

**Meeting Handout for Amendment No. 13 to Certificate of Compliance No. 1014 for the
HI-STORM 100 Multi-Purpose Canister Storage System
Docket No. 72-1014
Summary of Technical Issues**

Technical Issue in Confinement Analysis

Holtec proposed to include allowance for canisters currently loaded under earlier amendments which had different helium leak test requirements. The amendment, "Proposed Change #1," only applies to previously loaded and stored canisters; current and future canisters will continue to be helium leak tested as specified in the Certificate of Compliance (CoC) and Appendix A of the Technical Specifications (TS). The amendment, "Proposed Change #1," was not consistent with the proposed changes in the amendment. The licensing basis for the amendment, "Proposed Change #1," was not described in the amendment.

Regulatory Basis

(Title 10 of the *Code of Federal Regulations* (10 CFR) 72.236(d), 72.236(f), 72.236(j), and 72.244.

Safety Basis

Radiation shielding and confinement features must be provided sufficient to meet the requirements in 10 CFR 72.104 and 72.106. (10 CFR 72.236(d))

The spent fuel storage cask must be designed to provide adequate heat removal capacity without active cooling systems. (10 CFR 72.236(f))

The spent fuel storage cask must be inspected to ascertain that there are no cracks, pinholes, uncontrolled voids, or other defects that could significantly reduce its confinement effectiveness. (10 CFR 72.236(j))

Whenever a certificate holder desires to amend the CoC (including a change to the terms, conditions or specifications of the CoC), an application for an amendment shall be filed with the Commission fully describing the changes desired and the reasons for such changes, and following as far as applicable the form prescribed for original applications. (10 CFR 72.244)

Staff's Technical Position

The applicant stated in the amendment, "Reason for Proposed Change #1," that the ability for sites to upgrade to the latest amendment provides an operational benefit. However, the applicant did not identify, nor demonstrate, that design or operational changes that are part of the licensing basis (e.g. CoC and TS) would not have any effects on the overall performance of the storage systems in place under Amendment Nos. 2 and forward.

The applicant also stated in the amendment, "Justification for the Proposed Change #1," that the site would perform necessary evaluations. However, the scope of those evaluations were not described.

The applicant stated in the amendment, "Justification for Proposed Change # 1," that for the canisters loaded under Amendment Nos. 2 through 7: 1. the previously analyzed detectable leak rate, 2. the loss of helium from the canister resulting from a leak of this magnitude, 3. the effects on the canister's ability to reject heat under such a condition, and 4. that monitoring of the radiation levels at ISFSIs demonstrates that there is no significant radioactive release from the currently deployed canisters, were each documented in previous letters to the NRC.

The staff assumes that the information in the letters was related to Enforcement Action, EA-09-190 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML092180140).

Staff's Technical Position (con't.)

The applicant did not provide these letters, nor the NRC's evaluations of these letters, nor did the applicant summarize how those documents form part of the licensing basis for this amendment. The applicant also did not provide a summary of the results of the radiation monitoring for the relevant ISFSIs, nor the NRC's evaluations of this information, nor summarize how those documents form part of the licensing basis for this amendment. The applicant also did not provide any site-specific information on the current state of the loaded canisters from Amendment Nos. 2 through 7 to show that the NRC's evaluations following the Enforcement Action (EA-09-190) remain applicable and are bounding for the current state of the loaded canisters.

The "Reason for Proposed Change #1," indicates that the lid base material was not leak tested for canisters loaded under Amendment Nos. 2 through 7. It is not clear from the amendment request if other portions of the entire confinement boundary were also not leak tested.

In its amendment, "Reason for Proposed Change #1," the applicant indicates the proposed changes are for Amendment Nos. 2 through 7. This is contradictory to the proposed CoC, TS, and Safety Analysis Report changes that indicate that Amendment No. 7 and prior are affected by the proposed change #1.

In addition, page 3.1.1-1 of TS Appendix A includes outdated language from HI-STORM 100 Amendment No. 12 proposed change #5 that was removed prior to the submittal of this amendment request.

Supplemental information with respect to clarity and consistency regarding the amendment, "Proposed Change #1," and the proposed changes in the amendment, in addition to a clearly developed licensing basis that supports, "Proposed Change #1," will be necessary for staff to begin the review.