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March 17, 2023

Yen Chen, Project Manager
Division of Spent Fuel Management
Office of Nuclear Material Safety and Safeguards

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555-0001

Docket No. 72-1014, Certificate of Compliance (CoC) No. 1014
EPID: L-2021-LLA-0039, CAC No. 001028

Subject: HI-STORM 100 Amendment 16 RAI 3-3 Clarification

Reference:

- [1] "Amendment No. 16 To Certificate of Compliance No. 1014 for the HI-STORM 100 Multipurpose Canister Storage System – Request for Additional Information Fourth Batch," letter from Y. Chen (NRC) to D. Elisio (Holtec) dated November 7, 2022. ADAMS Accession No. ML22294A191
- [2] "HI-STORM 100 Amendment 16 Responses to Requests for Additional Information (Batch 4)," letter from D. Elisio (Holtec) to Y. Chen (NRC) dated January 4, 2023. ADAMS Accession No. ML23005A000
- [3] "Clarification Call with Holtec on Response to RAI 3-3 for HI-STORM 100 Amendment 16 Application," March 2, 2023 conversation record. ADAMS Accession No. ML ML23076A113

Dear Ms. Chen:

By letter dated November 7, 2022 [1], NRC staff documented Requests for Additional Information (RAI Batch 4) to support review of HI-STORM 100 amendment request 1014-16. On January 4, 2023 [2], Holtec submitted the responses to Batch 4 of the RAIs which included the response to RAI 3-3. On March 2, 2023, the NRC asked for some clarification on Holtec's response to RAI 3-3 in a clarification call between the NRC and Holtec [3]. This letter provides an updated response to RAI 3-3 based on that clarification call.

The updated responses to Batch 4 (RAI 3-3) are provided in Attachment 1, with Attachment 2



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being a non-proprietary copy. Changes to the FSAR as a result of this RAI clarification are included in Attachment 3. Attachment 4 contains a proprietary document supporting the RAI clarification.

Since Attachments 1 and 4 contain proprietary information, an affidavit requesting this information be withheld in accordance with 10CFR2.390 is included as Attachment 5.

Please contact me at (856) 797-0900 Extension 3326 if there are any questions or require any additional information.

Sincerely,

Denise Elisio
Licensing Engineer
Holtec International

cc: (via email)
Yaira Diaz-Sanabria (USNRC)
Kimberly Manzione (Holtec)

Attachments:

- Attachment 1: HI-STORM 100 Amendment 16 RAI Updated Responses Batch 4 (proprietary)
- Attachment 2: HI-STORM 100 Amendment 16 RAI Updated Responses Batch 4 (non-proprietary)
- Attachment 3: HI-STORM 100 FSAR Proposed text changes, changed pages (non-proprietary)
- Attachment 4: Analysis of the Non-Mechanistic Tipover Event of the Loaded HI-STORM 100 Version UVH Storage Cask (HI-2210290R2) (proprietary)
- Attachment 5: Affidavit in Accordance with 10 CFR 2.390