



April 19, 2021

Kristina Banovac, Project Manager
Division of Fuel Management
Office of Nuclear Material Safety and Safeguards

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555-0001

Docket No. 72-1014, Certificate of Compliance (CoC) No. 1014

Subject: Submittal of RAI Clarification Responses on HI-STORM 100 License Renewal

Reference(s): [1] "Request for Clarification of Response to Request for Additional Information for the Technical Review of the Application for Renewal of the Certificate of Compliance No. 1014 for the HI-STORM 100 Storage Cask System (CAC/EPID Nos. 001028/L-2020-RNW-0007)" (Letter from K. Banovac (NRC) to K. Manzione (Holtec) dated February 18, 2021)

Dear Ms. Banovac:

In reference [1] NRC staff requested additional clarification to previously submitted RAI responses needed to complete their detailed technical review of the application for renewal of HI-STORM 100 Certificate of Compliance No. 1014. This letter provides the responses to those remaining clarification requests.

Attachments 1 and 2 to this letter contain RAI clarification responses in proprietary and non-proprietary forms. Attachment 3 contains the revised renewal application. Please note that in Attachment 3, additional editorial change is made as part of the clarification responses. This change is made in Appendix A and Appendix D to element 6 of the Overpack and Transfer Cask AMP Tables and consist of replacing "part long" with "part length" in the instances to improved reader clarity. To facilitate the review of the RAI responses, this change, along with all changes discussed in the RAI clarification responses, are highlighted in blue in the updated renewal application. Additionally, all highlights from previous submittals were maintained in this submitted renewal application. Attachment 4 contains the shielding analysis performed in support of the response to the clarification request to RAI 3.6.



Holtec considers information in Attachments 1 and 4 to be proprietary information; therefore, Attachment 5 to this letter is an affidavit prepared in accordance with 10 CFR 2.390 requesting that these attachments be withheld from public disclosure.

If you have any questions, please contact me at 856-797-0900 ext. 3931.

Sincerely,

A handwritten signature in blue ink, appearing to read "B. Seawright".

Brian Seawright
Licensing Engineer,
Holtec International

cc: (via email)
Andrea Kock (USNRC)
John McKirgan (USNRC)

Attachments:

- Attachment 1: Response to Clarification Requests for Requests for Additional Information (Proprietary)
- Attachment 2: Response to Clarification Requests for Requests for Additional Information (Non-Proprietary)
- Attachment 3: HI-STORM 100 License Renewal Application Rev 1 (Non-Proprietary)
- Attachment 4: Shielding Analysis in Support of the HI-STORM 100 License Renewal Application Rev 0 (Proprietary)
- Attachment 5: Affidavit Pursuant to 10 CFR 2.390 to Withhold Information from Public Disclosure (non-proprietary)