



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

August 21, 2020

Mr. Prakash Narayanan  
Chief Technical Officer  
TN Americas LLC  
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**SUBJECT: RENEWED AMENDMENT NO. 16 TO CERTIFICATE OF COMPLIANCE NO. 1004 FOR THE STANDARDIZED NUHOMS® CASK SYSTEM (DOCKET NO. 72-1004, CAC NO. A33010, EPID: L-2017-LLA-0012)**

Dear Mr. Narayanan:

As requested by your application June 29, 2017 [Agencywide Documents Access and Management System (ADAMS) Package Accession Number (No.) ML17191A227], and supplemented its application on August 31, 2017 (ADAMS Accession Package No. ML17249A001), October 13, 2017 (ADAMS Package Accession No. ML17304A278), November 16, 2017 (ADAMS Accession Package No. ML17325A408), April 26, 2018 (ADAMS Package Accession No. ML18124A195), June 7, 2018 (ADAMS Package Accession No. ML18162A061), September 3, 2019 (ADAMS Package Accession No. ML19255E934), 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), enclosed is Renewed Amendment No. 16 to Certificate of Compliance (CoC) No. 1004 for the Standardized NUHOMS® Cask System (Enclosures 1, 3-5). The amended certificate constitutes the U.S. Nuclear Regulatory Commission's (NRC) approval for use of the Standardized NUHOMS® Cask System for storage of spent nuclear fuel under the general licensing provisions of 10 CFR Part 72, Subparts K and L, subject to the conditions in the amended certificate.

This amendment did not propose changes to the design or the aging management program for the CoC for the Standardized NUHOMS® Cask System. Instead, this amendment revised the CoC (including the technical specifications and appendices) format and content by implementing a methodology that includes risk-informed evaluation criteria (also referred as the graded approach criteria) (ADAMS Package Accession Nos. ML19353D337 and ML20143A075). Enclosure 2 includes a description of this methodology. This methodology considered the overall safety goals and risk associated with design features, operations, and testing requirements, which resulted in a streamlined CoC format and content by logically organizing the safety significant information that needs to be included in the CoC and its appendices. This amendment is a step forward in the development of a risk-informed framework for certification of designs of dry cask spent fuel storage systems.

As stated in the *Federal Register* (85 FR 39049; 6/30/2020), the effective date of this CoC is September 14, 2020. The NRC safety evaluation report for this amended CoC (including the CoC itself and Technical Specifications) is enclosed. If you have any questions regarding this amended certificate, please contact Ms. Norma García Santos at (301) 415-6999 or [Norma.GarcíaSantos@nrc.gov](mailto:Norma.GarcíaSantos@nrc.gov).

Sincerely,

John McKirgan, Chief  
Storage and Transportation Licensing Branch  
Division of Fuel Management  
Office of Nuclear Material Safety  
and Safeguards

Docket No.: 72-1004  
CAC No.: A33010  
EPID: L-2017-LLA-0012

Enclosures:

1. CoC No. 1004, Renewed  
Amendment No. 16
2. Final Safety Evaluation Report
3. Appendix A. Inspections, Tests, and  
Evaluations
4. Appendix B. Technical Specifications
5. Appendix C. ASME Code Alternatives

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Date: August 21, 2020

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Files Location:

**Letter: ADAMS Accession No. ML20226A065**

**CoC: ADAMS Accession No. ML20230A318**

**Appendix A: ADAMS Accession No. ML19262E153**

**Tech Specs: ADAMS Accession Nos. ML19262E154, ML19262E156, ML19262E157, and ML19262E158**

**Appendix C: ADAMS Accession Nos. ML19262E159**

**Final SER: ADAMS Accession No. ML20226A080**

**ADAMS Package No.:ML20226A014**

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