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January 29, 2016

Mr. Mark Lombard
Division of Spent Fuel Management
Office of Nuclear Material Safety and Safeguards

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555-0001

Docket No. 72-1014, Certificate of Compliance (CoC) No. 1014

Subject: Holtec International HI-STORM 100 Multipurpose Canister Storage System
Amendment Request 1014-11

Dear Mr. Lombard:

We request SFST's kind attention to the above-referenced licensing amendment request (LAR # 11) for the HI-STORM 100 system. The safety evaluation material to support this LAR is contained in the Proposed Revision 13 (PR-13) to the system FSAR whose affected pages are herewith in Attachment 5.

This LAR is rather modest in scope as it is limited to addressing the needs of our HI-STORM users and to updating certain long overdue manufacturing and site loading activities. The proposed changes in the manufacturing and site loading process are supported by an extensive body of corroborating evidence accumulated over the past 15 years.

As the slenderness of the affected FSAR material in Attachment 5 indicates, the safety case for the proposed changes is quite straightforward requiring minimal computer-aided analysis. We request an expedited review of the changes proposed in this application because the principal changes deal with the need:

1. for an expedited refueling of Vermont Yankee,
2. for improving ALARA at our users' nuclear plants through reduced human activity near the loaded canisters,
3. for enhancing worker safety in our manufacturing plant through reduced handling of heavy loads and,



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4. for alleviating an unnecessary surveillance burden on owners of ISFSI sites prone to unfavorable weather conditions periodically.

A complete listing of the changes for this amendment, including minor clarifications, is provided in the summary of proposed changes (SOPC), with more detailed description of the changes, reason for the changes and justification for the changes. The SOPC is provided in Attachment 1. Attachments 2 through 4 contain changes for the CoC and its appendices. Attachment 5 provides the proposed changed pages of the HI-STORM 100 FSAR, which supports the LAR. All proposed changes in Attachments 2 through 5 are provided in mark-up format to facilitate the Staff's review. Note that the marked changes are only those associated with LAR 1014-11. Changes associated with previous amendments or revisions to amendment, up to and including HI-STORM 100 Amendment 10, are included but not marked as changes, since that LAR request is awaiting publication in the federal register.

If you have any questions please contact me at 856-797-0900 ext 3844.

Sincerely,

A handwritten signature in cursive script, appearing to read "Royston Ngwayah".

Royston Ngwayah
Licensing Engineer,
Holtec International

cc: (via email)
Ms. Michelle Sampson, USNRC
Mr. Jose Cuadrado, USNRC

Attachments:
Attachment 1: Scope of Proposed Changes for HI-STORM 100 LAR 1014-11
Attachment 2: Proposed CoC 1014 Amendment 11
Attachment 3: Proposed CoC 1014 Amendment 11 Appendix A
Attachment 4: Proposed CoC 1014 Amendment 11 Appendix B
Attachment 5: HI-STORM 100 FSAR Proposed Changed pages