

**Holtec Clarifications of  
Responses to Request for Additional Information (Part 5)**

**Docket No.72-1032  
Holtec International  
HI-STORM FW  
Multipurpose Canister Storage System  
Certificate of Compliance No. 1032  
Amendment No. 7**

**RAI 3-4**

No clarifications required

**RAI 3-5 Clarification Question**

Staff requested clearer information (similar to FSAR table 1.0.1) of components used in FW system, include the combinations of overpacks and approved MPCs. It would help with the staff's review, as well as the end users. Currently, the information may be available but scattered in the FSAR.

**Holtec Action:**

Holtec has updated the response to RAI 3-5 and updated Table 1.0.1 in the FSAR.

**RAI 3-6**

No clarifications required

**RAI 3-7**

No clarifications required

**RAI 3-8**

No clarifications required

**RAI 3-9 Clarification Question**

Staff requested the deflection results for MPC-37 CBS in the SAR, and Holtec's response stated that the tipover analysis was not performed for MPC-37P CBS. Staff requested the deflection results for MPC-37 CBS because the evaluation of the MPC-37P CBS relies on the tipover analysis performed for MPC-37 CBS, which was not provided in the application. Staff needs the information to make a safety finding for the addition of MPC-37P CBS in the FW system.

**Holtec Action:**

Holtec has updated the response to RAI 3-9 and updated subparagraph 3.4.4.1.4d and Table 3.4.19 in the FSAR. Furthermore, Holtec calculation package HI-2200503, which contains the

bounding results of the MPC-37 CBS tipover analysis in Appendix C, is provided as Attachment 7 to this updated RAI response submittal.

**RAI 3-10 Clarification Question**

Staff requested clarification on the deflection design criterion for the fuel baskets, including what it is and how it is measured. Specifically, the SAR used different terms (e.g., "maximum total deflection" and "maximum permanent deformation") without clear definitions. Also, it is not clear how different terms are related to the technical basis for the original criticality evaluation. Holtec stated that it does not consider there is a shift or change in the technical design criteria.

**Holtec Action:**

Holtec has updated the Holtec Position Paper DS-331 to include further discussion and a more complete technical basis for the non-dimensional "permanent" deflection limit. The updated Position Paper is included as Attachment 6 to this submittal. Furthermore, Holtec has updated the response to RAI 3-10 and updated Section 2.2.8, Table 2.2.11 and Table 3.4.19 in the FSAR.

**RAI 3-11 Clarification Question**

Staff requested results demonstrating that the basket shims remain attached to the basket and maintain their physical integrity for MPC-37CBS, MPC-44CBS, and HI-STORM FW UVH MPCs, specifically the analysis results for MPC-37 CBS. Staff also requested Holtec to include the results in SAR to support the safety conclusion.

**Holtec Action:**

Holtec has updated the response to RAI 3-11 and added figures of stress contour plots to Chapter 3 and Supplement 3.I of the FSAR to support the safety conclusion. Furthermore, Holtec calculation package HI-2200503, which contains the bounding results of the MPC-37 CBS tipover analysis in Appendix C, is provided as Attachment 7 to this updated RAI response submittal.

**RAI 3-12**

No clarifications required

**RAI 3-13**

No clarifications required

**RAI 3-14 Clarification Question**

Staff requested analyses for the CBS baskets to support SAR statements that the combined radial gap between the basket, shims, and enclosure vessel is sized to ensure that no thermal stresses develop. Holtec's response showed discrepancies between thermal expansions and radial gaps.

**Holtec Action:**

Holtec has updated the response to RAI 3-14 and updated Subsections 3.1.1 and 3.4.4 in the FSAR.