

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

- Subject: Revision 1 to Application for Amendment 16 to Standardized NUHOMS[®] Certificate of Compliance No. 1004 for Spent Fuel Storage Casks (Docket No. 72-1004)
- Reference: "Application for Amendment 16 to Standardized NUHOMS[®] Certificate of Compliance No. 1004 for Spent Fuel Storage Casks, Revision 0 (Docket No. 72-1004)," TN Americas LLC submittal E-48527 transmitted to the NRC on June 29, 2017.

As a result of the public meeting with NRC held on August 10, 2017 to obtain preliminary feedback from NRC staff regarding the proposed changes to Certificate for Compliance No. 1004 as part of the Pilot for Graded Approach for Certificate of Compliance Format, Content, and Selection Criteria review for Amendment 16, TN Americas LLC (TN) is providing this revision to the application.

For those proposed changes to the Certificate of Compliance (CoC) and Technical Specifications (TS) for which the NRC staff provided comments or had questions, TN has considered the evaluations to address the NRC feedback. TN has also added to the header of each of the 99 individual evaluation forms to identify the form # (as provided in the NRC feedback) and the revision number for the form.

If there was no initial feedback from NRC for a particular form, the revision level is indicated as Revision 0. If there was feedback but no changes were made, the revision level is also indicated as Revision 0, with additional indication regarding why no changes were made. For those evaluations in which changes have been made, the revision level is indicated as Revision 1 and the changes in the body of the evaluation form are tracked so that they are clearly discernable.

An evaluation form for each of the current CoC requirements is provided in Enclosure 1. Similar evaluation forms for each of the sections of the TS and the TS tables and figures are provided in Enclosures 2 through 7. For information, a revised high-level summary of the results of the evaluation is given in Enclosure 8. The NRC initial feedback document from the August 10, 2017 public meeting is provided for information as Enclosure 9.

As discussed in the original amendment application and during the public meeting on August 10, 2017, the CoC, TS, and UFSAR documents are not being word-processed and provided at this time. 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.

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.

AREVA TN

TN Americas LLC looks forward to continue working with the NRC staff on this amendment application and receiving additional feedback on the remaining CoC and TS items. 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 9 (i.e., OSM #1 disk)

Enclosures:

- 1. Evaluation Forms for CoC 1004 CoC Items
- 2. Evaluation Forms for CoC 1004 TS Section 1 Items
- 3. Evaluation Forms for CoC 1004 TS Section 2 Items
- 4. Evaluation Forms for CoC 1004 TS Section 3 Items
- 5. Evaluation Forms for CoC 1004 TS Section 4 Items
- 6. Evaluation Forms for CoC 1004 TS Section 5 Items
- 7. Evaluation Forms for CoC 1004 TS Tables and Figures
- 8. Amendment 16 High-Level Evaluation Results Summary Table
- 9. NRC Initial Feedback on CoC 1004 Amendment 16 Changes

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Document Components:

001 1004 AMD 16 Cover Letter.pdf, 149,295 bytes 002 1004 AMD 16 Encl 1 Assess CoC.pdf, 201,827 bytes 003 1004 AMD 16 Encl 2 Assess TS-Sect 1.pdf, 62,189 bytes 004 1004 AMD 16 Encl 3 Assess TS-Sect 2.pdf, 131,819 bytes 005 1004 AMD 16 Encl 4 Assess TS-Sect 3.pdf, 79,415 bytes 006 1004 AMD 16 Encl 5 Assess TS-Sect 4.pdf, 347,248 bytes 007 1004 AMD 16 Encl 6 Assess TS-Sect 5.pdf, 246,194 bytes 008 1004 AMD 16 Encl 7 Assess TS-Tbls Figs.pdf, 222,956 bytes 009 1004 AMD 16 Encl 8 Summary Table.pdf, 83,239 bytes 010 1004 AMD 16 Encl 9 NRC initial feedback.pdf, 98,203 bytes

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

001 1004 AMD 16 Cover Letter.pdf, 149,295 bytes 002 1004 AMD 16 Encl 1 Assess CoC.pdf, 201,827 bytes 003 1004 AMD 16 Encl 2 Assess TS-Sect 1.pdf, 62,189 bytes 004 1004 AMD 16 Encl 3 Assess TS-Sect 2.pdf, 131,819 bytes 005 1004 AMD 16 Encl 4 Assess TS-Sect 3.pdf, 79,415 bytes 006 1004 AMD 16 Encl 5 Assess TS-Sect 4.pdf, 347,248 bytes 007 1004 AMD 16 Encl 6 Assess TS-Sect 5.pdf, 246,194 bytes 008 1004 AMD 16 Encl 7 Assess TS-Tbls Figs.pdf, 222,956 bytes 009 1004 AMD 16 Encl 8 Summary Table.pdf, 83,239 bytes 010 1004 AMD 16 Encl 9 NRC initial feedback.pdf, 98,203 bytes