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1.0 USE AND APPLICATION

1.1 Definitions

Refer to Definitions in Appendix **BA**.

1.2 Logical Connectors

Refer to Logical Connectors in Appendix BA

1.3 Completion Times

Refer to Logical Connectors in Appendix BA

1.4 Frequency

Refer to Frequency in Appendix **BA**

2.0 <u>SITE</u>

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2.1 72.212 Evaluations for Renewed CoC Use

Any general licensee that initiates spent fuel dry storage operations with the HI-STORM 100 system after the effective date of the renewal of the CoC and any general licensee operating a HI-STORM 100 system as of the effective date of the renewal of the CoC, including those that put additional storage systems into service after that date, shall:

2.1.1 Evaluations

- 2.1.1.1 As part of the evaluations required by 10CFR72.212(b)(5), include the evaluations related to the terms, conditions, and specifications of this CoC amendment as modified (i.e., changed or added) as a result of the renewal of the CoC.
- 2.1.1.2 As part of the document review required by 10CFR72.212(b)(6), include a review of the FSAR changes resulting from the renewal of the CoC; and
- 2.1.1.3 Ensure that the evaluations required by 10CFR72.212(b)(7) and (8) capture the evaluations and review described in (a) and (b) of this CoC condition.

5.8 Heavy Loads Requirement

5.8.1 Each lift of an MPC, a HI-TRAC transfer cask, or any HI-STORM overpack must be made in accordance to the existing heavy loads requirements and procedures of the licensed facility at which the lift is made. A plant specific review (under 10 CFR 50.59 or 10 CFR 72.48, if applicable) is required to show operational compliance with existing plant specific heavy loads requirements. Lifting operations outside of structures governed by 10 CFR Part 50 must be in accordance with Section 4.2 and Sections 2.1.6 and 2.3 (if applicable) of Appendix A.

5.9 Pre-Operational Testing and Training

5.9.1 Dry Run Training Exercise

- a. A dry run training exercise of the loading, closure, handling, unloading, and transfer of the HI-STORM 100 Cask System shall be conducted by the licensee prior to the first use of the system to load spent fuel assemblies. The training exercise shall not be conducted with spent fuel in the MPC. The dry run may be performed in an alternate step sequence from the actual procedures, but all steps must be performed. The dry run shall include, but is not limited to the following:
- b. Moving the MPC and the transfer cask into the spent fuel pool or cask loading pool.
- c. Preparation of the HI-STORM 100 Cask System for fuel loading.
- d. Selection and verification of specific fuel assemblies to ensure type conformance.
- e. Loading specific assemblies and placing assemblies into the MPC (using a dummy fuel assembly), including appropriate independent verification.
- <u>f.</u> Remote installation of the MPC lid and removal of the MPC and transfer cask from the spent fuel pool or cask loading pool.
- g. MPC welding, NDE inspections, pressure testing, draining, moisture removal (by vacuum drying or forced helium dehydration, as applicable), and helium backfilling. (A mockup may be used for this dry-run exercise.)
- h. Operation of the HI-STORM 100 SCS or equivalent system, if applicable.
- i. Transfer cask upending/downending on the horizontal transfer trailer or other transfer device, as applicable to the site's cask handling arrangement.
- j. Transfer of the MPC from the transfer cask to the overpack/VVM.
- k. Placement of the HI-STORM 100 Cask System at the ISFSI, for aboveground systems only.
- I. HI-STORM 100 Cask System unloading, including flooding MPC

<u>cavity, removing MPC lid welds.</u> (A mockup may be used for this <u>dry-run exercise.</u>)