

**SAFEGUARDS INFORMATION**



**UNITED STATES  
NUCLEAR REGULATORY COMMISSION**  
WASHINGTON, D.C. 20555-0001

October 11, 2018

Mr. Ed Mayer, Program Director  
Holtec International  
Holtec Technology Campus  
One Holtec Boulevard  
Camden, NJ 08104

**SUBJECT:   HOLTEC INTERNATIONAL'S APPLICATION FOR SPECIFIC INDEPENDENT  
SPENT FUEL STORAGE INSTALLATION LICENSE FOR THE HI-STORE  
CONSOLIDATED INTERIM STORAGE FACILITY FOR SPENT NUCLEAR  
FUEL – FIRST REQUEST FOR ADDITIONAL INFORMATION, PART 3**

Dear Mr. Mayer:

By letter dated March 30, 2017 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML17115A431), as supplemented on April 13, October 6, December 21, and 22, 2017; and February 23, 2018 (ADAMS Accession Nos. ML17109A386, ML17310A218, ML17362A097, ML18011A158, and ML18058A617, respectively), Holtec International submitted to the U.S. Nuclear Regulatory Commission (NRC) an application for a specific independent spent fuel storage installation license to construct and operate the HI-STORE Consolidated Interim Storage (CIS) Facility, in Lea County, New Mexico, in accordance with the requirements of Part 72 of Title 10 of the *Code of Federal Regulations*, "*Licensing Requirements for the Independent Storage of Spent Nuclear Fuel, High-Level Radioactive Waste and Reactor-Related Greater than Class C Waste.*" The license application seeks NRC approval to store up to 8,680 metric tons of commercial spent nuclear fuel in the HI-STORM UMAX Canister Storage System for a 40-year license term.

The NRC staff is conducting a detailed security review of Holtec's proposed Physical Security Plan, Safeguards Contingency Plan, and Security Training and Qualifications Plan for the HI-STORE CIS Facility (submitted on April 13, 2017, supplemented on December 22, 2017), and has determined that additional information is necessary in connection with its review. The information needed by the staff is discussed in the enclosed requests for additional information (RAIs). We request that you provide the responses to these RAIs within 60 days from the date of this letter. If you are unable to meet this deadline, please notify NRC staff in writing, within two weeks of receipt of this letter, of your new submittal date and the reasons for the delay.

As discussed in our February 28, 2018, letter notifying you of our decision to docket the application and begin a detailed technical review, the NRC staff expects to issue its first round RAIs in several parts. The enclosed RAIs only address the physical security portions of the application. Additional RAIs may be issued in the future as the staff's detailed review progresses.

Upon removal of Enclosure 2, this document is uncontrolled

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Please reference Docket No. 72-1051 and CAC/EPID No. 001028/07201051/L-2018-NEW-0001 in future correspondence related to the technical review for this licensing action. If you have any questions, please contact me at (301) 415-0606.

Sincerely,

**/RA/**

Jose R. Cuadrado, Project Manager  
Spent Fuel Licensing Branch  
Division of Spent Fuel Management  
Office of Nuclear Material Safety  
and Safeguards

Docket No.: 72-1051  
CAC/EPID Nos.: 001028/07201051/  
L-2018-NEW-0001

Enclosures:

1. 1<sup>st</sup> Round RAIs – Part 3 (Unclassified)
2. 1<sup>st</sup> Round RAIs – Part 3 (Safeguards Information)

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SUBJECT: HOLTEC INTERNATIONAL'S APPLICATION FOR SPECIFIC INDEPENDENT SPENT FUEL STORAGE INSTALLATION LICENSE FOR THE HI-STORE CONSOLIDATED INTERIM STORAGE FACILITY FOR SPENT NUCLEAR FUEL – FIRST REQUEST FOR ADDITIONAL INFORMATION, PART 3, DOCUMENT DATE: October 11, 2018

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MLayton      ARivera-Varona      CHair, OGC      VWilliams      DWhite

Letter: G:/SFST/Cuadrado/Holtec/Holtec ICSF/RAIs/Part 3 RAIs/HI-STORE RAIs – First Round Part 3 – Security.docx

**ADAMS Package No. ML18284A427**

<b>OFC:</b>	DSFM	DSFM	DSFM		
<b>NAME:</b>	JCuadrado	WWheatley	JMcKirgan		
<b>DATE:</b>	10/04/18	10/05/18	10/11/18		

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**First Request for Additional Information, Part 3 (Physical Security - Unclassified)**

**Docket No. 72-1051**

**Application for specific independent spent fuel storage installation license for the HI-STORE Consolidated Interim Storage (CIS) Facility in Lea County, New Mexico**

By letter dated March 30, 2017 (ADAMS Accession No. ML17115A431), as supplemented on April 13, October 6, December 21, and 22, 2017; and February 23, 2018 (ADAMS Accession Nos. ML17109A386, ML17310A218, ML17362A097, ML18011A158, and ML18058A617, respectively), Holtec International submitted to the U.S. Nuclear Regulatory Commission (NRC) an application for a specific independent spent fuel storage installation (ISFSI) license to construct and operate the HI-STORE Consolidated Interim Storage (CIS) Facility, in Lea County, New Mexico, in accordance with the requirements of Part 72 of Title 10 of the *Code of Federal Regulations* (10 CFR 72), "*Licensing Requirements for the Independent Storage of Spent Nuclear Fuel, High-Level Radioactive Waste and Reactor-Related Greater than Class C Waste.*" The license application seeks NRC approval to store up to 8,680 metric tons of commercial spent nuclear fuel in the HI-STORM UMAX Canister Storage System for a 40-year license term. In conjunction with the application, Holtec submitted a Physical Security Plan (PSP), a Security Training and Qualifications Plan (TQP), and a Safeguards Contingency Plan (SCP), as required by Subpart H of 10 CFR Part 72, 10 CFR 73.51, and relevant NRC Orders for a site-specific ISFSI.

This request for additional information (RAI) identifies additional information needed by the NRC staff in connection with its physical security review of the PSP, TQP, and SCP for the HI-STORE CIS facility.

**Physical Security RAIs:**

**RAI PS-1: [Contains Official Use Only – Security Related Information (OUO-SRI), see Enclosure 2]**

**RAI PS-2: [Contains Safeguards Information (SGI), see Enclosure 2]**

**RAI PS-3: [Contains SGI, see Enclosure 2]**

**RAI PS-4: [Contains OUO-SRI, see Enclosure 2]**

**RAI PS-5: [Contains OUO-SRI, see Enclosure 2]**

**RAI PS-6: [Contains SGI, see Enclosure 2]**

**RAI PS-7: [Contains OUO-SRI, see Enclosure 2]**

**RAI PS-8: [Contains SGI, see Enclosure 2]**

**RAI PS-9:** Specify the retention period for the PSP and SCP

Section 6.2 of the TQP references the retention of the plan for three years, but the PSP and the SCP do not specify retention periods.

This information is needed to determine compliance with 10 CFR 73.51(c).

**RAI PS-10: [Contains SGI, see Enclosure 2]**

**RAI PS-11: [Contains SGI, see Enclosure 2]**

**RAI PS-12: [Contains OUO-SRI, see Enclosure 2]**

**RAI PS-13: [Contains SGI, see Enclosure 2]**

**RAI PS-14: [Contains SGI, see Enclosure 2]**

**RAI PS-15: [Contains OUO-SRI, see Enclosure 2]**

**RAI PS-16: [Contains SGI, see Enclosure 2]**

**RAI PS-17: [Contains OUO-SRI, see Enclosure 2]**

**RAI PS-18: [Contains OUO-SRI, see Enclosure 2]**

**RAI PS-19:** Provide the administrative controls and major processes that are described in the procedures referenced in the PSP.

In several sections of the PSP, TQP, and SCP, the applicant has referenced the use of procedures for implementing actions that are described within the plan. However, the descriptions associated with the implementing procedures do not contain any details concerning the content of these procedures.

This information is needed to determine compliance with 10 CFR 73.51(d)(5).

**RAI PS-20: [Contains OUO-SRI, see Enclosure 2]**

**RAI PS-21: [Contains SGI, see Enclosure 2]**

**RAI PS-22: [Contains SGI, see Enclosure 2]**

**RAI PS-23: [Contains SGI, see Enclosure 2]**

**RAI PS-24: [Contains SGI, see Enclosure 2]**

**RAI PS-25: [Contains SGI, see Enclosure 2]**

**RAI PS-26: [Contains SGI, see Enclosure 2]**

**RAI PS-27: [Contains SGI, see Enclosure 2]**

**RAI PS-28: [Contains OUO-SRI, see Enclosure 2]**

**RAI PS-29: [Contains OUO-SRI, see Enclosure 2]**

**RAI PS-30: [Contains SGI, see Enclosure 2]**

**RAI PS-31: [Contains SGI, see Enclosure 2]**

**RAI PS-32: [Contains OOU-SRI, see Enclosure 2]**

**RAI PS-33:** Clarify whether the following records are required for three years after a record is made, or until termination of the license:

- a. A log of individuals granted access to the protected area;
- b. Screening records of members of the security organization;
- c. A log of all patrols;
- d. A record of each alarm received, identifying the type of alarm, location, date and time when received, and disposition of the alarm;
- e. Physical protection program review reports.

Section 4.13 of the PSP and Section 6.1.6 of the TQP have retention periods for records. The records cited above do not state a retention period.

This information is needed to determine compliance with 10 CFR 73.51(d)(13)(i)-(v).

**RAI PS-34: [Contains SGI, see Enclosure 2]**

**RAI PS-35:** Describe the quality assurance program that will provide reasonable assurance that the final security system will conform to the design bases for the principal design criteria for the ISFSI physical protection.

The applicant's submittal does not contain a description of the physical security quality assurance program. In its description of the physical security quality assurance program, the applicant should address how personnel with security technical expertise that support the quality assurance for the installation of physical security systems are independent from the security organization.

This information is needed to determine compliance with 10 CFR 72.182(c).

**RAI PS-36: [Contains SGI, see Enclosure 2]**

**RAI PS-37: [Contains SGI, see Enclosure 2]**

**RAI PS-38: [Contains SGI, see Enclosure 2]**

**RAI PS-39:** Describe how the reporting requirements of 10 CFR 73.71 are met for the facility.

The security plan does not address how NRC is notified or how any of the events outlined in 10 CFR Part 73, Appendix G, are logged and recorded. Licensees that are subject to the provisions of 10 CFR 73.51 are required to address certain requirements from 10 CFR 73.71(b)(1) and (c).

This information is necessary to determine compliance with 10 CFR 73.71

**RAI PS-40: [Contains SGI, see Enclosure 2]**

**RAI PS-41: [Contains SGI, see Enclosure 2]**

**RAI PS-42: [Contains SGI, see Enclosure 2]**

**RAI PS-43: [Contains SGI, see Enclosure 2]**

**RAI PS-44: [Contains SGI, see Enclosure 2]**