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

Comment On: NRC-2015-0134-0001

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; Direct Final Rule

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General Comment

Does this change address the impact of using the HI-STORM FW system MPC-37 in the HI-STORM UMAX underground canister system?

Regarding the Holtec application statement: "Change #5 limits the use of vacuum drying to casks at lower heat loads. The supporting analyses show that the current limit is acceptable for the use of vacuum drying, however, for having more margin and flexibility to implement changes under the 10 CFR 72.48 process, Holtec requests the change to lower the MPC heat load for vacuum drying", please explain the additional "flexibility to implement changes under the 10 CFR 72.48 process". What specific additional flexibility does this relate to?

Does this change allow MPC-37 canister thickness increases (such as a change from 0.5" to 0.625" proposed for San Onofre) without requiring a license amendment?

Does this change address the impact of using the HI-STORM FW system MPC-37 in the HI-STORM UMAX underground canister system with the proposed San Onofre configuration of only installing 1/2 underground? If not, would a license amendment be required for that proposed configuration?

