

**From:** [Habib, Donald](#)  
**To:** [David Lochbaum](#)  
**Cc:** [webrost@stpegs.com](mailto:webrost@stpegs.com); [Morris, Scott](#); [Diaz Sanabria, Yoira](#)  
**Subject:** RE: HI-TRAC interim storage configuration at South Texas Project  
**Date:** Tuesday, April 19, 2022 8:57:00 AM

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Mr. Lochbaum –

Thank you for participating in the March 31, 2022, public meeting regarding an exemption request from South Texas Project Nuclear Operating Company (STPNOC) (ADAMS Accession No. ML22070B140). STPNOC's exemption request concerned a storage canister containing spent fuel at the facility; STPNOC had determined that a 1-inch portion of the shell-to-baseplate weld on the canister was not properly digitally radiographed after a weld repair, as required by the applicable certificate of compliance (HI-STORM FW Storage System, Amendment 2). While awaiting NRC to complete its review, STPNOC has been storing the canister in the fuel handling building.

Below are the questions you asked and our responses. I appreciate your interest in this matter.

Regards

Don Habib  
Project Manager  
U.S. Nuclear Regulatory Commission  
Office of Nuclear Material Safety and Safeguards  
Division of Fuel Management  
Spent Fuel Storage and Transportation Licensing Branch  
301-415-1035

- Is the mating device still attached to this MPC-37?
  - No. The mating device is used when a canister is transferred from a HI-TRAC VW (variable weight) transfer cask to a HI-STORM overpack (See Section 9.2 of the HI-STORM FW FSAR, ADAMS Accession No. ML17179A444). At this time, the canister is inside a HI-TRAC VW transfer cask. The mating device has not yet been attached to the canister, and the canister will remain in the transfer cask in the fuel handling building until the NRC reaches a decision on STP's requested exemption (ADAMS Accession No. ML22070B140).
- Has a site-specific analysis for the interim configuration, with or without the mating device attached, been performed?
  - Yes, STP has performed two site-specific analyses. These analyses were without the mating device attached because, as discussed in response to the first question, the mating device has not yet been attached to the canister. STP's analysis determined that the canister is in an analyzed condition consistent with the FSAR. A high-level summary of the results for one of these analyses appears in the STP presentation from the March 9, 2022, public meeting (ADAMS Accession No. ML22062B040, see unnumbered slides 4, 5, and 6). The NRC staff inspectors communicated with STP about the analyses as part of the NRC's normal oversight processes, and the inspectors did not identify any safety concerns with the canister in its current configuration.
- Has an evaluation per 10 CFR 72.48 been completed for the deviation from the cask loading process as described in the HI-STORM FSAR?

No, STP has not done an evaluation under 10 CFR 72.48. STP determined that a 72.48 evaluation was not necessary for the pause in the loading process. The NRC staff will inspect this determination as part of its regular oversite process. Additionally, the Holtec information bulletin you submitted with your questions cited the HI-STORM 100 FSAR to note that the cask loading process should be "completed as a continuous operation." In this case, the governing FSAR is the HI-STORM FW MPC Storage System FSAR, which does not refer to the loading process as a "continuous operation" and which also does not specify a time limit on how long a canister may remain in the transfer cask.

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**From:** David Lochbaum <davelochbaum@gmail.com>

**Sent:** Saturday, April 2, 2022 8:54 AM

**To:** Habib, Donald <Donald.Habib@nrc.gov>

**Cc:** webrost@stpegs.com; Morris, Scott <Scott.Morris@nrc.gov>

**Subject:** [External\_Sender] HI-TRAC interim storage configuration at South Texas Project

Hello Mr. Habib:

During the NRC virtual public meeting on March 31 regarding the loaded MPC-37 canister at South Texas Project with a weld issue, I asked about the interim condition of this canister being stored in a HI-TRAC transfer cask for an extended period (i.e., over a month and counting).

I was aware that the NRC imposed a \$50,000 civil penalty on the Oconee licensee for having left a spent fuel assembly elevated by the refueling machine for about three weeks - an unanalyzed configuration. See attached NRC record.

I was also aware of Holtec Information Bulletin No. 65 (attached) cautioning users not to leave the mating device installed for a protracted period without a site-specific analysis and without a sufficient pathway for cooling air flow. As page three of HIB No.65 explicitly states, the HI-STORM FSAR states "the cask loading process is intended to be completed as a continuous operation." One month and counting of stalled movement to the ISFSI pad is clearly not a continuous operation.

Is the mating device still attached to this MPC-37?

Has a site-specific analysis for the interim configuration, with or without the mating device attached, been performed?

Has an evaluation per 10 CFR 72.48 been completed for the deviation from the cask loading process as described in the HI-STORM FSAR?

I lack the feeling that all the applicable safety questions have been asked and answered. I'm not implying that there are not satisfactory answers, just that unanswered safety questions are unsatisfactory.

Thanks,

Dave Lochbaum