



Krishna P. Singh Technology Campus, 1 Holtec Blvd., Camden, NJ 08104

Telephone (856) 797-0900

Fax (856) 797-0909

July 13, 2021

Shana Helton – Director
Division of Fuel Management
Office of Nuclear Material Safety and Safeguards

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

Docket No.:

72-1008, Certificate of Compliance (CoC) No. 1008

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

72-1032, Certificate of Compliance (CoC) No. 1032

72-1040, Certificate of Compliance (CoC) No. 1040

Subject: Extreme Environmental Phenomena During Short Term Operations Within 10CFR72
Jurisdiction – Update

Reference – [1] July 7, 2021 Public Meeting between NRC and Holtec International,
ML21188A203

[2] Holtec Letter 5018082, “Extreme Environmental Phenomena During Short Term
Operations Within 10CFR72 Jurisdiction,” Letter to C. Regan (NRC) from S. Anton
(Holtec) dated May 12, 2021

[3] Holtec Letter 5018086, “Submittal of Holtec Position Paper DS-481,
‘Consideration of Transient Loadings during Short Term Operations,” Letter to S.
Helton (NRC) from S. Anton (Holtec) dated June 23, 2021

Dear Ms. Helton:

Holtec greatly appreciates the NRC staff’s time at the public meeting on July 7, 2021 [1]. The discussion during that meeting was extremely helpful to Holtec and our clients. It became evident during that discussion that more clarity was needed for the NRC staff to determine if updates or additional guidance is needed. This letter provides clarity and a proposed path forward for Holtec and our users.



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As stated in the original letter on this issue [2], NUREG-2215 (and previously in NUREG-1536), provides guidance that tornados may occur at any time. The probability of the tornado wind and missile accidents occurring during short term operations that occur during the course of loading has been considered and based on the relatively short duration, the probability of a tornado occurring during these evolutions has been determined by analysis to be non-credible, as described in the position paper previously submitted to the NRC [3]. Holtec general licensees further reduce the probability through use of administrative controls to ensure cask movement does not take place during inclement weather (or place the casks in safe conditions upon recognition of adverse weather). Therefore, these accidents happening during the combination of normal operations with administrative controls are considered to be in the category of readily avoidable to the point where additional analyses of the short-term handling equipment is not warranted.

Based on this justification, Holtec plans to issue a change (ECO) to our FSAR, with any necessary supporting 72.48 documentation. This change will make explicitly clear the relationship between the inclement weather controls and the tornado accident evaluation. This change is consistent with how all sites have loaded the existing casks to date.

Holtec requests that the NRC consider its guidance in relation to this issue and provide any revised guidance or generic regulatory communication based on the widespread industry approach.

If you have any questions, please contact me at (856) 797-0900 ext 3951 or k.manzione@holtec.com.

Sincerely,

A handwritten signature in blue ink that reads "Kim Manzione".

Kimberly Manzione
Licensing Manager
Holtec International

cc:(via email)

John McKirgan (NRC)

Paul Peduzzi (NRC)

Marlone Davis (NRC)

Mark Richter (NEI)

Zita Martin (HUG)

Suzanne Leblang (HUG)