



UNITED STATES
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March 22, 2021

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

FROM: Christian Jacobs, Sr. Project Manager
Storage and Transportation Licensing Branch
Division of Fuel Management
Office of Nuclear Material Safety
and Safeguards

SUBJECT: SUMMARY OF MARCH 10, 2021, PUBLIC MEETING WITH
HOLTEC INTERNATIONAL TO DISCUSS PRE-APPLICATION OF
SHIELDING METHOD OF EVALUATION TOPICAL REPORT

On March 10, 2021, a Category 1 public meeting was held between the U.S. Nuclear Regulatory Commission (NRC) and Holtec International (Holtec, the applicant). The purpose of the meeting was to discuss Holtec's plans for submittal of a Shielding Method of Evaluation (MOE) Topical Report. Holtec provided a draft version of the report titled, "Topical Report on the Radiological Fuel Qualification Methodology for Dry Storage Systems", which is available in the Agencywide Documents Access and Management System (ADAMS) at Accession No. ML21032A349. The meeting notice and agenda, dated February 12, 2021, are available in ADAMS at Accession No. ML21043A328. During the meeting, NRC staff and the applicant presented slides, which are available at ADAMS Accession Nos. ML21048A142 and ML21053A021, respectively. The enclosure to this document contains the meeting attendance list.

NRC staff discussed the need for the topical report to define the area of applicability (AOA). Holtec initially thought that NRC staff was seeking to insert specific details from each cask system into the topical report. NRC staff clarified that it was seeking information within the topical report that defines what would be enveloped by the report (e.g., what is in scope and out of scope).

Holtec was seeking to understand whether the concept of including the transport calculations (e.g., dose calculations) in the safety analysis report (SAR) for each system (versus not including this information specifically in the topical report) would be an acceptable approach. NRC staff discussed that conceptually this approach may be found acceptable, but that it needs

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to determine implications of potential changes made under Part 72 of Title 10 of the *Code of Federal Regulations*, specifically 10 CFR 72.48. The staff noted that there would be a loss in efficiency since the future amendment reviews would now need to be more detailed than just confirming that the topical report was applied or referenced properly in the certificate of compliance amendment application.

NRC staff discussed that the fuel loading report/qualification report would not need to be submitted to the NRC to meet 10 CFR 72.236(a) if the method and the AOA were well defined. Rather, the method itself could then be used by the staff to make a determination that a system meets 10 CFR 72.236(a). However, NRC staff did confirm that this qualification report is needed to be available onsite for NRC staff to inspect. The staff stated that the requirements for what will and will not be included in the qualification report should be clearly stated within the topical report, and staff expressed a desire that an example qualification report be provided at the time of the topical report submission. Holtec agreed that it would be able to provide a sample qualification report.

Holtec discussed its desire that the dose point locations be system specific and within each SAR. NRC staff discussed the need for these locations to be tied to the tech specs and not to be changed without the NRC's review, since the entire MOE is based on a staff finding that these dose locations/doses are acceptable. Holtec agreed that the dose point locations/doses needed to be tied down, and that this information could be included in the Final SAR (FSAR). Holtec noted that relevant information in the FSAR could be tied down by incorporating those sections of the FSAR by reference in the technical specifications. NRC staff also discussed that these values and locations would be specific to each system for which it applied and be provided in the qualification report available for inspection. In addition, it would increase efficiency of the review if the instructions on how to determine these dose point locations are clear within the topical report.

No regulatory decisions were made during the meeting. Holtec did not identify when the Shielding MOE Topical Report would be submitted to the NRC for review. Sixteen members of the public attended the meeting and two members of the public asked questions during the Questions and Answers session.

Mr. Mark Richter from the Nuclear Energy Institute asked what criteria would be evaluated by NRC staff if Holtec were to submit a fee waiver request for this topical report and whether NRC staff's review of the topical report submittal would be impacted until such fee waiver determination had been made. NRC staff responded that Holtec is aware that staff is currently charging Holtec to review Holtec's Shielding MOE Topical Report, including support for this pre-application meeting, and that Holtec would need to submit a fee waiver request to the Office of the Chief Financial Officer (OCFO) for a review determination to be made on a fee waiver request. NRC staff also noted that staff is ready to review Holtec's submittal when it is received, and that any fee waiver request from Holtec would be handled under a separate review process that would not affect the technical staff's review of the report itself. Further, NRC staff noted that fee waiver questions were outside the scope of the meeting agenda, and that no OCFO officials were in attendance to field such questions. Mr. Richter indicated he would follow up separately with NRC staff after the meeting.

Ms. Kalene Walker, a member of the public, asked how this topical report could be generically applied, and expressed concern for it being used for new fuel designs and high burnup fuel that may lead to fuel failure. NRC staff responded that the concern regarding the AOA for the topical report was also a concern of the NRC staff, which was discussed earlier during the meeting. Holtec is aware the AOA needs to be defined clearly within the topical report and that the NRC will make a determination on whether or not the topical report adequately covers all fuel and fuel conditions defined by Holtec.

CAC: 001028

Docket No.: 72-1014

EPID: L-2021-LRM-0015

Enclosure:

List of Attendees

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NRC Attendees

ADAMS Package No. ML21077A267
Memo: ML21077A268
Slides: ML21048A142 and ML21053A021
Meeting Notice: ML21043A328
Draft Topical Report: ML21032A349

concurrence via email *

OFFICE:	DFM	DFM	DFM
NAME:	CJacobs	WWheatley *	JMcKirgan *
DATE:	3/11/21	3/17/21	3/19/21

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LIST OF ATTENDEES SELF IDENTIFIED

MARCH 10, 2021, PUBLIC MEETING REGARDING PRE-APPLICATION OF
HOLTEC'S SHIELDING METHOD OF EVALUATION TOPICAL REPORT

Name	Affiliation
Christian Jacobs	U.S. Nuclear Regulatory Commission (NRC)
Veronica Wilson	NRC
Michel Call	NRC
Zhian Li	NRC
Marlone Davis	NRC
Tim McCartin	NRC
Richard Chang	NRC
John McKirgan	NRC
Haile Lindsay	NRC
Alana Bell	NRC
Denis Elisio	Holtec International (Holtec)
Stefan Anton	Holtec
John Murphy	Holtec
Malinda Saia	Holtec
Nicholas Kucinski	Holtec
Pardem HoldinuBrain	Holtec
Peter Stefanovic	Holtec
Robert Tinker	Holtec
Debabrata MitraMajumdar	Holtec
Nadiia Kirillova	Holtec
Vadym Makodym	Holtec
Mark Richter	Nuclear Energy Institute
Hatice Akkurt	Electric Power Research Institute (EPRI)
Robert Hall	EPRI
Steve Baker	Transware
Joe Bernhardt	Exelon Corporation
Rick Migliore	Orano
Kalene Walker	public