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

September 30, 2019

MEMORANDUM TO: June Cai, Chief
Materials Rulemaking
and Project Management Branch
Division of Rulemaking
Office of Nuclear Material Safety
and Safeguards

FROM: John McKirgan, Chief **/RA/**
Spent Fuel Licensing Branch
Division of Spent Fuel Management
Office of Nuclear Material Safety
and Safeguards

SUBJECT: USER NEED FOR RULEMAKING FOR THE STANDARDIZED NUHOMS® SYSTEM, CERTIFICATE OF COMPLIANCE NO. 1004, RENEWED AMENDMENT NO. 16

The purpose of this communication is to request support for rulemaking activities in the Division of Spent Fuel Management (DSFM) for the following DSFM's 10 CFR Part 72 licensing action:

1. Changes to 10 CFR 72.214 rule text (changes appear in bold):

Certificate Number: 1004.
Renewed Initial Certificate, Revision 1, Effective Date: December 11, 2017.
* * *
Renewed Amendment Number 16 [insert 75 days from date of *Federal Register* publication]
SAR Submitted by: TN Americas LLC
SAR Title: Final Safety Analysis Report for the Standardized NUHOMS® Horizontal Modular Storage System for Irradiated Nuclear Fuel.
Docket Number: 72–1004.
Certificate Expiration Date: January 23, 2015.
Renewed Certificate Expiration Date: January 23, 2055.
Model Number: NUHOMS®–24P, –24PHB, –24PTH, –32PT, –32PTH1, –37PTH, –52B, –61BT, –61BTH, and –69BTH.

CONTACT: Norma García Santos, NMSS/DSFM
(301) 415-6999

2. On June 29, 2017 (ADAMS Package Accession No. ML17191A227), as supplemented on August 31, 2017 (ADAMS Package Accession No. ML17249A001), October 13, 2017 (ADAMS Package Accession No. ML17304A278), November 16, 2017 (ADAMS Package Accession No. ML17325A408), April 26, 2018 (ADAMS Package Accession No. ML18124A195), June 7, 2018 (ADAMS Package Accession No. ML18162A061), September 3, 2019 (TN, 2019a), September 6, 2019 (ADAMS Package Accession No. ML19252A394), September 10, 2019 (ADAMS Package Accession No. ML19253C390), and September 11, 2019 (ADAMS Package Accession No. ML19254C951), TN Americas LLC (the applicant) submitted an amendment request to the U.S. Nuclear Regulatory Commission (NRC) for the Standardized NUHOMS® System Certificate of Compliance (CoC) No. 1004. The amendment request contained no design changes to the NUHOMS® system, rather, the applicant included proposed changes to the CoC format and content using a graded approach principle as previously agreed by the staff and NEI (ADAMS Package Accession No. ML17138A119).

3. The proposed CoC, TS, and preliminary safety evaluation report (SER) have been placed in ADAMS (see references below) and are available for your use in the rulemaking package. DSFM will designate these documents as Official Agency Records after the Executive Director for Operations has approved the package (ADAMS Package No. ML19262E152).

The Office of the General Counsel has reviewed this memorandum with its referenced documents and has no legal objection to its contents.

CAC No. A33009
Docket No. 72-1004
EPID: L-2017-LLA-0112

ADAMS References:
1. Proposed CoC No. 1004 Renewed Amendment No. 16 CoC (ML19262E160)
2. Proposed CoC No. 1004 Renewed Amendment No. 16 Appendix A (ML19262E153)
3. Proposed CoC No. 1004 Renewed Amendment Nos. 16 Appendix B (ML16262E154, ML16262E156, ML16262E154, and ML16262E158)
4. Proposed CoC No. 1004 Renewed Amendment No. 16 Appendix C (ML19262E159)
5. Preliminary CoC No. 1004 Renewed Amendment No. 16 SER (ML19262E161)

SUBJECT: USER NEED FOR RULEMAKING FOR THE STANDARDIZED NUHOMS® SYSTEM, CERTIFICATE OF COMPLIANCE NO. 1004, AMENDMENT NO. 16
DOCUMENT DATE: September 30, 2019

ADAMS Package Accession No.: ML19262E152 Memo: ML19262E163

OFFICE	DSFM	DSFM	OGC	DSFM
NAME	NGarcía Santos	WWheatley (via email)	ACoggins (via email)	JMcKirgan
DATE	9/11/19	9/13/19	9/30/19	9/30/19

OFFICIAL RECORD COPY