

Holtec Response to Observations

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

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.

Holtec RSI Response:

The requested justification for adding risk insight analysis has been updated and incorporated into the latest revisions of the Evaluation Forms. Holtec attempted to use the same level of detail used for similar items during The Pilot Program which has been approved by the NRC. By performing the full evaluation and not leaving N/A as a response Holtec provides a full and clarified evaluation for the NRC to review based upon the update.

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.

Holtec RSI Response:

Holtec has reviewed the Evaluation Forms completed to ensure consistency between the evaluation rows and the summary statements on each form. The following item has been updated to correct inconsistent statements:

- Form ID: CoC-8

Upon review of RIRP-I-16-01 (ML17138A119), Holtec determined that the CoC-First Statement did not fit into any of the Appendix sections defined in the guidance. Therefore, the Evaluation Form states that the statement does not belong in any sections of the CoC or Appendices A or B. This is logical as the CoC first statement is an introductory statement and belongs before the technical content in CoC Section I. The CoC Evaluation Form has been updated to explain this in the summary.

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.

Holtec RSI Response:

The pilot program provided a lot of good guidance on restructuring/focusing a Part 72 CoC on safety per the graded approach. Holtec applied the guidance as applicable to the structure/content of our CoC.

While the final locations of the ASME code alternative information are different between the pilot program and Holtec's proposed HI-STORM FW Amendment 9, both the pilot and Holtec's amendment concluded that the ASME code alternatives did need to remain in the CoC and that the evaluation form/proposed outline developed and described in RIRP-I-16-01 (ML17138A119) did not include a standard location for this information, nor does 10CFR72.244 indicate a specific location for this information. Therefore, the appropriate location of the ASME code alternative information is dependent on the specifics of the System being considered.

As explained in the pilot, the ASME code alternatives were moved into a new Appendix C. This was a reasonable decision considering the structure and format of the CoC evaluated in the pilot program. However, based on the current structure and format of the HI-STORM 100 CoC, it seems more straightforward to keep the table in its current location for HI-STORM 100 Amendment 19. The HI-STORM FW Amendment 9 therefore follows the same outline as the HI-STORM 100 to ensure consistency between Holtec licenses.

While the pilot came up with one solution for where to locate the ASME code alternatives, Holtec is proposing a more appropriate location for the ASME code alternatives in the HI-STORM 100 CoC that does not conflict with the evaluation forms.