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List of Approved Spent Fuel Storage Casks - Holtec International HI-STORM 100 Cask System, Amendment No. 8, Revision 1

Comment On: NRC-2014-0233-0001

List of Approved Spent Fuel Storage Casks: Holtec International HI-STORM 100 Cask System, Certificate of Compliance No. 1014, Amendment No. 8, Revision No. 1

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Comment on FR Doc # 2015-02310

Submitter Information

Name: Brian Gutherman

General Comment

I have no comment on the technical content of the revision to the CoC amendment. However, the proposed modification to 10 CFR 72.214 states that Revision 1 of Amendment 8 to the CoC supersedes the original (as corrected) version of the amendment as of the effective date of the revision. This means that only Revision 1 to that amendment is valid for use by general licensees from that effective date forward.

Without an implementation period specified for the revision, general licensees which have previously loaded casks under the initial issue of Amendment 8 or are doing so at the time Revision 1 is effective on April 21, could be considered immediately out of compliance with the conditions of their general license. They would remain out of compliance until their 72.212 Report can be revised to address the changes in Revision 1 and until the CoC holder certifies that any canisters, overpacks, and the transfer cask previously delivered to licensees, and certified to the original issue of Amendment 8, are permitted for use under Revision 1.

To avoid this potential compliance problem and to allow sufficient time for licensees and CoC holders to complete the above actions, I recommend that a 180-day implementation period for CoC revisions (and corrections) be specified either as a condition in the revised/corrected CoC or in the letter issued to the CoC holder confirming the effective date of the revision/correction. This is recommended for all future revisions and corrections to any Part 72 CoCs.