HOLTEC INTERNATIONAL

Krishna P. Singh Technology Campus, 1 Holtec Blvd., Camden, NJ 08104
Telephone (856) 797-0900
Fax (856) 797-0909

Mr. Meraj Rahimi, Branch Chief
Division of Spent Fuel Management
Office of Nuclear Material Safety and Safeguards

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555-0001

Docket No. 72-1040

Subject: HI-STORM UMAX Design Change

Reference: [1] Holtec Letter 5021040, "HI-STORM UMAX Clarification Letter," from S. Anton (Holtec) to J. McKirgan (NRC) dated October 10, 017

Dear Mr. Rahimi:

We thank you and your colleagues at the headquarters and Region IV for an informed discussion on the Technical Specification for HI-STORM UMAX (Docket #72-1040) and truly appreciate NRC's affirmative assessment of the HI-STORM UMAX System's compliance with its governing Technical Specification. We are pleased to state for the record that the design change [1] has actually improved the ALARA performance of the HI-STORM UMAX system and are heartened by the fact that the fuel loading at SONGS will not be disrupted.

We also recognize your concern with respect to the absence of a calculational nexus between the 30 mrem/hr surface dose limit on the Closure Lid specified in the Technical Specification and the general provision of 10CFR72.104. We hereby confirm that a computation-based connection between the two will be developed using a reasonable set of input data (viz., number of units, distance to the site boundary, average enrichment & burn up, etc.) and shared with the NRC to serve as the technical basis for the 30 mrem/hr limit. This calculation will be docketed as an "explanatory memorandum" and will thus serve as an archival source for future reference by Holtec as well as the Staff. We will submit the above "explanatory memorandum" within 30 days.

NMSS26

HOLTEC INTERNATIONAL

Krishna P. Singh Technology Campus, 1 Holtec Blvd., Camden, NJ 08104
Telephone (856) 797-0900
Fax (856) 797-0909

We thank you again for your engagement to this urgent matter.

Very truly yours,

KP Singh

KRISHNA P. SINGH, Ph.D.
PRESIDENT & CEO
HOLTEC INTERNATIONAL

cc:

Michael Layton (NRC)