

**Attachment 1 to Holtec Letter 5021071**

**LAR 1040-0 REVISION 1, LAR 1040-1 REVISION 1, LAR 1040-2  
REVISION 1**

**SUMMARY OF PROPOSED CHANGES**

**Proposed Change #1**

Update the Technical Specification for Radiation Protection.

**Reason for Proposed Change #1**

The reason for the change is outlined in Holtec Letters 5021041 (ML18024A451) and 5021045 (ML18241A092). Concerns were raised by NRC staff members that there was no connection between the dose rate measurement requirements in CoC 1040, Appendix A, Section 5.3.4 and design calculations for the system. Holtec therefore has updated the CoC and associated bases information to clearly articulate the basis for the CoC value. The change also modifies the description of the location of the measurements for clarification for the users. Additionally there is an editorial change to the 10CFR72.212 reference, as the previous reference no longer exists.

**Justification for Proposed Change #1**

The revised dose rate value is based on the design basis fuel calculations previously performed for the HI-STORM UMAX System, with some margin added. Therefore, if a licensee detects a dose rate above this value, it is a clear indication that something is not in line with the design bases and corrective actions may be needed per CoC, Appendix A, Section 5.3.6 and Section 5.3.7. Note that this change does not modify the requirement under Sections 5.3.2 and 5.3.3 for the licensee to calculate a site specific surface dose rate limit based on site condition, ISFSI configuration, number of casks, and contents to confirm compliance with 10CFR72.104. As stated in Section 5.3.5, the lower of these limits shall be used to compare with measured values.

The revised measurement location ensures that the appropriate location of dose rates is measured. However, it is important to note that as long as the locations for measured and site-specific calculated values are the same, a successful comparison provides reasonable assurance that 10CFR72.104 is met.