

**Attachment 1 to Holtec Letter 5018088**

**Amendment Request 1032-8**

**SUMMARY OF PROPOSED CHANGES**

All changes to the CoC and FSAR are marked in the subsequent attachments. Changes that have occurred as part of prior applications are not marked as changes. No changes are proposed to CoC Appendices.

**Proposed Change #1**

Update the description of the HI-STORM FW system in the CoC to clearly indicate that only the portions of the components that come into contact with the pool water need to be made of stainless steel or aluminum.

**Reason for Proposed Change #1**

The current description in the CoC states that “All MPC components that may come into contact with spent fuel pool water or the ambient environment are made entirely of stainless steel or passivated aluminum/aluminum alloys.” While it is important that all portions of the components that come into contact with the pool water be made of stainless steel or aluminum, the remaining sections can be made from different material (e.g. carbon steel).

This change was originally proposed as part of the CoC 1032 Amendment 7 submittal and was described as an editorial change. However, it is now being requested in this separate Amendment 8 submittal to facilitate a more expedited review and approval.

**Justification for Proposed Change #1**

The statement quoted above has existed in the CoC since its initial approval and the phrasing is similar to the CoC for another Holtec System CoC: 72-1014 for the HI-STORM 100 System.

When the statement was introduced into the 1014-CoC in Amendment 5, the associated NRC SER Section 1.1.1 noted that “All MPC components that may come into contact with spent fuel pool water or the ambient environment, with the exception of neutron absorber, aluminum seals on vent and drain port caps, and optional aluminum heat conduction elements in early-vintage MPCs, are constructed of stainless steel.” The term “entirely” was not used in this statement. In this SER Section, the word “entirely” is only used in relation to confinement boundary components being made entirely of stainless steel. No changes to the CoC description statement specific to confinement boundary components is proposed in this LAR.

**Editorial Changes:**

Minor editorial changes were also made to the CoC.