

October 26, 2012

Dr. Stephan Anton
Vice President of Engineering
Holtec International
Holtec Center
555 Lincoln Drive West
Marlton, NJ 08053

SUBJECT: INDEPENDENT SPENT FUEL STORAGE INSTALLATION PAD DESIGN
QUALIFICATION

Dear Dr. Anton:

This letter responds to Holtec International's (Holtec) letter entitled, "ISFSI Pad Qualification – Request for Guidance", which Holtec submitted to the U.S. Nuclear Regulatory Commission on July 19, 2012. The purpose of Holtec's letter was to provide a framework to remove regulatory uncertainties with respect to independent spent fuel storage installation (ISFSI) concrete pad design qualification.

Holtec requested that the Division of Spent Fuel Storage and Transportation (SFST) provide an official position on the Not Important to Safety (NITS) classification of the ISFSI pad and the use of ACI-318 as the design code of reference. Holtec also requested that SFST reaffirm its long standing practice of devolving the authority and responsibility to the selection of design methodology for analyzing NITS structures, systems and components (SSCs), which is not covered in the final safety analysis report (FSAR), to the certificate holder.

The staff agrees that in the Holtec HI-STORM CoC and FSAR, the ISFSI pad is classified as NITS and the use of ACI-318 is allowed. The staff does not think it is appropriate to perform a technical evaluation of the information contained in the appendix through this letter, as such a review would more appropriately be performed under a process such as a certification review or a topical report review.

As a first step toward durable guidance development, Holtec provided an appendix to the letter which defined the 'Essentials of the ISFSI Pad Qualification Requirements per the FSAR'.

Preliminarily, of the eleven items presented in the appendix, SFST staff finds that elements 1, 2, 3, 5, 8, 9, and 11 are technically consistent with what has been reviewed and accepted by SFST in the past and present no safety concern. Elements 4, 6, 7, and 10, would require additional information to fully characterize a technical position.

S. Anton

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The staff would like to discuss these issues further in a public meeting no later than November 30, 2012, to determine the next steps in resolving Holtec's request. If you have any questions or comments with respect to this letter, please contact Mr. Jason Pottter of my staff at 301-492-3286.

Sincerely,

/RA/

Mark Lombard, Director
Division of Spent Fuel Storage and Transportation
Office of Nuclear Material Safety
and Safeguards

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Sincerely,

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Mark Lombard, Director
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Office of Nuclear Material Safety
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