

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-MPC CoC Renewal Application

Docket No. 72-1025  
CAC/EPID Nos. 001028/L-2020-RNW-0031

- References:
1. ED20190141, Submission of a Request to Renew the U.S. Nuclear Regulatory Commission Certificate of Compliance No. 1025 for the NAC-MPC Cask System, December 18, 2019
  2. Request for Additional Information for the Technical Review of the Application for Renewal of the Certificate of Compliance No. 1025 (CAC/EPID NOS. 001028/L-2019-RNW-0029), March 23, 2021
  3. Submission of Responses to the Nuclear Regulatory Commission's (NRC) Request for Additional Information for the Request to Renew the NRC Certificate of Compliance No. 1025 for the NAC-MPC Cask System, August 10, 2021
  4. 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
  5. ED20220034, Submission of Responses to the Nuclear Regulatory Commission's (NRC) Request for Additional Information for the Request to Renew the NRC Certificate of Compliance No. 1025 for the NAC-MPC Cask System, March 18, 2022
  6. ED20220100, Supplement to the Submission of Responses to the Nuclear Regulatory Commission's (NRC) Request for Additional Information for the Request to Renew the NRC Certificate of Compliance No. 1025 for the NAC-MPC Cask System, July 22, 2022



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NAC International Inc. (NAC) supplemented our NAC-MPC CoC renewal application on July 22, 2022 (Reference 6) 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 "Guidelines for Weather-related Administrative Controls for Short Duration Outdoor Dry Cask Storage Operations", NAC has decided to withdraw the portion of Reference 6 dealing with administrative controls (Chapter 8, pages 8-2 and 8.A-2). Upon final approval of the NAC-MPC CoC renewal application, changes to FSAR pages 8-2 and 8.A-2 will not be incorporated into the next revision of the NAC-MPC 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 10:11:20 -05'00'

Heath Baldner  
Director, Licensing