



November 9, 2018

Ms. May Ma
Office of Administration
US Nuclear Regulatory Commission

Docket ID: NRC-2018-0066

Subject: Holtec International Comments on Draft NUREG-2224

Dear Ms. Ma:

We fully agree with and support the comment letter on the NUREG submitted by NEI on September 21, 2018. Furthermore, given the importance of this NUREG, we feel the need to reinforce, and supplement those comments:

- Further interaction between NRC and the industry is considered crucial for a successful implementation. The examples in Chapter 3 and 4 of the NUREG allow a wide range of options in licensing of HBF, however, many of those will need additional justification, and there appears to be no clear guidance what level of justification would be needed and what the acceptance criteria would be. Resolving this on a case-by-case (i.e. application by application) basis does not appear to be an efficient regulatory process. Developing a broad consensus in that respect would help both applicants and NRC.
- The examples in Chapter 3 and 4 make extensive reference to the approaches developed in NUREG/CR-7203. NUREG/CR-7203 clearly and repeatedly states that the configurations considered are studies beyond the design basis, many of those excessively conservative if not physical impossible, and that the purpose of the report is to show the sensitivity to those assumed conditions. However, the way they are referenced in NUREG-2224 does not appear to fully recognize this. And while NUREG-2224 states in numerous places that other approaches may be acceptable, statements such as “In an approach acceptable to the Staff ...” may, for all practical purposes, essentially elevate those approaches or conditions to design basis conditions. We recommend adding an introductory section to those chapters that clearly clarifies the nature of the studies performed in NUREG/CR-7203 and its relevance for NUREG-2224. This would be valuable for both applicants and reviewers.



Holtec Technology Campus, 1 Holtec Blvd, Camden, NJ 08104

Telephone (856) 797-0900

Fax (856) 797-0909

Sincerely,

A handwritten signature in blue ink that reads "Stefan Anton".

Stefan Anton
Vice President of Engineering
Holtec International

SUNSI Review Complete
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E-RIDS=ADM-03
ADD= Wendy Reed,
Ricardo Torres

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NUREG-2224, Dry Storage and Transportation of High Burnup Spent Nuclear Fuel, Draft Report for Comment.

Comment On: NRC-2018-0066-0016

Dry Storage and Transportation of High Burnup Spent Nuclear Fuel

Document: NRC-2018-0066-DRAFT-0020

Comment on FR Doc # 2018-21974

Submitter Information

Name: Stefan Anton

General Comment

See attached file(s)

Attachments

5014857 - Holtec Comments on NUREG-2224