

Attachment 3 to Holtec Letter 5014920

Comment No.	Page No.	Line No.	Comment Type	NRC feedback & Holtec Response	NRC Disposition
1	6	1	Non-Proprietary Clarification	<p>OPEN ITEM 1: Provide all temperature values for both the FSAR and proposed TR. Specifically update Tables 2.1 and 4.1 with design basis temperatures and proposed TR temperatures with specific FSAR citations for where those values were obtained.</p> <p>Holtec Response: Tables 2.1 and 4.1 of the TR have been revised to cite the exact source (Table number from the FSARs) of component temperature limits. Proposed temperature limits of all components except fuel cladding in Table 2.1 of the TR are consistent with those in Table 2.2.3 and 2.II.2.9 of HI-STORM 100 Amendment 15 LAR. Similarly, the proposed temperature limits of all components except fuel cladding in Table 4.1 are consistent with those in Table 2.2.3 of HI-STORM FW FSAR. Fuel cladding temperature limits are conservatively set lower than those allowed in the FSAR and ISG-11 Rev 3. Explicit values of all component temperatures from the original source (i.e. the FSARs) are not duplicated in the TR to avoid convolution of the tables</p>	
2	6	5	Non-Proprietary Clarification	<p>OPEN ITEM 2: Provide all pressure values for both the FSAR and proposed TR. Specifically update Tables 2.2 and 4.2 with design basis pressures and proposed TR pressures for both the MPC-68M and MPC-32M as well as specific FSAR citations for where those values were obtained.</p> <p>The NRC noted during the review that there was a discrepancy between the design basis pressures reported in the FSAR and the pressures reported in the TR with respect to the acceptance criteria. This discrepancy relates to the assertion that acceptance criteria values for the TR will be lower than the design basis acceptance criteria. For the purpose of clarity and information integrity, the NRC would like to see a full comparison (summary table) of the design basis acceptance criteria from the FSARs and the intended acceptance criteria adopted in the TR. Since the acceptance criteria for temperature is also utilized in a similar way to pressure, the NRC would like to see the same comparison.</p> <p>Holtec Response: Tables 2.2 and 4.2 of the TR have been revised to cite the exact source (Table number from the FSARs) of design pressure limits under all conditions. Proposed MPC cavity pressure limits in Table 2.2 of the TR are consistent with those in Table 2.2.1 and 1.II.2.3 of HI-STORM 100 Amendment 15 LAR. Similarly, the proposed MPC cavity pressure limits in Table 4.2 are consistent with those in Table 2.2.1 of the HI-STORM FW FSAR. Explicit values of all design pressures from the original source (i.e. the FSARs) are not duplicated in the TR to avoid convolution of the tables. Additionally, the design</p>	

Attachment 3 to Holtec Letter 5014920

				pressure limits under normal long-term storage are conservatively set lower than the limit set forth in the latest revision of the HI-STORM 100 FSAR and HI-STORM FW FSAR.	
3	7	5	Non-Proprietary Accuracy	<p>OPEN ITEM 3: Insert fire accident discussion or provide justification for not including it as part of the transient evaluations. It was unclear to the NRC why this transient evaluation was left out of the series of analyses required when the screening criteria were not met.</p> <p>Holtec Response: The topical report has been updated to include discussions on the fire accident condition in Section 2.3.15.</p>	
4	7	11	Proprietary Accuracy	<p>[</p> <p>PROPRIETARY INFORMATION WITHHELD PER 10CFR2.390</p> <p>]</p>	
5	7	42	Non-Proprietary Clarification	<p>OPEN ITEM 5: Insert fire accident discussion or provide justification for not including it as part of the transient evaluations. It was unclear to the NRC why this transient evaluation was left out of the series of analyses required when the screening criteria were not met.</p> <p>Holtec Response: The topical report has been updated to include discussions on the fire accident condition in Section 4.3.14.</p>	
6	8	33	Proprietary Clarification	<p>[</p> <p>PROPRIETARY INFORMATION WITHHELD PER 10CFR2.390</p>	

E1	13	8	Non-Proprietary Editorial	ITEM E1: Table 4.4.2 of the HI-STORM 100 FSAR has a temperature value of 700 °F, not 750 °F Holtec Response: Table 2.4 of the TR has been revised to address this comment.	
E2	13	11	Non-Proprietary Editorial	ITEM E2: Change HI-STORM, to HI-STORM 100, Sections 2.3.1, 2.3.2.2, 2.3.7, 3.2.3, 3.2.3.2, 3.2.3.3, 3.2.4, 3.2.4.1 of TR HI-2200343 Holtec Response: Multiple sections of the TR have been revised to address this comment.	
E3	13	14	Non-Proprietary Editorial	ITEM E3: In Section 3.2.3.1, change Section 2.3.9 to 2.3.8 Holtec Response: Section 3.2.3.1 of the TR has been revised to address this comment.	
E4	13	16	Non-Proprietary Editorial	ITEM E4: In Table 3.8, add note 3 as described in column heading Holtec Response: Table 3.8 of the TR has been revised to address this comment.	
E5	13	18	Non-Proprietary Editorial	ITEM E5: change HI-STORM to HI-STORM FW, Sections 4.3.7, 4.3.8, 4.3.11, 4.3.14, Table 4.1, 5.1.1 of TR HI-2200343 Holtec Response: Multiple sections of the TR have been revised to address this comment.	

Attachment 3 to Holtec Letter 5014920

E6	13	21	Non-Proprietary Editorial	ITEM E6: change HI-STORM 100 to HI-STORM FW in Section 5.1.1, ...shows the pattern may be adopted for supporting fuel loading and storage in the HI-STORM 100 System Holtec Response: Section 5.1.1 of the TR has been revised to address this comment.	
E7	13	24	Non-Proprietary Editorial	ITEM E7: Provide referenced Figure 5.1 Holtec Response: The TR has been revised to include Figure 5.1.	