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

December 31, 2020

MEMORANDUM TO: Christopher Regan, Deputy Director
Division of Fuel Management
Office of Nuclear Material Safety
and Safeguards

FROM: Yen-Ju Chen, Sr. Project Manager
Storage and Transportation Licensing Branch
Division of Fuel Management
Office of Nuclear Material Safety
and Safeguards

Yen-Ju Chen
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Date: 2020.12.31 09:41:33 -05'00'

SUBJECT: SUMMARY OF DECEMBER 15, 2020, PUBLIC MEETING WITH HOLTEC INTERNATIONAL TO DISCUSS TECHNICAL TOPICS RELATED TO CERTIFICATE OF COMPLIANCE NO. 1040 FOR THE HI-STORM UMAX, AMENDMENT NO. 3

On December 15, 2020, staff from the Division of Fuel Management held a public meeting with representatives from Holtec International (Holtec). The purpose of this meeting was to discuss two specific topics related to Certificate of Compliance (CoC) No. 1040 for the HI-STORM UMAX, Amendment No. 3: 1) the "CoC boundary" described in Holtec's responses to NRC's request for additional information (RAI) for RAI-26 and RAI-28, and 2) the 24PT1-DSC canister's allowable term of service described in Holtec's response to RAI-27. Holtec's RAI responses can be found in Agencywide Documents Access and Management System (ADAMS) Accession No. ML20002A300.

The meeting was noticed on December 4, 2020 (ADAMS Accession No. ML20336A194) and the presentation slides (ADAMS Accession No. ML20338A060) were also available on the NRC public meeting Website. Members of the public attended this meeting on phone lines. A partial list of attendees is included in Enclosure 1.

NRC staff stated that, during the review of this amendment, the staff follows the regulatory process and procedures and ensures licensing bases are clearly established.

The first issue is related to the CoC boundary. NRC staff noted that Holtec's proposed CoC boundaries described in the responses to NRC's RAI-26 and RAI-28 are not clear nor specific. The NRC staff also noted that the CoC boundaries are not described in the proposed FSAR or CoC. In addition, the proposed boundary during the unloading process seems to imply a transfer of the canister undergoing unloading operations from CoC No. 1040 for Holtec's

CONTACT: Yen-Ju Chen, NMSS/DFM
(301) 415-1018

HI-STORM UMAX System back to CoC No. 1029 for TN Americas' Standardized Advanced NUHOMS® System, which was discussed with Holtec as a potential challenge. NRC staff noted that the CoC boundaries need to be clear and specific to allow the general licensee using the CoC to understand which safety bases are applicable at any point in the operational process. Holtec acknowledged that, from a licensing perspective, a well-defined CoC boundary in the FSAR is important to provide clear safety bases for the canister and storage system, and it would go through the process to identify the appropriate transition points for the CoC boundaries. NRC staff also noted that Holtec may need to consider modification to the accompanying operational procedures for the CoC transition process.

The second issue is related to the 24PT1-DSC canister's allowable service time. Holtec states in the proposed FSAR that 24PT1-DSC canisters in use for longer than 20 years are not permitted to be stored in the HI-STORM UMAX System. In its response to NRC's RAI-27, Holtec also stated that "[A] DSC canister that has been in storage for 20 years would be handled the same as any other licensed canister that reaches the end of its licensed life. In such a situation, either a renewal application will be submitted in accordance with Part 72 or the canister will be removed from service, identical to any canister in any NRC approved license."

NRC staff explained that the allowable service life of any canister in the HI-STORM UMAX System is controlled only by the CoC for the HI-STORM UMAX system. The need for the renewal of the UMAX CoC is driven by the UMAX CoC when it reaches 20 years, not by the 24PT1-DSC canister's time in service. The NRC staff considered that the restriction of not storing 24PT1-DSC canisters that have been in use for longer than 20 years should be a licensing condition or a technical specification. NRC staff also noted that, with the restriction in the CoC or technical specifications, a licensing action would be needed to store canisters in use for longer than 20 years, at which time potential long-term aging issues could be appropriately considered. In addition, NRC staff noted that the allowable service life of "20 years" should be clearly defined in the new license condition or technical specification. Holtec indicated that it is aligned with NRC's points and will provide clarification accordingly.

NRC planned to issue the meeting summary within 30 days of the meeting. Based on the meeting summary, Holtec would provide supplemental information to both issues. Holtec understood that the supplemental information may trigger additional NRC questions.

A member of the public asked how a canister would be removed from service. The NRC staff clarified that, in this case, it means the canister would be removed from UMAX storage system to another NRC-approved system.

Enclosure 1: Partial Attendee List

CAC: 001028
EPID: L-2017-LLA-0033

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OFFICE	NMSS/DFM	NMSS/DFM	NMSS/DFM
NAME	YChen	SFigueroa*	JMcKirgan
DATE	12/30/2020	12/30/2020	12/31/2020

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Enclosure 1 – Partial Attendee List

Name	Organization
Stefan Anton	Holtec
Yen-Ju Chen	NRC
Angela Coggins	NRC
Leira Cuadrado	NRC
Joseph Delmar	Holtec
Eliezer Goldfeiz	NRC
Carlyn Greene	SpentFUEL and StoreFUEL UxC
Donald Habib	NRC
Rick Jervey	NRC
Ed Mayer	Holtec
Kimberly Manzione	Holtec
David McIntyre	NRC
John McKirgan	NRC
Joy Russell	Holtec
Jeremy Smith	NRC
Jeremy Tapp	NRC
Aaron Thomlinson	NRC
Kalene Walker	
John Wise	NRC