MPC), provides assurance that there are not radioactive effluents from the SFSC.

b. This program includes an environmental monitoring program. Each general license user may incorporate SFSC operations into their environmental monitoring programs for 10 CFR Part 50 operations.

c. An annual report shall be submitted pursuant to 10 CFR 72.44(d)(3).

(continued)

DRAFT

5.5 Cask Transport Evaluation Program

This program provides a means for evaluating various transport configurations and transport route conditions to ensure that the design basis drop limits are met. For lifting of the loaded TRANSFER CASK or OVERPACK using devices which are integral to a structure governed by 10 CFR Part 50 regulations, 10 CFR 50 requirements apply. This program is not applicable when the TRANSFER CASK or OVERPACK is in the FUEL BUILDING or is being handled by a device providing support from underneath (i.e., on a rail car, heavy haul trailer, air pads, etc...) or is being handled by a device designed in accordance with the increased safety factors of ANSI N14.6 and having redundant drop protection.

Pursuant to 10 CFR 72.212, this program shall evaluate the site-specific transport route conditions.

a. For free-standing OVERPACKS and the TRANSFER CASK, the following requirements apply:

1. The lift height above the transport route surface(s) shall not exceed the limits in Table 5-1 except as provided for in Specification 5.5.a.2. Also, if applying the limits in Table 5-1, the program shall ensure that the transport route conditions (i.e., surface hardness and pad thickness) are equivalent to or less limiting than either Set A or Set B in HI-STORM FSAR Table 2.2.9.

2. The program may determine lift heights by analysis based on the site-specific conditions to ensure that the impact loading due to design basis drop events does not exceed 45 g's at the top of the MPC fuel basket. These alternative analyses shall be commensurate with the drop analyses described in the Final Safety Analysis Report for the HI-STORM 100 Cask System. The program shall ensure that these alternative analyses are documented and controlled.

DRAFT

(continued)

5.5 Cask Transport Evaluation Program (continued)

3. The TRANSFER CASK or OVERPACK, when loaded with spent fuel, may be lifted to any height necessary during TRANSPORT OPERATIONS, provided the lifting device is designed in accordance with ANSI N14.6 and has redundant drop protection features.

4. The TRANSFER CASK and MPC, when loaded with spent fuel, may be lifted to those heights necessary to perform cask handling operations, including MPC TRANSFER, provided the lifts are made with structures and components designed in accordance with the criteria specified in Section 3.5 of Appendix B to Certificate of Compliance No. 1014, as applicable.

b. For the transport of OVERPACKS to be anchored to the ISFSI pad, the following requirements apply:

1. Except as provided in 5.5.b.2, user shall determine allowable OVERPACK lift height limit(s) above the transport route surface(s) based on site-specific transport route conditions. The lift heights shall be determined by evaluation or analysis, based on limiting the design basis cask deceleration during a postulated drop event to $\leq$ 45 g's at the top of the MPC fuel basket. Evaluations and/or analyses shall be performed using methodologies consistent with those in the HI-STORM 100 FSAR.

2. The OVERPACK, when loaded with spent fuel, may be lifted to any height necessary during TRANSPORT OPERATIONS provided the lifting device is designed in accordance with ANSI N14.6 and has redundant drop protection features.

DRAFT

(continued)

5.5 Cask Transport Evaluation Program (continued)

Table 5-1

TRANSFER CASK and Free-Standing OVERPACK Lifting Requirements

ITEM	ORIENTATION	LIFTING HEIGHT LIMIT (in.)
TRANSFER CASK	Horizontal	42 (Notes 1 and 2)
TRANSFER CASK	Vertical	None Established (Note 2)
OVERPACK	Horizontal	Not Permitted
OVERPACK	Vertical	11 (Note 3)

Notes:
1. To be measured from the lowest point on the TRANSFER CASK (i.e., the bottom edge of the cask/lid assemblage)
2. See Technical Specification 5.5.a.3 and 4
3. See Technical Specification 5.5.a.3.

5.6 Deleted.

(continued)

DRAFT

5.7 Radiation Protection Program

5.7.1 Each cask user shall ensure that the Part 50 radiation protection program appropriately addresses dry storage cask loading and unloading, as well as ISFSI operations, including transport of the loaded OVERPACK or TRANSFER CASK outside of facilities governed by 10 CFR Part 50. The radiation protection program shall include appropriate controls for direct radiation and contamination, ensuring compliance with applicable regulations, and implementing actions to maintain personnel occupational exposures As Low As Reasonably Achievable (ALARA). The actions and criteria to be included in the program are provided below.

5.7.2 As part of its evaluation pursuant to 10 CFR 72.212(b)(2)(i)(C), the licensee shall perform an analysis to confirm that the dose limits of 10 CFR 72.104(a) will be satisfied under the actual site conditions and ISFSI configuration, considering the planned number of casks to be deployed and the cask contents.

5.7.3 Based on the analysis performed pursuant to Section 5.7.2, the licensee shall establish individual cask surface dose rate limits for the HI-TRAC TRANSFER CASK and the HI-STORM OVERPACK to be used at the site. Total (neutron plus gamma) dose rate limits shall be established at the following locations:

a. The top of the TRANSFER CASK and the OVERPACK.
b. The side of the TRANSFER CASK and OVERPACK
c. The inlet and outlet ducts on the OVERPACK

5.7.4 Notwithstanding the limits established in Section 5.7.3, the measured dose rates on a loaded OVERPACK shall not exceed the following values:

a. 30 mrem/hr (gamma + neutron) on the top of the OVERPACK
b. 300 mrem/hr (gamma + neutron) on the side of the OVERPACK, excluding inlet and outlet ducts

5.7.5 The licensee shall measure the TRANSFER CASK and OVERPACK surface neutron and gamma dose rates as described in Section 5.7.8 for comparison against the limits established in Section 5.7.3 or Section 5.7.4, whichever are lower.

DRAFT

5.7 Radiation Protection Program (cont'd)

5.7.6 If the measured surface dose rates exceed the lower of the two limits established in Section 5.7.3 or Section 5.7.4, the licensee shall:

a. Administratively verify that the correct contents were loaded in the correct fuel storage cell locations.
b. Perform a written evaluation to verify whether an OVERPACK at the ISFSI containing the as-loaded MPC will cause the dose limits of 10 CFR 72.104 to be exceeded.
c. Perform a written evaluation within 30 days to determine why the surface dose rate limits were exceeded.

5.7.7 If the evaluation performed pursuant to Section 5.7.6 shows that the dose limits of 10 CFR 72.104 will be exceeded, the MPC shall not be placed into storage or, in the case of the OVERPACK loaded at the ISFSI, the MPC shall be removed from storage until appropriate corrective action is taken to ensure the dose limits are not exceeded.

5.7.8 TRANSFER CASK and OVERPACK surface dose rates shall be measured at approximately the following locations:

a. A minimum of four (4) dose rate measurements shall be taken on the side of the TRANSFER CASK approximately at the cask mid-height plane. The measurement locations shall be approximately 90 degrees apart around the circumference of the cask. Dose rates shall be measured between the radial ribs of the water jacket.

b. A minimum of four (4) TRANSFER CASK top lid dose rates shall be measured at locations approximately half way between the edge of the hole in the top lid and the outer edge of the top lid, 90 degrees apart around the circumference of the top lid.

c. A minimum of twelve (12) dose rate measurements shall be taken on the side of the OVERPACK in three sets of four measurements. One measurement set shall be taken approximately at the cask mid-height plane, 90 degrees apart around the circumference of the cask. The second and third measurement sets shall be taken approximately 60 inches above and below the mid-height plane, respectively, also 90 degrees apart around the circumference of the cask.

DRAFT

5.7 Radiation Protection Program (cont'd)

d. A minimum of five (5) dose rate measurements shall be taken on the top of the OVERPACK. One dose rate measurement shall be taken at approximately the center of the lid and four measurements shall be taken at locations on the top concrete shield, approximately half way between the center and the edge of the top concrete shield, 90 degrees apart around the circumference of the lid.

e. A dose rate measurement shall be taken on contact at the surface of each inlet and outlet vent duct screen of the OVERPACK.

DRAFT