CERTIFICATE OF COMPLIANCE NO. 1032

APPENDIX B

APPROVED CONTENTS AND DESIGN FEATURES

FOR THE HI-STORM FW MPC STORAGE SYSTEM

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1.0 Definitions

Refer to Appendix A for Definitions.

2.0 APPROVED CONTENTS

2.1 Fuel Specifications and Loading Conditions

2.1.1 Fuel to Be Stored in the HI-STORM FW MPC Storage System

- a. UNDAMAGED FUEL ASSEMBLIES, DAMAGED FUEL ASSEMBLIES, FUEL DEBRIS, and NON-FUEL HARDWARE meeting the limits specified in Table 2.1-1 and other referenced tables may be stored in the HI-STORM FW MPC Storage System.
- b. All BWR fuel assemblies may be stored with or without ZR channels.

2.1.2 Fuel Loading

Figures 2.1-1 and 2.1-2 define the regions for the MPC-37 and MPC-89 models, respectively. Fuel assembly decay heat limits are specified in Section 2.3.1. Fuel assemblies shall meet all other applicable limits specified in Tables 2.1-1 through 2.1-3.

2.2 Violations

If any Fuel Specifications or Loading Conditions of 2.1 are violated, the following actions shall be completed:

- 2.2.1 The affected fuel assemblies shall be placed in a safe condition.
- 2.2.2 Within 24 hours, notify the NRC Operations Center.
- 2.2.3 Within 30 days, submit a special report which describes the cause of the violation, and actions taken to restore compliance and prevent recurrence.

					-	
		3-1	3-2	3-3		_
	3-4	2-1	2-2	2-3	3-5	
3-6	2-4	1-1	1-2	1-3	2-5	3-7
3-8	2-6	1-4	1-5	1-6	2-7	3-9
3-10	2-8	1-7	1-8	1-9	2-9	3-11
	3-12	2-10	2-11	2-12	3-13	
		3-14	3-15	3-16		-

Legend

Region-Cell ID

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Figure 2.1-1 MPC-37 Region-Cell Identification

				3-1	3-2	3-3				
		3-4	3-5	3-6	2-1	3-7	3-8	3-9		
	3-10	3-11	2-2	2-3	2-4	2-5	2-6	3-12	3-13	
	3-14	2-7	2-8	2-9	2-10	2-11	2-12	2-13	3-15	
3-16	3-17	2-14	2-15	1-1	1-2	1-3	2-16	2-17	3-18	3-19
3-20	2-18	2-19	2-20	1-4	1-5	1-6	2-21	2-22	2-23	3-21
3-22	3-23	2-24	2-25	1-7	1-8	1-9	2-26	2-27	3-24	3-25
	3-26	2-28	2-29	2-30	2-31	2-32	2-33	2-34	3-27	
	3-28	3-29	2-35	2-36	2-37	2-38	2-39	3-30	3-31	
Legend		3-32	3-33	3-34	2-40	3-35	3-36	3-37		-
Region- Cell ID				3-38	3-39	3-40				

Figure 2.1-2 MPC-89 Region-Cell Identification

I. MPC MODEL: MPC-37

- A. Allowable Contents
 - 1. Uranium oxide PWR UNDAMAGED FUEL ASSEMBLIES, DAMAGED FUEL ASSEMBLIES, and/or FUEL DEBRIS meeting the criteria in Table 2.1-2, with or without NON-FUEL HARDWARE and meeting the following specifications (Note 1):

a. Cladding Type:	ZR		
b. Maximum Initial Enrichment:	5.0 wt. % U-235 with soluble boron credit per LCO 3.3.1 OR burnup credit per Section 2.4		
c. Post-irradiation Cooling Time	Cooling Time ≥ 3 years		
Assembly:	Assembly Average Burnup ≤ 68.2 GWD/MTU		
d. Decay Heat Per Fuel Storage Location:	As specified in Section 2.3		
e. Fuel Assembly Length:	≤ 199.2 inches (nominal design including NON-FUEL HARDWARE and DFC)		
f. Fuel Assembly Width:	≤ 8.54 inches (nominal design)		
g. Fuel Assembly Weight:	≤ 2050 lbs (including NON-FUEL HARDWARE and DFC)		

I. MPC MODEL: MPC-37 (continued)

- B. Quantity per MPC: 37 FUEL ASSEMBLIES with up to twelve (12) DAMAGED FUEL ASSEMBLIES or FUEL DEBRIS in DAMAGED FUEL CONTAINERS (DFCs). DFCs may be stored in fuel storage locations 3-1, 3-3 through 3-7, 3-10 through 3-14, and 3-16 (see Figure 2.1-1). The remaining fuel storage locations may be filled with PWR UNDAMAGED FUEL ASSEMBLIES meeting the applicable specifications. For MPCs utilizing burnup credit, the MPC and DFC loading configuration must also meet the additional requirements of Section 2.4.
- C. One (1) Neutron Source Assembly (NSA) is authorized for loading in the MPC-37.
- D. Up to thirty (30) BRPAs are authorized for loading in the MPC-37.
- Note 1: Fuel assemblies containing BPRAs, TPDs, WABAs, water displacement guide tube plugs, orifice rod assemblies, or vibration suppressor inserts, with or without ITTRs, may be stored in any fuel storage location. Fuel assemblies containing APSRs, RCCAs, CEAs, CRAs, or NSAs may only be loaded in fuel storage Regions 1 and 2 (see Figure 2.1-1).

II. MPC MODEL: MPC-89

- A. Allowable Contents
- 1. Uranium oxide BWR UNDAMAGED FUEL ASSEMBLIES, DAMAGED FUEL ASSEMBLIES, and/or FUEL DEBRIS meeting the criteria in Table 2.1-3, with or without channels and meeting the following specifications:

a. Cladding Type:	ZR
b. Maximum PLANAR-AVERAGE INITIAL ENRICHMENT(Note 1):	As specified in Table 2.1-3 for the applicable fuel assembly array/class.
c. Initial Maximum Rod Enrichment	5.0 wt. % U-235
d. Post-irradiation Cooling Time and Average Burnup Per Assembly	
i. Array/Class 8x8F	Cooling time \ge 10 years and an assembly average burnup \le 27.5 GWD/MTU.
ii. All Other Array Classes	Cooling Time \ge 3 years and an assembly average burnup \le 65 GWD/MTU
e. Decay Heat Per Assembly	
i. Array/Class 8x8F	≤ 183.5 Watts
ii. All Other Array Classes	As specified in Section 2.3
f. Fuel Assembly Length	≤ 176.5 inches (nominal design)
g. Fuel Assembly Width	≤ 5.95 inches (nominal design)
h. Fuel Assembly Weight	≤ 850 lbs, including a DFC as well as a channel

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Table 2.1-1 (page 4 of 4) Fuel Assembly Limits

- II. MPC MODEL: MPC-89 (continued)
 - B. Quantity per MPC: 89 FUEL ASSEMBLIES with up to sixteen (16) DAMAGED FUEL ASSEMBLIES or FUEL DEBRIS in DAMAGED FUEL CONTAINERS (DFCs). DFCs may be stored in fuel storage locations 3-1, 3-3, 3-4, 3-9, 3-10, 3-13, 3-16, 3-19, 3-22, 3-25, 3-28, 3-31, 3-32, 3-37, 3-38, and 3-40 (see Figure 2.1-2). The remaining fuel storage locations may be filled with BWR UNDAMAGED FUEL ASSEMBLIES meeting the applicable specifications.
- Note 1: The lowest maximum allowable enrichment of any fuel assembly loaded in an MPC-89, based on fuel array class and fuel classification, is the maximum allowable enrichment for the remainder of the assemblies loaded in that MPC.

Table 2.1-2 (page 1 of 4) PWR FUEL ASSEMBLY CHARACTERISTICS (Note 1)								
Fuel Assembly Array/ Class	14x14 A	14x14 B	14x14 C	15x15 B	15x15 C			
No. of Fuel Rod Locations	179	179	176	204	204			
Fuel Clad O.D. (in.)	≥ 0.400	≥ 0.417	≥ 0.440	≥ 0.420	≥ 0.417			
Fuel Clad I.D. (in.)	≤ 0.3514	≤ 0.374	≤ 0.3880	≤ 0.3736	≤ 0.3640			
Fuel Pellet Dia. (in.) (Note 3)	≤ 0.3444	≤ 0.367	≤ 0.3805	≤ 0.3671	≤ 0.3570			
Fuel Rod Pitch (in.)	≤ 0.556	≤ 0.566	≤ 0.580	≤ 0.563	≤ 0.563			
Active Fuel Length (in.)	≤ 150	≤ 150	≤ 150	≤ 150	≤ 150			
No. of Guide and/or Instrument Tubes	17	17	5 (Note 2)	21	21			
Guide/Instrument Tube Thickness (in.)	≥ 0.017	≥ 0.017	≥ 0.038	≥ 0.015	≥ 0.0165			

Table 2.1-2 (page 2 of 4) PWR FUEL ASSEMBLY CHARACTERISTICS (Note 1)								
Fuel Assembly Array/Class	15x15 D	15x15 E	15x15 F	15x15 H	15x15 I			
No. of Fuel Rod Locations	208	208	208	208	216 (Note 4)			
Fuel Clad O.D. (in.)	≥ 0.430	≥ 0.428	≥ 0.428	≥ 0.414	≥ 0.413			
Fuel Clad I.D. (in.)	≤ 0.3800	≤ 0.3790	≤ 0.3820	≤ 0.3700	≤ 0.3670			
Fuel Pellet Dia. (in.) (Note 3)	≤ 0.3735	≤ 0.3707	≤ 0.3742	≤ 0.3622	≤ 0.3600			
Fuel Rod Pitch (in.)	≤ 0.568	≤ 0.568	≤ 0.568	≤ 0.568	≤ 0.550			
Active Fuel Length (in.)	≤ 150	≤ 150	≤ 150	≤ 150	≤ 150			
No. of Guide and/or Instrument Tubes	17	17	17	17	9 (Note 4)			
Guide/Instrument Tube Thickness (in.)	≥ 0.0150	≥ 0.0140	≥ 0.0140	≥ 0.0140	≥ 0.0140			

Table 2.1-2 (page 3 of 4) PWR FUEL ASSEMBLY CHARACTERISTICS (Note 1)						
Fuel Assembly Array and Class	16x16 A	16x16B	16x16C			
No. of Fuel Rod Locations	236	236	236			
Fuel Clad O.D. (in.)	≥ 0.382	≥ 0.374	≥ 0.374			
Fuel Clad I.D. (in.)	≤ 0.3350	≤ 0.3290	≤ 0.3290			
Fuel Pellet Dia. (in.) (Note 3)	≤ 0.3255	≤ 0.3225	≤ 0.3225			
Fuel Rod Pitch (in.)	≤ 0.506	≤ 0.506	≤ 0.485			
Active Fuel length (in.)	≤ 150	≤ 150	≤ 150			
No. of Guide and/or Instrument Tubes	5 (Note 2)	5 (Note 2)	21			
Guide/Instrument Tube Thickness (in.)	≥ 0.0350	≥ 0.04	≥ 0.0157			

Table 2.1-2 (page 4 of 4) PWR FUEL ASSEMBLY CHARACTERISTICS (Note 1)								
Fuel Assembly Array and Class17x17A17x17 B17x17 C17x17 D17x17 E								
No. of Fuel Rod Locations	264	264	264	264	265			
Fuel Clad O.D. (in.)	≥ 0.360	≥ 0.372	≥ 0.377	≥ 0.372	≥ 0.372			
Fuel Clad I.D. (in.)	≤ 0.3150	≤ 0.3310	≤ 0.3330	≤ 0.3310	≤ 0.3310			
Fuel Pellet Dia. (in.) (Note 3)	≤ 0.3088	≤ 0.3232	≤ 0.3252	≤ 0.3232	≤ 0.3232			
Fuel Rod Pitch (in.)	≤ 0.496	≤ 0.496	≤ 0.502	≤ 0.496	≤ 0.496			
Active Fuel length (in.)	≤ 150	≤ 150	≤ 150	≤ 170	≤ 170			
No. of Guide and/or Instrument Tubes	25	25	25	25	24			
Guide/Instrument Tube Thickness (in.)	≥ 0.016	≥ 0.014	≥ 0.020	≥ 0.014	≥ 0.014			

Notes:

- 1. All dimensions are design nominal values. Maximum and minimum dimensions are specified to bound variations in design nominal values among fuel assemblies within a given array/class.
- 2. Each guide tube replaces four fuel rods.
- 3. Annular fuel pellets are allowed in the top and bottom 12" of the active fuel length.
- 4. Assemblies have one Instrument Tube and eight Guide Bars (Solid ZR). Some assemblies have up to 8 fuel rods removed or replaced by Guide Tubes

Table 2.1-3 (page 1 of 4) BWR FUEL ASSEMBLY CHARACTERISTICS (Note 1)								
Fuel Assembly Array and Class	7x7 B	8x8 B	8x8 C	8x8 D	8x8 E			
Maximum Planar- Average Initial Enrichment (wt.% ²³⁵ U) (Note 14)	<u><</u> 4.8							
No. of Fuel Rod Locations (Full Length or Total/Full Length)	49	63 or 64	62	60 or 61	59			
Fuel Clad O.D. (in.)	<u>></u> 0.5630	<u>></u> 0.4840	<u>></u> 0.4830	<u>></u> 0.4830	<u>></u> 0.4930			
Fuel Clad I.D. (in.)	<u><</u> 0.4990	<u><</u> 0.4295	<u><</u> 0.4250	<u><</u> 0.4230	<u><</u> 0.4250			
Fuel Pellet Dia. (in.)	<u><</u> 0.4910	<u><</u> 0.4195	<u><</u> 0.4160	<u><</u> 0.4140	<u><</u> 0.4160			
Fuel Rod Pitch (in.)	<u><</u> 0.738	<u><</u> 0.642	<u><</u> 0.641	<u><</u> 0.640	<u><</u> 0.640			
Design Active Fuel Length (in.)	<u><</u> 150							
No. of Water Rods (Note 10)	0	1 or 0	2	1 - 4 (Note 6)	5			
Water Rod Thickness (in.)	N/A	<u>></u> 0.034	> 0.00	> 0.00	<u>≥</u> 0.034			
Channel Thickness (in.)	<u><</u> 0.120	<u><</u> 0.120	<u><</u> 0.120	<u><</u> 0.120	<u><</u> 0.100			

Table 2.1-3 (2 of 4) BWR FUEL ASSEMBLY CHARACTERISTICS (Note 1)								
Fuel Assembly Array and Class	8x8F	9x9 A	9x9 B	9x9 C	9x9 D			
Maximum Planar- Average Initial Enrichment (wt.% ²³⁵ U) (Note 14)	≤ 4.5 (Note 12)	<u><</u> 4.8	<u><</u> 4.8	<u><</u> 4.8	<u><</u> 4.8			
No. of Fuel Rod Locations	64	74/66 (Note 4)	72	80	79			
Fuel Clad O.D. (in.)	<u>></u> 0.4576	<u>></u> 0.4400	<u>></u> 0.4330	<u>></u> 0.4230	<u>></u> 0.4240			
Fuel Clad I.D. (in.)	<u><</u> 0.3996	<u><</u> 0.3840	<u><</u> 0.3810	<u><</u> 0.3640	<u><</u> 0.3640			
Fuel Pellet Dia. (in.)	<u><</u> 0.3913	<u><</u> 0.3760	<u><</u> 0.3740	<u><</u> 0.3565	<u><</u> 0.3565			
Fuel Rod Pitch (in.)	<u><</u> 0.609	<u><</u> 0.566	<u><</u> 0.572	<u><</u> 0.572	<u><</u> 0.572			
Design Active Fuel Length (in.)	<u><</u> 150							
No. of Water Rods (Note 10)	N/A (Note 2)	2	1 (Note 5)	1	2			
Water Rod Thickness (in.)	<u>></u> 0.0315	> 0.00	> 0.00	<u>></u> 0.020	<u>></u> 0.0300			
Channel Thickness (in.)	<u><</u> 0.055	<u><</u> 0.120	<u><</u> 0.120	<u><</u> 0.100	<u><</u> 0.100			

Table 2.1-3 (page 3 of 4) BWR FUEL ASSEMBLY CHARACTERISTICS (Note 1)							
Fuel Assembly Array and Class	9x9 E (Note 2)	9x9 F (Note 2)	9x9 G	10x10 A	10x10 B		
Maximum Planar- Average Initial Enrichment (wt.% ²³⁵ U) (Note 14)	<u><</u> 4.5 (Note 12)	<u><</u> 4.5 (Note 12)	<u><</u> 4.8	<u><</u> 4.8	<u><</u> 4.8		
No. of Fuel Rod Locations	76	76	72	92/78 (Note 7)	91/83 (Note 8)		
Fuel Clad O.D. (in.)	<u>></u> 0.4170	<u>></u> 0.4430	<u>></u> 0.4240	<u>></u> 0.4040	<u>></u> 0.3957		
Fuel Clad I.D. (in.)	<u><</u> 0.3640	<u><</u> 0.3860	<u><</u> 0.3640	<u><</u> 0.3520	<u><</u> 0.3480		
Fuel Pellet Dia. (in.)	<u><</u> 0.3530	<u><</u> 0.3745	<u><</u> 0.3565	<u><</u> 0.3455	<u><</u> 0.3420		
Fuel Rod Pitch (in.)	<u><</u> 0.572	<u><</u> 0.572	<u><</u> 0.572	<u><</u> 0.510	<u><</u> 0.510		
Design Active Fuel Length (in.)	<u><</u> 150	<u><</u> 150	<u><</u> 150	<u><</u> 150	<u><</u> 150		
No. of Water Rods (Note 10)	5	5	1 (Note 5)	2	1 (Note 5)		
Water Rod Thickness (in.)	<u>></u> 0.0120	<u>></u> 0.0120	<u>></u> 0.0320	<u>></u> 0.0300	> 0.00		
Channel Thickness (in.)	<u><</u> 0.120	<u><</u> 0.120	<u><</u> 0.120	<u><</u> 0.120	<u><</u> 0.120		

Table 2.1-3 (page 4 of 4) BWR FUEL ASSEMBLY CHARACTERISTICS (Note 1)				
Fuel Assembly Array and Class	10x10 C	10x10 F	10x10 G	
Maximum Planar-Average Initial Enrichment (wt.% ²³⁵ U) (Note 14)	<u><</u> 4.8	<u>≤</u> 4.7 (Note 13)	<u>≤</u> 4.6 (Note 12)	
No. of Fuel Rod Locations	96	92/78 (Note 7)	96/84	
Fuel Clad O.D. (in.)	<u>></u> 0.3780	<u>></u> 0.4035	<u>></u> 0.387	
Fuel Clad I.D. (in.)	<u><</u> 0.3294	<u><</u> 0.3570	<u><</u> 0.340	
Fuel Pellet Dia. (in.)	<u><</u> 0.3224	<u><</u> 0.3500	<u><</u> 0.334	
Fuel Rod Pitch (in.)	<u><</u> 0.488	<u><</u> 0.510	<u><</u> 0.512	
Design Active Fuel Length (in.)	<u><</u> 150	<u><</u> 150	<u><</u> 150	
No. of Water Rods (Note 10)	5 (Note 9)	2	5 (Note 9)	
Water Rod Thickness (in.)	<u>></u> 0.031	<u>></u> 0.030	<u>></u> 0.031	
Channel Thickness (in.)	<u><</u> 0.055	<u><</u> 0.120	<u><</u> 0.060	

NOTES:

- 1. All dimensions are design nominal values. Maximum and minimum dimensions are specified to bound variations in design nominal values among fuel assemblies within a given array/class.
- 2. This assembly is known as "QUAD+." It has four rectangular water cross segments dividing the assembly into four quadrants.
- 3. For the SPC 9x9-5 fuel assembly, each fuel rod must meet either the 9x9E or the 9x9F set of limits or clad O.D., clad I.D., and pellet diameter.
- 4. This assembly class contains 74 total rods; 66 full length rods and 8 partial length rods.
- 5. Square, replacing nine fuel rods.
- 6. Variable.
- 7. This assembly contains 92 total fuel rods; 78 full length rods and 14 partial length rods.
- 8. This assembly class contains 91 total fuel rods; 83 full length rods and 8 partial length rods.
- 9. One diamond-shaped water rod replacing the four center fuel rods and four rectangular water rods dividing the assembly into four quadrants.
- 10. These rods may also be sealed at both ends and contain ZR material in lieu of water.
- 11. Not used.
- 12. When loading fuel assemblies classified as DAMAGED FUEL, all assemblies in the MPC are limited to 4.0 wt.% U-235.
- 13. When loading fuel assemblies classified as DAMAGED FUEL, all assemblies in the MPC are limited to 4.6 wt.% U-235.
- 14. In accordance with the definition of UNDAMAGED FUEL, certain assemblies may be limited to 3.3 wt.% U-235. When loading these fuel assemblies, all assemblies in the MPC are limited to 3.3 wt.% U-235.

2.3 Decay Heat Limits (Changes in blue are due to RAI response)

This section provides the limits on fuel assembly decay heat for storage in the HI-STORM FW System. The method to verify compliance, including examples, is provided in Chapter 13 of the HI-STORM FW FSAR.

2.3.1 Fuel Loading Decay Heat Limits

Tables 2.3-1A, 2.3-1B, and 2.3-1C provide the maximum allowable decay heat per fuel storage location for MPC-37. Tables 2.3-2A and 2.3-2B provide the maximum allowable decay heat per fuel storage location for MPC-89. The limits in these tables are applicable when using FHD to dry moderate or high burnup fuel and when using VDS to dry moderate burnup fuel only. Tables 2.3-3 and 2.3-4 provide the maximum allowable decay heat per fuel storage location for MPC-89, respectively, when using VDS to dry high burnup fuel.

TABLE 2.3-1A					
Number of F	Regions:	3	D DATA (See Figure	2.1-1)	
Number of S	Storage Cells:	37			
Maximum D	esign Basis He	at Load (kW):	44.09 (Patteri	n A); 45.0 (Pat	tern B)
Region No.	Decay Heat L kV	imit per Cell, V	Number of Cells per Region	Decay Hea Regio	at Limit per n, kW
	Pattern A	Pattern B		Pattern A	Pattern B
1	1.05	1.0	9	9.45	9.0
2	1.70	1.2	12	20.4	14.4
3	0.89	1.35	16	14.24	21.6

TABLE 2.3-1B					
	MPC-37 HEAT LOA	D DATA (See Figure	2.1-1)		
Number of R	egions: 3				
Number of S	torage Cells: 37				
90% of Patte	ern A - Sub-design Heat Loa	d (kW): 39.68			
Region No.	Decay Heat Limit per	Number of Cells	Decay Heat Limit per		
Cell, kW per Region Region, kW					
1 0.945 9 8.505					
2	1.530	12	18.36		
3	0.801	16	12.816		

TABLE 2.3-1C					
	MPC-37 HEAT LOA	D DATA (See Figure	2.1-1)		
Number of R	egions: 3				
Number of S	torage Cells: 37				
80% of Patte	ern A - Sub-design Heat Loa	d (kW): 35.27			
Region No.	Decay Heat Limit per	Number of Cells	Decay Heat Limit per		
Cell, kW per Region Region, kW					
1 0.84 9 7.56					
2	1.36	12	16.32		
3	0.712	16	11.392		

TABLE 2.3-2A MPC-89 HEAT LOAD DATA (See Figure 2.1-2)					
Number of Regior	Number of Regions: 3				
Number of Storag	e Cells: 89				
Maximum Design	Basis Heat Load:	46.36 kW			
Region No.	Decay Heat Limit per Cell, kW	Number of Cells per Region	Decay Heat Limit per Region, kW		
1 0.44 9 3.96					
2	0.62	40	24.80		
3	0.44	40	17.60		

TABLE 2.3-2B							
	MPC-89 HEAT LOA	D DATA (See Figure	2.1-2)				
Number of R	Number of Regions: 3						
Number of S	torage Cells: 89						
80% Sub-de	sign Heat Load (kW):	37.1					
Region No.	Decay Heat Limit per	Number of Cells	Decay Heat Limit per				
-	Cell, kW	per Region	Region, kW				
1	0.352	9	3.168				
2	0.496	40	19.84				
3	0.352	40	14.08				

TABLE 2.3-3 MPC-37 HEAT LOAD DATA (See Figure 2.1-1)						
Number of Regions: 3						
Number of Storag	e Cells: 37					
Maximum Heat Lo	oad: 29.6					
Region No.	Decay Heat Limit per Cell, W	Number of Cells per Region	Decay Heat Limit per Region, kW			
1	800	9	7.2			
2	800	12	9.6			
3	800	16	12.8			

TABLE 2.3-4 MPC-89 HEAT LOAD DATA (See Figure 2.1-2)						
Number of Regior	Number of Regions: 3					
Number of Storag	e Cells: 89					
Maximum Heat Lo	oad: 30.0kV	V				
Region No.	Decay Heat Limit per Cell, W	Number of Cells per Region	Decay Heat Limit per Region, kW			
1 337 9 3.03						
2	337	40	13.48			
3	337	40	13.48			

2.3.2 When complying with the maximum fuel storage location decay heat limits, users must account for the decay heat from both the fuel assembly and any NON-FUEL HARDWARE, as applicable for the particular fuel storage location, to ensure the decay heat emitted by all contents in a storage location does not exceed the limit.

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2.4 Burnup Credit

Criticality control during loading of the MPC-37 is achieved through either meeting the soluble boron limits in LCO 3.3.1 OR verifying that the assemblies meet the minimum burnup requirements in Table 2.4-1 and the in-core operating requirements in Table 2.4-3.

For those spent fuel assemblies that need to meet the burnup requirements specified in Table 2.4-1, a burnup verification shall be performed in accordance with either Method A OR Method B described below.

Method A: Burnup Verification Through Quantitative Burnup Measurement

For each assembly in the MPC-37 where burnup credit is required, the minimum burnup is determined from the burnup requirement applicable to the loading configuration chosen for the cask (see Table 2.4-1). A measurement is then performed that confirms that the fuel assembly burnup exceeds this minimum burnup. The measurement technique may be calibrated to the reactor records for a representative set of assemblies. The assembly burnup value to be compared with the minimum required burnup should be the measured burnup value as adjusted by reducing the value by a combination of the uncertainties in the calibration method and the measurement itself.

<u>Method B: Burnup Verification Through an Administrative Procedure and Qualitative</u> <u>Measurements</u>

Depending on the location in the basket, assemblies loaded into a specific MPC-37 can either be fresh, or have to meet a single minimum burnup value. The assembly burnup value to be compared with the minimum required burnup should be the reactor record burnup value as adjusted by reducing the value by the uncertainties in the reactor record value. An administrative procedure shall be established that prescribes the following steps, which shall be performed for each cask loading:

- Based on a review of the reactor records, all assemblies in the spent fuel pool that have a burnup that is below the minimum required burnup of the loading curve for the cask to be loaded are identified.
- After the cask loading, but before the release for shipment of the cask, the presence and location of all those identified assemblies is verified, except for those assemblies that have been loaded as fresh assemblies into the cask.
- An independent, third-party verification of the loading process, including the fuel selection process and generation of the fuel move instructions.

Additionally, for all assemblies to be loaded that are required to meet a minimum burnup, a qualitative verification shall be performed that verifies that the assembly is not a fresh assembly.

TABLE 2.4-1

Assembly Classes	Configuration ¹	Cooling Time, years	Minimum Burnup (GWd/mtU) as a Function of the Initial Enrichment (wt% ²³⁵ U)
15x15B, C,	Uniform	≥3.0 and <7.0	f(x) = -7.9224e-02 * x^3 -7.6419e-01 * x^2 +2.2411e+01 * x^1 -4.1183e+01
D, E, F, H, I	Official	≥7.0	f(x) = +1.3212e-02 * x^3 -1.6850e+00 * x^2 +2.4595e+01 * x^1 -4.2603e+01
and	Pagionalizad	≥3.0 and <7.0	f(x) = +3.6976e-01 * x^3 -5.8233e+00 * x^2 +4.0599e+01 * x^1 -5.8346e+01
С, D, E	Regionalized	≥7.0	f(x) = +3.3423e-01 * x^3 -5.1647e+00 * x^2 +3.6549e+01 * x^1 -5.2348e+01
	Uniform	≥3.0 and <7.0	f(x) = -1.0361e+00 * x^3 +1.1386e+01 * x^2 -2.9174e+01 * x^1 +2.0850e+01
		≥7.0	f(x) = -9.6572e-01 * x^3 +1.0484e+01 * x^2 -2.5982e+01 * x^1 +1.7515e+01
Төхтөд, в, С	Regionalized	≥3.0 and <7.0 ≥7.0 Combined ² (>3.0)	$f(x) = -2.1456e \cdot 01 * x^3 + 2.4668e + 00 * x^2 + 2.1381e + 00 * x^1 - 1.2560e + 01$ $f(x) = -5.9154e \cdot 01 * x^3 + 5.8403e + 00 * x^2 - 6.9339e + 00 * x^1 - 4.7951e + 00$ $f(x) = -4.9680e \cdot 01 * x^3 + 4.9471e + 00 * x^2 - 4.2373e + 00 * x^1 - 7.3936e + 00$

POYNOMIAL FUNCTIONS FOR THE MINIMUM BURNUP AS A FUNCTION OF INITIAL ENRICHMENT

¹ Uniform configuration refers to Configuration 1 in Table 2.4-2. Regionalized configuration refers to Configuration 2, 3, or 4 in Table 2-4-2.

 $^{^2}$ The combined cooling time loading curve bounds the loading curves at 3 and 7 years cooling times and it is applicable for fuel with above 3 years cooling time.

TABLE 2.4-2

BURNUP CREDIT CONFIGURATIONS

Configuration	Description
Configuration 1	Spent UNDAMAGED fuel assemblies are placed in all positions of the basket
Configuration 2	Fresh UNDAMAGED fuel assemblies are placed in locations 3-4, 3-5, 3-12, and 3-13 (see Figure 2.1-1); spent UNDAMAGED fuel assemblies are placed in the remaining positions
Configuration 3	Damaged Fuel Containers (DFCs) with spent DAMAGED fuel assemblies are placed in locations 3-1, 3-3, 3-4, 3-5, 3-6, 3-7, 3-10, 3-11, 3-12, 3-13, 3-14, and 3-16 (see Figure 2.1-1); spent UNDAMAGED fuel assemblies are placed in the remaining positions
Configuration 4	DFCs with fresh FUEL DEBRIS are placed in locations 3-1, 3-7, 3-10, and 3-16 with locations 2-1, 2-5, 2-8, and 2-12 (see Figure 2.1-1) empty; spent UNDAMAGED fuel assemblies are placed in the remaining positions

¹ PWR assemblies that have been located under a control rod bank that was permitted to be inserted more than 8 inches from the top of the active length during full power operation are restricted for storage in the Configuration 1, but permitted for storage in the Configuration 2, specifically in the basket cells qualified for the fresh fuel assemblies.

TABLE 2.4-3

IN-CORE OPERATING REQUIREMENTS

Assembly Type	Specific Power (MW/mtU)	Moderator Temperature (K)	Fuel Temperature (K)	Soluble Boron (ppm)
	Bounding Values	; (for Design Basis C	Calculations)	
15x15D, E, F, H	≤ 47.36	≤ 604	≤ 1169	≤ 1000
15x15B, C (Note 1)	≤ 52.33	≤ 620	≤ 1219	≤ 1000
16x16A, B	≤ 51.90	≤ 608	≤ 1113	≤ 1000
17x17A, B, C, D, E	≤ 61.61	≤ 620	≤ 1181	≤ 1000

NOTES:

1. The same core operating parameters are assumed for the 15x15I and 16x16C fuel assembly types

3.0 DESIGN FEATURES

3.1 Site

3.1.1 <u>Site Location</u>

The HI-STORM FW Cask System is authorized for general use by 10 CFR Part 50 license holders at various site locations under the provisions of 10 CFR 72, Subpart K.

3.2 Design Features Important for Criticality Control

3.2.1 <u>MPC-37</u>

- 1. Basket cell ID: 8.92 in. (min.)
- 2. Basket cell wall thickness: 0.57 in. (min.)
- 3. B₄C in the Metamic-HT: 10.0 wt % (min.)

3.2.2 <u>MPC-89</u>

- 1. Basket cell ID: 5.99 in. (min.)
- 2. Basket cell wall thickness: 0.38 in. (min.)
- 3. B₄C in the Metamic-HT: 10.0 wt % (min.)
- 3.2.3 Neutron Absorber Tests
 - 1. The weight percentage of the boron carbide must be confirmed to be greater than or equal to 10% in each lot of Al/B4C powder.
 - 2. The areal density of the B-10 isotope corresponding to the 10% min.weight density in the manufactured Metamic HT panels shall be independently confirmed by the neutron attenuation test method by testing at least one coupon from a randomly selected panel in each lot.
 - 3. If the B-10 areal density criterion in the tested panels fails to meet the specific minimum, then the manufacturer has the option to reject the entire lot or to test a statistically significant number of panels and perform statistical analysis for acceptance.
 - 4. All test procedures used in demonstrating compliance with the above requirements shall conform to the cask designer's QA program which has been approved by the USNRC under docket number 71-0784.

3.3 Codes and Standards

The American Society of Mechanical Engineers Boiler and Pressure Vessel Code (ASME Code), 2007 Edition, is the governing Code for the HI-STORM FW System MPC as clarified in Specification 3.3.1 below, except for Code Sections V and IX. The ASME Code paragraphs applicable to the HI-STORM FW OVERPACK and TRANSFER CASK are listed in Table 3-2. The latest effective editions of ASME Code Sections V and IX, including addenda, may be used for activities governed by those sections, provided a written reconciliation of the later edition against the 2007 Edition, including any addenda, is performed by the certificate holder. American Concrete Institute (ACI) 349-85 is the governing Code for plain concrete as clarified in Appendix 1.D of the Final Safety Analysis Report for the HI-STORM 100 Cask System.

3.3.1 <u>Alternatives to Codes, Standards, and Criteria</u>

Table 3-1 lists approved alternatives to the ASME Code for the design of the MPCs of the HI-STORM FW Cask System.

3.3.2 Construction/Fabrication Alternatives to Codes, Standards, and Criteria

Proposed alternatives to the ASME Code, Section III, 2007 Edition, including modifications to the alternatives allowed by Specification 3.3.1 may be used on a case-specific basis when authorized by the Director of the Office of Nuclear Material Safety and Safeguards or designee. The request for such alternative should demonstrate that:

- 1. The proposed alternatives would provide an acceptable level of quality and safety, or
- 2. Compliance with the specified requirements of the ASME Code, Section III, 2007 Edition, would result in hardship or unusual difficulty without a compensating increase in the level of quality and safety.

Requests for alternatives shall be submitted in accordance with 10 CFR 72.4.

(continued)

3.0 DESIGN FEATURES (continued)

TABLE 3-1 List of ASME Code Alternatives for Multi-Purpose Canisters (MPCs)				
MPC Enclosure Vessel	Subsection NCA	General Requirements. Requires preparation of a Design Specification, Design Report, Overpressure Protection Report, Certification of Construction Report, Data Report, and other administrative controls for an ASME Code stamped vessel.	Because the MPC is not an ASME Code stamped vessel, none of the specifications, reports, certificates, or other general requirements specified by NCA are required. In lieu of a Design Specification and Design Report, the HI-STORM FSAR includes the design criteria, service conditions, and load combinations for the design and operation of the MPCs as well as the results of the stress analyses to demonstrate that applicable Code stress limits are met. Additionally, the fabricator is not required to have an ASME-certified QA program. All important-to-safety activities are governed by the NRC-approved Holtec QA program. Because the cask components are not certified to the Code, the terms "Certificate Holder" and "Inspector" are not germane to the manufacturing of NRC-certified cask components. To eliminate ambiguity, the responsibilities	
			Code, as applicable, shall be interpreted to apply to the NRC Certificate of Compliance (CoC) holder (and by extension, to the component fabricator) if the requirement must be fulfilled. The Code term "Inspector" means the QA/QC personnel of the CoC holder and its vendors assigned to oversee and inspect the manufacturing process.	
MPC Enclosure Vessel	NB-1100	Statement of requirements for Code stamping of components.	MPC Enclosure Vessel is designed and will be fabricated in accordance with ASME Code, Section III, Subsection NB to the maximum practical extent, but Code stamping is not required.	

TABLE 3-1 List of ASME Code Alternatives for Multi-Purpose Canisters (MPCs)			
MPC basket supports and lift lugs	NB-1130	NB-1132.2(d) requires that the first connecting weld of a non-pressure retaining structural attachment to a component shall be considered part of the component unless the weld is more than 2t from the pressure retaining portion of the component, where t is the nominal thickness of the pressure retaining material.	The lugs that are used exclusively for lifting an empty MPC are welded to the inside of the pressure-retaining MPC shell, but are not designed in accordance with Subsection NB. The lug-to-Enclosure Vessel Weld is required to meet the stress limits of Reg. Guide 3.61 in lieu of Subsection NB of the Code.
		NB-1132.2(e) requires that the first connecting weld of a welded nonstructural attachment to a component shall conform to NB-4430 if the connecting weld is within 2t from the pressure retaining portion of the component.	
MPC Enclosure Vessel	NB-2000	Requires materials to be supplied by ASME- approved material supplier.	Materials will be supplied by Holtec approved suppliers with Certified Material Test Reports (CMTRs) in accordance with NB-2000 requirements.
MPC Enclosure Vessel	NB-3100 NF-3100	Provides requirements for determining design loading conditions, such as pressure, temperature, and mechanical loads.	These requirements are subsumed by the HI-STORM FW FSAR, serving as the Design Specification, which establishes the service conditions and load combinations for the storage system.
MPC Enclosure Vessel	NB-4120	NB-4121.2 and NF-4121.2 provide requirements for repetition of tensile or impact tests for material subjected to heat treatment during fabrication or installation.	In-shop operations of short duration that apply heat to a component, such as plasma cutting of plate stock, welding, machining, and coating are not, unless explicitly stated by the Code, defined as heat treatment operations.

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TABLE 3-1			
List of ASME Code Alternatives for Multi-Purpose Canisters (MPCs)			
MPC Enclosure Vessel	NB-4220	Requires certain forming tolerances to be met for cylindrical, conical, or spherical shells of a vessel.	The cylindricity measurements on the rolled shells are not specifically recorded in the shop travelers, as would be the case for a Code-stamped pressure vessel. Rather, the requirements on inter-component clearances (such as the MPC-to- transfer cask) are guaranteed through fixture-controlled manufacturing. The fabrication specification and shop procedures ensure that all dimensional design objectives, including inter- component annular clearances are satisfied. The dimensions required to be met in fabrication are chosen to meet the functional requirements of the dry storage components. Thus, although the post-forming Code cylindricity requirements are not evaluated for compliance directly, they are indirectly satisfied (actually exceeded) in the final manufactured components.
MPC Enclosure Vessel	NB-4122	Implies that with the exception of studs, bolts, nuts and heat exchanger tubes, CMTRs must be traceable to a specific piece of material in a component.	MPCs are built in lots. Material traceability on raw materials to a heat number and corresponding CMTR is maintained by Holtec through markings on the raw material. Where material is cut or processed, markings are transferred accordingly to assure traceability. As materials are assembled into the lot of MPCs being manufactured, documentation is maintained to identify the heat numbers of materials being used for that item in the multiple MPCs being manufactured under that lot. A specific item within a specific MPC will have a number of heat numbers identified as possibly being used for the item in that particular MPC of which one or more of those heat numbers (and corresponding CMTRS) will have actually been used. All of the heat numbers identified will comply with the requirements for the particular item.
MPC Lid and Closure Ring Welds	NB-4243	Full penetration welds required for Category C Joints (flat head to main shell per NB-3352.3)	MPC lid and closure ring are not full penetration welds. They are welded independently to provide a redundant seal.

TABLE 3-1 List of ASME Code Alternatives for Multi-Purpose Canisters (MPCs)			
MPC Closure Ring, Vent and Drain Cover Plate Welds	NB-5230	Radiographic (RT) or ultrasonic (UT) examination required.	Root (if more than one weld pass is required) and final liquid penetrant examination to be performed in accordance with NB-5245. The closure ring provides independent redundant closure for vent and drain cover plates. Vent and drain port cover plate welds are helium leakage tested.
MPC Lid to Shell Weld	NB-5230	Radiographic (RT) or ultrasonic (UT) examination required.	Only progressive liquid penetrant (PT) examination is permitted. PT examination will include the root and final weld layers and each approx. 3/8" of weld depth.
MPC Enclosure Vessel and Lid	NB-6111	All completed pressure retaining systems shall be pressure tested.	The MPC vessel is welded in the field following fuel assembly loading. After the lid to shell weld is completed, the MPC shall then be pressure tested as defined in Chapter 10. Accessibility for leakage inspections preclude a Code compliant pressure test. All MPC enclosure vessel welds (except closure ring and vent/drain cover plate) are inspected by volumetric examination. The MPC lid-to-shell weld shall be verified by progressive PT examination. PT must include the root and final layers and each approximately 3/8 inch of weld depth. The inspection results, including relevant findings (indications) shall be made a permanent part of the user's records by video, photographic, of other means which provide an equivalent record of weld integrity. The video or photographic records should be taken during the final interpretation period described in ASME Section V, Article 6, T-676. The vent/drain cover plate and the closure ring welds are confirmed by liquid penetrant examination. The inspection of the weld must be performed by qualified personnel and shall meet the acceptance requirements of ASME Code Section III, NB-5350.

TABLE 3-1 List of ASME Code Alternatives for Multi-Purpose Canisters (MPCs)			
MPC Enclosure Vessel	NB-7000	Vessels are required to have overpressure protection.	No overpressure protection is provided. Function of MPC enclosure vessel is to contain radioactive contents under normal, off-normal, and accident conditions of storage. MPC vessel is designed to withstand maximum internal pressure considering 100% fuel rod failure and maximum accident temperatures.
MPC Enclosure Vessel	NB-8000	States requirements for nameplates, stamping and reports per NCA-8000.	The HI-STORM FW system is to be marked and identified in accordance with 10CFR71 and 10CFR72 requirements. Code stamping is not required. QA data package to be in accordance with Holtec approved QA program.

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	TABLE 3-2				
REF	REFERENCE ASME CODE PARAGRAPHS FOR HI-STORM FW OVERPACK and HI-TRAC				
	VW TRANSFER C	ASK. PRIMARY I	OAD BEARING PARTS		
	Item	Code	Notes, Explanation and Applicability		
		Paragraph [†]			
1	Definition of primary and	NF-1215	-		
••	secondary members	111 1210			
2		NF-1133	The "intervening elements" are termed		
2.			interfacing SSCs in this FSAR.		
3.	Certification of material	NF-2130	Materials for ITS components shall be		
		(b) and (c)	certified to the applicable Section II of the		
			ASME Code or equivalent ASTM		
			Specification.		
4.	Heat treatment of material	NF-2170	-		
_		and NF-2180			
5.	Storage of welding material	NF-2440,	-		
		NF-4411			
6.	Welding procedure	Section IX	Acceptance Criteria per Subsection NF		
7		O statistic II			
1.	Welding material	Section II	-		
8.	conditions	NF-3111	-		
9.	Allowable stress values	NF-3112.3	-		
10.	Rolling and sliding supports	NF-3124	-		
11.	Differential thermal expansion	NF-3127	-		
12.	Stress analysis	NF-3143	Provisions for stress analysis for Class 3		
	-	NF-3380	linear structures is applicable for overpack		
		NF-3522	top lid and the overpack and transfer cask		
		NF-3523	shells.		
13.	Cutting of plate stock	NF-4211	-		
		NF-4211.1			
14.	Forming	NF-4212	-		
15.	Forming tolerance	NF-4221	All cylindrical parts.		
16.	Fitting and Aligning Tack	NF-4231	-		
	Welds	NF-4231.1			
17.	Alignment	NF-4232	-		
18.	Cleanliness of Weld Surfaces	NF-4412	Applies to structural and non-structural welds		
19.	Backing Strips, Peening	NF-4421	Applies to structural and non-structural		
		NF-4422	welds		
20.	Pre-heating and Interpass	NF-4611	Applies to structural and non-structural		
	Temperature	NF-4612	welds		
		NF-4613			
21.	Non-Destructive Examination	NF-5360	Invokes Section V, Applies to Code welds		
22	NDE Demonpol Cortification		Applies to Code wolds only		
22.		NE 5522	Applies to code welds only		
		NF-5520			
	1				

[†] All references to the ASME Code refer to applicable sections of the 2007 edition.

3.0 DESIGN FEATURES (continued)

3.4 Site-Specific Parameters and Analyses

Site-specific parameters and analyses that will require verification by the system user are, as a minimum, as follows:

- 1. The temperature of 80° F is the maximum average yearly temperature.
- 2. The allowed temperature extremes, averaged over a 3-day period, shall be greater than -40° F and less than 125° F.
- a. The resultant horizontal acceleration (vectorial sum of two horizontal Zero Period Accelerations (ZPAs) at a three-dimensional seismic site), a_H, and vertical ZPA, a_V, on the top surface of the ISFSI pad, expressed as fractions of a, shall satisfy the following inequalities:

 $a_{H} \leq r (1 - a_{V}) / h$

where f is the Coulomb friction coefficient for the cask/ISFSI pad interface, r is the radius of the cask, and h is the height of the cask center-of-gravity above the ISFSI pad surface. Unless demonstrated by appropriate testing that a higher coefficient of friction value is appropriate for a specific ISFSI, the value used shall be 0.53. If acceleration time-histories on the ISFSI pad surface are available, a_H and a_V may be the coincident values of the instantaneous net horizontal and vertical accelerations. If instantaneous accelerations are used, the inequalities shall be evaluated at each time step in the acceleration time history over the total duration of the seismic event.

If this static equilibrium based inequality cannot be met, a dynamic analysis of the cask/ISFSI pad assemblage with appropriate recognition of soil/structure interaction effects shall be performed to ensure that the casks will not tip over or undergo excessive sliding under the site's Design Basis Earthquake.

- b. Under environmental conditions that may degrade the pad/cask interface friction (such as due to icing) the response of the casks under the site's Design Basis Earthquake shall be established using the best estimate of the friction coefficient in an appropriate analysis model. The analysis should demonstrate that the earthquake will not result in cask tipover or cause excessive sliding such that impact between casks could occur. Any impact between casks should be considered an accident for which the maximum total deflection, d, in the active fuel region of the basket panels shall be limited by the following inequality: d ≤ 0.005 l, where l is the basket cell inside dimension.
- 4. The maximum permitted depth of submergence under water shall not exceed 125 feet.
- 5. The maximum permissible velocity of floodwater, V, for a flood of height, h, shall be the lesser of V₁ or V₂, where:

 $V_1 = (1.876 \text{ W}^*)^{1/2} / \text{h}$ $V_2 = (1.876 \text{ f W}^* / \text{D h})^{1/2}$

and W* is the apparent (buoyant weight) of the loaded overpack (in pounds force), D is the diameter of the overpack (in feet), and f is the interface coefficient of friction between the ISFSI pad and the overpack, as used in step 3.a above. Use the height of the overpack, H, if h>H.

- 6. The potential for fire and explosion while handling a loaded OVERPACK or TRANSFER CASK shall be addressed, based on site-specific considerations. The user shall demonstrate that the site-specific potential for fire is bounded by the fire conditions analyzed by the Certificate Holder, or an analysis of the site-specific fire considerations shall be performed.
- 7. The user shall demonstrate that the ISFSI pad parameters used in the non-mechanistic tipover analysis are bounding for the site or a site specific non-mechanistic tipover analysis shall be performed using the dynamic model described in FSAR Section 3.4. The maximum total deflection, d, in the active fuel region of the basket panels shall be limited by the following inequality: d ≤ 0.005 1, where 1 is basket cell inside dimension.
- 8. In cases where engineered features (i.e., berms and shield walls) are used to ensure that the requirements of 10CFR72.104(a) are met, such features are to be considered important-to-safety and must be evaluated to determine the applicable quality assurance category.
- LOADING OPERATIONS, TRANSPORT OPERATIONS, and UNLOADING OPERATIONS shall only be conducted with working area ambient temperatures ≥ 0° F.
- 10. For those users whose site-specific design basis includes an event or

events (e.g., flood) that result in the blockage of any OVERPACK inlet or outlet air ducts for an extended period of time (i.e, longer than the total Completion Time of LCO 3.1.2), an analysis or evaluation may be performed to demonstrate adequate heat removal is available for the duration of the event. Adequate heat removal is defined as fuel cladding temperatures remaining below the short term temperature limit. If the analysis or evaluation is not performed, or if fuel cladding temperature limits are unable to be demonstrated by analysis or evaluation to remain below the short term temperature limit for the duration of the event, provisions shall be established to provide alternate means of cooling to accomplish this objective.

- 11. Users shall establish procedural and/or mechanical barriers to ensure that during LOADING OPERATIONS and UNLOADING OPERATIONS, either the fuel cladding is covered by water, or the MPC is filled with an inert gas.
- 12. The entire haul route shall be evaluated to ensure that the route can support the weight of the loaded system and its conveyance.
- 13. The loaded system and its conveyance shall be evaluated to ensure under the site specific Design Basis Earthquake the system does not tipover or slide off the haul route.
- 14. The HI-STORM FW/HI-TRAC VW stack which occurs during MPC TRANSFER shall be evaluated to ensure under the site specific Design Basis Earthquake the system does not tipover. A probabilistic risk assessment cannot be used to rule out the occurrence of the earthquake during MPC TRANSFER.

(continued)

3.0 DESIGN FEATURES (continued)

3.5 Combustible Gas Monitoring During MPC Lid Welding and Cutting

During MPC lid-to-shell welding and cutting operations, combustible gas monitoring of the space under the MPC lid is required, to ensure that there is no combustible mixture present.