



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

**PRELIMINARY SAFETY EVALUATION REPORT
AREVA INC.
STANDARDIZED NUHOMS® STORAGE SYSTEM
DOCKET NO. 72-1004
REVISION NO. 1 TO INITIAL CERTIFICATE, AMENDMENT NOS. 1 - 11, AND
AMENDMENT NO. 13**

Summary

This safety evaluation report (SER) documents the U.S. Nuclear Regulatory Commission (NRC) staff's review and evaluation of a revision to the Initial Certificate (Amendment No. 0), Amendments Nos. 1 through 11, and Amendment No. 13 to Certificate of Compliance (CoC) No. 1004 for the Standardized NUHOMS® Horizontal Modular Storage System for Irradiated Nuclear Fuel (NUHOMS®). By application dated August 24, 2015 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML15239A718), as supplemented on February 9, 2016 (ADAMS Accession Nos. ML16054A214 and ML16054A226), the cask vendor, AREVA Inc. (AREVA), submitted a request to the NRC in accordance with Title 10 of the *Code of Federal Regulations* (10 CFR) 72.244 to revise Certificate of Compliance No. 1004.

AREVA requested the following changes:

- Remove language in the technical specifications (TSs) that require a transfer cask (TC) containing a dry shielded canister (DSC) be returned to the spent fuel pool following a drop of over 15 inches, and instead permit the general to determine the best available option for inspection of the TC/DSC by either returning it to the spent fuel pool or an alternate means if a spent fuel pool is not available, and
- Clarify other language in the TSs that requires a TC be returned to the spent fuel pool for other reasons as stated in the TSs.

AREVA Inc. provided detailed information on its corporate reorganization within the U.S. by letter dated January 27, 2014 (see ADAMS Accession No. ML14030A373). Transnuclear Inc., the certificate holder for these revisions, was dissolved and became part of AREVA NP Inc. as part of the reorganization. Transnuclear, Inc. was renamed AREVA Inc. At all times, the ultimate parent company has remained AREVA SA. No change to the ultimate control by AREVA Inc. was made. Transnuclear, Inc.'s operations were not substantially changed, they were only moved to another affiliate company with the same ultimate parent company.

AREVA Inc. recognized that all the CoCs for the NUHOMS® No. 1004 cask system issued under 10 CFR Part 72 need to be revised to reflect issuance to AREVA Inc., the certificate holder. AREVA's notification to the NRC of its corporate reorganization indicated that all CoCs for No. 1004, issued to VECTRA Technologies, Inc., (a.k.a. Pacific Nuclear Fuel Services, Inc.), Transnuclear West Inc., and Transnuclear, Inc., should be reissued in the name of AREVA Inc., at its address in Columbia, MD.

The revised certificates of compliance, when codified through rulemaking, will be denoted as:

Initial Certificate Effective Date: January 23, 1995, superseded by Initial Certificate, Revision 1, on [insert 90 days from date of FR publication].

Initial Certificate, Revision 1, Effective Date: [insert 90 days from date of FR publication].

Amendment Number 1, Revision No. 1 Effective Date: [insert 90 days from date of FR publication].

Amendment Number 2, Revision No. 1 Effective Date: [insert 90 days from date of FR publication].

Amendment Number 3, Revision No. 1 Effective Date: [insert 90 days from date of FR publication].

Amendment Number 4, Revision No. 1 Effective Date: [insert 90 days from date of FR publication].

Amendment Number 5, Revision No. 1 Effective Date: [insert 90 days from date of FR publication].

Amendment Number 6, Revision No. 1 Effective Date: [insert 90 days from date of FR publication].

Amendment Number 7, Revision No. 1 Effective Date: [insert 90 days from date of FR publication].

Amendment Number 8, Revision No. 1 Effective Date: [insert 90 days from date of FR publication].

Amendment Number 9, Revision No. 1 Effective Date: [insert 90 days from date of FR publication].

Amendment Number 10, Revision No. 1 Effective Date: [insert 90 days from date of FR publication].

Amendment Number 11, Revision No. 1 Effective Date: [insert 90 days from date of FR publication].

Amendment Number 13, Revision No. 1 Effective Date: [insert 90 days from date of FR publication].

The CoC for each amendment and the associated TSs completely supersede the previous version of the certificate and TSs. Table 1.1 lists each standalone certificate and ADAMS accession number for each certificate.

In reviewing the revision request, NRC staff identified administrative and formatting changes in the TSs, which are identified in Section 13.2, Administrative Changes.

The original expiration date for Amendment No. 0 was incorrectly listed as January 31, 2015, on the certificate. The expiration date for the CoC was revised to read January 23, 1995, by Amendment No.1 on April 27, 2001.

Table 1.1: List of Amendments to be Revised

Amendment No.	Effective Date	ADAMS Accession No.
Initial Certificate (Amendment 0)	January 23, 1995	ML033020053
Amendment 1	April 27, 2000	ML003704754
Amendment 2	September 5, 2000	ML003730072
Amendment 3	September 12, 2001	ML012620111
Amendment 4	February 12, 2002	ML020640202
Amendment 5	January 7, 2004	ML040150834
Amendment 6	December 22, 2003	ML040120831
Amendment 7	March 2, 2004	ML040640919
Amendment 8	December 5, 2005	ML053390278
Amendment 9	April 17, 2007	ML071070570
Amendment 10	August 24, 2009	ML092290186
Amendment 11	January 7, 2014	ML14010A484
Amendment 12*	N/A	N/A
Amendment 13	May 24, 2014	ML14153A573

*Amendment application was withdrawn.

The applicant requested a revision of the CoCs, rather than an amendment of the CoCs. AREVA believes that a revision is the proper mechanism to effect these changes for the following reasons:

- All 18 general licensees currently storing spent fuel in casks certified under CoC No. 1004 advised the NRC in writing that they do not object to this revision (see ADAMS Accession No. ML16054A226);
- the requested changes to the CoCs under this revision will not impact the current operations or safety considerations of the NUMOMS® storage system;
- the physical design of the NUHOMS® storage system will not be changed by this revision;
- no new systems, structures, or components (SSCs) will be added to CoC No. 1004 as part of this revision;
- the proposed changes will make the CoC No. 1004 consistent with AREVA's certificates for the Standardized Advanced NUHOMS® (CoC No. 1029) and the NUHOMS® HD (CoC No.1030), and
- the requested changes are applicable to all amendments for CoC No. 1004.

The staff has provided a certificate condition that authorizes the continued use of the initial issuance of each amendment for up to 180 days, following the effective date of the revision. The condition also provides a general licensee up to 180 days to implement any changes authorized by this revision and to update the 10 CFR 72.212 evaluation required by the new condition.

The NRC staff's review of the revision request applied the guidance in NUREG-1536, "Standard Review Plan for Dry Cask Storage Systems," Rev. 1, dated July 2010. Based on its review of the statements and representations in AREVA's application, as supplemented, and the conditions specified in the CoCs and the corresponding TSs, the staff concludes that the requested changes meet the requirements of 10 CFR Part 72.

The NRC staff concludes that its findings in the areas of shielding, criticality, materials, acceptance test and maintenance program, radiation protection, and accident analyses that were published in prior safety evaluation reports are not affected by the CoC revisions.

1.0 GENERAL DESCRIPTION

The revisions requested by AREVA do not affect the system general description and do not alter the staff's previous evaluation of the general description of the Standardized NUHOMS® storage system. Therefore, the staff did not reevaluate this area for this revision request.

2.0 PRINCIPAL DESIGN CRITERIA

2.1 Review Objective

The objective of evaluating the principal design criteria related to structures, systems, and components (SSCs) important to safety is to ensure that, in the view of the NRC staff, the principal design criteria comply with the relevant general criteria established in 10 CFR Part 72, "Licensing Requirements for the Independent Storage of Spent Nuclear Fuel, High-Level Radioactive Waste and Reactor-Related Greater Than Class C Waste."

2.2 Operating Procedures

AREVA states in its application that

"it is highly unlikely that a DSC will be moved after all fuel has been transferred to the independent spent fuel storage installation (ISFSI). With regard to safety considerations, Section 8.2.5 of the final safety analysis report (FSAR) (see ADAMS Accession No. ML16088A172), along with related appendices, concludes that there is no reasonable way for a TC/DSC drop accident to occur."

The NRC staff recognizes that at some future time the spent fuel will be removed from the ISFSI. The conditions for a TC/DSC drop accident will not exist at the ISFSI from the time the DSCs are placed into the horizontal storage modules on the ISFSI pad until the spent fuel is moved into a package for transport to an offsite location. As part of the preparation for the transport of the spent fuel, NRC-approved transportation packaging will be available onsite. Transportation packaging is designed specifically to provide containment of spent fuel in the event of a drop. In its application for the revision to its CoCs, AREVA identifies that "the bounding analysis in the FSAR for an 80-inch drop accident demonstrates that all acceptance criteria, including DSC structural integrity, are met for all postulated drop scenarios."

2.3 Evaluation Findings

F2.1 The staff concludes that the principal design criteria identified in AREVA's revision request meet the regulatory requirements of 10 CFR Part 72. This finding is based on a review of the regulation itself, appropriate regulatory guides, applicable codes and standards, and accepted engineering practices. The staff's findings are detailed in its evaluation of the design criteria and its assessment of compliance with those criteria presented in Chapters 3 through 14 of the SER.

3.0 STRUCTURAL EVALUATION

The changes to the TSs proposed by AREVA for Amendments Nos. 0 through 11 and Amendment No. 13 are presented in Enclosures 1 through 13 to AREVA's application. The current TSs require that the TC containing a DSC be returned to the spent fuel pool following a drop of over 15 inches. AREVA seeks the addition of an alternative method to evaluate the integrity of a canister after a drop of up to 80 inches. AREVA provided technical support that the addition of an alternative method in the TS will not diminish safety.

The NRC staff evaluated the postulated drop scenarios for spent fuel loaded in TC/DSC described by AREVA in its application, and finds in general, that it is unlikely that a DSC will be moved after spent fuel has been transferred to the ISFSI. AREVA's FSAR and its appendices do not identify how a TC/DSC drop accident that falls within the design basis could occur. The NRC staff previously reviewed the FSAR evaluation of a drop accident from a height of 80 inches, which is the maximum lifting height permitted in the TSs. The staff finds that all acceptance criteria, including DSC structural integrity, are met for all postulated drop scenarios. The revised TSs provide that when a spent fuel pool is available, the TC/DSC will be returned to the spent fuel pool for inspection after a drop of over 15 inches. In the alternative, when a spent fuel pool is unavailable, the revised TSs will require the licensee to evaluate the canister by means other than placing it into the spent fuel pool. In either case, the revised TSs require that the DSC and TC be inspected for damage and evaluated for further use.

AREVA's proposed changes to the TSs apply to the handling of a TC loaded with a DSC when moved to or from the storage pad.

Evaluation Findings:

- F3-1 The staff determined there are no significant structural issues with the proposed revisions in TSs. The staff accepts the TSs changes, as marked up by the applicant in AREVA's submittal dated August 24, 2015.
- F3-2 The staff concludes that the structural design of the Standardized NUHOMS® storage system is in compliance with the applicable design and acceptance criteria of 10 CFR Part 72. The structural design provides reasonable assurance that the storage system will allow safe storage of spent fuel. The staff reached its finding after a review of the regulation and the appropriate regulatory guides, and an analysis of the applicable codes and standards and accepted engineering practices.

4.0 THERMAL EVALUATION

AREVA's application states that (a) an evaluation of an 80-inch drop of a TC/DSC, demonstrates the structural integrity of the DSC inside the TC is sustained without breaching the confinement boundary, (b) that the 80-inch drop evaluation was analyzed and approved by NRC, and (c) the bounding FSAR safety analysis for the drop accident demonstrates that all acceptance criteria, including DSC structural integrity, are met for all postulated drop scenarios and (d) if needed, an alternative method to reduce the cask temperature will be employed, when a spent fuel pool is unavailable.

The staff's review of the drop evaluation finds that the helium remains confined within the DSC after an 80-inch drop. The staff also finds that heat removal capability of the TC/DSC is maintained after a drop, that the heat load decreases with time after placement into storage, and heat load continues to decrease throughout the storage period. The staff concludes that

TC/DSC temperatures are bounded by the TC/DSC thermal analysis during loading and immediately after placement into storage. The staff evaluated and approved the thermal analysis as part of its reviews of the amendments listed in Table 1.1. The staff also finds that because decay heat decreases during storage, fuel cladding and TC/DSC component temperatures will remain below the corresponding temperature limits provided in the FSAR, after placement into storage.

- F4-1 The Standardized NUHOMS® storage system's heat-removal capability is reliable and verifiable, and important to safety. The cask design provides adequate heat removal capacity without the use of active cooling systems.
- F-2 The staff concludes that the thermal design of the NUHOMS® storage system complies with 10 CFR Part 72. In addition, the staff finds the thermal acceptance criteria described in the FSAR have been satisfied. AREVA's evaluation of the thermal design presented in the FSAR provides reasonable assurance that the NUHOMS® storage system will safely store spent fuel. The staff's finding is reached on the basis of a review of the regulation itself, appropriate regulatory guides, applicable codes and standards, and accepted engineering practices.

5.0 SHIELDING EVALUATION

The revisions requested by AREVA do not affect the shielding performance and do not alter the staff's previous shielding evaluation of the Standardized NUHOMS® storage system. Therefore, the staff did not reevaluate this area for this revision request.

6.0 CRITICALITY EVALUATION

The revisions requested by AREVA do not affect the criticality analyses of the system and do not alter the staff's previous criticality evaluation of the Standardized NUHOMS® storage system. Therefore, the staff did not reevaluate this area for this revision request.

7.0 CONFINEMENT EVALUATION

The staff analyzed and approved the applicant's TC/DSC drop evaluations as part of its reviews of the amendments listed in Table 1.1. The staff confirmed that a TC/DSC drop over a range of 15 to 80 inches is bounded by the applicant's evaluation of an 80-inch drop. An 80-inch drop will not breach the confinement boundary. The TSs for all amendments to the CoC stipulate the maximum lifting height of a TC/DSC is less than 80 inches. The staff concludes that the confinement function of a TC/DSC will not be significantly reduced by a drop over 15 inches, but less than 80 inches.

8.0 MATERIALS EVALUATION

The revisions requested by AREVA do not affect the materials of the system and do not alter the staff's previous materials evaluations of the Standardized NUHOMS® storage system. Therefore, the staff did not reevaluate this area for this revision request.

9.0 OPERATING PROCEDURES EVALUATION

The revisions requested by AREVA do not affect the operating procedures of the system, other than as discussed in Section 2.0, and do not alter the staff's previous operating procedures

evaluations of the NUHOMS® storage system. Therefore, the staff did not reevaluate this area for this revision request.

10.0 ACCEPTANCE TESTS AND MAINTENANCE PROGRAM EVALUATION

The revisions requested by AREVA do not affect the acceptance tests and maintenance programs of the system and do not alter the staff's previous evaluations of the acceptance tests and maintenance programs of the NUHOMS® storage system. Therefore, the staff did not reevaluate this area for this revision request.

11.0 RADIATION PROTECTION EVALUATION

The revisions requested by AREVA do not affect the radiation protection components of the system and do not alter the staff's previous evaluations of radiation protection of the NUHOMS® storage system. Therefore, the staff did not reevaluate this area for this revision request.

12.0 ACCIDENT ANALYSIS EVALUATION

The revisions requested by AREVA do not affect the accident analyses of this system and do not alter the staff's previous evaluations of the accident analyses of the NUHOMS® storage system, as all other accidents are bounded by the previous accident analyses. Therefore, the staff did not reevaluate this area for this revision request.

13.0 TECHNICAL SPECIFICATIONS AND OPERATING CONTROLS AND LIMITS EVALUATION

This section describes the additions and changes to the CoC, its conditions, and the technical specifications for the initial CoC No. 1004 and the subsequent amendments, as a result of this review.

13.1 Requested changes

The applicant requested technical specification changes to:

- Remove language in the TSs that require a TC containing a DSC be returned to the spent fuel pool following a drop of over 15 inches, and instead permit the general to determine the best available option for inspection of the TC/DSC by either returning it to the spent fuel pool or an alternate means if a spent fuel pool is not available, and
- Clarify other language in the TSs that requires a TC be returned to the spent fuel pool.

Revision No. 1 of these revised certificates contains a new condition that authorizes general licensees to continue to use the previous version of their certificate for up to 180 days from the effective date of Revision 1. This period provides general licensees time to implement any changes authorized by this revision and to update the 10 CFR 72.212 evaluation required by the new condition. In addition, the new condition stipulates a general licensee shall register each such cask with the NRC no later than 30 days after applying the changes authorized by the revised certificate, referring to the language at 10 CFR 72.212(b)(2).

Under the new condition, general licensees must be in compliance with either Revision 0 or Revision 1 of the applicable amendment to CoC No. 1004. The NRC concludes that because all prior-approved amendments of CoC No. 1004 were found to comply with the NRC's regulations, allowing the 180-day implementation period continues to ensure protection of public health and safety, because general licensees.

In addition, all revised amendments now identify the certificate holder as AREVA Inc. The certificate holder's address in Amendment Nos. 0 through 7 is changed to AREVA TN's main office in Columbia, MD.

13.2 Administrative Changes

Administrative and formatting changes to the CoCs and the associated TSs have also been made by the staff. The changes do not substantively revise the text of the TSs. On the first page of each certificate the amendment number of the CoC and its effective date, the amendment revision number and its effective date, and whether the certificate has been renewed are now shown.

Administrative and formatting changes have been made to the initial CoC and each amendment the corresponding TSs.

1. Initial certificate of compliance

The following changes were made to the initial CoC:

- The CoC is reformatted to use the current CoC format,
- The date of the certificate expiration was corrected to January 23, 2015,
- The terms "dry shielded canister," "pressurized-water reactor," and "boiling-water reactor" are spelled out in condition 5.a., instead of just using the abbreviation,
- The term U.S. is added in front of the Nuclear Regulatory Commission and the term "safety evaluation report" is spelled out in the first paragraph of condition 5.b., and
- In the second paragraph of Condition 5.b., the term "dry shielded canister" and the parentheses around (DSC) are deleted, because the term is defined in condition 5.a.

The following changes were made to the TSs:

- added "Amendment No. 0" and "Revision No. 1" to the front page,
- added the phrase "Docket No." in front of 72-1004 on the front page,
- added to the footer on each page are the certificate of compliance number, the amendment number, and the revision number, and
- the first line on page A-6 is revised to read "... a DSC..." instead of "... an DSC..."

2. Amendment No. 1

The following changes were made to the CoC for Amendment No. 1:

- The terms “dry shielded canister,” “pressurized-water reactor,” and “boiling-water reactor” are written out in condition 5.a., in place of the abbreviation,
- The term U.S. is added in front of the Nuclear Regulatory Commission and the term safety evaluation report is written out in the first paragraph of condition 5.b., and
- In the second paragraph of Condition 5.b. the term “dry shielded canister” and the parentheses around (DSC) are deleted, because the term is defined in condition 5.a.

The following changes were made to the TSs:

- added the Amendment No. and “Revision No. 1” to the front page,
- added the phrase “Docket No.” in front of 72-1004 on the front page,
- added to the footer on each page are the certificate of compliance number, the amendment number, and the revision number, and
- the first line on page A-6 is revised to read “... a DSC...” in place of “... an DSC....”

3. Amendment No. 2

No administrative changes were made to the CoC for Amendment No. 2.

The following administrative changes were made to the TSs:

- added “Revision No. 1” to the front page,
- added “No.” between the words Docket and 72-1004 on the front page, and
- added to the footer on each page the certificate of compliance number, the amendment number, and the revision number.

4. Amendment No. 3

No administrative changes were made to the CoC for Amendment No. 3.

The following administrative changes were made to the TSs:

- added “Revision No. 1” to the front page,
- added to the footer on each page are the certificate of compliance, the amendment number, and the revision number,
- added “No.” between the words Docket and 72-1004 on the front page,
- Table 1.3.1 is reformatted to fit on a single page. Two surveillance or monitoring actions both numbered 13 in the table are changed to numbers 13 and 14 and the subsequent items are renumbered, and
- the word “that” in TS 1.2.14 is changed to “than.” The TS now reads “The ambient temperature for transfer operations of a loaded TC/DSC shall not be greater than 100°F (when cask is exposed to direct insolation).”

5. Amendment No. 4

No administrative changes were made to the CoC.

The following administrative changes were made to each of the TSs:

- added “Revision No. 1” to the front page,
- added “No.” between the words Docket and 72-1004 on the front page,
- added to the footer on each page are the certificate of compliance, the amendment number, and the revision number, and
- the word “that” in TS 1.2.14 is changed to “than,” to read “The ambient temperature for transfer operations of a loaded TC/DSC shall not be greater than 100°F (when cask is exposed to direct insolation).”

6. Amendment Nos. 5 through 7

No administrative changes were made to the CoCs.

The following administrative changes were made to each of the TSs:

- added “Revision No. 1” to the front page,
- added “No.” between the words Docket and 72-1004 on the front page,
- added to the footer on each page the certificate of compliance, the amendment number, and the revision number,
- changed “a” to “an” in last bullet of Tables 1-2e and 1-2j, to read “...is acceptable for storage after an eight-year cooling time ...,” and
- the word “that” in TS 1.2.14 is changed to “than,” to read “The ambient temperature for transfer operations of a loaded TC/DSC shall not be greater than 100°F (when cask is exposed to direct insolation).”

7. Amendment Nos. 8 and 9

No administrative changes were made to the CoCs.

The following administrative changes were made to each of the TSs:

- added “Revision No. 1” to the front page,
- added “No.” between the words Docket and 72-1004 on the front page,
- added to the footer on each page the certificate of compliance, the amendment number, and the revision number,
- added the word “be” before “increased” in Tables 1-1p and d1-1q, the TSs now reads “...shall be increased by 50 ppm...,”
- changed “a” to “an” in last bullet of Tables 1-2e and 1-2j, to read “...is acceptable for storage after an eight-year cooling time ...,” and
- the word “that” in TS 1.2.14 is changed to “than,” to read “The ambient temperature for transfer operations of a loaded TC/DSC shall not be greater than 100°F (when cask is exposed to direct insolation).”

8. Amendment No. 10

No administrative changes were made to the CoC.

The following administrative changes were made to each of the TSs:

- added “Revision No. 1” to the front page,
- added “No.” between the words Docket and 72-1004 on the front page,

- added to the footer on each page the certificate of compliance number, the amendment number, and the revision number,
- added the word “be” before “increased” in Tables 1-1p and 1-1q, the TSs now to reads “...shall be increased by 50 ppm...,”
- changed “a” to “an” in last bullet of Tables 1-2e and 1-2j, the TSs now reads “...is acceptable for storage after an eight-year cooling time ...,”
- the word “an” is changed to “a” in the fourth bullet on Page A-79, to read “Fuel with a lattice average initial enrichment...,” and
- the word “that” in TSs 1.2.14 and 1.2.14a is changed to “than,” to read “The ambient temperature for transfer operations of a loaded TC/DSC shall not be greater than 100°F (when cask is exposed to direct insolation).”

9. Amendment No. 11

No administrative changes were made to the CoC.

The following administrative changes were made to each of the TSs:

- added “Revision No. 1” to the front page,
- added “No.” between the words Docket and 72-1004 on the front page,
- added to the footer on each page the certificate of compliance number, the amendment number, and the revision number,
- added the word “be” before “increased” in Table 1-1q1 to read “...shall be increased by 50 ppm...,” and
- the word “an” is changed to “a” in the fourth bullet on Page T-68 to read “Fuel with a lattice average initial enrichment....”

10. Amendment No. 13

No administrative changes were made to the CoC. The following administrative changes were made to each of the TSs:

- added “Revision No. 1” to the front page,
- added “No.” between the words Docket and 72-1004 on the front page,
- added to the footer on each page the certificate of compliance number, the amendment number, and the revision number, and
- the word “an” is changed to “a” in the fourth bullet on Page T-86 to read “Fuel with a lattice average initial enrichment....”

13.3 Evaluation Findings

F13.1 The staff concludes that the conditions for use for the NUHOMS® storage system identify necessary technical specifications to satisfy 10 CFR Part 72 and that the applicable acceptance criteria have been satisfied. The proposed TSs provide reasonable assurance that the dry storage system allows safe storage of spent fuel.

14.0 QUALITY ASSURANCE EVALUATION

The purpose of this review and evaluation is to determine whether AREVA has a quality assurance program that complies with the requirements of 10 CFR Part 72, Subpart G. The staff reviewed and accepted AREVA’s quality assurance program described in its original

application for a certificate of compliance and subsequent amendments. The application for Revision No. 1 to CoC No. 1004, Amendments Nos. 0 through 11 and Amendment No. 13, for the NUHOMS® storage system does not introduce changes in AREVA's quality assurance program.

15.0 CONCLUSION

The staff performed a detailed safety evaluation of the application for Revision No. 1 of the initial and all amendments to CoC No. 1004 for the NUHOMS® storage system. The staff performed the review in accordance with the guidance in NUREG-1536, "Standard Review Plan for Dry Cask Storage Systems," Rev. 1, dated July 2010. Based on its evaluation of the statements and representations in the application, as supplemented, and the conditions established in the CoCs and their TSs, as well as the new conditions proposed for the revised CoCs and associated appendices), the staff concludes that the NUHOMS® storage system, as revised, meets the requirements of 10 CFR Part 72.

Issued with CoC No. 1004, Amendment Nos. 0 through 11, and 13, Revision No. 1, on
