

Attachment 1 to Holtec Letter 5018042

Amendment Request 1032-3, REVISION 0

SUMMARY OF PROPOSED CHANGES

All changes to the CoC are marked in the subsequent attachments. Changes that have occurred as part of prior applications are not marked as changes.

Proposed Change #1

Inclusion of burnup credit for the MPC-37.

Reason for Proposed Change #1

This proposed change allows burnup credit for storage of fuel in the HI-STORM FW System.

Justification for Proposed Change #1

The burnup credit evaluation has previously been submitted to the NRC as part of the application for the HI-STAR 190 transportation cask. This application simply applies the same methodology to the fuel to be stored in the same canister. Proposed changes to the CoC, both Appendix A and Appendix B are enclosed. The HI-STORM FW FSAR Chapters 6 and 11 have been updated accordingly.

Proposed Change #2

It is proposed to revise the helium leak testing of the confinement boundary welds to be performed on statistical basis.

Reason for Proposed Change #2

The helium testing of the Confinement boundary welds, having been established to be redundant (and unnecessary to ensure confinement integrity) through testing of over 700 MPCs, is being proposed to be performed on a statistical basis in the same manner as the mechanical properties of Metamic-HT are tested. The testing of the thick closure lid as a helium blockage boundary is removed as it is evidently unnecessary. This manufacturing update will eliminate several heavy load handling evolutions in the shop with its attendant personnel safety implications

Justification for Proposed Change #2

As stated above, the confinement boundary testing of over 700 MPCs has shown no leakage. MPC leak test data is provided as justification for the change. FSAR Chapter 10 has been revised to document the statistical testing plan

Proposed Change #3

It is proposed to remove the requirement to hydrostatically test the MPC with loaded fuel.

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Reason for Proposed Change #3

The hydrostatic test of the MPC with loaded fuel is a contributor of dose to the loading crew, and over 700 loadings have provided no evidence of a leak.

Justification for Proposed Change #3

As stated above, the hydrostatic testing of over 700 MPCs has shown no leakage. FSAR Chapters 8 and 9 have been revised accordingly. The ASME code exception table has also be updated accordingly.

Proposed Change #4

The Condition 8 Airflow Test wording has been revised.

Reason for Proposed Change #4

The revised Condition 8 wording provides a more technically feasible test which should provide data with less uncertainty.

Justification for Proposed Change #4

The revised wording is in accordance with the revised wording in the HI-STORM 100 CoC, Amendment 10.