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# PUBLIC SUBMISSION

**Docket:** NRC-2015-0134

List of Approved Spent Fuel Storage Casks - Holtec International HI-STORM Flood/Wind Storage Cask System, Amendment 0, Revision 1

**Comment On:** NRC-2015-0134-0002

List of Approved Spent Fuel Storage Casks: Holtec International, HI-STORM Flood/Wind Multipurpose Storage System, Certificate of Compliance No. 1032, Amendment No. 0, Revision 1; Proposed Rule

**Document:** NRC-2015-0134-DRAFT-0013

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## General Comment

On Appendix A Technical Specifications page 3.1.2-2 it states: For OVERPACKS with installed temperature monitoring equipment, verify that the difference between the average OVERPACK air outlet temperature and ISFSI ambient temperature is 139 degrees F for OVERPACKS containing PWR MPCs, 136 degrees F for OVERPACKS containing BWR MPCs.

The 139 degrees F is not shown as a revision. However, on previous CoC 1032 approvals this temperature is listed as 137 degrees F. Which is correct and what is the implication of this difference?

Also, with an underground system, such as the Holtec HI-STORM UMAX, how relevant is ambient temperature as it relates to this requirement? Was this condition analyzed for UMAX system?