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March 16, 2019

URGENT COMMUNICATION

Mr. Michael C. Layton, Director
Division of Spent Fuel Management
Office of Nuclear Material Safety
and Safeguards
U.S. Nuclear Regulatory Commission
One White Flint North
11555 Rockville Pike
Rockville, MD 20852-2738

Via Regular Mail & Email
Michael.Layton@nrc.gov

Subject: Request for an Urgent Meeting – Docket #1040 (HI-STORM UMAX System)

Dear Director Layton:

Pursuant to our March 15th conference call with you, we hereby request that a public meeting on the above-referenced docket be held in White Flint at the earliest possible date to enable us to present our regulations-informed position on the “scratch” matter for NRC’s consideration. The urgency of this request is propelled by the need to establish a path forward to resume loading at the SONGS site without delay. The loaded transfer cask stranded inside the Fuel Building is one of several compelling reasons that beckon us for an urgent regulatory engagement. Thus far, we have not been *directly* involved in the safety dialog that has occurred between SCE and Region IV for the past several months. Now that the “scratch issue” has progressed to the *general-certification* space, we think it is only fitting and proper that the regulatory communication occurs in the purview of our docket with full participation from our company.

Further, we request that the meeting occur in an afternoon so that the concerned citizens on the West coast are able to participate without undue hardship. Our communications staff can reach out to them in advance of the meeting date to ensure that they are fully apprised of the meeting. The ten-day waiting period, which is intended to notify the concerned citizens (to our knowledge, it is not a regulatory requirement), should be waived to address this issue which is both time and safety sensitive.



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We expect the proposed meeting with participation from the NRC and Holtec's solid mechanics and licensing experts will help us reach a concurred path forward that preserves NRC's certification-bases and ensures continued regulatory compliance of the HI-STORM UMAX system.

Dr. Stefan Anton, our VP of Engineering and Licensing, will serve as the Holtec interface with the NRC to organize the meeting. His coordinates are:

Tel. (856) 797-0900 x3659

Cell: (856)-296-9219

s.anton@holtec.com

We appreciate your kind consideration of this request.

Sincerely,

A handwritten signature in black ink that reads "Kris Singh".

Dr. Kris Singh, President & CEO
Holtec International

cc: Dr. Stefan Anton
Pankaj Chaudhary
Pierre Oneid
Jearl Strickland
Steven Soler
Dr. Fred Bidrawn
Charles Bullard

Document No. 5014868