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Comment (7)
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Subject: Comments on DG-3057

Holtec International appreciates NRC staff's efforts to provide regulatory clarity around the issue of administrative controls for weather events that may impact short term operations at independent spent fuel storage installations (ISFSIs). Holtec participated in developing and agrees with the comments submitted by the Nuclear Energy Institute (NEI) on Draft Regulatory Guide DG-3057, but this letter provides the following additional comments for staff consideration:

- Clarification 5 in DG-3057 includes a statement that "For SSCs ITS that are determined to be fully analyzed by engineering analysis administrative controls may be implemented..."

Holtec suggests that some additional clarity be added to this statement to say that, "For SSCs ITS that are determined to be fully analyzed by engineering analysis **or bounded by another existing analysis** administrative controls may be implemented..."

In many operational sequences, similar equipment is used, and one bounding analysis may exist to cover a number of steps. The suggested clarification will make it clear that this approach remains acceptable.

- Clarification 5 discusses the need to "demonstrate the analyzed wind speed that is appropriate for short-term operations," and gives an example of a crane wind speed acceptance criterion.

While Holtec agrees with the NEI comments that this clarification should be deleted, in the event that it is not, the clarification should recognize the current licensing basis of some systems. Some systems include design of handling equipment to codes with significant safety factors. Those system FSARs specifically indicate that further wind analyses of equipment designed to those codes is not necessary. Therefore, this DG should acknowledge that users should stay within their current licensing basis, and not expand to



new analyses not required in the original licensing basis.

- Clarification 7 states that licensees should determine the duration of activities by “benchmarking or dry runs.”

Holtec suggests that this statement be revised to include licensees’ own operating experience, since many sites have been loading casks for decades. The statement could be revised to say, “by **site operating experience**, benchmarking, or dry runs.”

- Clarification 8 states that licensees should have specific procedures directing actions in the event of a combination of a malfunction at the same time as an adverse weather event.

The need to require a combination of malfunction and a low probability weather event is a new expectation that has not been previously required in any licensing application. Holtec has previously licensed systems that do combine accidents with other scenarios, but those accidents were significantly long term (30 days) and not the low probability, low duration occurrence of a severe weather event. Holtec suggests that this clarification be removed, as the current wording in the NEI guidance clearly states that the licensee should develop case-specific measures and involve the site’s corrective action program as needed.

Thank you for consideration of these comments.

Sincerely,

A handwritten signature in blue ink that reads "Kim Manzione".

Kimberly Manzione
Director of Licensing – NMSS Projects,
Holtec International