

Holtec Letter 5014959 Attachment 9  
CoC Condition/Technical Specification Evaluation Form - CoC original Appendix A

CoC Condition/TS Identifier: A-1.1

\* All LCOs also require an Applicability, Condition(s), Required Action(s), Completion Time(s), Surveillance Requirement(s), and Frequency(ies). Refer to NUREG-1745 for additional guidance.

\*\* In performing the risk insight evaluation above, the evaluator should think about subsequent changes to a relocated CoC requirement. Specifically, ask the question “what is the likelihood and worst possible consequences of a future change to this requirement in the less conservative direction”?

| Requirement   |  |    | Appendix A Section 1.1: Definitions  |
|---|--|----|--|
| CoC Body<br>Certified Design  | Section I. Technology  |    | No   |
|   | Section II. Design Features  |    | No   |
| Appendix A - Inspections, Tests, and Evaluations                            |  |    | No   |
| Appendix B.<br>Technical<br>Specifications                                  | Section 1 Definitions, Use and Application   |    | Yes  |
|   | Section 2 Approved Contents (Selection Criteria)   | A1 | No   |
|   |  | A2 | No   |
|   |  | A3 | No   |
|   | Section 3 Limiting Conditions for Operation (LCOs)* and Surveillance Requirements (SRs) (Selection Criteria)             | L1 | No   |
|   |  | L2 | No   |
|   |  | L3 | No   |
|   | Section 4 Administrative Controls  |    | No   |
| Risk Insight**: Will removing this requirement from the CoC/TS result in... | A significant increase in the probability or consequences of an accident previously evaluated in the cask FSAR?          |    | No/A   |
|   | The possibility of a new or different kind of accident being created compared to those previously evaluated in the FSAR? |    | No/A   |
|   | A Significant reduction in the margin of safety for ISFSI or cask operation?   |    | No/A   |
| Evaluation Summary  |  |    | Move to Appendix B Section 1 as it meets the criterion for inclusion in the new TS format (Use and Application). |

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CoC Condition/Technical Specification Evaluation Form - CoC original Appendix A

CoC Condition/TS Identifier: A-1.2

\* All LCOs also require an Applicability, Condition(s), Required Action(s), Completion Time(s), Surveillance Requirement(s), and Frequency(ies). Refer to NUREG-1745 for additional guidance.

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| Requirement  |  | Appendix A Section 1.2: Logical Connectors: The purpose of this section is to explain the meaning of logical connectors. |    |
| CoC Body<br>Certified Design   | Section I. Technology  | No   |    |
|  | Section II. Design Features  | No   |    |
| Appendix A - Inspections, Tests, and Evaluations                               |  | No   |    |
| Appendix B.<br>Technical<br>Specifications                                     | Section 1 Definitions, Use and Application   | Yes  |    |
|  | Section 2 Approved Contents (Selection Criteria)   | A1   | No |
|  |  | A2   | No |
|  |  | A3   | No |
|  | Section 3 Limiting Conditions for Operation (LCOs)* and Surveillance Requirements (SRs) (Selection Criteria)             | L1   | No |
|  |  | L2   | No |
|  |  | L3   | No |
| Section 4 Administrative Controls  |  | No   |    |
| Risk Insight**:<br>Will removing this requirement from the CoC/TS result in... | A significant increase in the probability or consequences of an accident previously evaluated in the cask FSAR?          | No/A   |    |
|  | The possibility of a new or different kind of accident being created compared to those previously evaluated in the FSAR? | No/A   |    |
|  | A Significant reduction in the margin of safety for ISFSI or cask operation?   | No/A   |    |
| Evaluation Summary   |  | Move to Appendix B Section 1 as it meets the criterion for inclusion in the new TS format (Use and Application).         |    |

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CoC Condition/Technical Specification Evaluation Form - CoC original Appendix A

CoC Condition/TS Identifier: A-1.3

\* All LCOs also require an Applicability, Condition(s), Required Action(s), Completion Time(s), Surveillance Requirement(s), and Frequency(ies). Refer to NUREG-1745 for additional guidance.

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| Requirement  |  |    | Appendix A Section 1.3: Completion Times: The purpose of this section is to establish the Completion Time convention and to provide guidance for its use. |  |
| CoC Body<br>Certified Design   | Section I. Technology  |    | No  |  |
|  | Section II. Design Features  |    | No  |  |
| Appendix A - Inspections, Tests, and Evaluations                               |  |    | No  |  |
| Appendix B.<br>Technical<br>Specifications                                     | Section 1 Definitions, Use and Application   |    | Yes   |  |
|  | Section 2 Approved Contents (Selection Criteria)   | A1 | No  |  |
|  |  | A2 | No  |  |
|  |  | A3 | No  |  |
|  | Section 3 Limiting Conditions for Operation (LCOs)* and Surveillance Requirements (SRs) (Selection Criteria)             | L1 | No  |  |
|  |  | L2 | No  |  |
|  |  | L3 | No  |  |
| Section 4 Administrative Controls  |  | No |   |  |
| Risk Insight**:<br>Will removing this requirement from the CoC/TS result in... | A significant increase in the probability or consequences of an accident previously evaluated in the cask FSAR?          |    | No/A  |  |
|  | The possibility of a new or different kind of accident being created compared to those previously evaluated in the FSAR? |    | No/A  |  |
|  | A Significant reduction in the margin of safety for ISFSI or cask operation?   |    | No/A  |  |
| Evaluation Summary   |  |    | Move to Appendix B Section 1 as it meets the criterion for inclusion in the new TS format (Use and Application).  |  |

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CoC Condition/TS Identifier: A-1.4

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\*\* In performing the risk insight evaluation above, the evaluator should think about subsequent changes to a relocated CoC requirement. Specifically, ask the question “what is the likelihood and worst possible consequences of a future change to this requirement in the less conservative direction”?

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| Requirement  |  |    | Appendix A Section 1.4: Frequency: The purpose of this section is to define the proper use and application of Frequency requirements. |  |
| CoC Body<br>Certified Design   | Section I. Technology  |    | No  |  |
|  | Section II. Design Features  |    | No  |  |
| Appendix A - Inspections, Tests, and Evaluations                               |  |    | No  |  |
| Appendix B.<br>Technical<br>Specifications                                     | Section 1 Definitions, Use and Application   |    | Yes   |  |
|  | Section 2 Approved Contents (Selection Criteria)   | A1 | No  |  |
|  |  | A2 | No  |  |
|  |  | A3 | No  |  |
|  | Section 3 Limiting Conditions for Operation (LCOs)* and Surveillance Requirements (SRs) (Selection Criteria)             | L1 | No  |  |
|  |  | L2 | No  |  |
|  |  | L3 | No  |  |
| Section 4 Administrative Controls  |  | No |   |  |
| Risk Insight**:<br>Will removing this requirement from the CoC/TS result in... | A significant increase in the probability or consequences of an accident previously evaluated in the cask FSAR?          |    | No/A  |  |
|  | The possibility of a new or different kind of accident being created compared to those previously evaluated in the FSAR? |    | No/A  |  |
|  | A Significant reduction in the margin of safety for ISFSI or cask operation?   |    | No/A  |  |
| Evaluation Summary   |  |    | Move to Appendix B Section 1 as it meets the criterion for inclusion in the new TS format (Use and Application).                      |  |

CoC Condition/TS Identifier: A-5.8

\* All LCOs also require an Applicability, Condition(s), Required Action(s), Completion Time(s), Surveillance Requirement(s), and Frequency(ies). Refer to NUREG-1745 for additional guidance.

\*\* In performing the risk insight evaluation above, the evaluator should think about subsequent changes to a relocated CoC requirement. Specifically, ask the question “what is the likelihood and worst possible consequences of a future change to this requirement in the less conservative direction”?

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| Requirement                                      |  | <p>Appendix A Section 5.8: Fabrication Helium Leak Test</p> <p>At completion of welding the MPC shell to baseplate, an MPC confinement weld helium leak test shall be performed using a helium mass spectrometer. This test shall include the base metals of the MPC shell and baseplate. A helium leak test shall also be performed on the base metal of the fabricated MPC lid. The confinement boundary leakage rate tests shall be performed in accordance with ANSI N14.5 to “leaktight” criteria. If a leakage rate exceeding the acceptance criteria is detected, then the area of leakage shall be determined and the area repaired per ASME Code Section III, Subsection NB requirements. Re-testing shall be performed until the leakage rate acceptance criterion is met.</p> <p>Casks initially loaded to Amendments No. 2 through 7 must meet the following:</p> <ul style="list-style-type: none"> <li>• Casks fabricated on or after July 1, 2009 a fabrication helium leak test at completion of the welding of the MPC shell to baseplate must be performed in accordance with the above requirements.</li> <li>• Casks loaded before July 1, 2009 must meet the fabrication helium leak test requirements of the lid base metal of the amendment to which they were originally loaded.</li> <li>• Casks loaded before July 1, 2009 do not meet the above fabrication helium leak test requirements after MPC shell to baseplate welding. These casks may be upgraded to Amendment 15.</li> </ul> |
| CoC Body<br>Certified Design                     | Section I. Technology                      | No   |
|  | Section II. Design Features                | No   |
| Appendix A - Inspections, Tests, and Evaluations |  | <del>Yes</del> No  |
|  | Section 1 Definitions, Use and Application | <del>No</del> Yes  |