7. a. For storage in a free-standing OVERPACK, ~~T~~the user shall demonstrate that the ISFSI pad parameters used in the non-mechanistic tipover and drop analyse~~i~~s are bounding for the site or ~~a~~ site specific non-mechanistic tipover and drop analyse~~i~~s to demonstrate that the acceptance criteria set forth in the HI-STORM FW FSAR are met shall be performed using the dynamic model described in FSAR Section 3.4. The maximum total deflection, d, in the active fuel region of the basket panels shall be limited by the following inequality: $d \leq 0.005 \ell$, where ℓ is basket cell inside dimension. The site-specific analyses shall be performed using methodologies consistent with those described in the HI-STORM FW FSAR.

b. For storage in an anchored OVERPACK, a tipover event is not credible. However, the ISFSI pad shall be designed to meet the embedment requirements of the anchored design. In addition, the user shall demonstrate that the ISFSI pad parameters used in the drop analysis are bounding for the site or a site specific drop analysis to demonstrate that the acceptance criteria set forth in the HI-STORM FW FSAR are met shall be performed using the dynamic model described in FSAR Section 3.4. The maximum total deflection, d, in the active fuel region of the basket panels shall be limited by the following inequality: $d \leq 0.005 \ell$, where ℓ is basket cell inside dimension. The site-specific drop analysis shall be performed using methodologies consistent with those described in the HI-STORM FW FSAR.

8. In cases where engineered features (i.e., berms and shield walls) are used to ensure that the requirements of 10CFR72.104(a) are met, such features are to be considered important-to-safety and must be evaluated to determine the applicable quality assurance category.

9. LOADING OPERATIONS, TRANSPORT OPERATIONS, and UNLOADING OPERATIONS shall only be conducted with working area ambient temperatures $\geq 0^{o}$ F.

10. For those users whose site-specific design basis includes an event or events (e.g., flood) that result in the blockage of any OVERPACK inlet or outlet air ducts for an extended period of time (i.e, longer than the total Completion Time of LCO 3.1.2), an analysis or evaluation may be performed to demonstrate adequate heat removal is available for the duration of the event. Adequate heat removal is defined as fuel cladding temperatures remaining below the short term temperature limit. If the analysis or evaluation is not performed, or if fuel cladding temperature limits are unable to be demonstrated by analysis or evaluation to remain below the short term temperature limit for the duration of the event,