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September 16, 2014

John Goshen, P.E., Project Manager – Licensing Branch  
Division of Spent Fuel Storage and Transportation  
Office of Nuclear Material Safety and Safeguards

U.S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, DC 20555-0001

Docket No. 72-1040  
Certificate of Compliance (CoC) No. 1040  
HI-STORM UMAX Canister Storage System

Subject: Review of HI-STORM UMAX Amendment 0 Certificate of Compliance and SER

Dear Mr. Goshen:

When Holtec International reviewed the Certificate of Compliance (CoC), Appendices and Safety Evaluation Report (SER) for Amendment 0 of the HI-STORM UMAX, published in the Federal Register under Docket ID Number NRC-2014-0120, several errors in those documents were identified. Descriptions of these errors are shown in Attachment 1 of this letter. Note that in Holtec's interpretation, all errors are essentially editorial to ensure consistency with the analyses and the FSAR, and do not affect any technical conclusions. We request that NRC updates the affected documents accordingly.

If you have any questions please contact me at 856-797-0900 ext 3951.

Sincerely,

Kimberly Manzione, PE  
Acting Licensing Manager,  
Holtec International

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cc: (via email)

Ms. Michelle Sampson, USNRC

Mr. Mark Lombard, USNRC

**Attachments:**

Attachment 1: Holtec Comments on HI-STORM UMAX CoC and SER

Holtec Comments on HI-STORM UMAX Proposed CoC and Tech Specs  
Docket ID: NRC-2014-0120

Item	Section	Comment	Justification
1.	Appendix A, Section 1.1, page 1.1-1	The definition of Ambient Temperature should read, "Ambient Temperature of Short Term Operations (operations involving use of the HI-TRAC, a Lifting device, and/or an on-site transport device) is defined as the <b>72</b> hour average of the local temperature as forecast by the National Weather Service"	This change ensures that ambient temperature for short term operations is defined as a 72-hr average which is consistent with the FSAR analyses, as well as with the 3-day (72hr) period described in the CoC Appendix B, Section 3.4, Item 2.
2.	Appendix B, Table 3-1, page 3-13	The row labeled "Rebar Size* (min.) and Layout* (max)" should read "Rebar Size* and Layout* ( <b>nom</b> )"	This change agrees with the HI-STORM UMAX analyses.
3.	SER, Section 4.3, Page 16	The first sentence in Section 4.3 should read "HI-STORM UMAX Canister Storage System materials and components designated as ITS (i.e., required to be maintained within their safe operating temperature ranges to ensure their intended function) are summarized in FSAR Tables <b>2.0.1 through 2.0.6</b> ."	The current reference to Table 2.3.1 for ITS categories is incorrect; the correct reference is to Tables 2.0.1 through 2.0.6.
4.	SER, Section 6.4, Page 28	The third sentence should read, "The maximum dose rate is reported for the side surface of the lid shell, while the dose rate value reported at <b>1.0</b> meter was taken at the middle of the lid shell."	The dose rate value in the middle of the lid shell is the 1.0 meter dose rate, as described in FSAR Section 5.1.3.
5.	SER, Section 6.4, Page 28	The eighth sentence should read, "Dose point #7 is located over an empty VVM located adjacent to <b>four</b> loaded VVMs."	The dose rate reported for point #7 in the HI-STORM UMAX FSAR Section 5.1.3 is calculated based on four loaded VVMs, not one.
6.	SER, Section 6.4, Page 28	The first paragraph, last sentence should read, "The annual dose at 100 meters from a single HI-STORM UMAX VVM is provided in FSAR Table <b>5.1.3</b> ."	Table 5.1.3 is the correct reference for the annual dose at 100 meters.