



June 29, 2017
E-48527

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
One White Flint North
11555 Rockville Pike
Rockville, MD 20852

Subject: Application for Amendment 16 to Standardized NUHOMS® Certificate of Compliance No. 1004 for Spent Fuel Storage Casks, Revision 0 (Docket No. 72-1004)

Reference:

1. Letter from Rodney McCullum, Nuclear Energy Institute (NEI) to Michael Layton (NRC), "Regulatory Issue Resolution Protocol Screening Form and Resolution Plan for Improving the Part 72 Regulatory Framework (RIRP-I-16-01)," Project Number 689," dated May 12, 2017.
2. Letter from Michael C. Layton (NRC) to Rodney J. McCullum (NEI), "Response to Nuclear Energy Institute's Letter Regarding Regulatory Issue Resolution Protocol Screening Form and Resolution Plan for Improving the Part 72 Regulatory Framework (RIRP-I-16-01)," dated June 5, 2017.

In accordance with 10 CFR 72.244 and consistent with References 1 and 2, TN Americas LLC herewith submits its application to amend Certificate of Compliance (CoC) No. 1004 for the Standardized NUHOMS® System. The approach and contents of this planned submittal were discussed with the NRC during a pre-application public meeting on June 15, 2017. This amendment application is a pilot licensing action intended to implement the format, content and selection criteria described in the Reference 1 enclosure titled "ISFSI LICENSE AND CASK CoC FORMAT, CONTENT, AND SELECTION CRITERIA."

No design changes are being proposed in this amendment. The intent is a restructuring and revision to the CoC 1004 CoC and CoC Attachment A - Technical Specifications (TS). Each current individual CoC condition and TS requirement is evaluated against the format and content guidance and risk insight questions described in Reference 1. The results of the evaluation are documented in forms that describe the evaluation results for each of the existing conditions and requirements. The form documents the decision-making process and justification for fully keeping a requirement, keeping the requirement but reducing the level of detail, deleting the requirement, or relocating the requirement to a different part of the CoC, or CoC Appendix A (Inspections, Tests, and Evaluations), or CoC Appendix B (Technical Specifications), or to the updated final safety analysis report (UFSAR).

The latest CoC 1004 CoC and TS are the starting point for this evaluation and amendment application. Amendment 15 was submitted on March 28, 2017 and is currently under NRC review. Amendment 15 contained no proposed changes to the CoC, so the Amendment 14 CoC was used for evaluation purposes (see Enclosure 1). The proposed TS for Amendment 15 (see Enclosure 2) were used as the initial starting point for this Amendment 16 evaluation.

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Additionally, because certain portions of the current CoC 1004 UFSAR are incorporated by reference into the TS (portions of Chapters K.9, M.9, P.9, T.9, U.9, Y.9 and Z.9), the UFSAR Revision 15 versions of these chapters have also been included for reference as Enclosure 3. Note that as Amendment 15 proceeds through the RSI / RAI stages, changes to the CoC / TS / UFSAR will be assessed to determine the need to submit a related Amendment 16 update.

An evaluation form for each of the current CoC requirements is provided in Enclosure 4. Similar evaluation forms for each of the sections of the TS and the TS tables and figures are provided in Enclosures 5 through 10. For information, a high-level summary of the results of the evaluation is given in Enclosure 11.

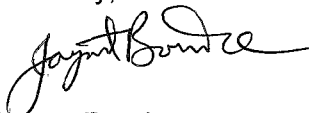
Because the initial phase of this RIRP-related pilot licensing action involves many proposed movements of CoC conditions and TS requirements, which will then involve assessment and feedback from the NRC initial review, the CoC, TS, and UFSAR documents are not being word-processed and provided during this initial Amendment 16 application submittal. After NRC's review of the proposed disposition of each of the individual CoC conditions and TS items, the proposed CoC and TS documents and UFSAR changes will be word-processed and provided to the NRC for review.

As discussed during the pre-application meeting (ML17151A233), based on the substantial cost savings and other benefits this licensing action will provide to the NRC and to the nuclear industry, we request that NRC review fees be waived for Amendment 16. We believe that an exemption from fees is warranted per the requirements of 10 CFR 170.11(a)(1)(ii) since this action relates to assisting the NRC in generic regulatory improvements or efforts.

This submittal is being provided as an electronic submission, using the optical storage media (OSM) provision from Section 4 of the NRC Guidance for Electronic Submissions to the NRC. Accordingly, we have included a Document Components listing and OSM#1 listing at the end of this cover letter.

TN Americas LLC looks forward to working with the NRC staff on this amendment application. We are prepared to meet with the staff to resolve any questions the staff might have. Should the NRC staff require additional information to support review of this application, please do not hesitate to contact Dennis Williford at 704-805-2223, or me at 410-910-6881.

Sincerely,



Jayant Bondre
Chief Technical Officer

cc: John Vera (NRC SFM), as follows:

- One paper copy of this cover letter
- Six computer disks, each containing this cover letter and Enclosures 1 through 11 (i.e., OSM #1 disk)

Enclosures:

1. Certificate of Compliance No. 1004 Amendment 14 CoC
2. Certificate of Compliance No. 1004 Proposed Amendment 15 Technical Specifications
3. Standardized NUHOMS[®] Updated Final Safety Analysis Report Revision 15 Chapters which Contain TS Incorporated by Reference
4. Evaluation Forms for CoC 1004 CoC Items
5. Evaluation Forms for CoC 1004 TS Section 1 Items
6. Evaluation Forms for CoC 1004 TS Section 2 Items
7. Evaluation Forms for CoC 1004 TS Section 3 Items
8. Evaluation Forms for CoC 1004 TS Section 4 Items
9. Evaluation Forms for CoC 1004 TS Section 5 Items
10. Evaluation Forms for CoC 1004 TS Tables and Figures
11. Amendment 16 High-Level Evaluation Results Summary Table

Document Components:

001 1004 AMD 16 Cover Letter.pdf, 443,664 bytes
002 1004 AMD 16 Encl 1 CoC for Amd 14.pdf, 959,609 bytes
003 1004 AMD 16 Encl 2 Prop TS for Amd 15.pdf, 5,291,390 bytes
004 1004 AMD 16 Encl 3 UFSAR Rev 15 Sect.pdf, 576,639 bytes
005 1004 AMD 16 Encl 4 Assess CoC.pdf, 160,666 bytes
006 1004 AMD 16 Encl 5 Assess TS-Sect 1.pdf, 84,239 bytes
007 1004 AMD 16 Encl 6 Assess TS-Sect 2.pdf, 118,215 bytes
008 1004 AMD 16 Encl 7 Assess TS-Sect 3.pdf, 102,042 bytes
009 1004 AMD 16 Encl 8 Assess TS-Sect 4.pdf, 314,076 bytes
010 1004 AMD 16 Encl 9 Assess TS-Sect 5.pdf, 244,084 bytes
011 1004 AMD 16 Encl 10 Assess TS-Tbls Figs.pdf, 242,182 bytes
012 1004 AMD 16 Encl 11 Summary Table.pdf, 80,968 bytes

OSM#1 (Entire Submittal) (computer disk):

001 1004 AMD 16 Cover Letter.pdf, 443,664 bytes
002 1004 AMD 16 Encl 1 CoC for Amd 14.pdf, 959,609 bytes
003 1004 AMD 16 Encl 2 Prop TS for Amd 15.pdf, 5,291,390 bytes
004 1004 AMD 16 Encl 3 UFSAR Rev 15 Sect.pdf, 576,639 bytes
005 1004 AMD 16 Encl 4 Assess CoC.pdf, 160,666 bytes
006 1004 AMD 16 Encl 5 Assess TS-Sect 1.pdf, 84,239 bytes
007 1004 AMD 16 Encl 6 Assess TS-Sect 2.pdf, 118,215 bytes
008 1004 AMD 16 Encl 7 Assess TS-Sect 3.pdf, 102,042 bytes
009 1004 AMD 16 Encl 8 Assess TS-Sect 4.pdf, 314,076 bytes
010 1004 AMD 16 Encl 9 Assess TS-Sect 5.pdf, 244,084 bytes
011 1004 AMD 16 Encl 10 Assess TS-Tbls Figs.pdf, 242,182 bytes
012 1004 AMD 16 Encl 11 Summary Table.pdf, 80,968 bytes