



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

February 10, 2023

Denise Elisio
Licensing Engineer
Holtec International
Holtec Technology Campus
1 Holtec Blvd.
Camden, NJ 08104

SUBJECT: ACCEPTANCE REVIEW OF REQUEST FOR AMENDMENT NO. 19 TO
CERTIFICATE OF COMPLIANCE NO. 1014 FOR THE HI-STORM 100
MULTIPURPOSE CANISTER STORAGE SYSTEM (DOCKET NO. 72-1014,
CAC NO. 001028, EPID: L-2022-LLA-0028) – REQUEST FOR SUPPLEMENTAL
INFORMATION

Dear Denise Elisio:

By a letter dated February 17, 2022 (Agencywide Document Access and Management System [ADAMS] Accession No. ML22048C222), Holtec International (Holtec) submitted to the U.S. Nuclear Regulatory Commission (NRC) a request to separate the portion implementing Graded Approach (ML19353D337) from the Amendment No. 16 application for the Certificate of Compliance (CoC) No. 1014 for HI-STORM 100 Multipurpose Canister Storage System. The Graded Approach portion is now Amendment No. 19.

The NRC staff has performed an acceptance review of your application to determine if the application contains sufficient technical information to begin a detailed technical review. The staff has determined that the application does not provide sufficient technical information to begin a detailed review and that supplemental information is needed. The information needed to continue our review is described in the request for supplemental information (RSI) in the enclosures to this letter.

In order to schedule our technical review, responses to the enclosed RSI should be provided within 30 days from the date of this letter. If Holtec is unable to meet this response date, please notify us, at least one week prior to the due date, of your new submittal date and the reasons for the delay. If Holtec is not able to respond within this timeframe or the RSI responses do not provide sufficient information, the application may not be accepted for review.

D. Elisio

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Please reference Docket No. 72-1014, CAC No. 001028, and EPID No. L-2022-LLA-0028 in future correspondence related to this licensing action. If you have any questions, please contact me at 301-415-1018.

Sincerely,



Signed by Chen, Yen-Ju
on 02/10/23

Yen-Ju Chen, Sr. Project Manager
Storage & Transportation Licensing Branch
Division of Fuel Management
Office of Nuclear Material Safety
and Safeguards

Docket No.: 72-1014
CAC No.: 001208
EPID No. L-2022-LLA-0028

Enclosure:
RSI

SUBJECT: ACCEPTANCE REVIEW OF REQUEST FOR AMENDMENT NO. 19 TO CERTIFICATE OF COMPLIANCE NO. 1014 FOR THE HI-STORM 100 MULTIPURPOSE CANISTER STORAGE SYSTEM (DOCKET NO. 72-1014, CAC NO. 001028, EPID: L-2022-LLA-0028) – REQUEST FOR SUPPLEMENTAL INFORMATION

DOCUMENT DATE: February 10, 2023

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OFFICE:	DFM	DFM	DFM	DFM	DFM
NAME:	YChen	WWheatley	YKim	JChang	CBajwa
DATE:	01/25/2023	01/30/2023	01/30/2023	01/25/2023	01/25/2023
OFFICE:	DFM	DFM	DFM	DFM	DFM
NAME:	EGoldfeiz	DForsyth	OKhan	JTapp	TBoyce
DATE:	01/25/2023	01/30/2023	01/30/2023	01/26/2023	01/30/2023
OFFICE:	DFM	DFM	DFM	DFM	
NAME:	DMarcano	JPiotter	ARivera-Varona	YDiaz-Sanabria	
DATE:	02/01/2023	02/01/2023	02/03/2023	02/09/2023	

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Request for Supplemental Information

**Docket No. 72-1014
Holtec International
HI-STORM 100
Multipurpose Canister Storage System
Certificate of Compliance No. 1014
Amendment No. 19**

RSI-1 Provide justification for not updating appendices A-100U and B-100U.

Holtec International (Holtec, the applicant) stated that it would not update appendices A-100U and B-100U but did not provide any explanation nor justification for the decision. The U.S. Nuclear Regulatory Commission (NRC) staff notes that not updating appendices A-100U and B-100U could cause inconsistencies and confusion as described below:

1. Per the NRC's endorsement on the graded approach (Agencywide Document Access and Management System [ADAMS] Accession No. ML19353D337), administrative controls technical specifications (TS) would be in appendix B, section 4. The applicant stated that it will not update appendix B-100U, so some administrative controls will remain in the certificate of compliance (CoC) to avoid complication. For example, condition 5, heavy load requirements (Form ID: CoC-5), and condition 10, pre-operational testing and training exercise (Form ID: CoC-10), will remain in CoC instead of moving to appendices B, D, and B-100U. Therefore, some administrative controls will be in the CoC and some in appendices B and D. This practice defeats the goal of streamlining the CoC & TS and could potentially cause confusion.
2. Form ID: CoC-15. CoC condition 15, 72.212 evaluations for renewed CoC use, is being moved to appendix A, section 2 as it is important to site-specific 72.212 evaluations. This information also applies to appendix A-100U, which Holtec decided not to update. By moving it to only appendix A, it creates a regulatory void.
3. Currently, appendix A-100U sections 1.1 through 1.4 refer to appendix A. All the referenced sections in appendix A are being moved to the new appendix B. Appendix A-100U would have several incorrect references if not updated.
4. Currently, appendix B-100U refers to appendices A and B in the following sections:
 - Section 1.0, definitions, refers to appendix A.
 - Section 3.3.1 refers to table 3-1 of appendix B.
 - Section 3.6.2.2 refers to appendix A.

These referenced sections are being moved to other parts of the TS. Appendix B-100U would have several incorrect references if not updated.

Enclosure

The staff needs this information to determine compliance with Title 10 of the *Code of Federal Regulations* (10 CFR) 72.244.

Observations

O-1 Provide risk insight evaluation for the following forms:

- Form ID: A-1.1, definition
- Form ID: A-1.2, logical connectors
- Form ID: A-1.3, completion times
- Form ID: A-1.4, frequency
- Form ID: B-Table 3-1
- Form ID: C-1.1
- Form ID: C-1.2
- Form ID: C-1.3
- Form ID: C-1.4
- Form ID: D-Table 3-1

As noted in the NRC's endorsement (ML19353D337), the graded approach criteria were developed to improve the spent fuel dry storage licensing process by applying risk insights to clarify the information required in the CoC and TS and removing or relocating details that are not risk significant to safety, thereby providing additional flexibility for licensees. Thus, the graded approach makes the contents of the CoC and TS more safety- and risk-focused and the level of detail more appropriate. The risk insight is an important part of the graded approach in providing the bases for removing or relocating the information in the CoC and TS.

The staff needs this information to determine compliance with 10 CFR 72.244.

O-2 Provide justification or additional information in the evaluation summary. The following are some examples:

- Form ID: A-5.8, fabrication helium leak test. The evaluation answered "yes" for appendix B section 1, but the summary states to stay in appendix A.
- Form ID: C-5.4, fabrication helium leak test. The evaluation answered "yes" for appendix D section 1, but the summary states to stay in appendix C.

The evaluation summaries for these forms are inconsistent with the information provided on the rest of the forms. The applicant did not provide sufficient justification to explain the differences.

The staff needs this information to determine compliance with 10 CFR 72.244.

O-3 Provide justification for moving American Society of Mechanical Engineers (ASME) code alternatives to appendix A instead of a new appendix as done in the pilot.

In the pilot, ASME code alternatives were moved to a new “appendix C”. The applicant moved code alternatives from appendix B to the new appendix A (Form ID: B-Table 3-1) and from appendix D to the new appendix C (Form ID: D-Table 3-1) without justification for the difference from the pilot.

The staff needs this information to determine compliance with 10 CFR 72.244.