



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

Telephone (856) 797-0900

Fax (856) 797-0909

January 28, 2022

Yen Chen, Project Manager  
Division of Spent Fuel Management  
Office of Nuclear Material Safety and Safeguards

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

Docket No. 72-1014, Certificate of Compliance (CoC) No. 1014  
EPID: L-2021-LLA-0039

Subject: HI-STORM 100 Amendment 16 Additional Information on Graded Approach

Reference: [1] "HI-STORM 100 Multipurpose Canister Storage System Amendment 16 Request," letter from B. Seawright (Holtec) to J. McKirgan (NRC) dated March 9, 2021. ADAMS Accession No. ML21068A361  
[2] "HI-STORM 100 Amendment 16 Responses to Requests for Supplemental Information," letter from B. Seawright (Holtec) to Y. Chen (NRC) dated August 11, 2021. ADAMS Accession No. ML21223A046

Dear Ms. Chen:

On June 27, 2021, a public meeting was held between the NRC and Holtec to discuss the NRC staff's feedback related to the CoC changes proposed in the application for HI-STORM 100 Amendment 16 following the process developed and described in RIRP-I-16-01 (ML17138A119), also referred to as the graded approach. In this meeting the NRC staff provided feedback and requested additional information on the proposed CoC changes. Attachments 1 through 11 contain the additional information requested related to the proposed reorganization of the CoC.

Attachments 1 through 5 are the reorganized CoC and its Appendices. Please note that changes are no longer being proposed to the CoC Appendix A-100U and Appendix B-100U. The mark-ups in these Attachments reflect text changes to the original format CoC proposed in Attachments 2 through 4, 7, and 8 of the HI-STORM 100 LAR 1032-16 [1] and in Attachment 3 to the HI-STORM 100 LAR 1032-16 RSI Responses [2]. Attachment 6 is a matrix showing a high-level perspective of where the information in the original CoC and its Appendices can be found in the

Document ID 5014939

Page 1 of 3



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

Telephone (856) 797-0900

Fax (856) 797-0909

reorganized documents. Attachments 7 through 11 provide the evaluations following the “graded approach” process described in RIRP-I-16-01. These evaluations support decisions made about where the parts of the original CoC and its Appendices are moved to in the reorganized documents and which parts can be removed or reduced.

Please contact me at (856) 797-0900 Extension 3326 if you have any questions or require any additional information.

Sincerely,

A handwritten signature in black ink that reads "Denise Elisio". The signature is written in a cursive, flowing style.

Denise Elisio  
Licensing Engineer  
Holtec International

cc: (via email)  
Yoira Diaz-Sanabria, USNRC  
Kimberly Manzione, Holtec



**Attachments:**

- Attachment 1: HI-STORM 100 Amendment 16 Certificate of Compliance Reorganization
- Attachment 2: HI-STORM 100 Amendment 16 Certificate of Compliance, Appendix A  
Reorganization
- Attachment 3: HI-STORM 100 Amendment 16 Certificate of Compliance, Appendix B  
Reorganization
- Attachment 4: HI-STORM 100 Amendment 16 Certificate of Compliance, Appendix C  
Reorganization
- Attachment 5: HI-STORM 100 Amendment 16 Certificate of Compliance, Appendix D  
Reorganization
- Attachment 6: HI-STORM 100 Amendment 16 Certificate of Compliance Reorganization Matrix
- Attachment 7: HI-STORM 100 Amendment 16 Certificate of Compliance Reorganization  
Evaluation Form
- Attachment 8: HI-STORM 100 Amendment 16 Certificate of Compliance, Appendix A  
Reorganization Evaluation Form
- Attachment 9: HI-STORM 100 Amendment 16 Certificate of Compliance, Appendix B  
Reorganization Evaluation Form
- Attachment 10: HI-STORM 100 Amendment 16 Certificate of Compliance, Appendix C  
Reorganization Evaluation Form
- Attachment 11: HI-STORM 100 Amendment 16 Certificate of Compliance, Appendix D  
Reorganization Evaluation Form