



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. 9 TO
CERTIFICATE OF COMPLIANCE NO. 1032 FOR THE HI-STORM
FLOOD/WIND MULTI-PURPOSE CANISTER STORAGE SYSTEM (DOCKET
NO. 72-1032, CAC NO. 001028, EPID: L-2022-LLA-0027)

Dear Denise Elisio:

By a letter dated February 17, 2022 (Agencywide Document Access and Management System (ADAMS) Accession No. ML22048C221), 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. 7 application for the Certificate of Compliance (CoC) No. 1032 for HI-STORM Flood/Wind Multi-purpose Canister Storage System. The Graded Approach portion is now Amendment No. 9.

The staff performed an acceptance review of the application to determine if the application contains sufficient information in scope and depth to allow the staff to begin a detailed review.

The enclosure includes staff's observations of the acceptance review. The staff included observations to allow you to start earlier on items containing the potential to be asked later. Responses to observations are not required for staff to begin a detailed technical review. Observations are not the result of a detailed technical review and may be resolved once staff begins a detailed review.

The graded approach in Amendment No. 9 is based on Amendment No. 7 which is under staff's review for approval. Holtec should inform NRC promptly and submit an update if there are any changes to the Amendment No. 9 application as a result of staff's review of Amendment No. 7.

This letter acknowledges acceptance of your application for Amendment No. 9. As discussed during the July 27, 2021 public meeting (ML21174A193) on graded approach discussion for HI-STORM Amendment No. 16, the staff will maintain open communications with you and provide feedback on the implementation of the graded approach through public meeting(s). Based on the current workload and priority, we plan to hold a public meeting in the summer of 2023. If Holtec provides sufficient responses to the questions on the implementation of the graded approach by July 2023, the draft CoC and preliminary safety evaluation report will be

D. Elisio

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submitted to Rulemaking in January 2024. The staff estimates that completing the safety review of this certificate amendment application will require approximately 2,750 staff review hours.

Please reference Docket No. 72-1032, CAC No. 001028, and EPID No. L-2022-LLA-0027 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 and Transportation Licensing Branch
Division of Fuel Management
Office of Nuclear Material Safety
and Safeguards

Docket No.: 72-1032
CAC No.: 001208
EPID: L-2022-LLA-0027

Enclosure:
Observations

SUBJECT: ACCEPTANCE REVIEW OF REQUEST FOR AMENDMENT NO. 9 TO CERTIFICATE OF COMPLIANCE NO. 1032 FOR THE HI-STORM FLOOD/WIND MULTIPURPOSE CANISTER STORAGE SYSTEM (DOCKET NO. 72-1032, CAC NO. 001028, EPID: L-2022-LLA-0027)

DOCUMENT DATE: February 10, 2023

DISTRIBUTION:

ADAMS Accession No.: ML23025A371

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Docket No. 72-1032
Holtec International
HI-STORM Flood/Wind
Multipurpose Canister Storage System
Certificate of Compliance No. 1032
Amendment No. 9
Observations

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

- Form ID: CoC-9, Pre-operational Testing and Training Exercise
- 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 2.4-3

As noted in the NRC's endorsement (Agencywide Document Access and Management System (ADAMS) Accession No. 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 technical specifications (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 Title 10 of the *Code of Federal Regulations* (10 CFR) 72.244.

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

- Form ID: CoC-First Statement. The evaluation answered "No" to all sections and the summary states to retain in the CoC. See TN pilot form for First Statement as an example.
- Form ID: CoC-8, special requirements for first system in place. The evaluation answered "yes" for appendix A but the summary states to delete it from the CoC.

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, the ASME code alternatives was 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) without justification for the difference from the pilot.

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