Attachment 1 to Holtec Letter 5018043

Amendment Request 1032-4, 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

Addition of MPC-31C and MPC-32ML

Reason for Proposed Change #1

MPC-31 allows for storage of VVER fuel and the MPC-32ML allows for storage of certain Westinghouse fuel assemblies.

Justification for Proposed Change #1

The new MPC baskets have been designed to utilize the same enclosure vessel as the MPC-37 and MPC-89 previously certified for storage in the HI-STORM FW system, and also utilize the same Metamic-HT neutron absorber. The MPC-31C and MPC-32ML have been evaluated against the previously certified MPCs and the HI-STORM FW FSAR has been updated to identify if the existing analyses are bounding or if new analyses have been performed. These canisters and their respective approved contents have also been added to the draft CoC.

Proposed Change #2

Allow for gadolinium credit for certain BWR fuel assemblies.

Reason for Proposed Change #2

The gadolinium credit allows storage of BWR fuel with a greater maximum fuel enrichment limit.

Justification for Proposed Change #2

The restrictions for gadolinium credit are outlined in the proposed HI-STORM FW FSAR Chapter 2, as well as the draft Appendix B to the CoC. These restrictions have been evaluated for their impact on criticality, as described in Chapter 6. Users of the HI-STORM FW System that meet these restrictions can load the identified BWR fuel with higher maximum enrichments.

Other Miscellaneous Changes

- The design pressures (in HI-STORM FW Table 2.2.1) have been modified to separate the short-term operation design pressure from the off-normal condition. This change provides greater clarity in the correct design pressure to use in each scenario. The short-term operation design pressure has been lowered to allow for more design margin.