



E-42575  
August 24, 2015

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

Subject: Application for Revision to the Standardized NUHOMS® System – CoC 1004,  
Amendments 0 through 11 and Amendment 13, Docket 72-1004

AREVA Inc. (AREVA) hereby submits an application to revise its Certificate of Compliance (CoC) 1004 for the Standardized NUHOMS® System for all currently approved amendments (Amendment 0 – 11 and 13) as documented in 10 CFR 72.214. Changes are needed to address standalone ISFSI sites preparing for decommissioning who may not have an operational spent fuel pool available. Revisions are required to the technical specifications to remove specific wording requiring a return of the transfer cask (TC) with dry shielded canister (DSC) inside to the spent fuel pool after a drop of over 15 inches. An inspection for damage will be performed with no specific requirement to return the TC/DSC to the spent fuel pool. In addition, clarification is needed for other related technical specifications implying a return to the spent fuel pool.

Approval of this submittal would eliminate the need for a site to maintain a spent fuel pool to meet requirements when operating in accordance with a standalone ISFSI Part 72 licensing basis during the decommissioning phase of operation. If the spent fuel pool is still available, the TC/DSC may be returned to the spent fuel pool. In addition, associated changes are proposed to be made to the final safety analysis report (FSAR) in the next update to revise the licensing basis. These proposed changes to all currently loaded casks will facilitate future decommissioning actions and have no impact on current operations or safety considerations. It is highly unlikely that a DSC will be moved after all fuel has been transferred to the ISFSI. With regard to safety considerations, Section 8.2.5 of the FSAR along with related appendices, concludes that there is no reasonable way for a TC/DSC drop accident to occur. In addition, the bounding FSAR safety analysis for the drop accident demonstrates that all acceptance criteria, including DSC structural integrity, are met for all postulated drop scenarios.

These proposed changes are being made to be consistent with AREVA's other NUHOMS® CoCs (CoC 1029, Amendment 3, ML15054A513 and CoC 1030, Amendment 2, ML14288A500). We are also aware of other standalone ISFSI sites (both site-specific licenses and general licensees using other approved dry cask storage designs) that do not require a return to a spent fuel pool following a cask drop. Approval is needed by October 2016 to support a utility client's licensing actions and removal of their spent fuel pool.

The wording of the affected pages of the technical specifications is similar in all approved amendments. A markup of the proposed technical specification change pages for Amendments 0

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through 11 and Amendment 13 is provided in Enclosures 1 through 13. Markups of the proposed revised FSAR pages are provided in Enclosure 14 for the latest FSAR update (Revision 14).

In order to allow sufficient time to incorporate these changes, we request that the NRC provide a maximum 180-day implementation period after the effective date of the amendment during which the incorporation can be completed and storage operations begun under the revised amendments. Our understanding is that implementation by general licensees will be in accordance with 10 CFR 72.212 and will involve incorporating the changed CoC and associated Technical Specifications, the corresponding revised FSAR as represented by the enclosed markup of FSAR Revision 14, and any necessary changes to site or corporate procedures. As soon as the general licensees have evaluated and incorporated the necessary changes, they can begin using the applicable revised CoC amendments.

A comparison of these proposed FSAR Revision 14 markup pages to similar pages in previous FSAR revisions is included as Enclosure 15 to assist the general licensees in incorporating the necessary changes to their FSAR licensing basis for DSCs loaded under earlier amendments and associated FSAR revisions.

The following enclosures are included:

- Enclosure 1 provides proposed Revision 1 markup pages to the technical specifications for CoC 1004 Amendment 0
- Enclosure 2 provides proposed Revision 1 markup pages to the technical specifications for CoC 1004 Amendment 1
- Enclosure 3 provides proposed Revision 1 markup pages to the technical specifications for CoC 1004 Amendment 2
- Enclosure 4 provides proposed Revision 1 markup pages to the technical specifications for CoC 1004 Amendment 3
- Enclosure 5 provides proposed Revision 1 markup pages to the technical specifications for CoC 1004 Amendment 4
- Enclosure 6 provides proposed Revision 1 markup pages to the technical specifications for CoC 1004 Amendment 5
- Enclosure 7 provides proposed Revision 1 markup pages to the technical specifications for CoC 1004 Amendment 6
- Enclosure 8 provides proposed Revision 1 markup pages to the technical specifications for CoC 1004 Amendment 7
- Enclosure 9 provides proposed Revision 1 markup pages to the technical specifications for CoC 1004 Amendment 8
- Enclosure 10 provides proposed Revision 1 markup pages to the technical specifications for CoC 1004 Amendment 9
- Enclosure 11 provides proposed Revision 1 markup pages to the technical specifications for CoC 1004 Amendment 10
- Enclosure 12 provides proposed Revision 1 markup pages to the technical specifications for CoC 1004 Amendment 11
- Enclosure 13 provides proposed Revision 1 markup pages to the technical specifications for CoC 1004 Amendment 13
- Enclosure 14 provides proposed markup pages to the FSAR from the latest UFSAR update (Revision 14 of the FSAR)

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- Enclosure 15 provides a comparison of the proposed UFSAR Revision 14 markup pages to earlier FSAR revisions

Should you have any questions regarding this submittal, please contact Mr. Dennis Williford by telephone at (704) 805-2223, or by email at [Dennnis.Williford@areva.com](mailto:Dennnis.Williford@areva.com).

Sincerely,



Paul Triska  
Vice President, Technical Services

cc: B. Jennifer Davis (NRC SFM) (one hardcopy and two copies on DVD)

Enclosures:

1. Revision 1 markup pages to CoC 1004 Amendment 0 technical specifications
2. Revision 1 markup pages to CoC 1004 Amendment 1 technical specifications
3. Revision 1 markup pages to CoC 1004 Amendment 2 technical specifications
4. Revision 1 markup pages to CoC 1004 Amendment 3 technical specifications
5. Revision 1 markup pages to CoC 1004 Amendment 4 technical specifications
6. Revision 1 markup pages to CoC 1004 Amendment 5 technical specifications
7. Revision 1 markup pages to CoC 1004 Amendment 6 technical specifications
8. Revision 1 markup pages to CoC 1004 Amendment 7 technical specifications
9. Revision 1 markup pages to CoC 1004 Amendment 8 technical specifications
10. Revision 1 markup pages to CoC 1004 Amendment 9 technical specifications
11. Revision 1 markup pages to CoC 1004 Amendment 10 technical specifications
12. Revision 1 markup pages to CoC 1004 Amendment 11 technical specifications
13. Revision 1 markup pages to CoC 1004 Amendment 13 technical specifications
14. CoC 1004 Updated Final Safety Analysis Report Revision 14 Markup for Revisions to CoC 1004 Amendments 0 to 11, and 13
15. Comparison of the Enclosure 14 Markups of UFSAR Revision 14 Pages 8.2-42 and 9.6-1 to Previous FSAR Revisions

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**Document Components:**

001 Public AREVA Inc. Transmittal Letter.pdf, 712,115 bytes  
002 Public Enc 1 Rev1 Markup TS\_Amd 0.pdf, 4,250,328 bytes  
003 Public Enc 2 Rev1 Markup TS\_Amd 1.pdf, 13,400,296 bytes  
004 Public Enc 3 Rev1 Markup TS\_Amd 2.pdf, 106,503 bytes  
005 Public Enc 4 Rev1 Markup TS\_Amd 3.pdf, 12,722,633 bytes  
006 Public Enc 5 Rev1 Markup TS\_Amd 4.pdf, 12,990,354 bytes  
007 Public Enc 6 Rev1 Markup TS\_Amd 5.pdf, 12,728,682 bytes  
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015 Public Enc 14 Rev1 Markup FSAR\_R14.pdf, 125,887 bytes  
016 Public Enc 15 Comp\_earlier FSAR revs.pdf, 3,266,287 bytes

**OSM#1 (Entire Submittal) (DVD):**

001 Public AREVA Inc. Transmittal Letter.pdf, 712,115 bytes  
002 Public Enc 1 Rev1 Markup TS\_Amd 0.pdf, 4,250,328 bytes  
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