



~~PROPRIETARY~~

Nuclear Innovation
North America LLC
4000 Avenue F, Suite A
Bay City, Texas 77414

August 15, 2013
U7-C-NINA-NRC-130042
REVISION
10 CFR 2.390

U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
One White Flint North
11555 Rockville Pike
Rockville, MD 20852-2738

South Texas Project
Units 3 and 4
Docket Nos. 52-012 and 52-013
Submittal of Technical Report for the Spent Fuel Racks

- References:
1. Letter, Scott Head to Document Control Desk, "Notification of Vendor Change for Spent Fuel Racks," U7-C-NINA-NRC-120071, dated December 6, 2012 (ML12352A364)
 2. Letter, Scott Head to Document Control Desk, "Accelerated Date for Submittal of Topical Reports for the Spent Fuel Racks," U7-C-NINA-NRC-130032, dated May 14, 2013 (ML13155A274)

This revision to the cover letter of U7-C-NINA-NRC-130042 is being submitted to correct an inappropriate designation contained in the original document. Specifically, the original cover letter referred to Holtec Report HI-2135462 as a Topical Report when in fact it is a Technical Report. Corrections of this error are identified by revision bars in the right margin. The remainder of the referenced submittal remains unchanged.

References 1 and 2 informed the NRC staff that Nuclear Innovation North America LLC (NINA) selected Holtec International (Holtec) as the vendor for fulfillment of Combined License (COL) Items related to the Units 3 and 4 Spent Fuel Racks (SFR) and the date for the submittal of a supporting Technical Report. Proprietary and nonproprietary versions of Technical Report, HI-2135462, "Licensing Report for South Texas Project Units 3 & 4 ABWR Spent Fuel Racks," Revision 1, are provided in Attachments 3 and 4, respectively.

Technical Report HI-2135462 provides detailed descriptions and the results of the analyses performed by Holtec that satisfy the requirements of the following COL Items:

DOI
NINA
STI 33733009

COL License Information Item 9.3, as described in Part 2, Tier 2, Subsection 9.1.6.3, "Spent Fuel Storage Racks Criticality Analysis;"

COL License Information Item 9.4, as described in Part 2, Tier 2, Subsection 9.1.6.4, "Spent Fuel Racks Load Drop Analysis;" and,

COL License Information Item 9.7, as described in Part 2, Tier 2, Subsection 9.1.6.7, "Spent Fuel Racks Structural Evaluation."

COL License Information Item 9.8, which is described in Part 2, Tier 2, Subsection 9.1.6.8, "Spent Fuel Racks Thermal-Hydraulic Analysis," requires that a confirmatory thermal-hydraulic analysis be prepared as required by Subsection 9.1.2.1.4, "Thermal-Hydraulic Design." Technical Report HI-2135462 includes thermal-hydraulic analyses performed by Holtec, as described in Part 2, Tier 2, Subsection 9.1.6.8, that demonstrate that the spent fuel rack design described in HI-2135462 is capable of satisfying ITAAC 2.5.6.4.

During development of Technical Report HI-2135462, NINA identified the need for changes to an existing departure, STD DEP 9.1-1, "Update of Fuel Storage and Handling Equipment." The changes to STD DEP 9.1-1 are provided in Attachment 1.

Technical Report HI-2135462 contains information proprietary to Holtec International as indicated by an affidavit signed by Holtec International, the owner of the information. Attachment 3 contains the Holtec International request that this information be withheld from public disclosure pursuant to 10 CFR 2.390 and an accompanying affidavit, AFFI-2294-001, "Affidavit Pursuant to 10 CFR 2.390 for Licensing Report for South Texas Project Units 3 & 4 ABWR Spent Fuel Racks." This affidavit sets forth the basis on which the information in HI-2135462 may be withheld from public disclosure by the Commission and addresses with specificity the considerations listed in paragraph (b)(4) of Section 2.390 of the Commission's regulations. Accordingly, it is respectfully requested that the information that is proprietary to Holtec International (Attachment 4) be withheld from public disclosure in accordance with 10 CFR 2.390 of the Commission's regulations. Correspondence with respect to the proprietary aspects of the item listed above or the supporting Holtec International Affidavit should reference AFFI-2294-001 and should be addressed to Evrim Kalfazade, Project Manager, Holtec International, Holtec Center, 555 Lincoln Drive West, Marlton, NJ 08053.

When separated from the proprietary material in Attachment 4, this letter is not proprietary.

When a change to the COLA is indicated, the change will be incorporated into the next routine revision of the COLA following NRC acceptance of the RAI response.

There are no commitments in this letter.

If there are any questions, please contact me at (979) 316-3011, or Bill Mookhoek at (979) 316-3014.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on 8/15/13



Scott Head
Manager, Regulatory Affairs
NINA STP Units 3 & 4

rhb

Attachments:

1. COLA Changes related to Standard Departure STD DEP 9.1-1, "Update of Fuel Storage and Handling Equipment"
2. Holtec International Affidavit AFFI-2294-01
3. HI-2135462, "Licensing Report for South Texas Project Units 3 & 4 ABWR Spent Fuel Racks," Revision 1 (Non-Proprietary)
4. HI-2135462, "Licensing Report for South Texas Project Units 3 & 4 ABWR Spent Fuel Racks," Revision 1 (Proprietary)

cc: w/o attachment except*
(paper copy)

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