Request for Additional Information Batch 4

Docket No. 72-1032 Certificate of Compliance No. 1032 Amendment No. 7 to the HI-STORM Flood/Wind Multipurpose Canister Storage System

The staff identified additional information needed in connection with its review of the application of Amendment No. 7 to the Certificate of Compliance (CoC) No. 1032 for HI-STORM Flood/Wind Multipurpose Canister Storage System as provided in the request for additional information (RAI) discussed below. Each question describes information needed by the staff to complete its review of the application and to determine whether the applicant has demonstrated compliance with regulatory requirements in Title 10 of the *Code of Federal Regulations* (10 CFR), Part 72.

Thermal RAI

RAI 4-14 Clarify the meaning of, "A minor deviation from the prescribed loading pattern in an MPC's permissible contents to allow one slightly thermally-discrepant fuel assembly per quadrant [...].," (e.g., the change in decay heat) and provide a bounding thermal analysis to show that the peak cladding temperature limits in interim staff guidance ISG-11 Rev. 3 and the important to safety (ITS) component temperature limits are met.

CoC No. 1032, appendix B, section 2.3.2, "Fuel Loading Decay Heat Limits for UNVENTILATED OVERPACK," states, "Tables 2.3-9A and 2.3-9B provide the maximum allowable decay heat per fuel storage location for MPC-37. Tables 2.3-10A and 2.3-10B provide the maximum allowable decay heat per fuel storage location for MPC-89. Table 2.3-13 provides the maximum allowable decay heat per fuel storage location for MPC-89. Table 2.3-13 provides the maximum allowable decay heat per fuel storage location for MPC-89. Table 2.3-13 provides the maximum allowable decay heat per fuel storage location for MPC-89. Table 2.3-13 provides the maximum allowable decay heat per fuel storage location for MPC-89. Table 2.3-13 provides the maximum allowable decay heat per fuel storage location for MPC-89. Table 2.3-13 provides the maximum allowable decay heat per fuel storage location for MPC-89. Table 2.3-13 provides the maximum allowable decay heat per fuel storage location for MPC-89. Table 2.3-13 provides the maximum allowable decay heat per fuel storage location for MPC-89. Table 2.3-13 provides the maximum allowable decay heat per fuel storage location for MPC-89. Table 2.3-13 provides the maximum allowable decay heat per fuel storage location for MPC-89. Table 2.3-10 per cell limits in these tables apply to cells containing undamaged fuel or damaged fuel in DFCs/DFIs or fuel debris in DFCs. A minor deviation from the prescribed loading pattern in an MPC's permissible contents to allow one slightly thermally-discrepant fuel assembly per quadrant to be loaded as long as the peak cladding temperature for the MPC remains below the ISG-11 Rev 3 requirements is permitted for essential dry storage campaigns to support decommissioning."

It is not clear to staff what the actual meanings of: 1) a minor deviation, or 2) one slightly thermally-discrepant fuel assembly are, or 3) how it has been demonstrated through a bounding thermal analysis that the peak cladding temperature limits and ITS component temperature limits are still met should thermally-discrepant fuel assemblies be loaded in the multipurpose cask as described.

This information is needed to determine compliance with 10 CFR 72.236(f).

Confinement RAI

RAI 9-2 through RAI 9-5 See Enclosure 2.

Denise Elisio, Holtec International

AMENDMENT NO. 7 TO CERTIFICATE OF COMPLIANCE NO. 1032 FOR THE HI-STORM FLOOD /WIND MULTIPURPOSE CANISTER STORAGE SYSTEM – REQUEST FOR ADDITIONAL INFORMATION BATCH 4 DATE December 7, 2022

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