



December 18, 2014

Mr. Mark Lombard  
Director, Division of Spent Fuel Management  
U.S. Nuclear Regulatory Commission

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

Subject: Exemption Request for Holtec HI-STORM 100 Certificate of Compliance 72-1014

Dear Mr. Lombard:

Attached please find a request for an exemption from the requirements for ASME B&PV Code compliance in the HI-STORM 100 Certificate of Compliance, specifically Section II of the ASME Code. The attached exemption request demonstrates that the use of ASME Code editions 2007 and 2010 for carbon steel material SA-516 / 516M does not endanger life or property or the common defense and security and is otherwise in the public interest.

A similar change will be made in an upcoming Certificate of Compliance amendment request; however, this exemption is necessary for fabrication and loading of storage system to existing amendments.

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

Sincerely,

Kimberly Manzione  
Acting Licensing Manager  
Holtec International

Attachment 1 – Exemption Request for the Use of ASME Code 2007 and 2010 editions, Section II, SA-516/516M

cc: Mr. John Goshen (NRC/SFM)