




UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

August 25, 2021

MEMORANDUM TO: Yoira Diaz-Sanabria, Acting Deputy Director
Division of Fuel Management
Office of Nuclear Material Safety
and Safeguards

FROM: Yen-Ju Chen, Sr. Project Manager 
Storage and Transportation Licensing Branch
Division of Fuel Management
Office of Nuclear Material Safety
and Safeguards

SUBJECT: SUMMARY OF JULY 27, 2021, PUBLIC MEETING WITH
HOLTEC INTERNATIONAL TO DISCUSS CERTIFICATE OF
COMPLIANCE NO. 1014 FOR THE HI-STORM 100
AMENDMENT NO. 16, GRADED APPROACH

On July 27, 2021, staff from the Division of Fuel Management held a public meeting with representatives from Holtec International (Holtec). The purpose of this meeting was to discuss the application for Certificate of Compliance (CoC) No. 1014 for the HI-STORM 100 Amendment No. 16 (Agencywide Documents Access and Management System [ADAMS] Accession No. ML21068A360), specifically on the proposed change that Holtec has referred to as a re-organization of the CoC and its appendices using the process known as the graded approach.

The meeting was noticed on June 23, 2021 (ADAMS Accession No. ML21174A193). Several members of the public attended this meeting. The partial attendees list is included in Enclosure 1. The presentation slides for the meeting (ADAMS Accession No. ML21201A028) were available on the NRC public meeting Website and are included in Enclosure 2.

The graded approach is an initiative with the objective to streamline the CoC and technical specifications (TSs) so that they focus on the most safety-significant and risk-significant issues. This enables the staff, certificate holders, and general licensees to focus their resources accordingly. The graded approach process also enhances the staff's licensing review and oversight activities. Currently, the staff relies on the pilot implementing the graded approach process as a good example to apply the process. At the meeting, the staff discussed the importance of completing the graded approach evaluation forms, based on the descriptions of the graded approach criteria that have been endorsed by the NRC and the experience from the pilot amendment application. Specifically, the staff stated that the narrative contained in the

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evaluations forms is important to support the conclusions made, such as why to retain, remove, or relocate an item. The narrative also helps the staff to independently evaluate the conclusions and document the findings in the safety evaluation report.

The application for HI-STORM 100 Amendment No. 16 contains proposed changes to the cask design and operations and changes to the CoC and its appendices using the graded approach. The staff notes that the proposed changes related to the graded approach do not completely follow the example of the pilot or appear to address or align with the descriptions of the graded approach criteria for evaluating the relocation (including within the graded approach format for the CoC and its appendices), removal or addition of needed CoC requirements and requirement details. Rather, the proposed changes appear to be a re-organization of the CoC and TSs. The staff emphasized the need for more narrative to clearly convey Holtec's decision in retaining, removing, or relocating an item. Holtec representatives stated that they understood the staff's general request for more information in Holtec's decision-making process. They also noted that, during the decision-making process, Holtec had considered the general licensees who currently use this storage system and tried to minimize the potential impacts if the general licensees decide to use a later amendment. Holtec will provide a decision on how to proceed with the graded approach at a later time.

The staff plans to follow the practice used during the graded approach pilot to continue the amendment review for HI-STORM 100 Amendment No. 16 and HI-STORM Flood/Wind Amendment No. 7 by maintaining open communications with the Holtec points of contact and providing feedback on implementation of the graded approach for these applications through public meetings. The staff will develop the review schedule for both amendments after receiving Holtec's decision.

There was no public comment.

Enclosures:

1. Partial Attendee List
2. Meeting Handout

CAC: 001028

EPID: L-2021-LLA-0039

Enclosure 1 – Attendee List

Name	Organization
Mike Call	NRC
Jimmy Chang	NRC
Yen-Ju Chen	NRC
Denise Elisio	Holtec
Daniel Forsyth	NRC
Carlyn Greene	UxC
Yong Kim	NRC
Patrick Koch	NRC
Shikha Kumar	NRC
Haile Lindsay	NRC
Kimberly Manzione	Holtec
Jonathan Marcano-Lozada	NRC
Zita Martin	Tennessee Valley Authority
John McKirgan	NRC
Mark Richter	Nuclear Energy Institute
Robert Quinn	Westinghouse Electric Company
Brian Seawright	Holtec
Jeremy Tapp	NRC
Kalene Walker	
Veronica Wilson	NRC
Jon Woodfield	NRC