

## Request for Additional Information for New Scope Addition

By letter dated March 31, 2021, as supplemented June 23, 2021, August 4, 2021, September 3, 2021, October 22, 2021, and November 30, 2021, TN Americas LLC (TN) submitted to the U.S. Nuclear Regulatory Commission (NRC) an application for Certificate of Compliance No. 1042, Amendment No. 3, to the NUHOMS® EOS System, pursuant to the requirements of Part 72 of Title 10 of the *Code of Federal Regulations*.

This request for additional information (RAI) identifies additional information needed by the NRC staff in connection with its review of this amendment application. Each RAI below describes information needed by the staff to complete its review of the subject application.

**RAI 9-1.** Describe how winds that are greater than 44 mph, which occur independent of tornados and thunderstorms, are addressed in the Technical Specification 1.1 and in the application as related to the definition of a SAFE CONDITION AND FORECAST.

Based on the staff's review of the warnings, watches, or advisories from the National Oceanic and Atmospheric Administration's National Weather Service, there are other external events that result in winds greater than 44 miles per hour (mph). Those warnings and watches include blizzard, high wind, hurricane, and tropical storm. A blizzard is a severe snowstorm characterized by strong sustained winds of at least 35 mph. High winds can be 40 mph or greater that last for one hour or longer or include wind gusts that are 58 mph or greater regardless of duration and observed on land. A Category 1 hurricane, the lowest hurricane category, can have sustained winds from 74 to 95 mph. A tropical storm can have sustained winds from 39 to 74 mph. In addition to the above watches and warnings, a wind advisory may be issued for sustained winds of 31 to 39 mph for an hour or more and/or wind gusts of 46 to 57 mph for any duration.

This information is necessary to determine compliance with 10 CFR 72.236(l).

**RAI 9-2:** Provide a basis for the updated final safety analysis report (UFSAR) eight-hour limit. Include a description of compensatory actions to cease transient operations when impending tornado conditions or forecasted winds are expected and/or exceed 44 mph to include mitigating actions related to safely securing the transfer cask in the event of transfer equipment failure. Further, provide a description of notification meteorological monitoring criterion prior to the start of the ISFSI transient operations (e.g., notification of control room, monitoring of weather during ISFSI transient operations, and site walkdowns to identify and secure any potential hazards).

UFSAR Section A.2.4.2.4, MX-LC Design Criteria, allows the use of administrative controls based on a conservative time frame of eight hours for completing operational tasks associated with insertion of a dry shielded canister into the HSM-MX. It is unclear as to the basis for eight hours. UFSAR Section 2.4.2.4 currently does not include a description of notification meteorological monitoring criterion prior to the start of the ISFSI transient operations to preclude short term operations during periods of adverse weather or during periods when adverse weather is predicted.

This information is necessary to determine compliance with 10 CFR 72.236(l).

Enclosure