

From: Goshen, John
Sent: Thursday, September 24, 2015 9:27 AM
To: 'Kimberly Manzione'
Cc: Stefan Anton
Subject: RE: RE: HS 100 A9, R1 additional condition.

Kim, I am going to take this message as Holtec's agreement with the new condition 13. You have essentially suggested that the two sentences in the first paragraph be reversed. There were specific reasons that the paragraph started with "The previous version of this certificate, Amendment No. 9, dated March 11, 2014, may continue to be ..." Therefore, we think it would be best to leave the first paragraph as we recommended. Please call me if you have any further questions. Thanks, John

From: Kimberly Manzione [<mailto:K.Manzione@Holtec.com>]
Sent: Thursday, September 24, 2015 12:22 AM
To: Goshen, John
Cc: Stefan Anton
Subject: [External_Sender] RE: HS 100 A9, R1 additional condition.

John,

I think we are in overall agreement. One main comment is on the heading "Continue Use of Previously Loaded Cask." We may have some clients who may be about to load shortly after the revision is effective, and I don't want them to think the implementation period does not apply to them. Can we simply call it, "13. IMPLEMENTATION" or "13. PREVIOUS CERTIFICATE REVISIONS"?

I have also included a few suggested editorial changes to the wording below, but none of these are showstoppers.

Thanks,
Kim

Changes authorized by this revision shall be implemented by the general licensee within 180 days of the revision effective date shown on this certificate. The previous version of this certificate, Amendment No. 9, dated March 11, 2014, may continue to be used until **[insert date 180 days from the effective date of the revised certificate]** to allow *time for* implementation of *changes authorized by this required* revision *changes* and completion of the evaluation described below.

The general licensee shall perform written evaluations before use and before applying the changes authorized by this revised certificate which establish that the cask, once loaded with spent fuel or once the changes authorized by this revised certificate have been applied will conform to the terms, conditions, and specifications of this revised certificate. The results of this review shall be documented in accordance with 10 CFR 72.212(b)(5) and completed by **[insert date 180 days from the effective date of the revised certificate]**.

In applying the changes authorized by this revised certificate, the general licensee shall register each such cask with the Nuclear Regulatory Commission no later than 30 days after applying the changes authorized by the revised certificate. The registration shall include the information required by 10 CFR 72.212(b)(2).

From: Goshen, John [<mailto:John.Goshen@nrc.gov>]
Sent: Monday, September 21, 2015 3:02 PM
To: Kimberly Manzione
Subject: HS 100 A9, R1 additional condition.

Kimberly, the staff is proposing the following condition to be added. A similar condition will be added for revisions in the future. Please provide your comments on the following: Thanks,

13 CONTINUED USE OF PREVIOUSLY LOADED CASK

The previous version of this certificate, Amendment No. 9, dated March 11, 2014, may continue to be used until **[insert date 180 days from the effective date of the revised certificate]** to allow implementation of required revision changes and completion of the evaluation described below. Changes authorized by this revision shall be implemented by the general licensee within 180 days of the revision effective date shown on this certificate.

The general licensee shall perform written evaluations before use and before applying the changes authorized by this revised certificate which establish that the cask, once loaded with spent fuel or once the changes authorized by this revised certificate have been applied will conform to the terms, conditions, and specifications of this revised certificate. The results of this review shall be documented in accordance with 10 CFR 72.212(b)(5) and completed by **[insert date 180 days from the effective date of the revised certificate]**.

In applying the changes authorized by this revised certificate, the general licensee shall register each such cask with the Nuclear Regulatory Commission no later than 30 days after applying the changes authorized by the revised certificate. The registration shall include the information required by 10 CFR 72.212(b)(2).

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