

December 21, 2022

U.S. Nuclear Regulatory Commission  
11555 Rockville Pike  
Rockville, MD 20852-2738

Attn: Document Control Desk

Subject: Request to Withdraw Administrative Controls for Adverse Weather Events During Operations from NAC-UMS CoC Renewal Application

Docket No. 72-1015  
CAC/EPID Nos. 001028/L-2020-RNW-0031

- References:
1. ED2020120, NAC International, NAC-UMS System, 72-1015 Certificate of Compliance (CoC) Renewal Application, October 13, 2020
  2. Request for Additional Information for the Technical Review of the Application for Renewal of the Certificate of Compliance No. 1015 (CAC/EPID Nos. 001028/L-2020-RNW-0031), December 21, 2021
  3. ED20220022, Submittal of Responses to the Nuclear Regulatory Commission's (NRC) Request for Additional Information for the Request to Renew the NAC-UMS Cask System Certificate of Compliance No. 1015, March 3, 2022
  4. ED20220036, Replacement Page for Responses to the Nuclear Regulatory Commission's (NRC) Request for Additional Information for the Request to Renew the NAC-UMS Cask System Certificate of Compliance No. 1015, March 18, 2022
  5. ED20220071, Supplement to the Nuclear Regulatory Commission's (NRC) Request for Additional Information for the Request to Renew the NAC-UMS Cask System Certificate of Compliance No. 1015, July 28, 2022

NAC International Inc. (NAC) supplemented our NAC-UMS CoC renewal application on July 28, 2022 (Reference 5) with provisions for our general licensees to address NRC's Enforcement Guidance Memo (EGM) 22-001, "Enforcement Discretion for Noncompliance of Tornado Hazards Protection Requirements at Independent Spent Fuel Storage Installations". The administrative controls we proposed in FSAR Chapter 8 would have placed NAC-MPC important to safety structures, systems, and components in an analyzed condition should there have been a severe weather hazard predicted or issued for the area during operations as required by EGM 22-001. After discussions with NRC staff on a proposed Regulatory Guide to be issued in late 2023, endorsing Nuclear Energy Institute NEI 22-02

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“Guidelines for Weather-related Administrative Controls for Short Duration Outdoor Dry Cask Storage Operations”, NAC has decided to withdraw the portion of Reference 5 dealing with administrative controls (Chapter 8, page 8-2). Upon final approval of the NAC-UMS CoC renewal application, changes to FSAR page 8-2 will not be incorporated into the next revision of the NAC-UMS FSAR.

If you have any comments or questions, please contact me on my direct line at 678-328-1252.

Sincerely,

**Heath M. Baldner** Digitally signed by Heath M.  
Baldner  
Date: 2022.12.21 10:11:45 -05'00'

Heath Baldner  
Director, Licensing