

**Holtec Clarifications of
Responses to Request for Additional Information (Part 1)**

**Docket No.72-1032
Holtec International
HI-STORM FW
Multipurpose Canister Storage System
Certificate of Compliance No. 1032
Amendment No. 7**

RAI 4-1

No clarifications required

RAI 4-2 Clarification Question

The NRC Staff asked for clarification on the applicability of MPCs to ventilated and unventilated overpacks.

Holtec Action:

Holtec's response to RAI 4-3 is updated to clarify that MPC-89 standard and CBS options may be used in unventilated overpacks. Supplement 4.1.4.4 has been revised to clarify that MPC-89CBS design is bounded by MPC-89 standard design when placed in HI-STORM FW UVH.

RAI 4-3

No clarifications required

RAI 4-4 Clarification Question

The NRC Staff asked for the revised table 1.2.3c which was not included in the response.

Holtec Action:

The missing page containing the revised Table 1.2.3c is shown in the FSAR changed pages pdf.

RAI 4-5 Clarification Question

The NRC Staff asked Holtec to provide additional information in the Drawing 12283 to ensure implementation.

Holtec Action:

As Drawing 12283 refers to HI-STORM FW FSAR Table 1.2.8, Holtec has clarified FSAR Table 1.2.8b Note 2 to ensure implementation.

RAI 4-6

No clarifications required

RAI 4-7

No clarifications required

RAI 4-8

Clarifications were discussed in the 8/11/2022 conversation (see Conversation Record, Accession No. ML22237A270). No further action is required.

RAI 4-9

No clarifications required

RAI 4-10

No clarifications required

RAI 4-11

No clarifications required

RAI 4-12

No clarifications required

RAI 4-13

No clarifications were discussed in the call between the NRC and Holtec. However, during review of the proposed HI-STORM FW FSAR changes it was identified that Table 9.I.2.1 should have been deleted. Now Table 9.I.2.1 has been removed from the proposed FSAR changes and the RAI 4-13 response has been updated.

RAI 5-1 Clarification Question

Holtec applied a penalty to compensate the increased source terms from the new 10x10J fuel which is heavier than the design basis assembly. The staff asked Holtec to provide justification for the choice of penalty.

Holtec Action:

Holtec's response to RAI 5-2 is updated to provide further justification for qualifying 10x10J assembly type for loading into MPC-89. Revisions have been made to the CoC Appendix B proposed changes, FSAR Chapters 2 and 5 proposed changes, and HI-2094431 Appendix Y.

RAI 5-2

No clarifications required

RAI 8-1

No clarifications required

RAI 8-2

No clarifications required

RAI 8-3

No clarifications required

RAI 9-1 Clarification Question

- a. Holtec clarified a typographical error in FSAR.
- b. The staff noted that the studs with nuts through the VCT anchor blocks cannot be so tight that they crush the gasket under the overpack lid.

Holtec RAI Response:

- a. The repeated asterisk note at the bottom of FSAR page 9-23 is removed.
- b. Added clarification that no preload be applied to avoid damage to the seal in FSAR Section 9.I.2.6.

RAI 9-2

No clarifications required

RAI 9-3

No clarifications required

RAI 10-1

No clarifications required

RAI 12-1

No clarifications required

Clarification connected to HI-STORM 100 Amendment 16:

In response to HI-STORM 100 Amendment 16 RAI (ADAMS Accession Number ML22243A270), changes were made to the HI-STORM 100 FSAR to clarify that, while the design of the UVH overpack gasket is such that it is expected to largely prevent exposure of the annulus between the MPC and overpack inner shell to the outside air, it cannot be relied on to do so in all scenarios. Similar clarifications are now made to the HI-STORM FW FSAR in support of HI-STORM FW Amendment 7.

The following HI-STORM FW FSAR sections have been updated: 1.1.1, 1.1.2.1.2, 10.1.1.4, 10.1.1.5.2, 12.1.0, 12.1.1, 12.1.1.2.