



June 1, 2021

Director of Division of Spent Fuel Management
Office of Nuclear Material Safety and Safeguards
ATTN: Document Control Desk
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Docket No.: Docket No. 71-9325 (HI-STAR 180 Model)

Subject: Submittal of License Amendment Request 9325-4 for Model No. HI-STAR 180
Transport Package

Dear DFM Director,

Holtec International is pleased to submit License Amendment Request (LAR) 9325-4 proposing certain changes to the HI-STAR 180 Certificate of Compliance (CoC) Number 9325 Revision 3 and its corresponding supporting Safety Analysis Report (SAR) Revision 8. A complete and updated SAR (Revision 9) is provided herein with this LAR.

This LAR presents enhancements mainly for fabrication flexibility but also to fine tune allowable content restrictions. Fabrication enhancement to the drawing packages is generally limited to a few tolerances. The safety analysis has been enhanced commensurately. All significant enhancements are identified in the summary of proposed changes (SOPC) provided in Enclosure 1 to facilitate the staff's review. The SOPC includes reasons and justifications for various safety significant changes. The SAR's Revision Summary Log section outlines chapter by chapter changes and includes information on the SAR's revision status and configuration control.

Considering the limited scope of this amendment and the importance of minimizing disruption to fabrication, we kindly request an expedited review and notify you of a need date of September 30, 2021 for the CoC.

Enclosure 2 contains Holtec's proposed changes to the Certificate of Compliance (CoC) for the staff's convenience.

Enclosures 3 and 4 contain the Safety Analysis Report (SAR) for the HI-STAR 180 Package (both proprietary and non-proprietary versions). Enclosure 5 contains the drawings that make up the licensing drawing package.

Doc. I.D.: 1553045-NRC When separated from the enclosures, this cover letter is non-proprietary.



Enclosures 6 and 7 contain supporting calculation packages.

Enclosure 8 is an affidavit prepared in accordance with 10 CFR 2.390 requesting that Enclosures marked proprietary be withheld from public disclosure due to their proprietary nature.

If you have any questions, then please contact me at 856-797-0900, ext. 3698.

Sincerely,

A handwritten signature in black ink that reads "Luis Hinojosa".

Luis Hinojosa
Corporate Adjunct Licensing Manager
Project Manager of Licensing of Transportation Systems
Holtec International

cc: (letter only)
John McKirgan, USNRC
Pierre Saverot, USNRC

Enclosures:

- Enclosure 1: Summary of Proposed Changes (SOPC) for HI-STAR 180 LAR 9325-4 (Holtec Proprietary Information)
- Enclosure 2: Holtec Proposed CoC 71-9325 Revision 4 for the HI-STAR 180 Package (Holtec Non-Proprietary Information)
- Enclosure 3: HI-STAR 180 Safety Analysis Report (SAR), HI-2073681, Revision 9 (Holtec Proprietary Information)
- Enclosure 4: HI-STAR 180 Safety Analysis Report (SAR), HI-2073681, Revision 9 (Holtec Non-Proprietary Information)
- Enclosure 5: HI-STAR 180 Cask Licensing Drawing No. 4845, Rev. 15
HI-STAR 180 F-37 Basket Licensing Drawing No. 4847, Rev. 9
HI-STAR 180 F-32 Basket Licensing Drawing No. 4848, Rev. 9
HI-STAR 180 Impact Limiter Licensing Drawing No. 5062, Rev. 8 (Holtec Proprietary Information)
- Enclosure 6: Shielding Analysis for the HI-STAR 180, HI-2073655, Revision 14 (Holtec Proprietary Information)



KPS Technology Campus, 1 Holtec Blvd, Camden, NJ 08104

Telephone (856) 797-0900

Fax (856) 797-0909

Enclosure 7: Thermal Analysis of the HI-STAR 180, HI-2073649, Revision 12
(Holtec Proprietary Information)

Enclosure 8: Affidavit Pursuant to 10 CFR 2.390 to Withhold Information from Public
Disclosure