

Orano TN 7160 Riverwood Drive Suite 200 Columbia, MD 21046 USA Tel: 410-910-6900 Fax: 434-260-8480

U. S. Nuclear Regulatory Commission Attn: Document Control Desk One White Flint North 11555 Rockville Pike Rockville, MD 20852

Subject: NUH-003, Updated Final Safety Analysis Report (UFSAR) for the Standardized NUHOMS[®] Horizontal Modular Storage System for Irradiated Nuclear Fuel, Revision 22 and 10 CFR 72.48 Summary Report for the Period 07/28/22 to 01/24/24

Reference: NUH-003, Updated Final Safety Analysis Report (UFSAR) for the Standardized NUHOMS[®] Horizontal Modular Storage System for Irradiated Nuclear Fuel, Revision 21, August 1, 2023 (E-62335)

Letter from Donis Shaw (TN) to Document Control Desk, "Submittal of Biennial Report of 10 CFR 72.48 Evaluations Performed for the Standardized NUHOMS[®] System, CoC 1004, for the Period 7/28/2020 to 7/27/2022, Docket 72-1004," July 27, 2022 (E-61025)

In order to formally incorporate Certificate of Compliance (CoC) No. 1004 Amendment 18 (which was approved by the NRC and became effective on December 18, 2023), TN Americas LLC has updated the referenced UFSAR and herewith submits the subject UFSAR Revision 22. In addition, pursuant to 10 CFR 72.248(c)(5), this update to the UFSAR incorporates changes to the Standardized NUHOMS[®] System implemented by TN Americas LLC under 10 CFR 72.48 from August 2, 2023 up to and including January 24, 2024.

I certify that this submittal accurately presents changes made from August 2, 2023 up to and including January 24, 2024.

The changed areas are marked as follows.

- New or changed pages show "Revision 22" and "January 2024" in their footer area.
- Changed areas are generally indicated using single revision bars in the margin. Newly inserted text is generally shown by italics.

January 24, 2024 E-62817

Enclosures transmitted herein contain SUNSI. When separated from enclosures, this transmittal document is decontrolled.

- Pages that are only changed by Amendment 18 include a text box with bold text in the footer, which states "All changes on this page are Amd 18."
- 10 CFR 72.48 and other Amendment 18 changes include annotations in the margin for differentiation.
- As a result of Amendment 18, necessary changes to the list of effective pages, tables of contents, references to the latest approved amendment, etc. are also made in the UFSAR update. Those changes are not annotated.

This submittal includes proprietary information which may not be used for any purpose other than NRC staff use of the UFSAR. In accordance with 10 CFR 2.390, I am providing an affidavit (Enclosure 1) specifically requesting that you withhold this proprietary information from public disclosure. This submittal also includes security-related information as provided in the proprietary replacement pages contained in Enclosure 2. Accordingly, public versions of all replacement UFSAR pages and drawings are provided as Enclosure 3.

In addition, TN Americas LLC hereby submits a 10 CFR 72.48 biennial summary report pursuant to the requirements of 10 CFR 72.48(d)(2). Enclosure 4 provides a brief description of changes, tests, and experiments, including a summary of the 10 CFR 72.48 evaluation of each change implemented since the submittal of the referenced biennial report, from July 28, 2022 to January 24, 2024 for the Standardized NUHOMS[®] System, including indication as to whether the evaluations had associated UFSAR changes that were incorporated into the UFSAR.

Should you have any questions regarding this submittal, please do not hesitate to contact Mr. Douglas Yates at 434-832-3101, or me at 410-910-6859.

Sincerely,

A.Pratash

Prakash Narayanan Chief Technical Officer

cc: Christian Jacobs, NRC DFM

Enclosures:

- 1. TN Americas LLC Affidavit Pursuant to 10 CFR 2.390
- 2. Replacement Pages and Drawings for the Standardized NUHOMS[®] System UFSAR, Revision 22 (Proprietary Version)
- 3. Replacement Pages and Drawings for the Standardized NUHOMS[®] System UFSAR, Revision 22 (Public Version)
- 4. Biennial Report of 10 CFR 72.48 Evaluations Performed for CoC 1004 for the Period 07/28/2022 to 01/24/2024

TN AMERICAS LLC AFFIDAVIT PURSUANT TO 10 CFR 2.390

State of Maryland: County of HOWARD:

I, Prakash Narayanan, depose and say that I am Chief Technical Officer of TN Americas LLC, duly authorized to execute this affidavit, and have reviewed or caused to have reviewed the information that is identified as proprietary and referenced in the paragraph immediately below. I am submitting this affidavit in conformance with the provisions of 10 CFR 2.390 of the Commission's regulations for withholding this information.

The information for which proprietary treatment is sought meets the provisions of paragraph (a) (4) of Section 2.390 of the Commission's regulations. The information is contained in Enclosure 2, as listed below:

• Enclosure 2 - Portions of Replacement Pages and Drawings for the Standardized NUHOMS[®] System UFSAR, Revision 22 (Proprietary Version)

I have personal knowledge of the criteria and procedures utilized by TN Americas LLC in designating information as a trade secret, privileged or as confidential commercial or financial information. This document has been appropriately designated as proprietary.

Pursuant to the provisions of paragraph (b) (4) of Section 2.390 of the Commission's regulations, the following is furnished for consideration by the Commission in determining whether the information sought to be withheld from public disclosure, included in the above referenced document, should be withheld.

- 1) The information sought to be withheld from public disclosure involves portions of the updated final safety analysis report related to the design of the Standardized NUHOMS[®] dry spent fuel storage system, which is owned by and has been held in confidence by TN Americas LLC.
- 2) The information is of a type customarily held in confidence by TN Americas LLC, and not customarily disclosed to the public. TN Americas LLC has a rational basis for determining the types of information customarily held in confidence by it.
- 3) Public disclosure of the information is likely to cause substantial harm to the competitive position of TN Americas LLC, because the information consists of descriptions of the design of dry spent fuel storage systems, the application of which provide a competitive economic advantage. The availability of such information to competitors would enable them to modify their product to better compete with TN Americas LLC, take marketing or other actions to improve their product's position or impair the position of TN Americas LLC's product, and avoid developing similar data and analyses in support of their processes, methods, or apparatus.

I declare that the statements set forth in this affidavit are true and correct to the best of my knowledge, information, and belief. I declare under penalty of perjury that the foregoing is true and correct.

Executed on: January 15, 2024

A.Pratash

Prakash Narayanan Chief Technical Officer, TN Americas LLC

Enclosure 2 to E-62817

Replacement Pages and Drawings for the Standardized NUHOMS[®] System UFSAR, Revision 22 (Proprietary Version)

Withheld Pursuant to 10 CFR 2.390

Enclosure 3 to E-62817

Replacement Pages and Drawings for the Standardized NUHOMS[®] System UFSAR, Revision 22 (Public Version)

NUH-003 Revision 22 NUH003.0103

UPDATED FINAL SAFETY ANALYSIS REPORT FOR THE STANDARDIZED NUHOMS[®] HORIZONTAL MODULAR STORAGE SYSTEM FOR IRRADIATED NUCLEAR FUEL

By TN Americas LLC⁽¹⁾ Columbia, MD

January 2024

⁽¹⁾ TN Americas LLC, formerly AREVA TN, Transnuclear, Inc. (herein referred to as AREVA TN, Transnuclear, Inc., Transnuclear, or TN)

REVISION LOG (Page 3 of 3)

UFSAR Revision	Date	Record of Changes/FCNs	Changed Pages
18	1/22/19	FCNs:721004-1678 R0, 1712 R0, 1718 R0, 1729, R0, 1730 R0, 1734 R0	 See changed areas of List of Effective Pages. Note that the following pages are removed in Revision 18: M.3.1-8a N.2-9a U.2-28a Z.5-6a
19	1/14/21	FCNs: 721004-1732 R0, 1741 R0, 1743 R0, 1744 R0, 1745 R0, 1754 R0, 1765 R0, 1771 R0, 1772 R2, 1774 R0, 1775 R0, 1784 R0, 1786 R0, 1791 R0, 1792 R0, 1797 R0, 1812 R0, 1813 R0, 1815 R0, 1816 R0, 1818 R0, 1820 R0, 1822 R0, 1825 R0, 1828 R0, 1838 R0, 1839 R0, 1845 R0, 1852 R0, 1853 R0, 1854 R0, 1856 R0, 1861 R0, 1863 R0, 1865 R0, 1867 R0, 1872 R0, 1879 R0	See changed areas of List of Effective Pages.
20	8/1/21	FCNs: 721004-1874 R0, 1876 R0, 1881 R0, 1882 R0, 1885 R0, 1887 R1, 1892 R0	See changed areas of List of Effective Pages.
21	8/1/23	FCNs: 721004-1863 R2, 1868 R1, 1873 R1, 1880 R0, 1889 R0, 1891 R0, 1897 R0, 1906 R0, 1908 R0, 1918 R0, 1921 R0, 1923 R0, 1926 R0, 1931 R1, 1933 R0, 1934 R0, 1935 R0, 1943 R0, 1944 R0, 1948 R0, 1961 R0	See changed areas of List of Effective Pages.
22	1/24/24	FCNs: 721004-1940 R0, 1943 R1, 1947 R0, 1949 R0, 1951 R0, 1956 R0, 1963 R0, 1965 R0, 1971 R0, 1972 R0, 1974 R0, 1977 R1, 1978 R2, and E-63035 (which verifies Amendment 18 incorporation into Revision 22)	See changed areas of List of Effective Pages.

Page or description	Rev.	Date
Title Page	22	January 2024
Proprietary Information Notice	21	August 2023
Revision Log (page 1 of 3)	18	January 2019
Revision Log (page 2 of 3)	18	January 2019
Revision Log (page 3 of 3)	22	January 2024
LOEP-1	22	January 2024
LOEP-2	22	January 2024
LOEP 3	22	January 2024
LOEP 4	22	Junuary 2024
LOEP 5	22	January 2024
LUEP-5	22	January 2024
LOEP-6	22	January 2024
LOEP-7	22	January 2024
LOEP-8	22	January 2024
LOEP-9	22	January 2024
LOEP-10	22	January 2024
LOEP-11	22	January 2024
LOEP-12	22	January 2024
LOEP-13	22	January 2024
LOEP-14	22	January 2024
LOEP-15	22	January 2024
LOEP-16	22	January 2024
LOEP 17	22	January 2024
LOEP-1/	22	January 2024
LOEP-18	22	January 2024
LOEP-19	22	January 2024
LOEP-20	22	January 2024
LOEP-21	22	January 2024
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LOEP-23	22	January 2024
LOEP-24	22	January 2024
LOEP-25	22	January 2024
LOEP-26	22	January 2024
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LOEP-20	22	January 2024
LOEP-29	22	January 2024
LOEP-30	22	January 2024
LOEP-31	22	January 2024
LOEP-32	22	January 2024
LOEP-33	22	January 2024
LOEP-34	22	January 2024
LOEP-35	22	January 2024
LOEP-36	22	January 2024
LOEP-37	22	January 2024
LOFP-38	22	January 2024
LOEP-39	22	January 2024
LOEP 40	22	January 2024
LOED 41	22	Junuary 2024
LOEP-41	22	January 2024
LOEP-42	22	January 2024
LOEP-43	22	January 2024
LOEP-44	22	January 2024
LOEP-45	22	January 2024
LOEP-46	22	January 2024
LOEP-47	22	January 2024
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LOEP-49	22	January 2024
LOEP-50	22	January 2024
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LOEP 52	22	January 2024
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LOEP-54	22	January 2024
LOEP-55	22	January 2024
LOEP-56	22	January 2024
LOEP-57	22	January 2024

Page or description	Rev.	Date
LOEP-58	22	January 2024
LOEP-59	22	January 2024
LOEP-60	22	January 2024
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LOEP-62	22	January 2024
LOEP-63	22	January 2024
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LOEP-67	22	January 2024
LOEP-68	22	January 2024
LOEP-69	22	January 2024
LOEP-70	22	January 2024
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LOEP-72	22	January 2024
LOEP-73	22	January 2024
LOEP-74	22	January 2024
LOEP-75	22	January 2024
LOEP-76	22	January 2024
LOEP 77	22	January 2024
LOEP 78	22	January 2024
LOEP-70	22	January 2024
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LOEP-81	22	January 2024
LOEP-82	22	January 2024
LOEP-83	22	January 2024
LOEP-84	22	January 2024
LOEP-85	22	January 2024
LOEP-86	22	January 2024
1	19	January 2021
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iv	22	January 2024
V	22	January 2024
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xii	22	January 2024
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XV	22	January 2024
xvi	22	January 2024
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xxiv	22	January 2024
XXV	22	January 2024
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xxvii	22	January 2024
xxviii	22	January 2024
xxix	22	January 2024
1 1-1	17	March 2018
11-1a	17	March 2018
1 1-2	0	January 2006
1.1-2	14	September 2014
1.1-2a	14	September 2014

1.1-2b 1.1-2c 1.1-2d 1.1-2e 1.1-2f 1.1-2g 1.1-3 1.1-5 1.1-6	18 20 20 20 20 20 20 20 20 20 20 20 20 20 20 20 20 20 20 7	January 2019 August 2021 August 2021 August 2021 August 2021 August 2021
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1.1-4 1.1-5 1.1-6	7	February 2012
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1.2-13	7	November 2003
1 2-14	6	October 2001
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1 3-1	14	September 2014
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1.3-2	10	January 2019 March 2018
1.3-2a	17	March 2018
1.3-5	17	March 2018
1.3-38	17	March 2018
1.3-4	17	March 2018
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1.3-22	6	October 2001
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1.6-1	6	October 2001

Page or description	Rev.	Date
1.6-2	22	January 2024
2.1-1	6	October 2001
2.1-2	6	October 2001
2.1-3	14	September 2014
3.1-1	14	September 2014
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31-14	13	January 2014
3.1-15	13	January 2014
3.1-16	13	January 2014
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3.2-7	14	September 2014
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3.2-8	22	January 2024
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3.3-2	14	September 2014
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3.3-5	7	November 2003
3.3-6	10	February 2008
3.3-7	6	October 2001
3.3-8	6	October 2001
3.3-9	6	October 2001

Page or description	Rev.	Date
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3 3-31	14	September 2014
3 3 3 2	6	October 2001
2 2 2 2	21	August 2022
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3.3-38	7	November 2003
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3 3-66	7	November 2003
3 3-67	7	November 2003
3 3 68	7	November 2003
2 2 60	7	November 2003
2.2.70	/	November 2003
3.3-70		INOVEMBER 2003

Page or description	Rev.	Date
3.3-71	7	November 2003
3.3-72	7	November 2003
3.3-73	7	November 2003
3.3-74	7	November 2003
3.3-75	7	November 2003
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3.3-78	7	November 2003
3.3-79	7	November 2003
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3.4-2	7	November 2003
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3.6-1	7	November 2003
3.6-2	7	November 2003
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3.6-7	7	November 2003
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4.2-3	6	October 2001
4.2-4	6	October 2001
4.2-5	6	October 2001
4.2-6	11	February 2010
4.2-7	22	January 2024
4.2-7a	14	September 2014

Page or description	Rev.	Date
4.2-8	6	October 2001
4.2-9	14	September 2014
4.2-9a	14	September 2014
4.2-10	14	September 2014
4.2-10a	13	January 2014
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4.2-12	6	October 2001
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4.2-23	6	October 2001
4.2-24	6	October 2001
4.2-25	6	October 2001
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4.2-26b	15	August 2016
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4.3-1	19	January 2021
4.3-2	19	January 2021
4.3-3	6	October 2001
4 4-1	6	October 2001
4 5-1	6	October 2001
4.5-2	6	October 2001
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4.7-9	16	July 2017
4.7-10	13	January 2014
4.7-11	6	October 2001
4.7-12	6	October 2001
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4.8-6	13	January 2014
4.9-1	6	October 2001
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Page or description	Rev.	Date
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12.3-7	19	January 2021
12.3-8	19	January 2021
12.3-9	19	January 2021
12.3-10	19	January 2021
12.3-11	19	January 2021
12.3-12	19	January 2021
12.3-13	19	January 2021
12.4-1	22	January 2024
12.5-1	17	March 2018
12 5-2	19	January 2021
12.5 2	17	March 2018
12.5-5	21	August 2022
12.5-4	21	August 2023
12.3-3	19	January 2021
12.6-1	17	March 2018
12.6-2	22	January 2024
A.0	6	October 2001
A.1	6	October 2001
A.2	6	October 2001
A.3	6	October 2001
A.4	7	November 2003
A.5	7	November 2003

Page or description	Rev.	Date
A.6	6	October 2001
A.7	6	October 2001
A.8	6	October 2001
"Appendix B"	6	October 2001
"This Appendix"	6	October 2001
B.1-1	6	October 2001
B.2-1	6	October 2001
B.2-2	6	October 2001
B.2-3	6	October 2001
B.2-4	6	October 2001
B.2-5	6	October 2001
B.2-6	6	October 2001
B.2-7	6	October 2001
B.2-8	6	October 2001
B.2-9	6	October 2001
B.2-10	6	October 2001
B.2-11	6	October 2001
B.2-12	6	October 2001
B.3-1	6	October 2001
B.3-2	6	October 2001
B.3-3	6	October 2001
B.3-4	6	October 2001
B.3-5	6	October 2001
B.3-6	6	October 2001
B.3-7	6	October 2001
B.3-8	6	October 2001
B.3-9	6	October 2001
B.3-10	6	October 2001
B.3-11	6	October 2001
B.3-12	6	October 2001
B.3-13	6	October 2001
B.4-1	6	October 2001
C.0	6	October 2001
C.1	6	October 2001
C.1-1	6	October 2001
C.2-1	6	October 2001
C.2-2	9	January 2006
C.2-3	6	October 2001
C.2-4	6	October 2001
C.2-5	6	October 2001
C.2-6	6	October 2001
C.2-7	6	October 2001
C.2-8	6	October 2001
C.2-9	6	October 2001
C.2-10	6	October 2001
C.2-11	6	October 2001
C.2-12	6	October 2001
C.2-13	6	October 2001
C.2-14	6	October 2001
C.2-15	6	October 2001
C.2-16	6	October 2001
C.2-17	6	October 2001
C.2-18	6	October 2001
C.2-19	6	October 2001
C.2-20	6	October 2001
C.2-21	6	October 2001
C.2-22	6	October 2001
C.2-23	6	October 2001
C.2-24	6	October 2001
C.2-25	6	October 2001
C.2-26	6	October 2001
C.2-27	6	October 2001

Page or description	Rev.	Date
C.3-1	6	October 2001
C.3-2	6	October 2001
C.3-3	6	October 2001
C.3-4	6	October 2001
C.3-5	6	October 2001
C.3-6	9	January 2006
C.3-7	6	October 2001
C.3-8	6	October 2001
C.3-9	6	October 2001
C.3-10	6	October 2001
C4-1	6	October 2001
C4-2	17	March 2018
C4-2a	17	March 2018
C4-3	17	March 2018
C4-3a	17	March 2018
C4-4	6	October 2001
C4-5	17	March 2018
C4-5a	17	March 2018
C4-6	12	February 2012
C4-7	12	February 2012
C4-8	12	February 2012
C5-1	6	October 2001
C5-2	6	October 2001
C5-3	6	October 2001
C5-4	6	October 2001
C5.5	12	February 2012
C5-6	12	February 2012
C5 7	12	February 2012
C5-7	12	February 2012
C5-0	12	February 2012
C5-9	6	October 2001
C6-1	12	Echmicary 2012
D.0	12	Ostahar 2001
D.0	0	October 2001
D.1-1	0	October 2001
D.1-2	0	October 2001
D.1-3	0	October 2001
D.1-4	0	October 2001
D.1-5	6	October 2001
D.1-0	0	October 2001
D.I-/	6	October 2001
D.1-8	6	October 2001
D.1-9	6	October 2001
E-1	6	October 2001
E-2	14	September 2014
E.I-I		February 2010
E.1-2	11	February 2010
DWG (sh. 1 of 3)	5	Not shown
NUH-03-1020-SAR		
DWG (sh. 2 of 3)	5	Not shown
NUH-03-1020-SAR	_	
DWG (sh. 3 of 3)	5	Not shown
NUH-03-1020-SAR		
DWG (sh. 1 of 1) NUH-03-1021-SAR	6	1/8/14
DWG (sh. 1 of 2) NUH-03-1022-SAR	5	1/8/14
DWG (sh. 2 of 2) NUH-03-1022-SAR	5	Not shown
DWG (sh. 1 of 3)	8	1/8/14
DWG (sh. 2 of 3)	8	Not shown
NUH-03-1023-SAR		

Page or description	Rev.	Date
DWG (sh. 3 of 3)	8	Not shown
NUH-03-1023-SAR		
E.1-3	11	February 2010
DWG (sh. 1 of 1) NULL 02 1020 SAP	6	1/8/14
DWG (sh 1 of 2)	5	1/8/14
NUH-03-1030-SAR	5	1/0/11
DWG (sh. 2 of 2)	5	Not shown
NUH-03-1030-SAR		
DWG (sh. 1 of 3)	8	1/8/14
NUH-03-1031-SAR	0	No.4 al array
DWG (sn. 2 of 3) $NUH_03_1031_SAR$	8	Not shown
DWG (sh. 3 of 3)	8	Not shown
NUH-03-1031-SAR	Ť	
DWG (sh. 1 of 3)	7	1/8/14
NUH-03-1032-SAR	_	
DWG (sh. 2 of 3)	7	Not shown
$\frac{\text{NUH-03-1032-SAR}}{\text{DWG}(\text{sh}, 2 \text{ of } 2)}$	7	Not shown
NUH-03-1032-SAR	/	Not shown
E.1-4	11	February 2010
DWG (sh. 1 of 3)	3	Not shown
NUH-03-1050-SAR		
DWG (sh. 2 of 3)	3	Not shown
NUH-03-1050-SAR	2	N. (1
DWG (sh. 3 of 3) NUH 03 1050 SAR	3	Not shown
DWG (sh 1 of 2)	4	1/8/14
NUH-03-1051-SAR		1/0/11
DWG (sh. 2 of 2)	4	Not shown
NUH-03-1051-SAR		
DWG (sh. 1 of 2)	4	1/8/14
NUH-03-1052-SAR	4	Notshown
NUH-03-1052-SAR	4	Not shown
DWG (sh. 1 of 3)	5	1/8/14
NUH-03-1053-SAR		
DWG (sh. 2 of 3)	5	Not shown
NUH-03-1053-SAR	-	NY . 1
DWG (sh. 3 of 3) NULL 02 1052 SAP	5	Not shown
F 2-1	11	February 2010
E.2-2	11	February 2010
DWG (sh. 1 of 3)	11	8/26/16
NUH-03-6008-SAR		
DWG (sh. 2 of 3)	11	Not shown
NUH-03-6008-SAR	11	N. (1
DWG (sh. 3 of 3) NUH 03 6008 SAR	11	Not shown
DWG (sh. 1 of 2)	9	1/8/14
NUH-03-6009-SAR		1.0.11
DWG (sh. 2 of 2)	9	Not shown
NUH-03-6009-SAR		
DWG (sh. 1 of 2)	5	1/8/14
NUH-03-6010-SAR	E	Not show
NUH-03-6010-SAR	3	INOU SHOWIN
DWG (sh. 1 of 3)	9	1/8/14
NUH-03-6014-SAR		
DWG (sh. 2 of 3)	9	Not shown
NUH-03-6014-SAR		

Page or description	Rev.	Date
DWG (sh. 3 of 3) NUH-03-6014-SAR	9	Not shown
DWG (sh. 1 of 2) NUH-03-6015-SAR	9	7/17/17
DWG (sh. 2 of 2) NUH-03-6015-SAR	9	Not shown
DWG (sh. 1 of 2) NUH-03-6016-SAR	11	12/15/2020
DWG (sh. 2 of 2) NUH-03-6016-SAR	11	Not shown
DWG (sh. 1 of 5) NUH-03-6017-01-SAR	7	Not shown
DWG (sh. 2 of 5) NUH-03-6017-01-SAR	7	Not shown
DWG (sh. 3 of 5) NUH-03-6017-01-SAR	7	Not shown
DWG (sh. 4 of 5) NUH-03-6017-01-SAR	7	Not shown
DWG (sh. 5 of 5) NUH-03-6017-01-SAR	7	Not shown
DWG (sh. 1 of 2) NUH-03-6018-SAR	7	Not shown
DWG (sh. 2 of 2) NUH-03-6018-SAR	7	Not shown
DWG (sh. 1 of 2) NUH-03-6024-SAR	5	1/28/10
DWG (sh. 2 of 2) NUH-03-6024-SAR	5	Not shown
E.3-1	11	February 2010
E.3-2	11	February 2010
DWG (sh. 1 of 1) NUH-03-8000-SAR	5	1/28/10
DWG (sh. 1 of 5) NUH-03-8001-SAR	10	6/14/23
DWG (sh. 2 of 5) NUH-03-8001-SAR	10	Not shown
DWG (sh. 3 of 5) NUH-03-8001-SAR	10	Not shown
DWG (sh. 4 of 5) NUH-03-8001-SAR	10	Not shown
DWG (sh. 5 of 5) NUH-03-8001-SAR	10	Not shown
DWG (sh. 1 of 3) NUH-03-8002-SAR	10	6/14/23
DWG (sh. 2 of 3) NUH-03-8002-SAR	10	Not shown
DWG (sh. 3 of 3) NUH-03-8002-SAR	10	Not shown
DWG (sh. 1 of 3) NUH-03-8003-SAR	10	6/14/23
DWG (sh. 2 of 3) NUH-03-8003-SAR	10	Not shown
DWG (sh. 3 of 3) NUH-03-8003-SAR	10	Not shown
F.0	6	October 2001
F.1	6	October 2001
4	None	January 1989
5	None	January 1989
6	None	January 1989
7	None	January 1989
8	None	January 1989
9	None	January 1989
10	inone	January 1989

Page or description	Rev.	Date
11	None	January 1989
F.2	6	October 2001
1	None	February 1989
2	None	February 1989
3	None	February 1989
4	None	February 1989
5	None	February 1989
6	None	February 1989
7	None	February 1989
8	None	February 1989
9	None	February 1989
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12	None	February 1989
13	None	February 1989
14	None	February 1989
15	None	February 1989
16	None	February 1989
17	None	February 1989
18	None	February 1989
19	None	February 1989
20	None	February 1989
21	None	February 1989
F.3	6	October 2001
1 of 5 of BGE001.0024.03	None	Not shown
2 of 5 of BGE001.0024.03	None	Not shown
3 of 5 of BGE001.0024.03	None	Not shown
4 of 5 of BGE001.0024.03	None	Not shown
5 of 5 of BGE001.0024.03	None	Not shown
6 of 5 of BGE001.0024.03	None	Not shown
7 of 5 of BGE001.0024.03	None	Not shown
G.0	6	October 2001
H.0	6	October 2001
H.1	13	January 2014
H.2	17	March 2018
H.2a	17	March 2018
Н.3	6	October 2001
H.4	6	October 2001
H.5	6	October 2001
H.6	6	October 2001
H.7	6	October 2001
H.8	6	October 2001
Н.9	6	October 2001
H.10	6	October 2001
H.11	6	October 2001
H.12	6	October 2001
H.13	6	October 2001
I.0	6	October 2001
I-1	6	October 2001
"Appendix J"	6	October 2001
J.1-1	17	March 2018
J.2-1	6	October 2001
J.3-1	6	October 2001
J.4-1	7	November 2003
J.4-2	7	November 2003
J.4-2a	7	November 2003
J.4-3	6	October 2001
J.4-4	6	October 2001
J.4-5	6	October 2001
J.5-1	6	October 2001
J.5-2	19	January 2021
J.5-3	6	October 2001

Page or description	Rev.	Date
J.5-4	6	October 2001
J.5-5	12	February 2012
J.5-6	12	February 2012
J.5-7	6	October 2001
J.5-8	6	October 2001
J.5-9	6	October 2001
J.5-10	7	November 2003
J.6-1	6	October 2001
J.6-2	6	October 2001
J.6-3	7	November 2003
J.6-4	6	October 2001
J.6-5	6	October 2001
1.6-6	6	October 2001
J.6-7	6	October 2001
1.6-8	6	October 2001
16-9	6	October 2001
I 6-10	6	October 2001
16-11	6	October 2001
I.6-12	6	October 2001
J.0-12	6	October 2001
J. 7-1	6	October 2001
10.1	6	October 2001
J.9-1	6	October 2001
J.10-1	12	January 2014
J.11-1 J.12 1	6	October 2001
J.12-1	6	October 2001
J.13-1	6	October 2001
J.14-1	0	Uctober 2001
K-1	19	January 2021
K-11	19	January 2021
K-III	19	January 2021
K-IV	19	January 2021
K-V	19	January 2021
K-VI	19	January 2021
K-VII	19	January 2021
K-viii	19	January 2021
K-1X	19	January 2021
K-x	19	January 2021
K-xi	19	January 2021
K.1-1	17	March 2018
K.1-2	14	September 2014
K.1-3	8	June 2004
K.1-4	14	September 2014
K.1-5	13	January 2014
K.1-6	8	June 2004
K.1-7	13	January 2014
K.1-8	8	June 2004
DWG (sh. 1 of 2)	7	8/26/16
NUH-61B-1060-SAR		
DWG (sh. 2 of 2)	7	Not shown
NUH-61B-1060-SAR		
DWG (sh. 1 of 2)	5	1/8/14
NUH-61B-1061-SAR		
DWG (sh. 2 of 2) NUH-61B-1061-SAR	5	Not shown
DWG (sh. 1 of 2)	6	1/8/14
DWG (sh. 2 of 2)	6	Not shown
NUH-61B-1062-SAR DWG (sh. 1 of 1)	4	1/8/14
NUH-61B-1063-SAR	-	01/10/10
DWG (sh. 1 of 2) NUH-61B-1064-SAR	8	01/10/19

Page or description	Rev.	Date
DWG (sh. 2 of 2)	8	Not shown
NUH-61B-1064-SAR		
DWG (sh. 1 of 1) NUH-61B-1065-SAR	7	7/17/17
DWG (sh. 1 of 3)	7	7/17/17
NUH-61B-1066-SAR		
DWG (sh. 2 of 3)	7	Not shown
NUH-61B-1066-SAR		
DWG (sh. 3 of 3)	7	Not shown
NUH-61B-1066-SAR	0	Juna 2004
K.1-9	8 10	February 2008
K.1-10	8	June 2004
K 2-1	14	September 2014
K.2-2	18	January 2019
K.2-2a	14	September 2014
K.2-3	14	September 2014
K.2-4	14	September 2014
K.2-4a	14	September 2014
K.2-5	8	June 2004
K.2-6	8	June 2004
K.2-7	17	March 2018
K.2-7a	17	March 2018
K.2-8	13	January 2014
K.2-9	13	January 2014
K.2-10	17	March 2018
K.2-11	8	June 2004
K.2-12	19	January 2021
K.2-13	19	January 2021
K.2-14	19	January 2021
K.2-15	13	January 2014
K.2-16	13	January 2014
K.2-17	10	February 2008
K.2-18	8	June 2004
K.2-19	14	September 2014
K.2-20	14	September 2014
K.2-21	8	June 2004
K.2-22	8	June 2004
K.2-23	8	June 2004
K.2-24	11	February 2010
K.2-25	14	September 2014
K.2-26	14	September 2014
K.2-27	14	September 2014
K.3.1-1	14	September 2014
K.3.1-1a	14	September 2014
K.3.1-2	8	June 2004
K.3.1-3	8	June 2004
K.3.1-4	8	June 2004
K.3.1-5	8	June 2004
K.3.1-6	19	January 2021
K.3.1-7	16	July 2017
K.3.1-8	19	January 2021
K.3.1-9	8	June 2004
K.3.1-10	8	June 2004
K.3.2-1	14	September 2014
K.3.2-2	22	January 2024
K.3.2-2a	14	September 2014
K.3.3-1	8	June 2004
K.3.4-1	14	September 2014
K.3.4-2	8	June 2004
K.3.4-3	8	June 2004
К.3.4-4	8	June 2004

Page or description	Rev.	Date
K.3.4-5	10	February 2008
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K.3.4-7a	14	September 2014
K.3.4-8	8	June 2004
K.3.4-9	11	February 2010
K.3.4-10	8	June 2004
K.3.4-11	8	June 2004
K.3.4-12	8	June 2004
K 3 4-13	8	June 2004
K 3 4-14	8	June 2004
K 3 4-15	8	June 2004
K 3 4-16	8	June 2004
K 3 4-17	8	June 2004
K 3 4-18	8	June 2004
K.3.4-10	0	June 2004
K.3.4-19	0	June 2004
K.3.3.1	13	Santanal an 2014
N.3.0-1	14	September 2014
N.3.0-1a	14	September 2014
N.3.0-2	12	rebruary 2012
K.3.6-3	8	June 2004
K.3.0-4	8	June 2004
K.3.6-5	8	June 2004
K.3.6-6	8	June 2004
K.3.6-7	8	June 2004
K.3.6-8	14	September 2014
K.3.6-9	8	June 2004
K.3.6-10	8	June 2004
K.3.6-11	8	June 2004
K.3.6-12	14	September 2014
K.3.6-13	8	June 2004
K.3.6-14	8	June 2004
K.3.6-15	14	September 2014
K.3.6-16	14	September 2014
K.3.6-17	14	September 2014
K.3.6-18	14	September 2014
K.3.6-19	18	January 2019
K.3.6-19a	18	January 2019
K.3.6-20	8	June 2004
K.3.6-21	8	June 2004
K.3.6-22	8	June 2004
K.3.6-23	8	June 2004
K.3.6-24	8	June 2004
K.3.6-25	8	June 2004
K.3.6-26	8	June 2004
K.3.6-27	8	June 2004
K.3.6-28	8	June 2004
K 3 6-29	8	June 2004
K 3 6-30	8	June 2004
K.3.6-30	8	June 2004
K 3 6 3 2	0	June 2004
K.3.0-32 V 2.6.22	0	June 2004
K.J.U-JJ V 2 6 24	0	June 2004
N.3.0-34	8	June 2004
N.3.0-33	8	June 2004
K.3.0-30	8	June 2004
K.3.0-37	8	June 2004
K.3.6-38	8	June 2004
K.3.6-39	8	June 2004
K.3.6-40	8	June 2004
K.3.6-41	8	June 2004
K.3.6-42	8	June 2004
K.3.6-43	8	June 2004

Page or description	Dov	Data
	v v.	June 2004
K.3.6-44	8	June 2004
K.3.0-+3	8	June 2004
K.3.6-40	8	June 2004
K 36-48	8	June 2004
K 3 6-49	8	June 2004
K 3 6-50	8	June 2004
K.3.6-50	8	June 2004
K 36-52	8	June 2004
K 36-53	8	June 2004
K 36-54	8	June 2004
K 36-55	8	June 2004
K 3 6-56	8	June 2004
K 3.6-57	8	June 2004
K 3.7-1	14	September 2014
K 3 7-1a	14	September 2014
K.3.7-2	14	September 2014
K 3 7-2a	14	September 2014
K 3 7-3	14	September 2014
K 3.7-3a	14	September 2014
K 3 7-4	14	September 2014
K 3 7-4a	14	September 2014
K 3 7-5	14	September 2014
K 3 7-5a	14	September 2014
K 3 7-6	14	September 2014
K 3 7-6a	14	September 2014
K 3 7-6b	14	September 2014
K 3 7-7	8	June 2004
K 3 7-8	8	June 2004
K 3 7-9	14	September 2014
K 3 7-9a	14	September 2014
K.3.7-10	14	September 2014
K.3.7-10a	14	September 2014
K.3.7-11	14	September 2014
K.3.7-11a	14	September 2014
K.3.7-12	8	June 2004
K.3.7-13	8	June 2004
K.3.7-14	8	June 2004
K.3.7-15	8	June 2004
K.3.7-16	8	June 2004
K.3.7-17	8	June 2004
K.3.7-18	8	June 2004
K.3.7-19	8	June 2004
K.3.7-20	8	June 2004
K.3.7-21	8	June 2004
K.3.7-22	8	June 2004
K.3.7-23	8	June 2004
K.3.7-24	14	September 2014
K.3.7-25	14	September 2014
K.3.7-25a	14	September 2014
K.3.7-26	14	September 2014
K.3.7-26a	14	September 2014
K.3.7-27	14	September 2014
K.3.7-28	14	September 2014
K.3.7-29	8	June 2004
K.3.7-30	8	June 2004
K.3.7-31	8	June 2004
K.3.7-32	8	June 2004
K.3.7-33	8	June 2004
K.3.7-34	8	June 2004
K.3.7-35	8	June 2004
K.3.7-36	22	January 2024

Page or description	Rev.	Date
K.3.7-37	10	February 2008
K.3.7-38	14	September 2014
K.3.7-39	8	June 2004
K.3.7-40	10	February 2008
K.3.7-41	8	June 2004
K.3.7-42	8	June 2004
K.3.7-42A	12	February 2012
K.3.7-42b	14	September 2014
K.3.7-42c	14	September 2014
K.3.7-42d	14	September 2014
K.3.7-42e	14	September 2014
K.3.7-43	11	February 2010
K.3.7-44	8	June 2004
K.3.7-45	8	June 2004
K.3.7-46	8	June 2004
K.3.7-47	8	June 2004
K.3.7-48	8	June 2004
K.3.7-49	8	June 2004
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K 3 7 50	8	June 2004
K.3.7-60	8	June 2004
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K.3.7-02	0	June 2004
K.3.7-03	0	June 2004
K.3.7-04	0	June 2004
K.3.7-03	0	June 2004
K.3./-66	8	June 2004
K.3./-0/	8	June 2004
K.3./-68	8	June 2004
K.3.7-69	8	June 2004
K.3./-/0	8	June 2004
K.3./-/1	8	June 2004
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K.3.7-73	8	June 2004
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K.3.7-86	8	June 2004
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K.3.7-88	8	June 2004
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Page or description	Rev.	Date
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K.4-43	8	June 2004
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Page or description	Rev.	Date
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K 5 / 3	0 0	June 2004
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K 5-56	8	June 2004
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Page or description	Rev.	Date
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Page or description	Rev.	Date
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Page or description	Rev.	Date
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K.8-6	19	January 2021
K.8-7	19	January 2021
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K.8-9	19	January 2021
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K.8-11a	21	August 2023
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K 8-16a	19	January 2024
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K.8-2/	13	January 2014
K.8-28	13	January 2014
K.8-29	13	January 2014
K.8-30	13	January 2014
K.8-31	13	January 2014
K.8-32	16	July 2017
K.9 Introduction-1	20	August 2021
K.9 Introduction-2	20	August 2021
K.9-1	8	June 2004
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K.9-2	11	February 2010
(associated with UFSAR Rev. 11)		
K.9-3	11	February 2010
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K.9-4	11	February 2010
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K.9-5	11	February 2010
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K.9-8	11	February 2010
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Page or description	Rev.	Date
K.9-9	11	February 2010
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K.9-10	11	February 2010
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K.9-11	11	February 2010
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K.9.12 (accordented with UESAR Day, 11)	11	February 2010
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K.9.15	11	February 2010
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K.9-1	8	June 2004
(associated with UFSAR Rev. 12)		
K.9-2	11	February 2010
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K.9-5	11	February 2010
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K.9-6	11	February 2010
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K.9-9	11	February 2010
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K.9-10	11	February 2010
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K.9-11	11	February 2010
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K.9.14	11	February 2010
(associated with UFSAR Rev. 12)	10	F 1 2012
K.9.15 (according to d with LIES A.B. Day, 12)	12	February 2012
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(associated with LIESAR Rev. 13)	15	January 2014
(associated with OFSAR Rev. 15)	13	January 2014
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K 9-3	13	January 2014
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K.9-4	13	January 2014
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K.9-6	13	January 2014
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Page or description	Rev.	Date
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K.9-3 (associated with UFSAR Rev. 16)	14	September 2014
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K.9-5 (associated with UESAR Rev. 16)	16	July 2017
K.9-5a (associated with UESAP Pey, 16)	16	July 2017
K.9-6	14	September 2014
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(associated with UFSAR Rev. 16)	10	July 2017
K.9-10 (associated with UFSAR Rev. 16)	14	September 2014
K.9-11 (associated with UFSAR Rev. 16)	11	February 2010
K.9-12 (associated with UFSAR Rev. 16)	13	January 2014
K.9-13 (associated with UESAR Rev. 16)	13	January 2014
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Page or description	Rev.	Date
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K.9-8 (associated with UESAP Pay, 17)	14	September 2014
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(associated with UFSAR Rev. 17)	15	January 2014
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Page or description	Rev.	Date
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K.11.15 K 11.16	0	June 2004
K.11.10 V 12 1	8	June 2004
K.12-1	19	January 2021
K.13-1	8	June 2004
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L.1-3	6	October 2001
L.1-4	13	January 2014
L.1-5	6	October 2001
L.1-6	7	November 2003

Page or description	Rev.	Date
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NUH-03-1070-SAR		
DWG (sh. 3 of 4)	2	Not shown
NUH-03-1070-SAR		
DWG (sh. 4 of 4)	2	Not shown
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DWG (sh. 1 of 4)	1	Not shown
NUH-03-10/1-SAR	1	NT - 1
DWG (sh. $2 \text{ of } 4$)	1	Not shown
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DWG (sh 4 of 4)	1	Not shown
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L.2-1 L.2.2	12	January 2014
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L.3-14	12	February 2012
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I 2 22	22	January 2024
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Page or description	Rev.	Date
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I.0 2	13	January 2014
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Page or description	Rev.	Date
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DWG (sh. 2 of 2)	5	Not shown
DWG (sh. 1 of 4)	9	12/15/2020
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DWG (sh. 4 of 4)	9	Not shown
DWG (sh. 1 of 4)	7	01/10/19
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DWG (sh. 4 of 4)	7	Not shown
DWG (sh. 1 of 1)	3	1/30/06
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Page or description	Rev.	Date
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Page or description	Rev.	Date
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Page or description	Rev.	Date
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M.3.7-5d	22	January 2024
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Page or description	Rev.	Date
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Page or description	Rev.	Date
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Page or description	Rev.	Date	
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M.9-10 (associated with LIESAP Pov. 14)	14	September 2014
M.9-11	13	January 2014
(associated with UFSAK Kev. 14) M.9-12	13	January 2014
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(associated with UFSAR Rev. 14)	12	January 2014
(associated with UFSAR Rev. 15)	13	January 2014

Page or description	Rev.	Date
M.9-2 (associated with UFSAR Rev. 15)	15	August 2016
M.9-3 (associated with UFSAR Rev. 15)	14	September 2014
M.9-4 (associated with UESAR Rev. 15)	14	September 2014
M.9-5 (associated with UESAR Rev. 15)	13	January 2014
M.9-6 (associated with UESAR Rev. 15)	14	September 2014
M.9-7 (associated with UESAR Rev. 15)	14	September 2014
M.9-8 (associated with UESAR Rev. 15)	14	September 2014
M.9-9 (associated with UESAR Rev. 15)	14	September 2014
M.9-10 (associated with UESAR Rev. 15)	14	September 2014
M.9-11 (associated with UESAR Rev. 15)	13	January 2014
M.9-12 (associated with UESAR Rev. 15)	13	January 2014
M.9-13 (associated with UESAR Rev. 15)	13	January 2014
M.9-14 (associated with UESAR Rev. 15)	13	January 2014
M.9-1 (associated with UESAR Rev. 16)	13	January 2014
M.9-2 (associated with UESAR Rev. 16)	15	August 2016
M.9-3 (associated with UESAR Rev. 16)	14	September 2014
M.9-4 (associated with UFSAR Rev. 16)	14	September 2014
M.9-5 (associated with UFSAR Rev. 16)	16	July 2017
M.9-5a (associated with UFSAR Rev. 16)	16	July 2017
M.9-5b (associated with UFSAR Rev. 16)	16	July 2017
M.9-6 (associated with UFSAR Rev. 16)	16	July 2017
M.9-7 (associated with UFSAR Rev. 16)	14	September 2014
M.9-8 (associated with UFSAR Rev. 16)	14	September 2014
M.9-9 (associated with UFSAR Rev. 16)	16	July 2017
M.9-10 (associated with UFSAR Rev. 16)	14	September 2014
M.9-11 (associated with UFSAR Rev. 16)	13	January 2014
M.9-12 (associated with UFSAR Rev. 16)	13	January 2014
M.9-13 (associated with UFSAR Rev. 16)	13	January 2014
M.9-14 (associated with UFSAR Rev. 16)	13	January 2014
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M.9-5	16	July 2017
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M.9-5b	16	July 2017
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M.9-10	14	September 2014
(associated with UFSAR Rev. 17)		
M.9-11	17	March 2018
(associated with UFSAR Rev. 17)		
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M 9-1	20	August 2021
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M.9-3	20	August 2021

Page or description	Rev.	Date
M.9-4	20	August 2021
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M 0 16	20	August 2021
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M.10-1	10	January 2019
M.10-1a	18	January 2019
M.10-2	8	June 2004
M.10-3	8	June 2004
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M.10-5	18	January 2019
N1.10-5a	18	January 2019
M.10-6	8	June 2004
M.10-7	8	June 2004
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M.10-10	8	June 2004
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M.10-15	8	June 2004
M.10-16	8	June 2004
M.10-17	8	June 2004
M.11-1	14	September 2014
M.11-2	8	June 2004
M.11-3	19	January 2021
M.11-4	14	September 2014
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M.11-6	18	January 2019
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M.11-8	14	September 2014
M.11-9	18	January 2019
M.11-9a	14	September 2014
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M.11-11	14	September 2014
M.11-12	14	September 2014
M.11-13	18	January 2019
M.11-14	8	June 2004
M.11-15	8	June 2004
M.12-1	19	January 2021
M.13-1	8	June 2004
M.14-1	8	June 2004
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N-ii	19	January 2021
N-iii	19	January 2021
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N-vi	19	January 2021
N-vii	19	January 2021
N-viii	19	January 2021
N-ix	19	January 2021
N-x	19	January 2021
N-xi	19	January 2021
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Page or description	Rev.	Date
N.1-1	15	August 2016
N.1-1a	17	March 2018
N.1-2	14	September 2014
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N.1-8	8	June 2004
N.2-1	9	January 2006
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N 2-4	17	March 2014
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N.2.5	17	January 2014
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N.2-7	14	September 2014
N.2-8	14	September 2014
N.2-9	19	January 2021
IN.2-9a	19	January 2021
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N.2-11	14	September 2014
N.2-11a	14	September 2014
N.2-12	14	September 2014
N.2-13	14	September 2014
N.2-13a	14	September 2014
N.2-14	9	January 2006
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N.2-16	9	January 2006
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N.6-7	9	January 2006	N.6
N.6-8	9	January 2006	N.6
N.6-9	9	January 2006	N.6
N.6-10	14	September 2014	N.6
N.6-11	9	January 2006	N.6
N.6-12	9	January 2006	N.6
N.6-13	9	January 2006	N.6
N.6-14	9	January 2006	N.6
N.6-15	9	January 2006	N.6
N.6-16	9	January 2006	N.6
N.6-17	9	January 2006	N.6
N.6-18	9	January 2006	N.6
N.6-19	9	January 2006	N.6
N.6-20	9	January 2006	N.6
N.6-21	14	September 2014	N.6
N.6-21a	14	September 2014	N.6
N.6-21b	14	September 2014	N.6
N.6-21c	14	September 2014	N.6
N.6-21d	14	September 2014	N.6
N.6-21e	14	September 2014	N.6
N.6-21f	14	September 2014	N.6
N.6-21g	14	September 2014	N.6
N.6-21h	14	September 2014	N.7
N.6-21i	14	September 2014	N.7
N.6-21j	14	September 2014	N.7
N.6-21k	14	September 2014	N.7
N.6-211	14	September 2014	N.7
N.6-21m	14	September 2014	N.7
N.6-22	9	January 2006	N.8
N.6-23	10	February 2008	N.8
N.6-24	10	February 2008	N.8
N.6-25	10	February 2008	N.8
N.6-25a	14	September 2014	N.8
N.6-26	9	January 2006	N.8
N.6-27	14	September 2014	N.8
N.6-28	9	January 2006	N.8
N.6-29	9	January 2006	N.8
N.6-30	9	January 2006	N.8
N.6-31	9	January 2006	N.8

Page or description	Rev.	Date
N.6-32	9	January 2006
N.6-33	9	January 2006
N.6-34	14	September 2014
N.6-35	9	January 2006
N.6-36	9	January 2006
N.6-37	9	January 2006
N.6-38	9	January 2006
N.6-39	9	January 2006
N.6-39a	9	January 2006
N.6-39b	9	January 2006
N.6-39c	9	January 2006
N.6-39d	9	January 2006
N.6-39e	9	January 2006
N.6-39f	9	January 2006
N.6-39g	9	January 2006
N.6-39h	9	January 2006
N.6-391	9	January 2006
N.6-39]	14	September 2014
N.6-39K	14	September 2014
N.0-391	14	September 2014
N.6-39III	14	September 2014
N.0-3911	14	September 2014
N.6-390	14	September 2014
N 6-39a	14	September 2014
N 6-39r	14	September 2014
N 6-39s	14	September 2014
N 6-39t	14	September 2014
N.6-40	9	January 2006
N.6-41	9	January 2006
N.6-42	9	January 2006
N.6-43	9	January 2006
N.6-44	9	January 2006
N.6-45	9	January 2006
N.6-46	9	January 2006
N.6-47	9	January 2006
N.6-48	9	January 2006
N.6-49	9	January 2006
N.6-50	14	September 2014
N.6-51	14	September 2014
N.6-52	14	September 2014
N.6-53	14	September 2014
N.6-54	14	September 2014
N.6-55	14	September 2014
N.6-56	14	September 2014
N.7-1	8	June 2004
N./-2	8	June 2004
N./-3	8	June 2004
N.7-4	8	June 2004
N.7-5	0	June 2004
N. 7-0 N. 8-1	0	June 2004
N.8-1	13	Santambar 2014
N 8-2a	14	January 2019
N 8-3	19	January 2019
N 8-4	19	January 2021
N.8-5	19	January 2021
N.8-6	13	January 2014
N.8-7	8	June 2004
N.8-8	13	January 2014
N.8-9	8	June 2004
N.8-10	13	January 2014

Page or description	Rev.	Date
N.8-11	13	January 2014
N.8-12	13	January 2014
N.8-13	13	January 2014
N.8-14	13	January 2014
N.8-15	13	January 2014
N.8-16	13	January 2014
N.8-17	8	June 2004
N.9-1	13	January 2014
N.9-2	13	January 2014
N.9-3	8	June 2004
N.10-1	8	June 2004
N.10-2	8	June 2004
N.10-3	8	June 2004
N.10-4	12	February 2012
N.10-5	8	June 2004
N.10-6	8	June 2004
N.10-7	8	June 2004
N.10-8	12	February 2012
N.10-9	12	February 2012
N.10-10	8	June 2004
N.10-11	8	June 2004
N.10-12	8	June 2004
N.10-13	8	June 2004
N.10-14	8	June 2004
N.10-15	8	June 2004
N.10-16	8	June 2004
N.10.17	8	June 2004
N.11-1	8	June 2004
N.11-2	8	June 2004
N.11-3	19	January 2021
N.11-4	8	June 2004
N.11-5	8	June 2004
N.11-6	8	June 2004
N.11-7	8	June 2004
N.11-8	8	June 2004
N.11-9	8	June 2004
N.11-10	8	June 2004
N.11-11	8	June 2004
N.11-12	8	June 2004
N.11-13	8	June 2004
N.11-14	8	June 2004
N.11-15	8	June 2004
N.12-1	19	January 2021
N.13-1	13	January 2014
P-i	22	January 2024
P-ii	22	January 2024
P-iji	22	January 2024
P-iv	22	January 2024
P-v	22	January 2024
P-vi	22	January 2024
P-vii	22	January 2024
P-viii	22	January 2024
P-ix	22	January 2024
P-x	22	January 2024
P-xi	22	January 2024
P_vii	22	January 2024
P-viii	22	January 2024
P_viv	22	January 2024
	22	January 2024
P_vvi	22	January 2024
	22	January 2024
	22	January 2024
I -AVIII	22	January 2024

Page or description	Rev.	Date
P-xix	22	January 2024
P-xx	22	January 2024
P-xxi	22	January 2024
P-xxii	22	January 2024
P-xxiii	22	January 2024
P-xxiv	22	January 2024
P-xxv	22	January 2024
P-rrvi	22	January 2024
P-rrvii	22	January 2024
P-rrviii	22	January 2024
P 1-1	22	January 2024
P 1-2	22	January 2024
P 1_2	22	January 2024
P 1_3	22	January 2024
P 1_4	22	January 2024
D 1 5	22	January 2024
$D_{1} = 5$	22	January 2024
D 1 6	22	January 2024
D 1 7	22	January 2024
D 1 9	22	January 2024
D 1 0	22	January 2024
P.1.19	12	January 2024
r.1-10	13	January 2014
P.I-11	22	January 2024
P.I-IIa	22	January 2024
DWG (sn. 1 of 5)	/	1/2/24
$\frac{1}{1001-3}$	7	Not also area
DWG (sn. 2 of 5)	/	Not snown
DWC (at 2 of 5)	7	Not also area
DWG(SII. 5 OI 5)	/	Not shown
$\frac{\text{NOII24FIII-1001-SAR}}{\text{DWG}(ab. 4 \text{ of } 5)}$	7	Not shown
DWG (SII. 4 01 5) NI IH24PTH 1001 SAP	/	Not shown
DWG (sh 5 of 5)	7	Not shown
NUH24PTH-1001-SAR	,	1101 5110 1111
DWG (sh. 1 of 5)	3	1/2/24
NUH24PTH-1002-SAR	Ū.	1, 2, 2, 1
DWG (sh. 2 of 5)	3	Not shown
NUH24PTH-1002-SAR		
DWG (sh. 3 of 5)	3	Not shown
NUH24PTH-1002-SAR		
DWG (sh. 4 of 5)	3	Not shown
NUH24PTH-1002-SAR		
DWG (sh. 5 of 5)	3	Not shown
NUH24PTH-1002-SAR		
DWG (sh. 1 of 7)	6	8/26/16
NUH24PTH-1003-SAR		
DWG (sh. 2 of 7)	6	Not shown
NUH24PTH-1003-SAR		
DWG (sh. 3 of 7)	6	Not shown
NUH24PTH-1003-SAR		
DWG (sh. 4 of 7)	6	Not shown
NUH24P1H-1003-SAR	6	AT - 1
DWG (sh. 5 of /)	6	Not shown
$\frac{1000}{124} \frac{1000}{100} 1$	6	Not show
$DWG(SII, 0.017)$ $MIH24PTH_1002 SAP$	0	INOU SHOWIN
$\frac{11011241111-1003-SAK}{DWG (sh. 7 of 7)}$	6	Not show
$\frac{D}{100} \frac{100}{100} \frac{100}$	0	NOT SHOWN
DWG (sh 1 of 2)	5	7/22/14
$\frac{D}{10} \frac{1012}{1004} 101$	5	1122/14
DWG (sh 2 of 2)	5	Not shown
NUH24PTH-1004-SAR	5	THOUSING WIL
1,0112 II 111-100+-0AIK		

Page or description	Rev.	Date
DWH (sh. 1 of 2) NUH24PTH-5013-SAR	0	1/2/24
DWH (sh. 2 of 2) NUH24PTH-5013-SAR	0	Not shown
DWH (sh. 1 of 2) NUH24PTH-5014-SAR	0	1/2/24
DWH (sh. 2 of 2) NUH24PTH-5014-SAR	0	Not shown
DWG (sh. 1 of 2) NUH24PTH-72-1008	0	8/25/14
DWG (sh. 2 of 2) NUH24PTH-72-1008	0	Not shown
DWG (sh. 1 of 8) NUH24PTH-72-1009	0	8/25/14
DWG (sh. 2 of 8) NUH24PTH-72-1009	0	Not shown
DWG (sh. 3 of 8) NUH24PTH-72-1009	0	Not shown
DWG (sh. 4 of 8) NUH24PTH-72-1009	0	Not shown
DWG (sh. 5 of 8) NUH24PTH-72-1009	0	Not shown
DWG (sh. 6 of 8) NUH24PTH-72-1009	0	Not shown
DWG (sh. 7 of 8) NUH24PTH-72-1009	0	Not shown
DWG (sh. 8 of 8) NUH24PTH-72-1009	0	Not shown
DWH (sh. 1 of 6) NUH24PTH-S-5011-SAR	0	1/2/24
DWH (sh. 2 of 6) NUH24PTH-S-5011-SAR	0	Not shown
DWH (sh. 3 of 6) NUH24PTH-S-5011-SAR	0	Not shown
DWH (sh. 4 of 6) NUH24PTH-S-5011-SAR	0	Not shown
DWH (sh. 5 of 6) NUH24PTH-S-5011-SAR	0	Not shown
DWH (sh. 6 of 6) NUH24PTH-S-5011-SAR	0	Not shown
DWH (sh. 1 of 9) NUH24PTH-S-5012-SAR	0	1/2/24
DWH (sh. 2 of 9) NUH24PTH-S-5012-SAR	0	Not shown
DWH (sh. 3 of 9) NUH24PTH-S-5012-SAR	0	Not shown
DWH (sh. 4 of 9) NUH24PTH-S-5012-SAR	0	Not shown
DWH (sh. 5 of 9) NUH24PTH-S-5012-SAR	0	Not shown
DWH (sh. 6 of 9) NUH24PTH-S-5012-SAR	0	Not shown
DWH (sh. 7 of 9) NUH24PTH-S-5012-SAR	0	Not shown
DWH (sh. 8 of 9) NUH24PTH-S-5012-SAR	0	Not shown
DWH (sh. 9 of 9) NUH24PTH-S-5012-SAR	0	Not shown
DWH (sh. 1 of 6) NUH24PTH-L-5011-SAR	0	1/2/24
DWH (sh. 2 of 6) NUH24PTH-L-5011-SAR	0	Not shown

Page or description	Rev.	Date
DWH (sh. 3 of 6) NUH24PTH-L-5011-SAR	0	Not shown
DWH (sh. 4 of 6) NUH24PTH-L-5011-SAR	0	Not shown
DWH (sh. 5 of 6) NUH24PTH-L-5011-SAR	0	Not shown
DWH (sh. 6 of 6) NUH24PTH-L-5011-SAR	0	Not shown
DWH (sh. 1 of 9) NUH24PTH-L-5012-SAR	0	1/2/24
DWH (sh. 2 of 9) NUH24PTH-L-5012-SAR	0	Not shown
DWH (sh. 3 of 9) NUH24PTH-L-5012-SAR	0	Not shown
DWH (sh. 4 of 9) NUH24PTH-L-5012-SAR	0	Not shown
DWH (sh. 5 of 9) NUH24PTH-L-5012-SAR	0	Not shown
DWH (sh. 6 of 9) NUH24PTH-L-5012-SAR	0	Not shown
DWH (sh. 7 of 9) NUH24PTH-L-5012-SAR	0	Not shown
DWH (sh. 8 of 9) NUH24PTH-L-5012-SAR	0	Not shown
DWH (sh. 9 of 9) NUH24PTH-L-5012-SAR	0	Not shown
DWH (sh. 1 of 7) NUH24PTH-S-I C-5011-S4R	0	1/2/24
DWH (sh. 2 of 7) NUH24PTH-S-LC-5011-SAR	0	Not shown
DWH (sh. 3 of 7) NUH24PTH-S-LC-5011-SAR	0	Not shown
DWH (sh. 4 of 7) NUH24PTH-S-LC-5011-SAR	0	Not shown
DWH (sh. 5 of 7) NUH24PTH-S-LC-5011-SAR	0	Not shown
<i>DWH (sh. 6 of 7)</i> <i>NUH24PTH-S-LC-5011-SAR</i>	0	Not shown
DWH (sh. 7 of 7) NUH24PTH-S-LC-5011-SAR	0	Not shown
DWH (sh. 1 of 9) NUH24PTH-S-LC-5012-SAR	0	1/2/24
DWH (sh. 2 of 9) NUH24PTH-S-LC-5012-SAR	0	Not shown
DWH (sh. 3 of 9) NUH24PTH-S-LC-5012-SAR	0	Not shown
DWH (sh. 4 of 9) NUH24PTH-S-LC-5012-SAR	0	Not shown
DWH (sh. 5 of 9) NUH24PTH-S-LC-5012-SAR	0	Not shown
DWH (sh. 6 of 9) NUH24PTH-S-LC-5012-SAR	0	Not shown
DWH (sh. 7 of 9) NUH24PTH-S-LC-5012-SAR	0	Not shown
DWH (sh. 8 of 9) NUH24PTH-S-LC-5012-SAR	0	Not shown
DWH (sh. 9 of 9) NUH24PTH-S-LC-5012-SAR	0	Not shown
DWG (sh. 1 of 1) NUH-03-8006-SAR	1	1/8/14
DWG (sh. 1 of 11) NUH-03-7001-SAR	9	6/14/23

Page or description	Rev.	Date
DWG (sh. 2 of 11)	9	Not shown
NUH-03-7001-SAR		
DWG (sh. 3 of 11)	9	Not shown
NUH-03-7001-SAR		
DWG (sh. 4 of 11)	9	Not shown
NUH-03-7001-SAR		
DWG (sh. 5 of 11)	9	Not shown
NUH-03-7001-SAR		
DWG (sh. 6 of 11)	9	Not shown
NUH-03-7001-SAR	0	NY . 1
DWG (sh. 7 of 11)	9	Not shown
NUH-03-/001-SAK	0	Not all array
DWG (Sn. 8 Of 11) $NUH 02 7001 SAP$	9	Not shown
DWG (sh. 9 of 11)	0	Not shown
NUH-03-7001-SAR	,	NOT SHOWI
DWG (sh 10 of 11)	9	Not shown
NUH-03-7001-SAR	,	i tot shown
DWG (sh. 11 of 11)	9	Not shown
NUH-03-7001-SAR		
DWG (sh. 1 of 3)	2	8/26/16
NUH-03-7004-SAR		
DWG (sh. 2 of 3)	2	Not shown
NUH-03-7004-SAR		
DWG (sh. 3 of 3)	2	Not Shown
NUH-03-7004-SAR		
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P.1-13	22	January 2024
P.1-14	22	January 2024
P.1-15	22	January 2024
P.1-16	9	January 2006
P.1-17	9	January 2006
P.1-18	9	January 2006
P.1-19	9	January 2006
P.2-1	14	September 2014
P.2-2	16	January 2024
P.2-2a	10	July 2017
$\Gamma.2-5$	22	January 2024
$P_2 A$	22	January 2024
$\mathbf{P} 2 \mathbf{A} \mathbf{a}$	22	January 2024
P 2-4h	16	July 2017
P.2-5	13	January 2014
P.2-6	14	September 2014
P.2-6a	14	September 2014
P.2-7	9	January 2006
P.2-8	22	January 2024
P.2-9	22	January 2024
P.2-10	13	January 2014
P.2-11	22	January 2024
P.2-11a	22	January 2024
<i>P.2-11b</i>	22	January 2024
P.2-12	9	January 2006
P.2-13	14	September 2014
P.2-14	17	March 2018
P.2-15	13	January 2014
P.2-16	13	January 2014
P.2-17	22	January 2024
P.2-18	22	January 2024
P.2-18a	22	January 2024
P.2-19	19	January 2021
P.2-20	16	July 2017

Page or description	Rev.	Date
P.2-21	19	January 2021
P.2-22	19	January 2021
P.2-23	19	January 2021
P.2-24	16	July 2017
P.2-25	19	January 2021
P.2-25a	19	January 2021
P.2-26	18	January 2019
P.2-27	18	January 2019
P.2-28	18	January 2019
P.2-29	18	January 2019
P.2-30	18	January 2019
P.2-31	18	January 2019
P.2-32	18	January 2019
P.2-33	18	January 2019
P.2-34	18	January 2019
P.2-35	11	February 2010
P.2-36	9	January 2006
P.2-37	14	September 2014
P.2-38	14	September 2014
P.2-39	9	January 2006
P.2-40	9	January 2006
P.2-41	14	September 2014
P.2-42	14	September 2014
P.2-43	22	January 2024
P.2-44	14	September 2014
P.2-45	18	January 2019
P.2-45a	18	January 2019
P.2-45b	18	January 2019
P.2-45c	18	January 2019
P.2-46	22	January 2024
P.2-47	22	January 2024
P.2-48	22	January 2024
P.2-49	22	January 2024
P.2-50	22	January 2024
P.2-51	22	January 2024
P.2-52	9	January 2006
P.2-53	9	January 2006
P.2-54	22	January 2024
P.3.1-1	22	January 2024
P.3.1-1a	22	January 2024
P.3.1-2	22	January 2024
P.3.1-3	22	January 2024
P.3.1-4	22	January 2024
P.3.1-4a	22	January 2024
P.3.1-5	11	February 2010
P.3.1-6	9	January 2006
P.3.1-7	22	January 2024
P.3.1-8	19	January 2021
P.3.1-9	16	July 2017
P.3.1-10	19	January 2021
P.3.1-11	16	July 2017
P.3.1-12	9	January 2006
P.3.1-13	9	January 2006
P.3.2-1	14	September 2014
P.3.2-2	22	January 2024
P.3.2-3	14	September 2014
P.3.3-1	22	January 2024
P.3.3-2	22	January 2024
P.3.3-2a	22	January 2024
P.3.3-3	9	January 2006
P.3.3-4	9	January 2006
P.3.3-5	9	January 2006

Page or description	Rev.	Date	Pa
P.3.3-6	9	January 2006	P.3
P.3.3-7	9	January 2006	P.3
P.3.3-8	9	January 2006	P.3
P.3.3-9	9	January 2006	P.3
P.3.3-10	9	January 2006	P.3
P.3.3-11	9	January 2006	P.3
P.3.3-11a	22	January 2024	P.3
P.3.3-11b	22	January 2024	P.3
P.3.3-11c	22	January 2024	P.3
P.3.3-11d	22	January 2024	P.3
P.3.3-12	9	January 2006	P.3
P.3.4-1	22	January 2024	P.3
P.3.4-2	22	January 2024	P.3
P.3.4-3	9	January 2006	P.3
P.3.4-4	22	January 2024	P.3
P.3.4-4a	22	January 2024	P.3
P.3.4-5	10	February 2008	P.3
P.3.4-6	9	January 2006	P.3
P.3.4-7	14	September 2014	P.3
P.3.4-8	22	January 2024	P.3
P.3.4-8a	14	September 2014	P.3
P.3.4-9	9	January 2006	P.3
P.3.4-10	9	January 2006	P.3
P.3.4-11	11	February 2010	P.3
P.3.4-12	9	January 2006	P.3
P.3.4-13	22	January 2024	P.3
P.3.4-13a	22	January 2024	P.3
P.3.4-13b	22	January 2024	P.3
P.3.4-13c	22	January 2024	P.3
P.3.4-14	11	February 2010	P.3
P.3.4-15	22	January 2024	P.3
P.3.4-16	11	February 2010	P.3
P.3.4-17	11	February 2010	P.3
P.3.4-18	11	February 2010	P.3
P.3.5-1	13	January 2014	P.3
P.3.6-1	14	September 2014	P.3
P.3.6-1a	14	September 2014	P.3
P.3.6-2	14	September 2014	P.3
P.3.6-3	9	January 2006	P.3
P.3.6-4	9	January 2006	P.3
P.3.6-5	9	January 2006	P.3
P.3.6-6	22	January 2024	P.3
P.3.6-7	9	January 2006	P.3
P.3.6-8	9	January 2006	P.3
P.3.6-9	9	January 2006	P.3
P.3.6-10	9	January 2006	P.3
P.3.6-11	9	January 2006	P.3
P.3.6-12	14	September 2014	P.3
P.3.6-12a	14	September 2014	P.3
P.3.6-13	9	January 2006	P 3
P.3.6-14	22	January 2024	P 3
P.3.6-15	9	January 2006	P 3
P 3 6-16	9	January 2006	P 3
P 3 6-17	9	January 2006	P 3
P 3 6-18	- 18	January 2000	P 2
P 3 6-18a	18	January 2019	1.J D 2
P 3 6-19	0	January 2019	P 2
P 3 6 10a	2	January 2000	г.э
P 3 6 10b	22	January 2024	P.3
P 3 6-20	0	January 2024	T.5 D 2
P 3 6 21	9	January 2006	P.2
P 3 6 22	9	January 2006	P.3
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Page or description	Rev.	Date
P.3.6-23	22	January 2024
P.3.6-24	22	January 2024
P.3.6-25	22	January 2024
P.3.6-26	22	January 2024
P.3.6-27	22	January 2024
P.3.6-28	9	January 2006
P.3.6-29	22	January 2024
P.3.6-30	9	January 2006
P.3.6-31	9	January 2006
P.3.6-32	9	January 2006
P.3.6-33	10	February 2008
P.3.6-34	9	January 2006
P.3.6-35	9	January 2006
P.3.6-36	9	January 2006
P.3.6-3/	9	January 2006
P.3.6-38	9	January 2006
P.3.6-39	9	January 2006
P 2 6 41	9	January 2006
P 2 6 42	9	January 2006
D 2 6 42	22	January 2024
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Page or description	Rev.	Date	F
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P.3.8-3	22	January 2024	F
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Page or description	Rev.	Date
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Page or description	Rev.	Date	
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Page or description	Rev	Date
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Page or description	Rev.	Date
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Page or description	Rev.	Date
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Page or description	Rev.	Date
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Page or description	Rev.	Date
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Page or description	Rev.	Date	
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P 6-87e	22	January 2024
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P 6-923	14	September 2014
P 6-92h	14	September 2014
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P 6 114	9	January 2006
1.0-114	フ	January 2000

Page or description	Rev.	Date	Page
P.6-115	9	January 2006	P.6-1
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P.6-118	9	January 2006	P.6-1
P.6-119	9	January 2006	P.6-1
P.6-120	9	January 2006	P.6-1
P.6-121	9	January 2006	P.6-1
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P.6-125	9	January 2006	P.6-1
P.6-126	9	January 2006	P.6-1
P.0-127	9	January 2006	P.6-1
P.0-128	9	January 2006	P.0-1
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P.6.131	9	January 2006	P.0-1
P 6 132	9	January 2006	P.6.1
P 6-133	9	January 2006	P 6-1
P.6-134	9	January 2006	P.6-1
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P.6-137	9	January 2006	P.6-1
P.6-138	9	January 2006	P.6-1
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P.6-142	9	January 2006	P.6-1
P.6-143	9	January 2006	P.6-1
P.6-144	9	January 2006	P.6-1
P.6-145	9	January 2006	P.6-1
P.6-146	9	January 2006	P.6-1
P.6-147	9	January 2006	P.6-1
P.6-148	14	September 2014	P.6-1
P.6-149	9	January 2006	P.0-1
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P 6-153	9	January 2006	P 6-1
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P.6-165	14	September 2014	P.6-1
P.6-166	9	January 2006	P.6-1
P.6-167	9	January 2006	P.6-1
P.6-168	9	January 2006	P.6-1
P.6-169	9	January 2006	P.6-2
P.6-170	9	January 2006	P.6-2
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P.0-172	9	January 2006	P.6-2
P.0-1/3	9	Santambar 2014	P.6-2
P.6.173b	14	September 2014	P.0-2
P.6.173c	14	September 2014	P.0-2
1.0-1/30	14	September 2014	r.0-2

Page or description	Rev.	Date
P.6-173d	14	September 2014
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P.6-173i	14	September 2014
P.6-173j	14	September 2014
P.6-173k	14	September 2014
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P.6-173m	14	September 2014
P.6-173n	14	September 2014
P.6-1730	14	September 2014
P.6-173p	14	September 2014
P.6-173q	14	September 2014
P.6-173r	14	September 2014
P.6-173s	14	September 2014
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P.6-182	14	September 2014
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P.6-183a	22	January 2024
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P.6-183c	22	January 2024
P.6-183d	22	January 2024
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Page or description	Rev.	Date
P.6-208	9	January 2006
P.6-209	14	September 2014
P.6-210	22	January 2024
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P.7-3	9	January 2006
P.7-4	9	January 2006
P.7-5	9	January 2006
P.7-6	9	January 2006
P.8-1	14	September 2014
P.8-2	20	August 2021
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P.8-4	14	September 2014
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P.8-6	19	January 2021
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P.8-8	21	August 2023
P.8-8a	19	January 2021
P.8-9	22	January 2024
P.8-10	19	January 2021
P.8-11	21	August 2023
P.8-11a	19	January 2021
P.8-12	11	February 2010
P 8-13	11	February 2010
P 8-14	9	January 2006
P 8-15	22	January 2024
P 8-15a	22	January 2024
P 8-16	19	January 2021
P 8-16a	14	September 2014
P 8-17	19	January 2021
P 8 172	10	January 2021
P 8-18	19	January 2021
D 9 190	17	March 2018
P 8 10	1/	September 2014
P 8-20	0 0	January 2006
P 8 21	9	January 2006
P 8 22	9	January 2006
D 9 22	9	January 2006
P. 8-24	12	January 2000
P 8 25	22	January 2014
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P.9 Introduction 2	20	August 2021
P.9 Introduction-2	20	August 2021
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Page or description	Rev.	Date
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P.9.12 (associated with UESAR Rev. 11)	11	February 2010
P.9.13 (associated with UESAP Pay, 11)	11	February 2010
P.9-1 (associated with UESAR Rev. 12)	9	January 2006
P.9.2	11	February 2010
P.9.3	11	February 2010
P.9.4	11	February 2010
P.9.5	11	February 2010
(associated with UFSAR Rev. 12) P.9.6	11	February 2010
(associated with UFSAR Rev. 12) P.9.7	11	February 2010
(associated with UFSAR Rev. 12) P.9.8	11	February 2010
(associated with UFSAR Rev. 12) P.9.9	11	February 2010
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(associated with UFSAR Rev. 12) P.9.13	11	February 2010
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(associated with UFSAR Rev. 13) P.9-2	13	January 2014
(associated with UFSAR Rev. 13) P.9-3	13	January 2014
(associated with UFSAR Rev. 13) P.9-4	13	January 2014
(associated with UFSAR Rev. 13) P.9-5	13	January 2014
(associated with UFSAR Rev. 13) P.9-6	13	January 2014
(associated with UFSAR Rev. 13) P.9-7	13	January 2014
(associated with UFSAR Rev. 13) P.9-8	13	January 2014
(associated with UFSAR Rev. 13) P 9-9	13	January 2014
(associated with UFSAR Rev. 13) P 9-10	13	January 2014
(associated with UFSAR Rev. 13) P 9-11	13	January 2014
(associated with UFSAR Rev. 13)	13	January 2014
(associated with UFSAR Rev. 13)	13	January 2014
(associated with UFSAR Rev. 13)	13	January 2014
r.9-14 (associated with UFSAR Rev. 13)	13	January 2014

Page or description	Rev.	Date	
P.9-1 (associated with UFSAR Rev. 14)	13	January 2014	
P.9-2 (associated with UESAR Rev. 14)	13	January 2014	
P.9-3	14	September 2014	
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(associated with UFSAR Rev. 14) P.9-5	14	September 2014	
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(associated with UFSAR Rev. 14) P.9-7	14	September 2014	
(associated with UFSAR Rev. 14) P.9-8	14	September 2014	
(associated with UFSAR Rev. 14)	14	Soptember 2014	
(associated with UFSAR Rev. 14)	14		
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P.9-14 (associated with UESAR Rev. 14)	13	January 2014	
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(associated with UFSAR Rev. 15) P.9-4	14	September 2014	
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P.9-14 (associated with LIESAD Dev. 15)	13	January 2014	
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(associated with UFSAR Rev. 16) P.9-2	13	January 2014	
(associated with UFSAR Rev. 16) P.9-3	14	September 2014	
(associated with UFSAR Rev. 16)			

Page or description	Rev.	Date
P.9-4	14	September 2014
P.9-5	14	September 2014
(associated with UFSAR Rev. 16) P.9-6	16	July 2017
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P.9-7	16	July 2017
P.9-7a	16	July 2017
(associated with UFSAR Rev. 16) P 9-7b	16	July 2017
(associated with UFSAR Rev. 16)	10	5ury 2017
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P.9-10	14	September 2014
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(associated with UFSAR Rev. 16)	17	September 2014
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P.9-13	13	January 2014
P.9-14	13	January 2014
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(associated with UFSAR Rev. 17)	15	August 2010
P.9-2 (associated with UFSAR Rev. 17)	13	January 2014
P.9-3	14	September 2014
P.9-4	14	September 2014
(associated with UFSAR Rev. 17) P 9-5	14	September 2014
(associated with UFSAR Rev. 17)		
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P.9-6a	16	July 2017
P.9-7	16	July 2017
(associated with UFSAR Rev. 17) P.9-7a	16	July 2017
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P.9-8	14	September 2014
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P.9-12 (associated with LIES AD Day, 17)	13	January 2014
P.9-13	13	January 2014
(associated with UFSAR Rev. 17) P 9-14	13	January 2014
(associated with UFSAR Rev. 17)	15	2011

Page or description	Rev.	Date
P.9-1	15	August 2016
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(associated with UFSAR Rev. 18)		
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P.9-5 (associated with LIES AP Pov. 18)	14	September 2014
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P.9-7b	16	July 2017
(associated with UFSAR Rev. 18)		
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P.9-6	20	August 2021
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P.10-6	18	January 2019
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P.10-9	21	August 2023
P.10-9a	22	January 2024

Page or description	Rev.	Date
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P 11-3	22	January 2000
P 11-4	14	September 2014
P 11_5	18	January 2019
P 11-6	14	September 2014
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D 11 9	9	January 2006
D 11 0	9	January 2006
P 11 10	9	January 2006
D 11 11	9	January 2006
P.11-11 P.11-12	9	January 2006
D 11 12	18	January 2000
D 11 120	10	January 2019
P.11-13a D.11-14	22	January 2019
D 11 15	14	Santambar 2014
P.11-15	14	Jopuery 2010
D 11 16	10	January 2019
P.11-10 P.11.17	9	January 2006
D 11 19	9	Santambar 2014
P.11-10	14	Jonuary 2010
P.11-19	21	January 2019
P.11-20	21	August 2025
P.12.1	9	January 2000
P.12-1	19	January 2021
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K.1-5	13	January 2014
K.1-4	13	January 2014
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Page or description	Rev.	Date
DWG (sh. 6 of 9)	4	Not shown
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R.3-3	13	January 2014
R.3-4	12	February 2012
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R.3-47	9	January 2006
R.3-48	9	January 2006

Page or description	Rev.	Date
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T-i	21	August 2023
T-11	21	August 2023
T-iii	21	August 2023
1-1V	21	August 2023
1-v	21	August 2023
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T-V111	21	August 2023
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1-x	21	August 2023
1-x1	21	August 2023
T-x11	21	August 2023
1-x111	21	August 2023
T-xiv	21	August 2023
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T-xviii	21	August 2023
T-x1x	21	August 2023
T-xx	21	August 2023
T-xxi	21	August 2023
T-xxii	21	August 2023

Page or description	Rev.	Date
T-xxiii	21	August 2023
T-xxiv	21	August 2023
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T.1-3	20	August 2021
T.1-3a	14	September 2014
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T.1-6	16	July 2017
T.1-7	21	August 2023
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T.1-9	11	February 2010
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T.1-11	21	August 2023
T.1-12	11	February 2010
T.1-13	22	January 2024
T.1-14	11	February 2010
T.1-15	11	February 2010
T.1-16	11	February 2010
T.1-17	11	February 2010
T.1-18	21	August 2023
DWG (sh. 1 of 5)	6	6/14/23
NUH61BTH-1000-SAR		
DWG (sh. 2 of 5)	6	Not shown
NUH61BTH-1000-SAR		
DWG (sh. 3 of 5)	6	Not shown
NUH61BTH-1000-SAR		NY . 1
DWG (sh. 4 of 5)	6	Not shown
NUH61B1H-1000-SAR		N. (1
DWG (sn. 5 of 5)	6	Not shown
$\frac{\text{NUROIBIR-1000-SAR}}{\text{DWC} (ab. 1 \text{ of } 4)}$	6	6/11/22
DWG (Sn. 1 01 4) MUH61DTH 2000 SAD	0	0/14/23
DWG (sh 2 of 4)	6	Not shown
NUH61BTH-2000-SAR	0	NOT SHOWI
DWG (sh 3 of 4)	6	Not shown
NUH61BTH-2000-SAR	Ū	rtot bilo wii
DWG (sh. 4 of 4)	6	Not shown
NUH61BTH-2000-SAR	Ť	
DWG (sh. 1 of 2)	6	6/14/23
NUH-61BTH-2001-SAR		
DWG (sh. 2 of 2)	6	Not shown
NUH61BTH-2001-SAR		
DWG (sh. 1 of 6)	5	6/14/23
NUH-61BTH-2002-SAR		
DWG (sh. 2 of 6)	5	Not shown
NUH61BTH-2002-SAR		
DWG (sh. 3 of 6)	5	Not shown
NUH61BTH-2002-SAR		
DWG (sh. 4 of 6)	5	Not shown
NUH-61BTH-2002-SAR	-	
DWG (sh. 5 of 6)	5	Not shown
NUH61BTH-2002-SAR	-	N 1
DWG (sh. 6 of 6)	5	Not shown
NUH61B1H-2002-SAR	2	12/20/20
DWG (Sn. 1 OI 1) $NUH61DTU 2002 SAD$	2	12/30/20
$\frac{1}{1}$	1	7/17/17
DWG (Sn. 1 OI 1) $NUH61DTU 2004 SAP$	1	//1//1/
$\frac{1001010111-2004-3AK}{DWG (sh, 1 of 2)}$	5	6/11/22
NUH61BTH-2006 SAP	5	0/14/23
DWG (sh 2 of 3)	5	Not shown
NUH61BTH-2006-SAR	5	1101 3110 1011
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Page or description	Rev.	Date
DWG (sh. 3 of 3)	5	Not shown
NUH61BTH-2006-SAR		
DWG (sh. 1 of 2)	1	7/17/17
NUH61BTH-72-1105		
DWG (sh. 2 of 2)	1	Not shown
NUH61BTH-72-1105		
DWG (sh. 1 of 1)	1	1/8/14
NUH-03-8007-SAR		
DWG (sh. 1 of 4)NUH-06-8026-	0	6/14/23
SAR		NT - 1
DWG (sh. 2 of 4)	0	Not shown
NUH-00-8020-SAR	0	Not also
DWG (Sn. 3 014) $NUH 06 8026 SAP$	0	Not snown
$\frac{1}{10000000000000000000000000000000000$	0	Not shown
NUH-06-8026-SAR	0	INOU SHOWII
T 2-1	14	September 2014
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T.2-3a	20	August 2021
T.2-3b	20	August 2021
T.2-4	20	August 2021
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T.2-9a	17	March 2018
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T.2-14	11	February 2010
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T.2-16	16	July 2017
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T.2-26f	20	August 2021
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T.2-29	14	September 2014
T.2-30	14	September 2014
1.2-31 T 2.22	11	February 2010
T.2-32	11	February 2010
1.2-33 T 2.24	14	September 2014
T 2 24	19	January 2021
1.2-34a	20	August 2021

Page or description	Rev.	Date	Pa
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T.2-34c	20	August 2021	Т.3
T.2-34d	20	August 2021	Т.3
T.2-34e	20	August 2021	T.3
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T.2-36	14	September 2014	Т.3
T.2-37	14	September 2014	Т.3
T.2-38	14	September 2014	T.3
T.2-39	14	September 2014	Т.3
T.2-40	14	September 2014	T.3
T.2-41	14	September 2014	T.3
T.2-42	14	September 2014	T.3
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T.2-44	19	January 2021	T.3
T.2-45	19	January 2021	T.3
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T.3.1-11	11	February 2010	1.3
T 2 2 2	14	September 2014	1.3
T.3.2-2	22	January 2024	1.3
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T 3 4-7	21	August 2023	Т.3
T 3 4-7a	14	September 2014	T 3
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T.3.4-24	11	February 2010	Т.3
T.3.4-25	11	February 2010	Т.3
T.3.4-26	11	February 2010	Т.3
Т.3.4-27	11	February 2010	T.3
T.3.4-28	11	February 2010	T.3
T.3.5-1	15	August 2016	T.3

Page or description	Rev.	Date
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T.3.5-16	18	January 2019
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T.3.5-27	18	January 2019
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T 3 6-8	22	January 2024
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T 3 6-11	19	January 2021
T 3 6-12	20	August 2021
T 3 6-13	14	September 2014
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T.3.6-21	14	September 2014
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T.3.6-22a	18	January 2019

Page or description	Rev.	Date	Pag
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T.3.6-28	11	February 2010	Т.3.
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T.3.6-37	11	February 2010	T.3.
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T.3.6-42a	21	August 2023	T.3.
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T.3.6-44	11	February 2010	T.3.
T.3.6-45	11	February 2010	Т.З.
T.3.6-46	11	February 2010	<u>T.3</u> .
T.3.6-47	11	February 2010	T.3.
T.3.6-48	11	February 2010	<u>T.3</u> .
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1.3.6-57	11	February 2010	1.3.
1.3.6-58 T 2.6.50	11	February 2010	1.3.
T.3.6-59	11	February 2010	1.3.
T 2 6 60a	10	February 2010	1.3. T.2
T 2 6 61	19	February 2021	1.3. T 2
T 2 6 61a	10	Lenvery 2021	T.3.
T 2 6 62	19	February 2021	T.2
T 3 6 622	10	January 2021	T.3.
T 3 6 63	11	February 2010	T 3
T 3 6-63a	10	January 2021	T 2
T 3 6 64	19	February 2021	T 2
T 3 6 65	11	February 2010	T.3.
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T 3 6-67	11	February 2010	T 2
T 3 6-68	11	February 2010	T 2
T 3 6 60	11	February 2010	T.3.
T 3 6-70	11	February 2010	T 2
T 3 6-71	11	February 2010	T 2
T 3 6-72	11	February 2010	T 2
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T 3 6-74	11	February 2010	T 2
Т 3 6-75	11	February 2010	T 2
T 3 6-76	11	February 2010	T 2
T 3 6-77	11	February 2010	T 2
T 3 6-78	11	February 2010	T 2
1.5.0-70	11	1 coluary 2010	1.3.

Page or description	Rev.	Date
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1.3./-4c	14	September 2014
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1.3.7-0 T 2.7.7	14	September 2014
T.2.7.8	14	September 2014
T 2 7 0	14	Japuary 2021
T 3 7 10	19	February 2021
T 3 7 11	10	January 2021
T 3 7-11a	19	January 2021
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Page or description	Rev.	Date
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Page or description	Rev.	Date
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Page or description	Rev.	Date
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T.4-27g	14	September 2014
T.4-27h	14	September 2014
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T 4-27k	14	September 2014
T 4-271	14	September 2014
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T 4 27m	14	September 2014
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1.4-2/r	14	September 2014
1.4-2/s	14	September 2014
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Page or description	Rev.	Date
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T.9.16 (associated with UESAR Rev. 14)	13	January 2014
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T.9-7 (associated with UFSAR Rev. 16)	14	September 2014
T.9-7a (associated with UFSAR Rev. 16)	16	July 2017

Page or description	Rev.	Date
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T.9-8 (associated with UESAR Rev. 16)	14	September 2014
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(associated with UFSAR Rev. 16)	15	January 2014
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T.9.16 (associated with UFSAR Rev. 16)	13	January 2014
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T.9-9 (associated with UFSAR Rev. 17)	14	September 2014
T.9-10 (associated with UESAR Rev. 17)	16	July 2017
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Page or description	Rev.	Date
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Page or description	Rev.	Date
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T.11-15	11	February 2010
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U-iv	19	January 2021
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Page or description	Rev.	Date
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U.1-2	17	March 2018
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U.1-5a	16	July 2017
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U.1-7	14	September 2014
U.1-7a	16	July 2017
U.1-8	16	July 2017
U.1-9	11	February 2010
U.1-10	13	January 2014
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Page or description	Rev.	Date
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Page or description	Rev.	Date
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Page or description	Rev.	Date
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U 3 4-9	11	February 2010
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Page or description	Rev.	Date
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U 6-297	11	February 2010
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U 6-300	11	February 2010
U 6-301	11	February 2010
U 6-302	11	February 2010
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U 6-304	11	February 2010
U 6 305	11	February 2010
U 6-306	11	February 2010
U.6-307	11	February 2010
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Page or description	Rev.	Date
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U.7-3	11	February 2010
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U.7-6	11	February 2010
U.8-1	11	February 2010
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U.8-18a	19	January 2021
U.8-19	12	February 2012
U.8-20	16	July 2017
U.8-21	11	February 2010
U.8-22	11	February 2010
U.8-23	11	February 2010
U.8-24	13	January 2014
U.8-25	11	February 2010
U.9 Introduction-1	20	August 2021
U.9 Introduction-2	20	August 2021
U.9-1	11	February 2010
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U.9-2	11	February 2010
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U.9-3	11	February 2010
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U.9-10	11	February 2010
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Page or description	Rev.	Date
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U.9-12 (associated with UFSAR Rev. 11)	11	February 2010
U.9-13 (associated with UESAR Rev. 11)	11	February 2010
U.9-14 (associated with UESAR Rev. 11)	11	February 2010
U.9-1 (associated with UESAR Rev. 12)	11	February 2010
U.9-2 (associated with UESAR Rev. 12)	11	February 2010
U.9-3 (associated with UESAR Rev. 12)	11	February 2010
U.9-4 (associated with UESAR Rev. 12)	11	February 2010
U.9-5 (associated with UESAR Rev. 12)	11	February 2010
U.9-6 (associated with UESAR Rev. 12)	11	February 2010
U.9-7 (associated with UESAR Rev. 12)	11	February 2010
U.9-8 (associated with UESAR Rev. 12)	11	February 2010
U.9-9 (associated with UESAR Rev. 12)	11	February 2010
U.9-10 (associated with UESAR Rev. 12)	11	February 2010
U.9-11 (associated with UESAR Rev. 12)	11	February 2010
U.9-12 (associated with UESAP Pay 12)	11	February 2010
U.9-13 (associated with UESAR Rev. 12)	11	February 2010
U.9-14 (associated with UESAR Rev. 12)	11	February 2010
U.9-1 (associated with UESAR Rev. 12)	11	February 2010
U.9-2 (associated with UESAP Pay 13)	13	January 2014
U.9-3 (associated with UESAP Pay, 13)	13	January 2014
U.9-4 (associated with UESAP Pay 13)	13	January 2014
U.9-5 (associated with UESAR Rev. 13)	13	January 2014
U.9-6 (associated with UESAR Rev. 13)	13	January 2014
U.9-7 (associated with UESAR Rev. 13)	13	January 2014
U.9-8 (associated with UESAR Rev. 13)	13	January 2014
U.9-9 (associated with UFSAR Rev. 13)	13	January 2014
U.9-10 (associated with LIFSAR Rev. 13)	13	January 2014
U.9-11 (associated with UFSAP Pay 12)	13	January 2014
U.9-12 (associated with LIFSAR Rev. 13)	11	February 2010
U.9-13 (associated with UESAR Rev. 12)	13	January 2014
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Page or description	Rev.	Date
U.9-14 (associated with UFSAR Rev. 13)	13	January 2014
U.9-1 (associated with UESAR Rev. 14)	11	February 2010
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(associated with UFSAR Rev. 14)	14	September 2014
U.9-8 (associated with UFSAR Rev. 14)	14	September 2014
U.9-9 (associated with UFSAR Rev. 14)	14	September 2014
U.9-10 (associated with UFSAR Rev. 14)	14	September 2014
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U.9-12	11	February 2010
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U.9-6 (associated with UFSAR Rev. 15)	13	January 2014
U.9-7 (associated with UESAR Rev. 15)	14	September 2014
U.9-8 (associated with UESAR Rev. 15)	14	September 2014
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U.9-6	16	July 2017
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U.9-7a	16	July 2017
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U.9-10	14	September 2014
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(associated with UFSAR Rev. 16)	14	September 2014
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U.9-13	14	September 2014
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(associated with UFSAR Rev. 16)	15	January 2014
U.9-1	11	February 2010
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U.9-2	15	August 2016
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U.9-7a	16	July 2017
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U.9-8	14	September 2014
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U.9-2	15	August 2016
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U.9-6a	16	July 2017
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U.9-9	14	September 2014
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U.9-13	14	September 2014
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(associated with UESAR Rev. 18)	15	January 2014
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U.9-2	20	August 2021
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U.9-5	20	August 2021
U.9-6	20	August 2021
U.9-7	20	August 2021
0.9-8	20	August 2021
U 9-10	20	August 2021
U.9-11	20	August 2021
U.9-12	20	August 2021
U.9-13	20	August 2021
U.9-14	20	August 2021
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U.10-2	18	January 2019
U.10-2a	18	January 2019
U 10-4	11	February 2010
U.10-5	11	February 2010
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U.10-7	18	January 2019
U.10-8	11	February 2010
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U.10-11	11	February 2010
U.10-12 U 10 13	11	February 2010
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U.11-2	11	February 2010
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Page or description	Rev.	Date
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U.11-6	11	February 2010
U.11-7	18	January 2019
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U.11-9	11	February 2010
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U.11-12	11	February 2010
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U.14-1	11	February 2010
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iv of iv	10	February 2008
V.1-1	17	March 2018
V.1-1a	18	January 2019
V.1-2	18	January 2019
V.1-3	13	January 2014
V.1-4	13	January 2014
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V.1-5	22	January 2024
V.1-6	10	February 2008
V.2-1	13	January 2014
V.2-2	13	January 2014
V.2-3	13	January 2014
V.3-1	13	January 2014
V.3-2	13	January 2014
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V.3-4	10	February 2008
V.3-5	10	February 2008
V.3-6	10	February 2008
V.3-7	10	February 2008
V.3-8	10	February 2008
V.3-9	10	February 2008
V.3-10	11	February 2010
V.3-10A	13	January 2014
V.3-11	10	February 2008
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V.4-5	10	February 2008
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V.5-1	10	February 2008
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V 8-2	12	February 2008
V 8-3	12	February 2012
V 9-1	13	January 2008
V 9-2	13	January 2014
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Page or description	Rev.	Date
V.11-1	10	February 2008
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V.11-5	10	February 2008
V.12-1	10	February 2008
V.13-1	10	February 2008
V.14-1	10	February 2008
W-i	19	January 2021
W-ii	19	January 2021
W-iii	19	January 2021
W-iv	19	January 2021
W-v	19	January 2021
W-vi	19	January 2021
W-vii	19	January 2021
W 1-1	17	March 2018
W 1-1a	17	March 2018
W 1-2	13	January 2014
W 1-3	19	January 2014
W 1-4	13	January 2014
W 1-5	13	January 2014
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DWG (sh. 7 of 8)	1	Not shown
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DWG (sh. 8 of 8)	1	Not shown
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Page or description	Rev.	Date	
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Page or description	Rev.	Date
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W.8-22	19	January 2021
W.8-23	19	January 2021
W 8-24	19	January 2021
W 8-24a	21	August 2023
W 9 25	21	January 2024
W.8-25	12	January 2024
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W.9-1	13	January 2014
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W.10-6	13	January 2014
W.11-1	13	January 2014
W.11-2	13	January 2014
W 11-3	13	January 2014
W 12-1	10	January 2014
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W.13-1	10	February 2008
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Y-XIV	19	January 2021
Y-XV	19	January 2021
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DWG (sh. 2 of 4) NUH69BTH-72-1001	0	Not shown
DWG (sh. 3 of 4) NUH69BTH-72-1001	0	Not shown
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Page or description	Rev.	Date	Page or d
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Y.3-65	14	September 2014	Y.3-127
Y.3-66	14	September 2014	Y.3-128
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Page or description	Rev.	Date
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Page or description	Rev.	Date
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Page or description	Rev.	Date
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Page or description	Rev.	Date
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Page or description	Rev.	Date	Page o
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Page or description	Rev.	Date
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Page or description	Rev.	Date
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Page or description	Rev.	Date
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Z.6-93	14	September 2014
Z.6-94	14	September 2014
Z.6-95	14	September 2014
Z.6-96	14	September 2014
Z.6-97	14	September 2014
Z.6-98	14	September 2014
Z.6-99	14	September 2014
Z.6-100	14	September 2014
Z.6-101	14	September 2014
Z.6-102	14	September 2014
Z.6-103	14	September 2014
Z.6-104	14	September 2014
Z.6-105	14	September 2014
Z.6-106	14	September 2014
Z.6-106a	16	July 2017
Z.6-106b	16	July 2017
Z.6-106c	16	July 2017
Z.6-106d	16	July 2017
Z.6-106e	16	July 2017
Z.6-106t	16	July 2017
Z.6-107	14	September 2014
Z.6-108	14	September 2014
Z.6-109	14	September 2014
Z.6-110	14	September 2014
Z.6-111	14	September 2014
Z.6-112	14	September 2014
Z.0-113	14	September 2014
Z.0-114	14	September 2014
Z.0-115 Z.6.116	14	September 2014
7.6.117	14	September 2014
Z.0-11/ 7.6.118	14	September 2014
7.6.110	14	September 2014
7.6.120	14	July 2017
7.6-121	10	July 2017
7.6.122	10	July 2017
7 7-1	10	September 2014
7.7.2	14	September 2014
7.7_3	14	September 2014
7.7_4	14	September 2014
7.7-5	14	September 2014
7.7-6	14	September 2014
Z.8-1	14	September 2014
7.8-2	19	January 2021
7.8-3	17	March 2018
Z.8-4	16	July 2017
7.8-4a	19	January 2021
Z.8-5	19	January 2021
7.8-6	19	January 2021
Z.8-7	19	January 2021
·	17	

Page or description	Rev.	Date
Z.8-8	14	September 2014
Z.8-9	19	January 2021
Z.8-10	22	January 2024
Z.8-11	19	January 2021
Z.8-12	21	August 2023
Z.8-12a	22	January 2024
Z.8-13	14	September 2014
Z.8-14	15	August 2016
Z.8-15	14	September 2014
Z.8-16	22	January 2024
Z.8-16a	19	January 2021
Z.8-17	14	September 2014
Z.8-18	19	January 2021
Z.8-18a	19	January 2021
7.8.20	19	Santamban 2014
7.8.21	14	September 2014
7.8.22	14	September 2014
7.8.22	14	September 2014
7 8-24	14	September 2014
7 8-25	14	September 2014
Z 9 Introduction-1	20	August 2021
Z 9-1	14	September 2014
(associated with UFSAR Rev. 14)		September 2011
Z.9-2	14	September 2014
(associated with UFSAR Rev. 14)		1 .
Z.9-3	14	September 2014
(associated with UFSAR Rev. 14)		
Z.9-4	14	September 2014
(associated with UFSAR Rev. 14)		
Z.9-5	14	September 2014
(associated with UFSAR Rev. 14)		
Z.9-6	14	September 2014
(associated with UFSAR Rev. 14)	1.4	0 1 2014
Z.9-7	14	September 2014
(associated with OFSAK Kev. 14)	14	September 2014
(associated with UESAR Rev. 14)	14	September 2014
7.9-9	14	September 2014
(associated with UFSAR Rev. 14)		September 2011
Z.9-10	14	September 2014
(associated with UFSAR Rev. 14)		1 .
Z.9-11	14	September 2014
(associated with UFSAR Rev. 14)		
Z.9-12	14	September 2014
(associated with UFSAR Rev. 14)		
Z.9-13	14	September 2014
(associated with UFSAR Rev. 14)		
Z.9-1	14	September 2014
(associated with UFSAR Rev. 15)	1.5	4 (2016
Z.9-2	15	August 2016
(associated with UFSAR Rev. 15)	1.4	Santan 1 an 2014
(associated with LIES AD Day 15)	14	September 2014
7 9-4	14	September 2014
(associated with UFSAR Rev. 15)	14	September 2014
7.9-5	14	September 2014
(associated with UFSAR Rev. 15)		September 2011
Z.9-6	14	September 2014
(associated with UFSAR Rev. 15)		1
Z.9-7	14	September 2014
(associated with UFSAR Rev. 15)		

Page or description	Rev.	Date
Z.9-8 (associated with UFSAR Rev. 15)	14	September 2014
Z.9-9 (associated with UESAR Rev. 15)	14	September 2014
Z.9-10	14	September 2014
(associated with UFSAR Rev. 15) Z.9-11	14	September 2014
(associated with UFSAR Rev. 15)	14	September 2014
(associated with UFSAR Rev. 15)	14	
2.9-13 (associated with UFSAR Rev. 15)	14	September 2014
Z.9-1 (associated with UFSAR Rev. 16)	14	September 2014
Z.9-2	15	August 2016
Z.9-3	14	September 2014
(associated with UFSAR Rev. 16) Z.9-4	14	September 2014
(associated with UFSAR Rev. 16)	1.4	
2.9-5 (associated with UFSAR Rev. 16)	14	September 2014
Z.9-6 (associated with UFSAR Rev. 16)	16	July 2017
Z.9-6a	16	July 2017
Z.9-7	14	September 2014
(associated with UFSAR Rev. 16) Z.9-8	16	July 2017
(associated with UFSAR Rev. 16)	16	July 2017
(associated with UFSAR Rev. 16)	10	July 2017
Z.9-8b (associated with UFSAR Rev. 16)	16	July 2017
Z.9-9 (associated with LIESAR Rev. 16)	14	September 2014
Z.9-10	16	July 2017
(associated with UFSAR Rev. 16) Z.9-11	14	September 2014
(associated with UFSAR Rev. 16) 7.9-11a	16	July 2017
(associated with UFSAR Rev. 16)	10	Suly 2017
Z.9-12 (associated with UFSAR Rev. 16)	14	September 2014
Z.9-13 (associated with UFSAR Rev. 16)	16	July 2017
Z.9-1	14	September 2014
Z.9-2	15	August 2016
(associated with UFSAR Rev. 17) Z.9-3	14	September 2014
(associated with UFSAR Rev. 17)	1.4	September 2014
(associated with UFSAR Rev. 17)	14	September 2014
Z.9-5 (associated with UFSAR Rev. 17)	14	September 2014
Z.9-6	16	July 2017
Z.9-6a	16	July 2017
(associated with UFSAR Rev. 17) Z.9-7	14	September 2014
(associated with UFSAR Rev. 17)		1

Page or description	Rev.	Date
Z.9-8	16	July 2017
(associated with UFSAR Rev. 17)	16	1 1 2017
2.9-8a (associated with LIESAR Rev. 17)	16	July 2017
Z.9-8b	16	July 2017
(associated with UFSAR Rev. 17)		
Z.9-9	14	September 2014
(associated with UFSAR Rev. 17)	16	1.1. 2017
2.9-10 (associated with UESAR Rev. 17)	16	July 2017
Z.9-11	14	September 2014
(associated with UFSAR Rev. 17)		1
Z.9-11a	16	July 2017
(associated with UFSAR Rev. 17)	1.4	Santanahan 2014
(associated with UFSAR Rev. 17)	14	September 2014
Z.9-13	16	July 2017
(associated with UFSAR Rev. 17)		
Z.9-1	14	September 2014
(associated with UFSAR Rev. 18)	15	August 2016
(associated with UFSAR Rev. 18)	15	August 2010
Z.9-3	14	September 2014
(associated with UFSAR Rev. 18)		
Z.9-4	14	September 2014
(associated with OFSAR Rev. 18)	14	September 2014
(associated with UFSAR Rev. 18)	11	September 2011
Z.9-6	16	July 2017
(associated with UFSAR Rev. 18)	16	1.1. 2017
2.9-6a (associated with LIESAR Rev. 18)	16	July 2017
Z.9-7	14	September 2014
(associated with UFSAR Rev. 18)		1
Z.9-8	16	July 2017
(associated with UFSAR Rev. 18)	16	July 2017
(associated with UFSAR Rev. 18)	10	July 2017
Z.9-8b	16	July 2017
(associated with UFSAR Rev. 18)		<u> </u>
(associated with UESAR Rev. 18)	14	September 2014
Z.9-10	16	July 2017
(associated with UFSAR Rev. 18)		5
Z.9-11	14	September 2014
(associated with UFSAR Rev. 18)	16	July 2017
(associated with UFSAR Rev. 18)	10	July 2017
Z.9-12	14	September 2014
(associated with UFSAR Rev. 18)		
Z.9-13 (associated with LIES AP Poy. 18)	16	July 2017
7.9-1	20	August 2021
Z.9-2	20	August 2021
Z.9-3	20	August 2021
Z.9-4	20	August 2021
Z.9-5 7 9-6	20	August 2021
Z.9-7	20	August 2021
Z.9-8	20	August 2021
Z.9-9	20	August 2021
Z.9-10	20	August 2021
Z.9-11	20	August 2021

Page or description	Rev.	Date
Z.9-12	20	August 2021
Z.9-13	20	August 2021
Z.9-14	20	August 2021
Z.9-15	20	August 2021
Z.10-1	14	September 2014
Z.10-2	18	January 2019
Z.10-3	14	September 2014
Z.10-4	18	January 2019
Z.10-5	14	September 2014
Z.10-6	18	January 2019
Z.10-7	14	September 2014
Z.10-8	14	September 2014
Z.10-9	14	September 2014
Z.10-10	14	September 2014
Z.10-11	14	September 2014
Z.10-12	14	September 2014
Z.10-13	14	September 2014
Z.11-1	14	September 2014
Z.11-2	14	September 2014
Z.11-3	19	January 2021
Z.11-4	14	September 2014
Z.11-5	14	September 2014
Z.11-6	14	September 2014
Z.11-7	18	January 2019
Z.11-8	14	September 2014
Z.11-9	14	September 2014
Z.11-10	18	January 2019
Z.11-11	14	September 2014
Z.11-12	14	September 2014
Z.11-13	14	September 2014
Z.11-14	14	September 2014
Z.12-1	19	January 2021
Z.13-1	14	September 2014
Z.14-1	14	September 2014

Revision 19 of this UFSAR incorporates design modifications implemented per §72.48 since the issuance of UFSAR Revision 18. It also incorporates changes implemented due to approval of Amendment 16 to CoC 1004. Amendment 16 and the reformatted CoC consists of CoC conditions contained in three main categories: Technology, Design Features, and Renewed CoC and includes three new appendices: CoC Appendix A - Inspections, Tests, and Evaluations (ITE), CoC Appendix B - Technical Specifications (TS), and CoC Appendix C - ASME Code Alternatives. References to specific CoC conditions, ITE, TS or ASME Code Alternative requirements within UFSAR Revision 19 apply to the Amendment 16 CoC, ITE, TS and ASME Code Alternatives.

Revision 20 of this UFSAR incorporates design modifications implemented per §72.48 since the issuance of UFSAR Revision 19. It also incorporates changes implemented due to approval of Amendment 17 to CoC 1004. References to specific CoC conditions, ITE, TS or ASME Code Alternative requirements within UFSAR Revision 20 apply to the Amendment 17 CoC, ITE, TS and ASME Code Alternatives.

Revision 21 of this UFSAR incorporates design modifications implemented per 10 CFR 72.48 since the issuance of UFSAR Revision 20. References to specific CoC conditions, ITE, TS or ASME Code Alternative requirements within UFSAR Revision 21 apply to Amendment 17 CoC, ITE, TS and ASME Code Alternatives.

Revision 22 of this UFSAR incorporates design modifications implemented per 10 CFR 72.48 since the issuance of UFSAR Revision 21. It also incorporates changes implemented due to approval of Amendment 18 to CoC 1004. References to specific CoC conditions, ITE, TS or ASME Code Alternative requirements within UFSAR Revision 22 apply to the Amendment 18 CoC, ITE, TS and ASME Code Alternatives.

EX	ECUT	IVE SUN	IMARY i
TA	BLE (OF CONT	TENTSv
LIS	ST OF	TABLES	S xvi
LIS	ST OF	FIGURE	2S xxiii
LIS	ST OF	ABBRE	VIATIONS xxviii
1.	INTF	RODUCT	TION AND GENERAL DESCRIPTION OF INSTALLATION 1.1-1
	1.1	Introdu	ction
	1.2	General	Description of Installation
		1.2.1	Arrangement of Major Structures and Equipment1.2-1
		1.2.2	Principal Design Criteria
		1.2.3	Operating and Fuel Handling Systems
		1.2.4	Safety Features
		1.2.5	Principal Characteristics of the Site 1.2-4
	13	Conoral	Systems Description 13.1
	1.5	1.3.1	Storage Systems Descriptions 1.3-1
		1.0.1	1.3.1.1 Dry Shielded Canister 1.3-1
			1.3.1.2 Horizontal Storage Module Model 80 and Model 102 1.3-2
		1.3.2	Transfer Systems Descriptions
			1.3.2.1 On-Site TC
		1 2 2	1.3.2.2 Transfer Equipment
		1.3.3 1.3.4	Arrangement of Storage Structures 1.3-3
	1 /	1.J.T Idontifi	Partian of Agonts and Contractors
	1.4	Motorio	Lincornerated by Deference
	1.5	Doforon	an incorporated by Reference
r	1.0 CITE		CTEDISTICS 1
2.	SIIE		LIERISTICS
	2.1	Geogra	
	2.2	Nearby	Industrial, Transportation, and Military Facilities2
	2.3	Meteoro	blogy2
	2.4	Surface	Hydrology2
	2.5	Subsurf	ace Hydrology
	2.6	Geology	v and Seismology3
3.	PRIN	ICIPAL 1	DESIGN CRITERIA
	3.1	Purpose	e of Installation
		3.1.1	Material to be Stored
			3.1.1.1 Physical Characteristics
			3.1.1.2 Internal Characteristics 3.1-2 3.1.1.3 Radiological Characteristics 2.1.2
			5.1.1.5 Rudiological Characteristics

Page

	3.1.2	General (Operating Functions	3.1-3
		3.1.2.1	Handling and Transfer Equipment	3.1-4
		3.1.2.2	Waste Processing, Packaging and Storage Areas	3.1-6
3.2	Structu	ral and M	echanical Safety Criteria	3.2-1
	3.2.1	Tornado	and Wind Loadings	3.2-1
		3.2.1.1	Applicable Design Parameters	3.2-1 <i>a</i>
		3.2.1.2	Determination of Forces on Structures	3.2-2
		3.2.1.3	Ability of Structures to Perform	3.2-3
	3.2.2	Water Le	vel (Flood) Design	3.2-4
	3.2.3	Seismic I	Design Criteria	3.2-4
	3.2.4	Snow and	l Ice Loads	3.2-5
	3.2.5	Load Cor	nbination and Structural Design Criteria	3.2-5
		3.2.5.1	Horizontal Storage Module	3.2-5
		3.2.5.2	Dry Shielded Canister	3.2-6
		3.2.5.3	On-site Transfer Cask	3.2-7
3.3	Safety P	rotection	System	3.3-1
	3.3.1	General	•	3.3-1
	3.3.2	Protection	n by Multiple Confinement Barriers and Systems	3.3-1
		3.3.2.1	Confinement Barriers and Systems	3.3-1
		3.3.2.2	Ventilation - Offgas	3.3-3
	3.3.3	Protection	n by Equipment and Instrumentation Selection	3.3-3
		3.3.3.1	Equipment	3.3-3
		3.3.3.2	Instrumentation	3.3-3
	3.3.4	Nuclear (Criticality Safety	3.3-3
		3.3.4.1	NUHOMS [®] -24P DSC Criticality Safety (Fuel with an	
			Equivalent Unirradiated Enrichment of less than 1.45	
			wt. % U-235)	3.3-4
		3.3.4.2	NUHOMS [®] -52B DSC Criticality Safety	3.3-18
		3.3.4.3	Criticality Analysis Methods (NUHOMS [®] -52B)	3.3-21
		3.3.4.4	NUHOMS [®] -61BT DSC Criticality Safety	3.3-30
		3.3.4.5	NUHOMS [®] -24PT2 DSC Criticality Safety	3.3-30
		3.3.4.6	NUHOMS [®] -32PT DSC Criticality Safety	3.3-30
		3.3.4.7	NUHOMS [®] -24PHB DSC Criticality Safety	3.3-30
		3.3.4.8	NUHOMS®-24PTH DSC System Criticality Safety	3.3-30
		3.3.4.9	NUHOMS [®] -61BTH System Criticality Safety	3.3-30
		3.3.4.10	NUHOMS [®] -32PTH1 System Criticality Safety	3.3-30
		3.3.4.11	NUHOMS [®] -69BTH System Criticality Safety	3.3-30
		3.3.4.12	NUHOMS [®] -37PTH System Criticality Safety	3.3-30
	3.3.5	Radiolog	ical Protection	3.3-30
		3.3.5.1	Access Control	3.3-31
		3.3.5.2	Shielding	3.3-31
		3.3.5.3	Radiological Alarm Systems	3.3-31
	3.3.6	Fire and I	Explosion Protection	3.3-32
	3.3.7	Materials	Handling and Storage	3.3-33
		3.3.7.1	Spent Fuel Handling and Storage	3.3-33

I

Page

			3.3.7.2 Radioactive Waste Treatment
			3.3.7.3 On-site Waste Storage
		3.3.8	Industrial and Chemical Safety
	3.4	Classif	ication of Structures. Components, and Systems
		3.4.1	Drv Shielded Canister
		3.4.2	Horizontal Storage Module
		3.4.3	ISFSI Basemat and Approach Slabs
		3.4.4	Transfer Equipment
			3.4.4.1 Transfer Cask and Yoke 3.4-2
			3.4.4.2 Other Transfer Equipment
		3.4.5	Auxiliary Equipment
	35	Decom	missioning Considerations 35-1
	2.6	Critico	lity Evolution for Evol With on Equivalent Unique disted
	3.0	Enviah	may Evaluation for Fuel with an Equivalent Unifradiated
			Discussion on d Deculta
		3.0.1	Discussion and Results
		3.0.2	Package Fuel Loading
		3.0.3	Criticality Analysis
		3.0.4	Critical Developments
		3.0.3	Critical Benchmark Experiments and Applicability 265
			5.0.5.1 Benchmark Experiments and Applicability
		266	5.0.5.2 Results of the Benchmark Calculations
		3.0.0	Example Keno V.a Input Listing
	3.7	Refere	nces
4.	INST	FALLAT	TION DESIGN
	4.1	Summa	ary Description
		4.1.1	Location and Layout of Installation
		4.1.2	Principal Features
	4.2	Storage	e Structures
		4.2.1	Structural Specifications 4.2-1
		4.2.2	Installation Lavout
		4.2.3	Individual Unit Description 4.2-2
			4.2.3.1 Dry Shielded Canister
			4.2.3.2 The Horizontal Storage Module
			4.2.3.3 On-Site Transfer Cask
	43	Auvilia	rv Systems 43-1
	т.5		Ventilation Systems 4.3-1
		т.Ј.1	4311 Off-Gas Systems 43-1
		432	Flectrical Systems 43-1
		433	Helium Sunnly System A 2-1
		434	Steam Supply and Distribution System
		435	Water Supply and Distribution System $4.3-1$ Water Supply System $4.3-1$
		т. <i>Э.Э</i> ДЗБ	Viauer Suppry System
		т.э.0	Sewage Treatment System

Page

	4.3.7 4.3.8	Communications and Alarm System Fire Protection System	
	4.3.9	Maintenance Systems	
	4.3.10	Cold Chemical Systems	
	4.3.11	Air Sampling System	
	4.3.12	Instrumentation	
4.4	Deconta	mination System	4.4-1
	4.4.1	Equipment Decontamination	
	4.4.2	Personnel Decontamination	
4.5	Transfe	r Cask and Lifting Hardware Repair and Maintenan	ce 4.5-1
	4.5.1	Routine Inspection	
	4.5.2	Annual Inspection	
4.6	Cathod	ic Protection	4.6-1
4.7	Fuel Ha	ndling Operation Systems	
-	4.7.1	Structural Specifications	
	4.7.2	Installation Layout	
		4.7.2.1 Building Plans	
		4.7.2.2 Building Sections	
		4.7.2.3 Confinement Features	
	4.7.3	Individual Unit Descriptions	
		4.7.3.1 Fuel/Reactor Building Equipment	
		4.7.3.2 Transfer Cask	
		4.7.3.3 Transfer Cask Lifting Yoke	
		4.7.3.4 Transfer Trailer	4.7-7a
		4.7.3.5 Skid Positioning System	
		4.7.3.6 Hydraulic Ram System	
		4.7.3.7 Ram Support Assembly	
		4.7.3.8 Cask Support Skid	
	4.7.4	Transfer Equipment	
		4.7.4.1 Transfer Cask and Lifting Yoke	
		4.7.4.2 Transfer System Equipment	
4.8	ASME	Code Exceptions List for the NUHOMS [®] -24P, (Stand	ard and
	Long C	avity), 24PT2 and 52B DSC	4.8-1
4.9	ASME	Code Exceptions List for the Transfer Cask	4.9-1
4.10	Referen	ces	4.10-1
OPE	RATION	SYSTEMS	5.1-1
5.1	Operat	on Description	
	5.1.1	Narrative Description	
		5.1.1.1 Preparation of the Transfer Cask and DSC	
		5.1.1.2 DSC Fuel Loading	
		5.1.1.3 DSC Drying and Backfilling	

I

5.

<u>Page</u>

			5.1.1.4	DSC Sealing Operations	5.1-8a
			5.1.1.5	Transfer Cask Downending and Transfer to ISFSI	5.1-8a
			5.1.1.6	DSC Transfer to the HSM	5.1-9
			5.1.1.7	Monitoring Operations	5.1-11
			5.1.1.8	DSC Retrieval from the HSM	5.1-11 <i>a</i>
			5.1.1.9	Removal of Fuel from the DSC	5.1-12
			5.1.2	Process Flow Diagram	5.1-18
		5.1.3	Identific	ation of Subjects for Safety Analysis	5.1-18
			5.1.3.1	Criticality Control	5.1-18
			5.1.3.2	Chemical Safety	
			5.1.3.3	Operation Shutdown Modes	
			5.1.3.4	Instrumentation	
	5 2		J.1.J.J		
	5.2	Fuel Ha	andling Sy	/stems	
		3.2.1	Spent Fu	Function Description	
			5.2.1.1 5.2.1.2	Safety Features	
		522	Spent Fu	el Storage	5 2-3
		5.2.2	5.2.2.1	Safety Features	
	5.3	Other (Inerating	Systems	5.3-1
	0.0	5.3.1	Operatin	g System	5.3-1
		5.3.2	Compon	ent/Equipment Spares	5.3-1
	5.4	Operat	ion Suppo	ort System	
		5.4.1	Instrume	ntation and Control System	5.4-1
		5.4.2	System a	and Component Spares	5.4-1
	5.5	Contro	l Room ar	ıd/or Control Areas	5.5-1
	5.6	Analyti	ical Sampl	ling	5.6-1
	5.7	Referer	1ces	5	
6.	WAS	TE CON	NFINEME	INT AND MANAGEMENT	
	6.1	Waste S	Sources		
	6.2	Offoas	Treatmen	t and Ventilation	6-1
	63	Liquid	Wosto Tr	estment and Retention	6_1
	6.4	Solid W	Vastas		0-1 6 1
	6.5	Dadiala	asics	not of Normal Onorations Summary	0-1
7	0.5 DAD	Kauloit	Denoted	vact of Normal Operations - Summary	0-1
7.	KAD				/.1-1
	/.1	Ensurii	ng I nat O	ovabla (AI AD A)	711
		7 1 1	Policy C	onsiderations	 /.I-I 7 1.1
		712	Design (Considerations	
		1.1.4	Design		

I

		7.1.3	Operational Considerations	
	7.2	Radiati	on Sources	
		7.2.1	Characterization of Sources	
		7.2.2	Airborne Radioactive Material Sources	
		7.2.3	Fuel Qualification Tables and Equations	7.2-7
			7.2.3.1 Fuel Qualifications for the 24P and 52B Systems	7.2.7
			7.2.3.2 Determining Fuel Assembly Minimum Required	
			Cooling Times Using Fitting Equations	
	7.3	Radiati	on Protection Design Features	
		7.3.1	Installation Design Features	7.3-1
		7.3.2	Shielding	
			7.3.2.1 Radiation Shielding Design Features	
			7.3.2.2 Shielding Analysis	
			7.3.2.3 Shielding Provided by Lead Shield Plug	
		7.3.3	Ventilation	
		7.3.4	Area Radiation and Airborne Radioactivity Monitoring	
			Instrumentation	7.3-7
	7.4	Estimat	ted On-Site Collective Dose Assessment	
		7.4.1	Operational Dose Assessment	7.4-1
		7.4.2	Site Dose Assessment	7.4-1
	7.5	Health	Physics Program	
	7.6	Estimat	ted Off-Site Collective Doses	
		7.6.1	Effluent and Environmental Monitoring Program	
		7.6.2	Analysis of Multiple Contribution	
		7.6.3	Estimated Dose Equivalents	
		7.6.4	Liquid Release	
	7.7	Referen	1ces	
8.	ANA	LYSIS C	OF DESIGN EVENTS	8.1-1
	8.1	Norma	l and Off-Normal Operations	8.1-1
		8.1.1	Normal Operation Structural Analysis	8.1-2
			8.1.1.1 Normal Operating Loads	8.1-2
			8.1.1.2 Dry Shielded Canister Analysis	8.1-7
			8.1.1.3 DSC Internal Basket Analysis	
			8.1.1.4 DSC Support Structure Analysis	
			8.1.1.5 HSM Loads Analysis	
			8.1.1.6 HSM Door Analyses	
			8.1.1./ HSM Heat Shield Analysis	
			8.1.1.8 HSWI AXIAI Ketainer for DSU	
		017	0.1.1.9 Un-Site Transfer Cask Analysis	
		0.1.2	8.1.2.1 Jammed DSC During Transfor	0.1-28
			8.1.2.2 Off Normal Thermal Loads Analysis	
		812	o.1.2.2 On-inormal finemal Loaus Analysis	0.1-31 & 1 22
		0.1.3	8 1 3 1 Thermal Hydraulics of the HSM	

I

Page

Page

		8.1.3.2	Thermal Analysis of the DSC Inside the HSM	8.1-40
		8.1.3.3	Thermal Analysis of the DSC Inside the Transfer Cask	8.1-45
8.2	Acciden	t Analysi	\$	
0.2	8.2.1	Reduced	HSM Air Inlet and Outlet Shielding	
	0.2.1	8.2.1.1	Cause of Accident	
		8.2.1.2	Accident Analysis	
		8.2.1.3	Accident Dose Calculations	8.2-2
		8.2.1.4	Recovery	8.2-3
	8.2.2	Tornado	Winds/Tornado Missile	8.2-3
		8.2.2.1	Cause of Accident	8.2-3
		8.2.2.2	Accident Analysis	8.2-3
		8.2.2.3	Accident Dose Calculation	8.2-14
		8.2.2.4	Transfer Cask Missile Impact Analysis	8.2-14
	8.2.3	Earthqua	ke	8.2-14
		8.2.3.1	Cause of Accident	8.2-14
		8.2.3.2	Accident Analysis	8.2-14
		8.2.3.3	Accident Dose Calculations	8.2-23
	8.2.4	Flood		8.2-23
		8.2.4.1	Cause of Accident	8.2-23
		8.2.4.2	Accident Analysis	8.2-23
		8.2.4.3	Accident Dose Calculations	8.2-25
		8.2.4.4	Recovery	8.2-25
	8.2.5	Accident	tal Cask Drop	8.2-26
		8.2.5.1	Cause of Accident	8.2-26
		8.2.5.2	Accident Analysis	8.2-28
		8.2.5.3	Loss of Neutron Shield	8.2-40
		8.2.5.4	Recovery	8.2-42
	8.2.6	Lightnin	g	8.2-42
		8.2.6.1	Postulated Cause of Event	8.2-42
		8.2.6.2	Analysis of Effects and Consequences	8.2-42a
	8.2.7	Blockag	e of Air Inlet and Outlet Openings	8.2-43
		8.2.7.1	Cause of Accident	8.2-43
		8.2.7.2	Accident Analysis	8.2-43
		8.2.7.3	Accident Dose Calculations	8.2-45
	0.00	8.2.7.4 DCC I	Recovery	8.2-45
	8.2.8	DSC Lea	akage	8.2-45
		8.2.8.1	Cause of Accident	8.2-46
		8.2.8.2	Accident Analysis	8.2-46
	0.0	8.2.8.3	Accident Dose Calculations	8.2-46
	8.2.9	Accident	A anidart Analysia	8.2-46
		8.2.9.1	Accident Analysis	8.2-46
		8.2.9.2	Accident Dose Calculations	8.2-4/

Page

		8.2.10	 Load Combinations	8.2-47 8.2-47 8.2-47 8.2-48
			 8.2.10.4 HSM Load Combination Evaluation 8.2.10.5 Thermal Cycling of the HSM 8.2.10.6 DSC Support Structure Load Combination Evaluation 	8.2-48 8.2-48 8.2.49
	83	Site Che	8.2.10.0 DSC Support Structure Load Combination Evaluation	0.2-49 8 3_1
	8.5 8.4	Referen	res	0.5-1 8 <i>4</i> _1
9	CON		F OPERATIONS	
).	91	Organiz	rational Structure	
	7.1	9.1.1	Corporate Organization	
		-	9.1.1.1 Corporate Functions, Responsibilities and Authorities	
			9.1.1.2 Applicant's In-House Organization	9.1-1
			9.1.1.3 Interrelationship with Contractors and Suppliers	9.1-1
		0.1.0	9.1.1.4 Applicant's Technical Staff	9.1-1
		9.1.2	Operating Organization, Management and Administrative	0.1.2
			0.1.2.1 On Site Organization	
			9.1.2.1 Oll-Sile Organization.	
		9.1.3	Personnel Qualification Requirements	
		9.1.4	Liaison with Other Organizations	
	9.2	Pre-Op	erational Testing and Operation	9.2-1
		9.2.1	Administrative Procedures for Conducting Test Programs	9.2-1
		9.2.2	Test Program Description	9.2-1
		9.2.3	Test Discussion	9.2-2
	9.3	Trainin	g Program	9.3-1
		9.3.1	Program Description	9.3-1
			9.3.1.1 Training for Operations Personnel	
			9.3.1.2 Training for Maintenance Personnel	
			9.3.1.3 Iraining for Health Physics Personnel	
			9.3.1.5 Specific Training Module Elements	93-1a
		9.3.2	Retraining Program	
		9.3.3	Administration and Records	
	9.4	Normal	Operations	
		9.4.1	Procedures	
		9.4.2	Records	9.4-1
	9.5	Emerge	ncy Planning	9.5-1
	9.6	Decom	nissioning Plan	9.6-1
	9.7	Referen	ces	9.7-1

10.	OPE	RATING	G CONTROLS AND LIMITS	10-1		
11.	QUA	QUALITY ASSURANCE11.1-1				
	11.1	Introduction				
	11.2	"Impor	"Important-to-Safety" and "Safety Related" NUHOMS [®] System			
		Compo	Components			
	11.3	Descrip	tion of TN 10 CFR 72 Subpart G Ouality Assurance Program1	1.3-1		
		11.3.1	Organization1	1.3-1		
		11.3.2	Quality Assurance Program	1.3-1		
		11.3.3	Design Control	1.3-2		
		11.3.4	Procurement Document Control	1.3-2		
		11.3.5	Instructions, Procedures, and Drawings1	1.3-2		
		11.3.6	Document Control	1.3-2		
		11.3.7	Control of Purchased Material, Equipment and Services 1	1.3-3		
		11.3.8	Identification and Control of Materials, Parts, and Components1	1.3-3		
		11.3.9	Control of Special Processes	1.3-3		
		11.3.10	Inspection	1.3-3		
		11.3.11	Test Control 1	1.3-4		
		11.3.12	Control of Measuring and Test Equipment1	1.3-4		
		11.3.13	Handling, Storage and Shipping1	1.3-4		
		11.3.14	Inspection, Test, and Operating Status1	1.3-4		
		11.3.15	Nonconforming Material, Parts or Components1	1.3-4		
		11.3.16	Corrective Action	1.3-5		
		11.3.17	Quality Assurance Records1	1.3-5		
		11.3.18	Audits1	1.3-5		
	11.4	Conditi	ons of Approval Records1	1.4-1		
12.	AGI	NG MAN	AGEMENT1	2.1-1		
	12.1	Aging N	Management Review1	2.1-1		
	12.2	Time-L	imited Aging Analyses and Other Supporting Evaluations1	2.2-1		
		12.2.1	Fatigue Evaluation of the Dry Shielded Canister	2.2-2		
		12.2.2	Fatigue Evaluation of the Transfer Casks1	2.2-2		
		12.2.3	Horizontal Storage Module Concrete and Dry Shielded Canister			
			Steel Support Structure Thermal Fatigue, Corrosion, and			
			Temperature Effects Evaluation1	2.2-4		
		12.2.4	Dry Shielded Canister Poison Plates Boron Depletion Evaluation 1	2.2-5		
		12.2.5	Evaluation of Neutron Fluence and Gamma Radiation on Storage			
			System Structural Materials	2.2-6		
		12.2.6	Confinement Evaluation of 24P and 52B Non-Leaktight Dry			
		100 =	Shielded Canisters	2.2-7		
		12.2.7	Thermal Performance of Horizontal Storage Modules for the			
		1000	Period of Extended Operation	2.2-8		
		12.2.8	Evaluation of Additional Cladding Oxidation and Additional			
			Hydride Formation Assuming Breach of Dry Shielded Canister			
			Continement Boundary	2.2-9		

	12.2.9	Evaluation of Cladding Gross Rupture during Period of Extended	
		Operation 12.2-1	0
	12.2.10	Structural Assessment of High Burnup Cladding Performance	
		during Period of Extended Operation 12.2-1	1
	12.2.11	Defense-in-Depth Thermal Evaluation of Dry Shielded Canister	
		Internal Pressures Assuming High Burnup Fuel Cladding Failure	
		during Period of Extended Operation 12.2-1	2
	12.2.12	Defense-in-Depth Structural Evaluation of Dry Shielded Canister	
		Confinement and Retrievability Assuming High Burnup Fuel	
		Cladding Failure during Period of Extended Operation 12.2-1	3
	12.2.13	Bounding Evaluation of Dry Shielded Canister with Reduced	
		Shell Thickness Due to Chloride Induced Stress Corrosion	
		Cracking under Normal and Off Normal Conditions of Storage	
		during Renewal Period	3
12.3	Aging M	lanagement Program12.3-	1
12.4	Retrieva	ıbility 12.4-	1
12.5	Tollgate	Assessments 12.5-	1
	12.5.1	Tollgate Assessments by General Licensees 12.5-	1
	12.5.2	The Role of the CoC Holder for Tollgate Assessments 12.5-	1
	12.5.3	Aging Management Tollgates	2
12.6	Referen	ces12.6-	1

APPENDICES TABLE OF CONTENTS

APPENDIX A	DETAILS OF SHIELDING MODELS FOR THE NUHOMS® SYSTEM	A.1
APPENDIX B	DETAILS OF HEAT TRANSFER ANALYSIS OF THE NUHOMS [®] SYSTEM	B.1
APPENDIX C	SUPPORTING STRUCTURAL ANALYSES	C.1
APPENDIX D	A REVIEW OF CONCRETE BEHAVIOR UNDER SUSTAINED ELEVATED TEMPERATURES	D.1
APPENDIX E	DRAWINGS FOR THE STANDARDIZED NUHOMS [®] SYSTEM	E.1
APPENDIX F	NUHOMS [®] -24P TOPICAL REPORT REVISION 1 NRC CRITICALITY QUESTION RESOLUTIONS	F.1
APPENDIX G	DELETED	G.1
APPENDIX H	NUHOMS [®] -24P LONG CAVITY DSC EVALUATION FOR STORING PWR FUEL WITHOUT BURNABLE POISON ROD ASSEMBLIES (BPRAs)	H.1
APPENDIX I	DELETED	I.1
APPENDIX J	EVALUATION OF BURNABLE POISON ROD ASSEMBLIES (BPRAs) FOR THE STANDARDIZED NUHOMS® 24P LONG CAVITY DSC	J.1
APPENDIX K	NUHOMS [®] 61BT SYSTEM	K.1-1
APPENDIX L	NUHOMS [®] 24PT2 DSC	.L.1-1
APPENDIX M	NUHOMS [®] 32PT DSC	M.1-1
APPENDIX N	NUHOMS [®] 24PHB DSC	N.1-1
APPENDIX P	NUHOMS [®] 24PTH DSC SYSTEM	.P.1-1
APPENDIX R	NUHOMS [®] HSM MODEL 152	R.1-1
APPENDIX T	NUHOMS [®] 61BTH DSC	.T.1-1
APPENDIX U	NUHOMS [®] 32PTH1 SYSTEM	U.1-1
APPENDIX V	NUHOMS [®] HSM MODEL 202	V.1-1
APPENDIX W	NUHOMS® OS197L TRANSFER CASK	W.1-1
APPENDIX Y	NUHOMS [®] 69BTH SYSTEM	Y.1-1
APPENDIX Z	NUHOMS [®] 37PTH SYSTEM	.Z.1-1

LIST OF TABLES

Table 1.2-1	Typical NUHOMS [®] ISFSI Storage Capacity Expansion and Canister	
T 11 100	Loading Plan (for information only)	1.2-6
Table 1.2-2	Key Design Parameters for the Standardized NUHOMS [®] System	1.2-7
Table 1.2-3	NUHOMS [®] System Operations Overview ^{(1), (2) (3)}	1.2-10
Table 1.2-4	Typical Plant Equipment and Materials Used for NUHOMS [®] DSC	
	Loading, Closure, and Transfer Operations (for information only)	1.2-12
Table 1.3-1	Components, Structures and Equipment for the Standardized NUHOMS [®]	
	System	1.3-9
Table 1.3-2	Known Fabricated NUHOMS [®] Transfer Casks Licensed for Use Under	
	CoC 1004	1.3-10a
Table 3.1-1	PWR Fuel Specifications for Fuel to be Stored in the Standardized	
	NUHOMS [®] -24P DSC	3.1-7
Table 3.1-1a	PWR Fuel Assembly Designs Suitable for Storage in the Standardized	
	NUHOMS [®] -24P DSC	3.1-8
Table 3.1-2	BWR Fuel Specifications for Fuel to be Stored in NUHOMS [®] -52B DSC	3.1-9
Table 3.1-2a	BWR Fuel Assembly Designs Suitable for Storage in NUHOMS [®] -52B	
	DSC	3.1-10
Table 3.1-3	General PWR Fuel Assembly Data ⁽¹⁾	3.1-11
Table 3.1-4	Deleted	3.1-12
Table 3.1-5	Deleted	3.1-12
Table 3.1-6	Deleted	3.1-12
Table 3.1-7	NUHOMS [®] Transfer Equipment Criteria	3.1-13
Table 3.1-8	Deleted	3.1-19
Table 3.1-8a	PWR Fuel Qualification Table for the Standardized NUHOMS [®] -24P and	
	-24PT2 DSC (Fuel Without BPRAs)	3.1-14
Table 3.1-8b	BWR Fuel Qualification Table for the Standardized NUHOMS [®] -52B	
	DSC	3.1-15
Table 3.1-8c	PWR Fuel Qualification Table for the Standardized NUHOMS [®] -24P and	
	-24PT2 DSC (Fuel with BPRAs)	3.1-16
Table 3.2-1	Summary of NUHOMS® Component Design Loadings	3.2-8
Table 3.2-2	Design Pressures for Tornado Wind Loading	3.2-14
Table 3.2-3	Deleted	3.2-15
Table 3.2-4	HSM Ultimate Strength Reduction Factors	3.2-16
Table 3.2-5	HSM Load Combination Methodology	3.2-17
Table 3.2-6	DSC Load Combinations and Service Levels ⁽¹⁰⁾	3.2-18
Table 3.2-7	On-site Transfer Cask Load Combinations and Service Levels	3.2-20
Table 3.2-8	DSC Support Structure Load Combination Methodology	3.2-21
Table 3.2-9a	Stress Design Criteria for DSC Pressure Boundary Components	3.2-22
Table 3.2-9b	Stress Design Criteria for DSC Non-Pressure Boundary Components	3.2-23
Table 3.2-10	Structural Design Criteria for DSC Support Structure	3.2-24
Table 3.2-11	Structural Design Criteria for On-Site Transfer Cask	3.2-25
Table 3.2-12	Structural Design Criteria for Bolts	3.2-26
Table 3.2-13	Deleted	3.2-27
Table 3.3-1	NUHOMS [®] System Components Important to Safety	3.3-36
Table 3.3-2	Radioactive Material Confinement Barriers for NUHOMS® System	3.3-37
Table 3.3-3	Design Parameters for Criticality Analysis of the NUHOMS [®] -24P DSC	3.3-38

LIST OF TABLES (Continued)

Table 3.3-4	Results Summary for Reactivity Equivalence Burnup Cases Nominal Case NUHOMS [®] -24P DSC Model Fully Loaded with Irradiated Fuel 3.3-40)
Table 3.3-5	Summary of Selected Irradiated Fuel Equivalence Calculation Results	1
Table 3.3.6	Banchmark Critical Experiments	י י
Table 2.3-0	CSAS2 DuO2 UO2 Critical Experiment Penchmark Calculations ⁽¹⁾	1
Table 3.3-7	CSAS2 FuO2 - 002 Childan Experiment Denominark Calculations	t
1 able 5.5-6	Mathad Validation by Comparison to CASMO 21: a Desulta	5
T_{a} [1, 2, 2, 0]	Avial Dynamic Variation Sonsitivity Desults Symmetry NULLOMS [®] 24D	,
Table 5.5-9	Axial Burnup Variation Sensitivity Results Summary -NUHOWIS -24P	
	USC Fully Loaded with 4 wi. % Irradiated Fuel Flooded with Pure	c
$T_{abla} 2 2 10$	Water)
Table 5.5-10	Irradiated Fuel NUHOMS [®] -24P DSC 3.3.47	7
Table 3 3-11	DSC Criticality Analysis Summary of Final k. Result Components	
14010 5.5-11	for Selected Points on Reactivity Equivalence Curve NUHOMS [®] -24P	
	DSC 3.2.45	2
Table 3 3-12	NI IHOMS [®] -52B Baseline Case Fuel Design Parameters 3 3-40	,)
Table 3 3-13	NUHOMS [®] -52B DSC Nominal Basket Parameters 33 3.40	, ,
Table 3 3-14	Transfer Cask Parameters 3.3-4	ý
Table 3 3_{-15}	$\frac{11}{11} = \frac{11}{11} = 11$	ý
Table 3.3-15 Table 3.3.16	Summary of DNL Critical Benchmark Calculations	, ,
Table 3 3-17	Oualified BWR Fuel Designs ⁽²⁾	7
Table 3 3-18	NUHOMS [®] -52B KENO Analysis Evel Assembly Position Results $3.3-58$	2
Table 3 3-10	NUHOMS [®] -52B KENO Analysis Neutron Absorber Boron Content	,
14010 5.5-17	Results 3.3-58	2
Table 3.3-20	NUHOMS [®] -52B KENO Analysis Neutron Absorber Sheet Thickness	,
14010 515 20	Results 3.3-50)
Table 3.3-21	NUHOMS [®] -52B KENO Analysis Neutron Absorber Sheet Width	
14010 515 21	Results 3.3-50)
Table 3.3-22	NUHOMS [®] -52B KENO Analysis Moderator Density Results 3.3-60)
Table 3.3-23	NUHOMS [®] -52B KENO Analysis Loss of Absorber Sheet Results)
Table 3.3-24	NUHOMS [®] -52B KENO Analysis Summary of Biases and	·
10010 010 21	Uncertainties	
Table 3.4-1	NUHOMS [®] Major Components and Safety Classification	1
Table 3.6-1	NUHOMS [®] -24P DSC Dimensional Data (Worst Case Tolerances)	}
Table 3.6-2	Criticality Results (with Water in Fuel-Cladding Gap and Without	-
	BPRA))
Table 3.6-3	Criticality Results (Water in Fuel-Cladding Gap With BPRA))
Table 3.6-4	Criticality Results (Void in Fuel-Cladding Gap and Without BPRA)	L
Table 3.6-5	Criticality Results (Void in Fuel-Cladding Gap and With BPRA)	2
Table 3.6-6	Benchmarking Results	3
Table 3.6-7	USL-1 Results	5

LIST OF TABLES (Continued)

Table 3.6-8	USL Determination for Criticality Analysis	3.6-27
1 able 4.0-1	ASIME Code Alternatives for NUHOMIS -24F, 24 FHB, and 52B DSC Pressure Boundary Components	18-3
Table 4.8-2	A SME Code Alternatives for NITHOMS [®] -24P 24 PHB and 52B	······ - ····
1 4010 4.0-2	DSC Basket Assembly	4 8-6
Table 4 9-1	ASME Code Alternatives for the Standardized NUHOMS [®] System	
14010 1.9 1	TCs Except for the OS200 and OS200FC TCs	
Table 5.1-1	Instrumentation Used During NUHOMS [®] System Loading	
-	Operations	5.1-20
Table 7.2-1	Neutron Energy Spectrum and Flux-to-Dose Conversion Factors for	
	PWR Spent Fuel	
Table 7.2-2	Neutron Energy Spectrum and Flux-to-Dose Conversion Factors for	
	BWR Spent Fuel	7.2-4
Table 7.2-3	Gamma Energy Spectrum and Flux-to-Dose Conversion Factors for	
	PWR Fuel	7.2-5
Table 7.2-4	Gamma Energy Spectra and Flux-to-Dose Conversion Factors for	
	BWR Fuel	7.2-6
Table 7.2-5	PWR Allowable Decay Heat Versus Cooling Time and Burnup	7.2-9
Table 7.2-6	Formulae for Mapping Gamma Source Spectra	7.2-11
Table 7.2-7	PWR HSM and TC Unit Gamma Source Response Functions	
	(mrem/hr per $\gamma/s/cm^3$	7.2-12
Table 7.2-8	Sample PWR Dose Rate Evaluation	7.2-14
Table 7.2-9	BWR Allowable Decay Heat Versus Cooling Time	7.2-15
Table 7.2-10	BWR Fuel Region Densities	7.2-16
Table 7.2-11	BWR HSM and TC Unit Source Response Functions	7.2-17
Table 7.2-12	Input Parameters Needed for Fitting Equation	7.2-19
Table 7.2-13	Input Parameters Needed for 32PT Example	7.2-19
Table 7.2-14	Input Parameters Needed 37PTH Example	7.2-20
Table 7.2-15	Input Parameters Needed 67BTH Example	7.2-21
Table 7.3-1	Deleted	7.3-5
Table 7.3-2	Shielding Analysis Results for 5 Year Cooled Fuel NUHOMS [®] -24P	
	System ⁽⁵⁾ (w/o BPRAs)	7.3-6
Table 7.3-3	Shielding Analysis Results for 10 Year Cooled Fuel NUHOMS [®] -24P	
	System ⁽²⁾	7.3-8
Table 7.3-4	Shielding Analysis Results for 5 Year Cooled Fuel NUHOMS [®] -52B	
	System	7.3-9
Table 7.3-5	Shielding Analysis Results for 10 Year Cooled Fuel NUHOMS [®] -52B	
	System	7.3-11
Table 7.4-1	NUHOMS [®] System Operations Enveloping Time for Occupational	
	Dose Calculations	
Table 8.1-1	NUHOMS [®] Normal Operating Loading Identification	8.1-49
Table 8.1-2	NUHOMS® Off-Normal Operating Loading Identification	8.1-50
Table 8.1-3	Mechanical Properties of Materials	8.1-51
Table 8.1-4	Estimated NUHOMS [®] -24P Component Weights	
---------------	---	
Table 8.1-5	Estimated NUHOMS [®] -52B Component Weights	
Table 8.1-6	NUHOMS [®] -24P DSC Operating and Accident Pressures ⁽⁵⁾ (w/o	
10010 011 0	BPRAS) 81-60	
Table 8.1-7	NUHOMS [®] -52B DSC Operating and Accident Pressures 8.1-61	
Table 8.1-8	Thermophysical Properties of Materials 8.1-62	
Table 8.1-9	Temperature Dependent Thermophysical Properties	
Table 8.1-10	Maximum NUHOMS [®] -24P DSC Stresses for Normal and Off-	
10010 011 10	Normal Loads 81-65	
Table 8.1-11	Maximum NUHOMS [®] -52B DSC Stresses for Normal and Off-	
	Normal Loads 81-67	
Table 8 1-12	Deleted 81-69	
Table 8 1-13	Deleted 81-69	
Table 8 1-14	Maximum DSC Support Structure Stresses for Normal and Off-	
	Normal Loads 81-70	
Table 8 1-15	Maximum ⁽¹⁾ Normal and Off-Normal Loads for DSC Support	
10010 0.1 15	Structure End Connections 8 1-71	
Table 8 1-16	Maximum DSC Support Structure Vertical Displacements for	
10010 0.1 10	Normal and Off-Normal Loads 81-72	
Table 8 1-17	Thermal Load Case Definitions for HSM Structural Analysis 8 1-73	
Table 8.1-18	Deleted 8.1-75	
Table 8.1-19	Maximum HSM Reinforced Concrete Bending Moments and Shear	
	Forces for Normal and Off-Normal Loads	
Table 8.1-20	Maximum Standardized Transfer Cask Stresses for Normal Loads	
Table 8.1-20a	Maximum OS197 Transfer Cask Stresses for Normal Loads	
Table 8.1-20b	Maximum OS197H Transfer Cask Stresses for Normal Loads	
Table 8.1-21	Maximum Standardized Transfer Cask Stresses for Off-Normal	
	Operating Loads	
Table 8.1-21a	Maximum OS197 Transfer Cask Stresses for Off-Normal Operating	
	Loads	
Table 8.1-21b	Maximum OS197H Transfer Cask Stresses for Off-Normal Operating	
	Loads	
Table 8.1-22	NUHOMS [®] -24P HSM Bulk Air Temperature	
Table 8.1-23	NUHOMS [®] -52B HSM Bulk Air Temperature	
Table 8.1-24	NUHOMS [®] -24P HSM Thermal Analysis Results Summary	
Table 8.1-25	NUHOMS [®] -52B HSM Thermal Analysis Results Summary	
Table 8.1-26	NUHOMS [®] -24P DSC Thermal Analysis Results Summary	
Table 8.1-27	NUHOMS [®] -52B DSC Thermal Analysis Results	
Table 8.1-28	Standardized Transfer Cask with NUHOMS [®] -24P DSC Thermal	
	Analysis Results Summary	
Table 8.1-29	Standardized Transfer Cask with NUHOMS [®] -52B DSC Thermal	
	Analysis Results Summary	

Page

Table 8.1-29a	OS197 Transfer Cask with NUHOMS [®] -24P or 52B DSC Thermal
	Analysis Results Summary
Table 8.1-30	Thermal Analysis Results Summary for the HSM Support Structure:
	24P and 52B Systems
Table 8.2-1	Postulated Accident Loading Identification
Table 8.2-2	Comparison of Total Dose Rates for HSM with and without Adjacent
	HSM Shielding Effects
Table 8.2-3	Maximum HSM Reinforced Concrete Bending Moments and Shear
	Force for Accident Loads
Table 8.2-4	Deleted
Table 8.2-5	Deleted
Table 8.2-6	Deleted
Table 8.2-7	Maximum NUHOMS [®] -24P DSC Stresses for Drop Accident Loads
Table 8.2-8	Maximum NUHOMS [®] -52B DSC Stresses for Drop Accident Loads
Table 8.2-9	Maximum Standardized Transfer Cask Stresses for Drop Accident
	Loads
Table 8.2-9a	Maximum OS197 Transfer Cask Stresses for Drop Accident Loads
Table 8.2-9b	Maximum OS197H Transfer Cask Stresses for Drop Accident Loads 8.2-58
Table 8.2-10	Dose at 300m from ISFSI Site Due to Release from Postulated DSC
	Rupture
Table 8.2-11	NUHOMS [®] -24P DSC Enveloping Load Combination Results for
	Normal and Off-Normal Loads (ASME Service Levels A and B)
Table 8.2-12	NUHOMS [®] -52B DSC Enveloping Load Combination Results for
	Normal and Off-Normal Loads (ASME Service Levels A and B)
Table 8.2-13	NUHOMS [®] -24P DSC Enveloping Load Combination Results for
	Accident Loads (ASME Service Level C)
Table 8.2-14	NUHOMS [®] -52B DSC Enveloping Load Combination Results for
	Accident Loads (ASME Service Level C)
Table 8.2-15	NUHOMS [®] -24P DSC Enveloping Load Combination Results for
	Accident Loads (ASME Service Level D) ⁽³⁾
Table 8.2-16	NUHOMS [®] -52B DSC Enveloping Load Combination Results for
	Accident Loads (ASME Service Level D) ⁽³⁾
Table 8.2-17	DSC Enveloping Load Combination Table Notes
Table 8.2-18	HSM Enveloping Load Combination Results
Table 8.2-19	DSC Support Structure Enveloping Load Combination Results
Table 8.2-20	DSC Support Structure Enveloping Load Combination Results
	Support Member End Connection Loads
Table 8.2-21	Standardized Transfer Cask Enveloping Load Combination Results
	for Normal and Off-Normal Loads (ASME Service Levels A and B)
Table 8.2-21a	OS197 Transfer Cask Enveloping Load Combination Results
	for Normal and Off-Normal Loads (ASME Service Levels A and B)
Table 8.2-21b	OS197H Transfer Cask Enveloping Load Combination Results
	for Normal and Off-Normal Loads (ASME Service Levels A and B)

Table 8.2-22	Standardized Transfer Cask Enveloping Load Combination Results	
	for Accident Loads (ASME Service Level C)	8.2-74
Table 8.2-22a	OS197 Transfer Cask Enveloping Load Combination Results	
	for Accident Loads (ASME Service Level C)	8.2-75
Table 8.2-22b	OS197H Transfer Cask Enveloping Load Combination Results	
	for Accident Loads (ASME Service Level C)	8.2-76
Table 8.2-23	Standardized Transfer Cask Enveloping Load Combination Results	
	for Accident Loads (ASME Service Level C)	8.2-77
Table 8.2-23a	OS197 Transfer Cask Enveloping Load Combination Results for	
	Accident Loads (ASME Service Level D)	8.2-78
Table 8.2-23b	OS197H Transfer Cask Enveloping Load Combination Results for	
	Accident Loads (ASME Service Level D)	8.2-79
Table 8.2-24	Expanded Load Combinations for DSC Analyses	8.2-80
Table 10-1	Index of CoC Requirements v/s Historical SAR References	10-2
Table 10-2	Technical Specification Cross Reference Table between Amendment	
	10 and Amendment 11	10-3
Table 10-3	CoC Conditions and Technical Specifications Cross Reference Table	
	between Amendment 15 and Amendment 16	10-5
Table 11.1-1	Quality Assurance Criteria Matrix	11.1-2
Table 11.2-1	Attributes to be Verified for Quality Category B Components of	
	Horizontal Storage Module ⁽¹⁾	11.2-3
Table 11.2-2	Attributes to be Verified for Quality Category B Components of	
	Onsite Transfer Cask ⁽¹⁾	11.2-4
Table 12.2-1	OS197 Types and OS200 TC Material Specifications	12.2-15
Table 12.2-2	Standardized TC Material Specifications	12.2-16
Table 12.2-3	100 m Dose Summary for the 52B Confinement Calculations	12.2-17
Table 12.2-4	100 m Dose Summary for the 24P Confinement Calculations	12.2-18
Table 12.2-5	Maximum FA Cladding Temperature and Incubation Time for Long-	
	Term DSC Storage in HSM.	12.2-19
Table 12.2-6	BWR Fuel Assembly Analysis and Results	12.2-20
Table 12.2-7	PWR Fuel Assembly Analysis and Results	12.2-21
Table 12.2-8	Maximum DSC Internal Pressure after 20-Year Storage with	
	High Burnun Fuel Rod Runture	12 2-22
Table 12 2-9	Normal and Off-Normal DSC Internal Pressures after 20-Vear	12.2 22
14010 12.2-9	Storage	12 2-23
Table 12 2_{-10}	Normal DSC Internal Pressures after 60-Vear Storage	12.2-23
Table 12.2-10	DSC Loaded with High Burnun Fuel from CoC 1004	12.2-24
Table 12.2-11	DSC Evaluation Function Coc 1004	12.2-23
Table 12.3-1	DSC Aging Management Program for the Effects of CISCC (Coastal	12.3-2
1 abic 12.3-2	Locations Near Salted Roads, or in the Path of Effluent Downwind	
	from the Cooling Tower(s))	1221
Table 12.2.2	HSM Aging Management Program for External and Internal Surfaces	1726
Table 12.3-3	HSM Inlets and Outlets Ventilation Aging Management Program	12.3-0
14010 12.3-4	TISM mices and Outlets ventuation Aging Management Flogram	12.3-9

Page

Table 12.3-5	Transfer Cask Aging Management Program	
Table 12.3-6	High Burnup Fuel Aging Management Program	
Table 12.5-1	DSC AMP for the Effects of CISCC Tollgates	
Table 12.5-2	High Burnup Fuel AMP Tollgates	

LIST OF FIGURES

Page

Figure 1.1-1	Illustration of Typical Life-of-Plant NUHOMS [®] ISFSI (for	
C	information only)	1.1-5
Figure 1.1-2	NUHOMS [®] System Components, Structures, and Transfer Equipment	
C	- Elevation View	1.1-6
Figure 1.1-3	NUHOMS [®] System Components, Structures, and Transfer Equipment	
-	Plan View.	1.1-7
Figure 1.2-1	Standardized NUHOMS [®] Systems Canister Baskets for PWR and	
C	BWR Spent Fuel (for information only	1.2-13
Figure 1.2-2	Prefabricated NUHOMS [®] Horizontal Storage Module (Model 102)	1.2-14
Figure 1.3-1	NUHOMS [®] Dry Shielded Canister Assembly Components	1.3-11
Figure 1.3-1a	NUHOMS [®] -61BT DSC Components	1.3-12
Figure 1.3-1b	NUHOMS [®] -24PT2 DSC Components	1.3-13
Figure 1.3-1c	NUHOMS [®] -32PT DSC Components	1.3-13a
Figure 1.3-2	NUHOMS [®] -24P Dry Shielded Canister Cross-Section	1.3-14
Figure 1.3-3	NUHOMS [®] -52B Dry Shielded Canister Cross-Section	1.3-15
Figure 1.3-4	NUHOMS [®] Horizontal Storage Module Arrangement	1.3-16
Figure 1.3-5	HSM Ventilation Air Flow Diagram	1.3-17
Figure 1.3-6	NUHOMS [®] On-Site TC	1.3-18
Figure 1.3-7	Transfer Trailer for the NUHOMS [®] System	1.3-19
Figure 1.3-8	Cask Support Skid for the NUHOMS [®] System	1.3-20
Figure 1.3-9	Hydraulic Ram System for NUHOMS [®]	1.3-21
Figure 1.3-10	NUHOMS [®] System Operational Overview	1.3-22
Figure 1.3-11	Typical Double Module Row NUHOMS [®] ISFSI Layout	1.3-23
Figure 1.3-12	Typical Single Module Row NUHOMS [®] ISFSI Layout	1.3-24
Figure 1.3-13	Typical Combined Single and Double Module Row NUHOMS [®]	
C	ISFSI Layout	1.3-25
Figure 3.1-1	PWR Spent Fuel Pool Inventory	3.1-17
Figure 3.1-2	BWR Spent Fuel Pool Inventory	3.1-18
Figure 3.3-1	NUHOMS [®] -24P DSC and KENO Model Geometry	3.3-62
Figure 3.3-2	KENO Model for NUHOMS [®] -24P Fuel	3.3-63
Figure 3.3-3	NUHOMS [®] -24P DSC Burnup Equivalence Curve	3.3-64
Figure 3.3-4	KENO Geometry of 1/8 NUHOMS [®] -24P DSC Array Model Used to	
-	Analyze Axial BU Variation Effects on Calculated Reactivity	3.3-1
Figure 3.3-5	Relative Axial Burnup vs. Fuel Height Used in Axial BU Sensitivity	
	Study NUHOMS [®] -24P DSC	3.3-2
Figure 3.3-6	NUHOMS [®] -52B KENO Model General Arrangement (Internals)	3.3-3
Figure 3.3-7	NUHOMS [®] -52B KENO Model Cask Arrangement	3.3-4
Figure 3.3-8	NUHOMS [®] -52B Typical Fuel Assembly Cell	3.3-5
Figure 3.3-9	NUHOMS [®] -52B Typical Fuel Assembly Array (7x7)	3.3-6
Figure 3.3-10	NUHOMS [®] -52B Location of Fuel Assemblies	3.3-7
Figure 3.3-11	Histogram of keff Results for PNL Criticals	3.3-8
Figure 3.3-12	NUHOMS [®] -52B Fuel Assembly Position Sensitivity	3.3-9
Figure 3.3-13	NUHOMS [®] -52B Neutron Absorber Boron Sensitivity Curve	3.3-10
Figure 3.3-14	NUHOMS [®] -52B Absorber Sheet Thickness Sensitivity	3.3-11
Figure 3.3-15	NUHOMS [®] -52B Neutron Absorber Width Sensitivity	3.3-12

Page

Figure 3.3-16	NUHOMS [®] -52B Moderator Density Sensitivity	3.3-13
Figure 3.3-17	Maximum PWR Cladding Temperature Limit vs. Cooling Time	3.3-14
Figure 3.3-18	Maximum BWR Cladding Temperature Limit vs. Cooling Time	3.3-15
Figure 3.6-1	KENO Model of the DSC Basket	3.6-28
Figure 3.6-2	Exploded View of the KENO Model	3.6-29
Figure 3.6-3	DSC Geometry	3.6-30
Figure 3.6-4	Criticality Results	3.6-31
Figure 4.2-1	Standardized NUHOMS [®] Canister Shell Assembly	4.2-12
Figure 4.2-2	Standardized NUHOMS [®] -24P Canister Basket	4.2-13
Figure 4.2-3	Standardized NUHOMS [®] -52B Canister Basket	4.2-14
Figure 4.2-4	DSC Top Shield Plug and Cover Plate Closure Welds	4.2-15
Figure 4.2-5	DSC Siphon and Vent Port Closure Welds	4.2-16
Figure 4.2-6	Prefabricated NUHOMS [®] HSM (Model 102) Longitudinal Section	4.2-17
Figure 4.2-7	Prefabricated NUHOMS [®] HSM (Model 102) Cross-Section	4.2-18
Figure 4.2-8	DSC Support Structure	4.2-19
Figure 4.2-9	DSC Axial Retainer	4.2-20
Figure 4.2-10	Composite View of NUHOMS [®] Transfer Cask and NUHOMS [®] -24P	
8	DSC with Spent PWR Fuel	4.2-21
Figure 4.2-11	Composite View of NUHOMS [®] Transfer Cask and NUHOMS [®] -52B	
8	DSC with Spent BWR Fuel	4.2-22
Figure 4.2-12	NUHOMS [®] On-Site Transfer Cask with BWR Extension Collar	4.2-23
Figure 4.2-13	Elevation View of Transfer Cask Restraint	4.2-24
Figure 4.2-14	Transfer Cask Temporary Shield Plug	4.2-25
Figure 4.2-15	NUHOMS [®] Transfer Cask Lifting Yoke	4.2-26
Figure 4.2-15a	NUHOMS [®] 7 Transfer Cask Alternate Lifting Yoke	4.2-26a
Figure 4.2-15b	NUHOMS [®] 7 Lightweight Lifting Assembly Yoke	4.2-26b
Figure 4.2-16	DSC/Transfer Cask Annulus Seal Detail	4.2-27
Figure 4.7-1	Typical DSC Draining and Drying System	4.7-12
Figure 4.7-2	DSC Automatic Welding System	4.7-13
Figure 4.7-3	Typical NUHOMS [®] Transfer Trailer	4.7-14
Figure 4.7-4	NUHOMS [®] Transfer Cask Downending Sequence	4.7-15
Figure 4.7-5	NUHOMS [®] Skid Positioning System (SPS)	4.7-16
Figure 4.7-6	NUHOMS [®] Cask Support Skid Tie-Down Bracket	4.7-17
Figure 5.1-1	NUHOMS [®] System Loading Operations Flow Chart	5.1-21
Figure 5.1-2	NUHOMS [®] System Retrieval Operations Flow Chart	5.1-24
Figure 5.2-1	Primary Operations for the NUHOMS [®] System	5.2-4
Figure 5.2-2	NUHOMS [®] Transfer Cask/HSM Alignment Verification	5.2-7
Figure 7.3-1	Deleted	7.3-12
Figure 7.3-2	Deleted	7.3-12
Figure 7.3-3	Locations of Reported Dose Rates for Tables 7.3-2 and 7.3-3	7.3-13
Figure 7.3-4	Included in Appendix A	7.3-14
Figure 7.3-5	Deleted	7.3-14
Figure 7.3-6	Deleted	7.3-14
Figure 7.3-7	Deleted	7.3-14

Page

T : T A A	
Figure 7.3-8	Included in Appendix A
Figure 7.3-9	Deleted
Figure 7.3-10	Deleted
Figure 7.3-11	Included in Appendix A
Figure 7.4-1	Deleted
Figure 7.4-2	On-Site Dose Map Around 2x10 Array of Standard HSMs Containing
	10 Year Cooled Fuel (mrem/hr)
Figure 7.4-3	On-Site Dose Map Around 2-1x10 Arrays of Standard HSMs
	Containing 10 Year Cooled Fuel (mrem/hr)
Figure 7.4-4	Deleted
Figure 7.4-5	HSM Roof Average Dose Rate - 10 Year Fuel
Figure 7.4-6	HSM Front Wall Average Dose Rate - 10 Year Fuel7.4-10
Figure 7.4-7	Deleted
Figure 7.4-8	Deleted
Figure 8.1-1	NUHOMS [®] -24P DSC Internal Temperature Distribution for 70°F
-	Ambient
Figure 8.1-2	NUHOMS [®] -24P DSC Internal Temperature Distribution for 100°F
-	Ambient
Figure 8.1-3	NUHOMS [®] -52B DSC Internal Temperature Distribution for 70°F
e	Ambient
Figure 8.1-4	NUHOMS [®] -52B DSC Internal Temperature Distribution for 100°F
e	Ambient
Figure 8.1-5	NUHOMS [®] -24P DSC Spacer Disc Temperature Distribution for
8	100°F Ambient
Figure 8.1-6	NUHOMS [®] -52B DSC Spacer Disk Temperature Distribution for
8	100°F Ambient
Figure 8.1-7	NUHOMS [®] -24P HSM Temperature Distribution for 70°F Ambient
Figure 8 1-8	NUHOMS [®] -24P HSM Temperature Distribution for 100°F Ambient 81-101
Figure 8 1-9	NUHOMS [®] -52B HSM Temperature Distribution for 70°F Ambient 81-102
Figure 8 1-10	NUHOMS [®] -52B HSM Temperature Distribution for 100°F Ambient 81-102
Figure 8 1-11	Standardized Transfer Cask Temperature Distribution for 100°F
	Ambient 8 1-102
Figure $8.1-12$	Standardized Transfer Cask Temperature Distribution for 0°F
Tigure 0.1-12	Ambient 8 1 105
Figure 8 1 13	DSC Shell Stress Analysis Diagram 81.106
Figure $8.1-13$	DSC Shell A secondary Ten End 00% A relation 1 Model
Figure 8.1-14a E^{2}	DSC Shell Assembly Top End 90° Analytical Model $8.1-107$
Figure 8.1-14b	DSC Shell Assembly Bottom End 90° Analytical Model 8.1-108
Figure 8.1-15	Partial View of DSC Shell Assembly Bottom End 180° Analytical
	Model Showing End Plates and Grapple Assembly
Figure 8.1-16	NUHOMS [®] -24P DSC Spacer Disk Thermal Model 8.1-110
Figure 8.1-17	NUHOMS ^w -52B DSC Spacer Disk Thermal Model
Figure 8.1-18	NUHOMS [®] -24P DSC Basket Assembly Handling Model 8.1-112
Figure 8.1-19	Typical HSM Reinforcement (Reinforcing bar size and spacing)
Figure 8.1-20	DSC Support Structure Analytical Model

Figure 8.1-21	Prefabricated HSM Analytical Model	8.1-115
Figure 8.1-22	Analytical Model for HSM, DSC, and DSC Support Structure	8.1-116
Figure 8.1-23	Analytical Model for HSM Base Unit Thermal Conditions	8.1-117
Figure 8.1-24	Analytical Model for HSM Roof Thermal Conditions	8.1-118
Figure 8.1-25	Variation in Strength of Basalt Aggregate Concrete with Temperature	e
8	and Length of Exposure	8.1-119
Figure 8.1-26	Compressive Strength of Concrete at High Temperature	8.1-120
Figure 8.1-27	Modulus of Elasticity of Concrete at High Temperatures	8.1-121
Figure 8.1-28	Modulus of Elasticity for Portland Cement/Basalt Aggregate	
8	Concrete Subjected to Short and Long-Term Heating	8.1-122
Figure 8.1-29	Deleted	8.1-123
Figure 8.1-30	Transfer Cask Handling Loads	8.1-124
Figure 8.1-31	DSC Axial Jam Condition	8.1-125
Figure 8.1-32	DSC Binding (Pinching) Condition	8.1-126
Figure 8.1-33	Deleted	8.1-127
Figure 8.1-34	NUHOMS [®] -24P HSM Air Temperatures for 70°F Ambient	
8	Temperature	8.1-128
Figure 8.1-35	NUHOMS [®] -52B HSM Air Temperatures for 70°F Ambient	
8	Temperature	8.1-129
Figure 8.1-36	Two-Dimensional HSM Model Geometry	8.1-130
Figure 8.1-36a	ANSYS Model of AHSM	8.1-131
Figure 8.1-37	Deleted	8.1-132
Figure 8.1-38	HEATING7 Model of NUHOMS [®] -24P DSC	8.1-133
Figure 8.1-39	HEATING7 Model of NUHOMS [®] -52B DSC	8.1-134
Figure 8.1-40	NUHOMS [®] -24P DSC HEATING7 Results for 70°F Ambient	8.1-135
Figure 8.1-41	NUHOMS [®] -52B DSC HEATING7 Results for 70°F Ambient	8.1-137
Figure 8.1-42	Transfer Cask Thermal Model for Top and Bottom of the Cask	8.1-139
Figure 8.1-43	Deleted	8.1-140
Figure 8.1-44	Deleted	8.1-141
Figure 8.1-45	Maximum Fuel Clad Temperature vs. DSC Surface Temperature for	
	NUHOMS [®] -24P	8.1-142
Figure 8.1-46	Maximum Fuel Clad Temperature vs. DSC Surface Temperature for	
	NUHOMS [®] -52B	8.1-143
Figure 8.1-47	Deleted	8.1-144
Figure 8.1-48	Deleted	8.1-144
Figure 8.1-49	Deleted	8.1-144
Figure 8.1-50	Deleted	8.1-144
Figure 8.2-1	DSC Lift-Off Evaluation	8.2-83
Figure 8.2-2	Design Seismic Response Spectra	8.2-84
Figure 8.2-3	Transfer Cask Postulated Drop Accident Scenarios	8.2-85
Figure 8.2-4	NUHOMS [®] -24P DSC Spacer Disk Horizontal Side Drop Analytical	
	Model	8.2-86
Figure 8.2-5	NUHOMS [®] -24P DSC Spacer Disk Loading for Horizontal Drop	
	Accident	8.2-87

Page

Figure 8.2-6	Deleted	8.2-88
Figure 8.2-7a	NUHOMS [®] -52B DSC 180° Spacer Disk Side Drop Analytical Model	8.2-89
Figure 8.2-7b	NUHOMS [®] -52B DSC 360° Spacer Disk Side Drop Analytical Model	8.2-90
Figure 8.2-8	Deleted	8.2-91
Figure 8.2-9	Transfer Cask and DSC Top Drop Model	8.2-92
Figure 8.2-10	Transfer Cask and DSC Bottom Drop Model	8.2-93
Figure 8.2-10a	OS197 and OS197H Transfer Cask Side Drop Model	8.2-94
Figure 8.2-11	Tornado Missile Impact Model	8.2-95
Figure 8.2-12	NUHOMS [®] -52B DSC Neutron Absorber Plate Analytical Model for	
-	Top End Drop	8.2-96
Figure 8.2-13	NUHOMS [®] -52B DSC Neutron Absorber Plate Horizontal Side Drop	
	Load Conditions	8.2-97
Figure 8.2-14	NUHOMS [®] -24P Support Rod Vertical End Drop Analytical Model	8.2-98
Figure 8.2-15a	NUHOMS [®] -52B DSC Basket Assembly 90° Model Vertical End	
-	Drop Analytical Model	8.2-99
Figure 8.2-15b	NUHOMS [®] -52B DSC Basket Assembly 180° Model Vertical End	
	Drop Analytical Model	8.2-100
Figure 8.2-16	HSM Roof Internal Concrete Temperatures Following Vent Blockage	8.2-101
Figure 8.2-17	Temperature Performance of the NUHOMS [®] System During the	
	Electrically Heated Tests	8.2-102
Figure 8.2-18	Effect of Blocking the Inlet and Outlet Air Vents	8.2-103
Figure 11.1-1	NUHOMS [®] Project Organization Chart	11.1-3
Figure 12.2-1	Heat Load vs. Energy Deposition Rate Curves	12.2-26
Figure 12.2-2	Comparison of the CISCC Initiation Time at Different Chloride	
	Concentrations and Heat Loads	12.2-27
Figure 12.2-3	Calculated Crack Penetration Depth as a Function of Storage Time for	
	the Initial Heat Loads of 32 and 6 kW at the Activation Energy of	
	47.5 kJ/mol	12.2-28
Figure 12.2-4	DSC Shell Temperature Profile (in degrees F) for 61BTH Type 1	
	DSC after 20-Year Storage in Standardized HSM	12.2-29
Figure 12.2-5	DSC Shell Temperature Profile (in degrees F) for 32PT-S125 DSC	
	after 20-Year Storage in Standardized HSM	12.2-30
Figure 12.2-6	DSC Shell Temperature Profile (in degrees F) for 32PTH1-S DSC	
	after 20-Year Storage in HSM-H	12.2-31
Figure 12.2-7	Calculated Crack Penetration Depth Depending on the Activation	
	Energy of 30.5, 47.5, and 92.1 kJ/mol for the Initial Heat Loads of 6	
	kW	12.2-32

LIST OF ABBREVIATIONS

10CFR	Code of Federal Regulations, Title 10
ACI	American Concrete Institute
AISC	American Institute of Steel Construction
ALARA	As Low as is Reasonably Achievable
ANF	Advanced Nuclear Fuels
ANS	American Nuclear Society
ANSI	American National Standards Institute
ASME	American Society of Mechanical Engineers
ASTM	American Society for Testing and Materials
B&W	Babcock & Wilcox
BWR	Boiling Water Reactor
CE	Combustion Engineering
DBT	Design Basis Tornado
DSC	Dry Shielded Canister
GE	General Electric
HSM	Horizontal Storage Module
ISFSI	Independent Spent Fuel Storage Installation
MWD/MTU	Megawatt days per metric ton uranium
MWe	Megawatts electric
MWt	Megawatts thermal
NDE	Non-Destructive Examination
NDRC	National Defense Research Committee
NFPA	National Fire Protection Association
NRC	Nuclear Regulatory Commission
NUHOMS	Nuclear Horizontal Modular Storage
NUREG	Nuclear Regulatory Guide
OBE	Operating Basis Earthquake
OSHA	Occupational Health and Safety Administration
PI	Project Instruction
PWR	Pressurized Water Reactor
QP	Quality Procedure
R.G.	NRC Regulatory Guide
SFA	Spent Fuel Assembly
SSE	Safe Shutdown Earthquake
TC	Transfer Cask
TR	Topical Report
U.S.	United States
UFSAR	Updated Final Safety Analysis Report
W	Westinghouse
atm	Atmosphere
bar	Bar
B-10 or B10	Isotope ¹⁰ B

LIST OF ABBREVIATIONS (Continued)

°C	degrees Centigrade
Ci/cm ²	Curies per square centimeter
cm	centimeter
°F	degrees Fahrenheit
fps	feet per second
ft	foot
ft-lb	foot pounds
ft/s	feet per second
He	helium
Hg	Mercury
in	inch
k-in	kip inch
kg	kilogram
keff	neutron multiplication factor, effective
kips	thousand pounds
kN	kilonewton
ksi	kips per square inch
kW	kilowatt
lb	pound
lbf	pounds-force
m	meter
MeV	Megaelectron volt
mm	millimeter
mph	miles per hour
mrem/hr	millirem per hour
mR/hr	milliroentgen per hour
n	neutron
Ν	Newton
psf	pounds per square foot
psi	pounds per square inch
psia	pounds per square inch, absolute
psig	pounds per square inch, gauge
sec	second
sq. mi.	square mile
ton	ton
w/o	without
wt. %	weight %

Table 1.3-2 Known Fabricated NUHOMS[®] Transfer Casks Licensed for Use Under CoC 1004

Fabricated NUHOMS[®] transfer casks (TCs) listed in the table below have design compatibility with the TC design basis models indicated. These fabricated TCs may have been fabrication-certified to one or more of the indicated compatible amendments. Determination of the fabrication-certification, the maintenance history, and current condition of these casks, in order to determine suitability for use under a particular amendment, would be achieved through contractual agreement between general licensees and the owner of the TC in question.

Fabricated TC Serial Number*	TC Design Basis Model	Amendment TC Design Initially Licensed Under	Amendments Currently Licensed Under***	Design Variants Licensed
None built	Standardized NUHOMS [®] TC	0	0 through 11, 13 through <i>18</i>	None
BGE001**	**	**	0 through 11, 13 through <i>18</i> **	**
OTC24P-001**			•	
OS197-1	00107	4	1 through 11, 12 through 10	OS197FC (as of Amendment 8)
OS197-2	05197	1 1 through 11, 13 through 18		OS197FC-B (as of Amendment 10)
OS197H-3				
OS197H-4				OS107HEC (as of Amondment 9)
OS197H-6	091074	5	5 through 11, 13 through 18	US 197 HFC (as of Amendment 8)
OS197H-7	0319/11	5		OS107HEC B (as of Amendment 10)
OS197H-8				OS 19711 C-D (as of Amendment 10)
OS197H-9				
OS197L-5	OS197L	11	11, 13 through <i>18</i>	None
OSTC-1				
OSTC-2	0\$200	10	10 11 13 through 18	OS200EC (as of Amondmont 13)
OSTC-3	03200	10		US200FU (as of Amenument 13)
OSTC-4				

*These fabricated casks are to the best of TN Americas LLC's knowledge as of this UFSAR revision

** As described in UFSAR Section 4.2.3.3, it is noted that certain transfer casks not fabricated under CoC 1004 are acceptable for use under CoC 1004 as long as the limiting conditions of use as described in CoC 1004 can be met.

*** This includes renewal, all amendment revisions, and all 'as corrected' amendments.

- 1.13 U. S. Nuclear Regulatory Commission, Office of Nuclear Materials Safety and Safeguards, "Safety Evaluation Report for Nutech Horizontal Modular System for Irradiated Fuel Topical Report," March 28, 1986.
- 1.14 U. S. Nuclear Regulatory Commission, Office of Nuclear Material Safety and Safeguards, "Safety Evaluation Report for a Design Change to the Transfer Cask for the Duke Power Company's Independent Spent Fuel Storage Installation," February 1990.
- 1.CoC-APPC CoC 1004 Appendix C, ASME Code Alternatives for the Standardized NUHOMS[®] Horizontal Modular Storage System, Amendment *18*.
- 1.TS CoC 1004 Technical Specifications for the Standardized NUHOMS[®] Horizontal Modular Storage System, Amendment *18*.

3.2 <u>Structural and Mechanical Safety Criteria</u>

The reinforced concrete HSM and its DSC support structure, the DSC and its internal basket assembly, and the transfer cask are the NUHOMS[®] system components which are important to safety. Consequently, they are designed and analyzed to perform their intended functions under the extreme environmental and natural phenomena specified in 10 CFR 72.122 (3.6) and ANSI-57.9 (3.36). Since the NUHOMS[®] ISFSI is an independent, passive system, no other components or systems contribute to its safe operation.

Table 3.2-1 summarizes the design criteria for the standardized NUHOMS[®] system components which are important to safety. This table also summarizes the applicable codes and standards utilized for design. The extreme environmental and natural phenomena design criteria discussed below comply with the requirements of 10 CFR 72.122 and ANSI-57.9. A description of the structural and mechanical safety criteria for the other design loadings listed in Table 3.2-1, such as thermal loads and cask drop loads, are provided in Chapter 8. The principal design criteria for the NUHOMS[®]-61BT system are provided in Appendix K.

The principal design criteria for the NUHOMS[®] HSM Model 80 and Model 102 described in this chapter are also applicable to HSM Model 152 and HSM Model 202. See Appendix R and Appendix V, respectively, for details. See Appendix P for HSM-H design criteria and Appendix U for the high seismic design criteria for the HSM-HS.

3.2.1 <u>Tornado and Wind Loadings</u>

The NUHOMS[®] ISFSI is designed to be located anywhere within the contiguous United States. Consequently, the most severe tornado and wind loadings specified by NRC Regulatory Guide 1.76 (3.7) and NUREG-0800, Section 3.5.1.4 (3.8) are selected as the design basis. The NUHOMS[®] reinforced concrete HSMs are designed to safely withstand 10 CFR 72.122 (b)(2) tornado missiles. Extreme wind effects are much less severe than tornado wind and missile loads or seismic effects and, therefore, are not evaluated in detail for the HSM.

Since the NUHOMS[®] on-site transfer cask is used infrequently and for short durations, the possibility of a tornado funnel cloud enveloping the cask/DSC during transit to the HSM is a low probability event. Nevertheless, the transfer cask is designed for the effects of tornados, in accordance with 10 CFR 72.122. This includes design for the effects of worst-case tornado winds and missiles.

Administrative controls, as described in Section 5.1.1.5, are required for short-duration outdoor dry storage system (DSS) handling activities (ODHAs) for which deterministic tornado wind/missile analyses have not been performed, or other weather-related design requirements exist. These controls, coupled with the low probability of tornado events, gives confidence in weather conditions being acceptable during ODHAs. Such ODHAs may also be associated with infrequently performed maintenance or inspections (e.g., aging management inspections).

3.2.1.1 Applicable Design Parameters

The design basis tornado (DBT) intensities used for the NUHOMS[®] transfer cask and HSM design are obtained from NRC Regulatory Guide 1.76. Region I intensities are utilized since they result in the most severe loading parameters. For this region, the maximum wind speed is 160 m/sec (360 miles per hour), the rotational speed is 130 m/sec (290 miles per hour), the maximum translational speed is 31 m/sec (70 miles per hour), the radius of the maximum rotational speed is 45.7 m (150 feet), the pressure drop

		SAR		
	Design Load	Section		
Component	Туре	Reference	Design Parameters	Applicable Codes
Horizontal Storage Module ⁽¹⁾ :				ACI 349-85, ACI 349R-85 (design); ACI 318-83 (construction only)
	Design Basis Wind Load	3.2.1	Max. wind pressure: 397 psf Max. speed: 360 mph	NRC Reg. Guide 1.76 and ANSI A58.1 1982
	Design basis tornado wind load + Missile load	3.2.1	Maximum wind speed of 360 mph, and a pressure drop of 3 psi + Missile types: Automobile, 4000 lbs, 195 fps; 8" diameter shell, 276 lb, 185fps; 1 in. diameter, solid steel sphere; wood plank, 4 in. x 12 in. x 12 ft, 200 lb, 440 fps.	NRC Reg. Guide 1.76 and ANSI A58.1, 1982. NUREG-0800, Section 3.5.1.4
	Flood	3.2.2	Maximum water height: 50 ft Maximum velocity: 15 ft/sec	10CFR72.122(b)
	Seismic ⁽²⁾	3.2.3	Hor. ground acceleration: 0.25g (both directions) Vert. ground acceleration: 0.17g with Reg. Guide 1.60 spectra at 7% damping.	NRC Reg. Guides 1.60 & 1.61
	Snow and Ice	3.2.4	Maximum load: 110 psf (included in live load)	ANSI A58.1-1982
	Dead Load	8.1.1.5	Dead weight including loaded DSC (<i>max. fresh</i> concrete density of <i>160</i> pcf)	ANSI 57.9-1984
	Normal and ⁽³⁾ Off-Normal Operating Temperatures	8.1.1.5	DSC with spent fuel rejecting 24.0 kW of decay heat for 5 yr. cooling time. Ambient air temperature range of -40 °F to 125 °F for off-normal case	ANSI 57.9-1984

Table 3.2-1 Summary of NUHOMS[®] Component Design Loadings

(1) See Appendix K for information associated with the NUHOMS[®]-61BT DSC.

(2) See Appendix P and U for HSM-H and HSM-HS seismic criteria respectively.

(3) See Appendix P for HSM-H and Appendix U for HSM-HS (40.8kW heat decay heat.)

January 2024

During DSC insertion/withdrawal operations, the transfer cask is docked with the HSM docking flange and mechanically secured to embedments provided in the front wall of the HSM. The cask restraints used for this purpose are shown in Figure 4.2-13. The embedments are equally spaced on either side of the HSM access opening. The HSM embedments are designed in accordance with the requirements of ACI 349 Code (4.14). The transfer cask restraint system is designed for loads which occur during normal DSC transfer operations and during an off-normal jammed DSC event.

The HSM gap between modules is covered with stainless steel wire bird screen to prevent pests or foreign material from entering the HSM. Periodic surveillance constitutes the only required maintenance activity for the NUHOMS[®] ISFSI.

It is expected that during the installation and loading of an HSM array there will be empty modules. Vacant HSMs can occur due to: partial filling of a complete construction phase of HSMs, or a partial filling of a phase of HSMs which will be expanded at a future date. The following issues have been evaluated for both cases: Normal Operation Issues, Construction Issues, and Accident Condition Issues. During installation of an additional HSM(s), or for other reasons, shield wall(s) may be removed for a period of time. However, compensatory measures shall be considered for radiation shielding and for missile protection, if necessary.

The design flexibility of the HSMs permits a licensee to choose the most economical arrangement of HSMs which best meets plant specific conditions and requirements. This SAR presents a detailed analysis for a single stand-alone module as this is the governing design case for the postulated environmental loads such as earthquake, flooding, and tornado loads. Thermal loads also provide significant loadings for the HSM structural design for the free-standing prefabricated HSM.

A typical reinforcing steel layout for the HSM floor, walls, and roof is shown in Figure 8.1-19. The reinforcement sizing and placement specified is used for HSM array configurations ranging in size from a single stand alone module to a 2x10 array of HSMs or larger. Licensing details, such as concrete joint and reinforcing bar lap splice requirements, are shown on the Appendix E drawings.

The HSM design documented in this SAR is constructed of 5,000 psi (minimum) compressive strength, normal weight (145 pounds per cubic foot minimum density) concrete with Type II Portland cement meeting the requirements of ASTM C150 (4.6) or blended Portland cement meeting the requirements of ASTM C595 [4.8]. Type III cement may be used as long as it meets the chemical and physical requirements for Type II cement specified in ASTM C150. The concrete aggregate meets the specifications of ASTM C33 (4.6). The concrete is reinforced by ASTM A615 or A706 Grade 60 (4.7) deformed bars placed vertically and horizontally at each face of the walls, roof and floor.

NUH-003		
Revision 22	Page 4.2-7	January 2024
	All changes on this page are Amd 18.	

4.10 <u>References</u>

- 4.1 U.S. Government, "Licensing Requirements for the Storage of Spent Fuel in an Independent Spent Fuel Storage Installation (ISFSI)," Title 10 Code of Federal Regulations, Part 72, Office of the Federal Register, Washington, D.C.
- 4.2 Deleted.
- 4.3 Deleted.
- 4.4 Deleted.

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- 4.5 American Society of Mechanical Engineers, <u>ASME Boiler and Pressure Vessel</u> <u>Code</u>, Section III, Division 1, 1983 Edition, with Winter 1985 Addenda.
- 4.6 American Society for Testing and Materials, Annual Book of ASTM Standards, Section 4, Volume 04.02, 1990.
- 4.7 American Society for Testing and Materials, Annual Book of ASTM Standards, Section 1, Volume 01.04, 1990.
- 4.8 *ASTM International, C595/C595M, Standard Specification for Blended Hydraulic Cements.*
- "American National Standard for Special Lifting Devices for Shipping Containers Weighing 10,000 Pounds (4500 kg) or More for Nuclear Materials", ANSI N14.6-1993, American National Standards Institute, Inc., New York, New York.
- 4.10 American Concrete Institute, "Building Code Requirement for Reinforced Concrete," ACI-318, 1983.
- 4.11 American Institute of Steel Construction, (AISC), "Specification for Structural Steel Buildings," Ninth Edition 1989, Chicago, Illinois.
- 4.12 American National Standards Institute, "American National Standard for Radioactive Materials - Leakage Tests on Packages for Shipment," ANSI N14.5, 1977.

NUH-003		
Revision 22	Page 4.10-1	January 2024
	All changes on this page are Amd 18.	

- 28. Open the valve on the vent port and allow helium to flow into the DSC cavity to pressurize the DSC to 2.5 $psig \pm 2.5$ psig in accordance with Technical Specification 3.1.2.a limits.
- 29. Close the valves on the helium source.
- 30. Remove the Strongback, decontaminate as necessary, and store.

5.1.1.4 DSC Sealing Operations

- 1. Disconnect the VDS from the DSC. Seal weld the prefabricated plugs over the vent and siphon ports and perform a dye penetrant weld examination in accordance with the CoC Appendix A Inspections, Tests, and Evaluations Item 4.3 requirements.
- 2. Install the automated welding machine onto the outer top cover plate and place the outer top cover plate with the automated welding system onto the DSC. Verify proper fit up of the outer top cover plate with the DSC shell.
- 3. Tack weld the outer top cover plate to the DSC shell. Complete the outer top cover plate weld root pass. Perform dye penetrant examination of the root pass weld. Weld out the outer top cover plate to the DSC shell and perform dye penetrant examination on the weld surface in accordance with the CoC Appendix A Inspections, Tests, and Evaluations Item 4.3.
- 4. Remove the automated welding machine from the DSC. Rig the cask top cover plate and lower the cover plate onto the transfer cask.
- 5. Bolt the cask cover plate into place, tightening the bolts to the required torque in a star pattern. Verify that the TC radial dose rates measured at the surface of the transfer cask are compliant with limits specified in CoC Appendix A Inspections, Tests, and Evaluations Item 3.2. The configuration for determining the TC radial surface dose rates shall be in accordance with CoC Appendix A Inspections, Tests, and Evaluations Item 3.2.

5.1.1.5 Transfer Cask Downending and Transfer to ISFSI

The following weather-related administrative controls are based on NEI 22-02 Revision 2, "Guidelines for Weather-Related Administrative Controls for Short Duration Outdoor Dry Cask Storage Operations," and NRC Regulatory Guide 3.77 Revision 0, "Weather-Related Administrative Controls at Independent Spent Fuel Storage Installations."

NOTE:

Although the administrative controls covered here are in this section on transfer cask downending and transfer, as discussed herein they apply to any short-term operations where weather conditions must be considered.

Background and general requirements:

For short-duration operations that are necessary to transfer spent fuel to the ISFSI, administrative controls are required if these outdoor dry storage system (DSS) handling activities (ODHAs) are performed with equipment configurations for which deterministic tornado wind/missile analyses have not been performed, or other weather-related design requirements exist.

These administrative controls provide one way that general licensees can continue to comply with weather conditions associated with normal and off-normal operation, maintenance, testing, and accident conditions, including normal and off-normal winds, accident winds, hurricane winds, hurricane missiles, tornado winds, tornado missiles, and tornado pressure drops.

While recognizing that the types and durations of these activities, and the equipment involved, are defined by the combination of the dry storage system design and licensing basis and site-specific facility configuration and procedures, a discussion is provided at the end of this section regarding what is, and what is not, analyzed for tornado hazards, in the current generic licensing basis.

Such ODHAs may also be associated with infrequently performed maintenance or inspections (e.g., aging management inspections). Note that the licensing basis of some structures, systems and components (SSCs) used during an ODHA may have safe operating wind speed limits below the values associated with severe weather (e.g., a crane).

The presence of a safe condition and forecast (defined below) ensures that an SSC's important to safety (ITS) design criteria are not exceeded when administrative controls are used in lieu of engineering analysis during an ODHA. Any time that the safe condition and forecast conditions cannot be met during ODHAs, the storage system SSCs must be placed in a safe and analyzed condition as soon as practicable.

Implementing procedures should contain specific steps to document the satisfactory execution of the weather check (e.g., log or checklist) before and, if required, periodic checks during the ODHAs, depending on their expected duration.

The expected duration of ODHAs should be based on operating experience, benchmarking, dry runs or a combination of these, while considering the time required to perform compensatory actions to place SSCs in an analyzed condition before severe weather occurs.

Each licensee must individually determine what, if any, short duration outdoor DSS activities are conducted at its site and the timeframes involved. General Licensees will develop, revise, or review existing procedures to establish administrative controls that confirm a safe condition and forecast before commencing outdoor DSS activities and for implementing compensatory measures should those conditions be lost during such activities.

Weather-forecast Resources:

Weather forecasts should be obtained using the National Weather Service (NWS). General licensees can use other resources with justification that the resource provides information that is equivalent to or more representative for the site than the NWS information in terms of timeliness and accuracy.

The NWS Active Alerts web page has several useful links to determine if a safe condition and forecast is in effect for the site for the upcoming time periods of interest, including, but not limited to:

- Warnings by State
- Latest Warnings
- Thunderstorm/Tornado Outlook
- Hurricanes

In addition, monitoring of weather conditions below the threshold of severe weather may be necessary to ensure SSCs ITS are not exposed to weather conditions that may exceed their design and licensing basis.

On-site meteorological data and use of one of several mobile phone and internet-based applications (e.g., the Weather Channel) can be used to augment the NWS forecast resources and allow receipt of notifications in real time for the site area to confirm a safe condition and forecast. Such measures are defense-in-depth only.

Prior to starting ODHAs:

Immediately prior to initiating an ODHA, the general licensee should determine if a safe condition and forecast is in effect for the site that encompasses the expected duration of the ODHA.

A safe condition and forecast is considered to be the absence of (1) forecasted weather for wind speeds (gusts or sustained) that could exceed an SSC's ITS design criteria and (2) a hazardous weather outlook indicating a risk of severe storms that could generate at the site, for example, tornado winds, missiles or pressure differentials, or hurricane winds or missiles, that could exceed an SSC's ITS design criteria, for the expected duration of the ODHA.

Even though near-term weather forecasts are highly reliable, the procedures or instructions should also include checking the future radar projections for the plant site. Based on these additional checks, outdoor activities should be prohibited if a licensee independently determines that severe weather is likely at any time over the expected duration of the outdoor activity. Additionally, the responsible personnel should decide if an advisory or other weather forecast information (e.g., temperature, wind, etc.) should prohibit such operations based on the particular circumstances of that advisory or other forecast information.

During the ODHA:

Depending on the expected duration of the DCS activity, the procedures or instructions should include additional checks of the weather forecast one or more times during the activity.

Licensees should decide if, and how frequently, additional weather forecast checks should be performed and include that frequency in procedures or instructions. In establishing the frequency of any weather checks performed during the activity, the licensee should also consider the time required to perform "response actions" to place the DSS in an analyzed condition before the severe weather occurs.

<u>After the ODHA</u>:

The ODHA duration should be reassessed based upon operating experience, including equipment malfunctions, and expected delays, before each DSS loading campaign.

Analyzed and Unanalyzed Configuration Information:

To assist licensees, information is provided here regarding what is, and what is not, analyzed for tornado hazards, in the current generic licensing basis contained in this Standardized NUHOMS[®] System UFSAR:

- Transfer casks (TCs) are analyzed for tornado hazards while in a horizontal orientation, with all TC cover plate (i.e., lid) bolts installed and torqued; however, the analysis does not credit the RAM access cover plate for tornado protection.
- The horizontal storage modules (HSMs) are analyzed for tornado hazards with the door and all door-bolts installed, with an adjacent shield wall or an empty HSM with its door and all door-bolts installed. (CoC 1004 HSM designs require "snug tight" condition, which means tightened sufficiently to prevent removal of the nuts without a wrench.)
- Based on this, there are known short duration operations in the operating procedures herein which are not analyzed for tornado hazards, as follows:
 - The short duration from when the TC is being transferred to the ISFSI, including removal of the TC lid in order to insert the dry shielded canister into the HSM, until the HSM door is installed.

Although not explicitly covered in this UFSAR, it is known that greater than class C (GTCC) waste is sometimes stored in radioactive waste canisters (RWCs), co-located and adjacent to CoC 1004 systems on ISFSI pads. Those situations also introduce the following non-analyzed condition:

- The short duration from the HSM door being removed in order to insert a GTCC RWC into the HSM until the HSM door is installed, if adjacent to a loaded system (the DSC of the loaded system is vulnerable to tornado missiles through the HSM opening).
 - Note that if an end shield wall was installed on the end of the loaded Part 72 array, before the GTCC-RWC HSM was placed, that shield wall provides adequate protection and administrative controls would not be required.
 - Also note that storage of any other low-level waste at the ISFSI would need careful consideration regarding this.

NOTE:

<u>Alternate Procedure for Downending of Transfer Cask</u>: Some plants have limited floor hatch openings above the cask/trailer/skid, which limit crane travel (within the hatch

- 2a. Perform a daily visual surveillance of the HSM air inlets and outlets (end wall and roof birdscreens) to insure that no debris is obstructing the HSM vents in accordance with Technical Specification 4.3.6.a requirements.
- 2b. Perform a temperature measurement of the thermal performance, for each HSM, on a daily basis in accordance with Technical Specification 4.3.6.b requirements.
- Note: This provision, with these two alternate allowed approaches, first became effective as of CoC 1004 Amendment 8, consistent with Amendment 8 Technical Specification 1.3.

5.1.1.8 DSC Retrieval from the HSM

- *Note: Ensure the administrative controls detailed in Section 5.1.1.5 are being implemented.*
- 1. Ready the transfer cask, transfer trailer, and support skid for service and tow the trailer to the HSM.

8.1.1 Normal Operation Structural Analysis

Table 8.1-1 shows the normal operating loads for which the NUHOMS[®] safety-related components are designed. The table also lists the individual NUHOMS[®] components which are affected by each loading. The magnitude and characteristics of each load are described in Section 8.1.1.1.

The method of analysis and the analytical results for each load are described in Sections 8.1.1.2 through 8.1.1.9. The mechanical properties of materials employed in the structural analysis of the NUHOMS[®] system components are presented in Table 8.1-3.

8.1.1.1 Normal Operating Loads

The normal operating loads for the NUHOMS[®] system components are:

- 1. Dead Weight Loads
- 2. Design Basis Internal and External Pressure Loads
- 3. Design Basis Thermal Loads
- 4. Operational Handling Loads
- 5. Design Basis Live Loads

These loads are described in detail in the following paragraphs.

A. Dead Weight Loads

Table 8.1-4 and Table 8.1-5 show the weights of various components of the NUHOMS[®] system. The dead weight of the component materials is determined based on nominal component dimensions.

A density value of 0.283 pound per cubic inch for carbon steel, 0.285 pound per cubic inch for stainless steel, 0.408 pound per cubic inch for lead shielding, and 0.064 pound per cubic inch for solid neutron shielding material are used in the dead weight calculations.

A nominal concrete density of 140 to 145 pounds per cubic foot is conservatively selected as a design basis for the shielding and thermal evaluations. A maximum nominal *fresh concrete* density *(with no rebar)* of *160 pcf* is conservatively assumed for the structural evaluation of the HSM.

The thicker roof and front wall sections qualify as deep flexural members and the allowable shear capacity (V_c) may be calculated in accordance with Section 11.8.6 of ACI 349 using the formula:

$$V_{c} = \left(3.5 - 2.5 \frac{M_{u}}{V_{u} d}\right) \left(1.9\sqrt{f'_{c}} + 2500 \rho_{w} \frac{V_{u} d}{M_{u}}\right) b_{w} d$$
(8.1-8)

but not to exceed

$$6\sqrt{f_{\it c}^{\,\prime}}\;b_{\rm w}\;d$$

8.1.1.6 <u>HSM Door Analyses</u>

The access opening for transferring the DSC into and out of the HSM is protected by a shielded door. The standard door (used in HSM Model 102) is a thick reinforced concrete door with a steel plate at the rear. The standard door design provides for increased shielding compared to the alternate door (used in HSM Model 80). The alternate door is a steel door with a core of concrete shielding material. Both doors are recessed into the HSM front wall and bear against the concrete docking flange as shown in Appendix E drawings. The door is attached to the front wall by four embedded studs with threaded nuts.

Standard Door Analysis: The weight of the 24 inch thick reinforced concrete door (with $\frac{1}{2}$ inch thick steel plate at the rear) is *12.6* kips. The door is designed conservatively for a maximum pressure of 10 psi which envelops the equivalent pressure load due to seismic and tornado wind pressure. The maximum moment and shear forces due to the enveloping load are 26.4 kip-in/ft and 1.98 kips/ft, respectively. These computed moments and shear forces are significantly less than the bending capacity (457 kips-in/ft) and the shear capacity (18.3 kips/ft) of the door.

Alternate Door Analysis: For normal system operation, the door assembly is only subjected to the dead weight which is transmitted by bearing directly into the HSM front wall, and handling loads resulting from installation and removal of the door during DSC transfer operations.

The concrete bearing strength required to support a bearing load on the frame from the door weight of 6556 pounds is a small fraction of the ACI 349 (Section 10.15) permissible concrete bearing strength of $\phi[0.85 \text{ f'}_c \text{ A}_1] = 0.7 [0.85 \text{ x} 5 \text{ x} 6 \text{ x} 80.63] = 1440 \text{ kips}$. The embedded anchors for the HSM door frame are designed in accordance with ACI 349-85, Appendix B. The governing design load combination for the HSM door embedded anchors is the dead load plus tornado wind load combination. The dead load consists of the weight of the door. The wind load consists of the uniform suction acting on the door. The wind load produces shear and tension on the anchors. The maximum stress in the door subjected to the tornado wind pressure drop load is 3.17 ksi, which is much less than the allowable stress of 33 ksi. The maximum stress in the door due to seismic load is 0.4 ksi, which is less than the allowable stress of 39.4 ksi. The maximum tensile load in the anchors is 18.1 kips which is less than the allowable tension load of 106.0 kips.

	Component Description	Calculated Weight (Pounds)
1.	Dry Shielded Canister Shell Assembly	15,778
2.	DSC Top Shield Plug	7,859
3.	DSC Internal Basket Assembly	12,189
4.	DSC Inner and Outer Top Cover Plates	1,934
5.	24 PWR Spent Fuel Assemblies	$\leq 40,368^{(4)}$
6.	Weight of Water in DSC Cavity	14,843
	Total Wet DSC Loaded Weight (w/o DSC inner and outer top cover plates.)	91,038
	Total Dry DSC Loaded Weight (w/ DSC inner and outer top cover plates.)	78,129
7.	Standardized Transfer Cask Empty Weight	107,091 ⁽¹⁾⁽³⁾
8.	Standardized Transfer Cask Max. Loaded Weight	193,642 ⁽²⁾⁽⁵⁾
9.	HSM Single Module Weight, Model 80 (empty)	243,000
10.	HSM Single Module Weight, Model 102 (empty)	273,100

 Table 8.1-4

 Estimated NUHOMS®-24P Component Weights

^{72.48}

⁽¹⁾ Includes weight of cask top cover plate assembly.

⁽²⁾ Weight includes: DSC dry weight plus fuel, plus water in DSC and cask less DSC and cask top cover plate assemblies.

⁽³⁾ The as-built empty weight for the OS197 transfer cask is 111,250 lb, including neutron shield water. The asbuilt empty weight of the standardized cask is 106,700 lb including solid neutron shield and top cover. The as-built weights of each individual OS197 transfer cask may vary slightly.

⁽⁴⁾ The standard design DSC fuel assembly weight of 1,682 lb/assembly is used.

⁽⁵⁾ The maximum loaded weight for the OS197 transfer cask without 24P DSC and OS197 top cover plates is 199,372 lb.

	Component Description	Calculated Weigh (Pounds)
1.	Dry Shielded Canister Shell Assembly	15,658
2.	DSC Top Shield Plug	7,621
3.	DSC Internal Basket Assembly	12,012
4.	DSC Inner and Outer Top Cover Plates	1,934
5.	52 BWR Spent Fuel Assemblies	≤37,700
6.	Weight of Water in DSC Cavity	16,211
	Total Wet DSC Loaded Weight (w/o DSC inner and outer top cover plates.)	89,202
	Total Dry DSC Loaded Weight (w/ DSC inner and outer top cover plates.)	74,925
7.	Standardized Transfer Cask Empty Weight (w/collar)	113,501 ⁽¹⁾⁽³⁾
8.	Standardized Transfer Cask Max. Loaded Weight	198,294 ⁽²⁾⁽⁴⁾
9.	HSM Single Module Weight, Model 80 (empty)	252,000
10.	HSM Single Module Weight, Model 102 (empty)	283,200

Table 8.1-5 Estimated NUHOMS[®]-52B Component Weights

(1) Includes weight of cask top cover plate assembly.

⁽²⁾ Weight includes: DSC dry weight plus fuel, plus water in DSC and cask less DSC and cask top cover plate assemblies.

⁽³⁾ The as-built empty weight of the OS197 transfer cask is 111,250 pounds, including water in the neutron shield. The as-built empty weight of the standardized cask is 106,700 lb, including solid neutron shield and top cover. The as-built weights of each individual OS197 transfer cask may vary slightly.

⁽⁴⁾ The maximum loaded weight for the OS197 transfer cask without 52B DSC and cask top cover plates is 196,197 lb.

Table 8.1-19 Maximum HSM Reinforced Concrete Bending Moments and Shear Forces for Normal and Off-Normal Loads

Structural	Force	HSM Internal Forces (kip/ft., ink/ft.) ⁽¹⁾				
Section	Component ⁽²⁾	Dead Weight	Live Loads	Normal ⁽³⁾ Thermal	Off-Normal ⁽³⁾ Thermal	
Elear Slab	Shear	0.05	0.56	1.1	1.5	
FIOOI SIAD	Moment	0.48	6.57	11.2	14.6	
	Shear	0.26	3.09	3.6	4.6	
Side Wall	Moment	1.65	35.07	101.9	118.9	
	Shear	0.92	10.76	6.4	6.1	
	Moment	15.02	124.03	190.1	190.1	
Boor Wall	Shear	0.25	0.19	3.4	3.1	
Real Wall	Moment	0.42	3.92	62.5	56.3	
Poof Slab	Shear	2.64	1.08	1.0	0.6	
	Moment	35.16	15.24	120.8	33.3	

72.48

- (2) Out-of-plane shears and moments.
- (3) Maximum moments based on cracked section properties.

⁽¹⁾ Maximum loads reported irrespective of location.

Thus, loss of bending strength of the shield wall due to a tornado missile impact is acceptable and does not affect the safe operation of the HSM. Recovery from this event can be performed in a planned and deliberate manner to replace the shield wall and tie plates. This requires temporary shielding during removal and replacement of the wall, or removal of the HSM from service. At no time is there any danger of a release of radioactive materials to the general public.

8.2.2.3 Accident Dose Calculation

Each exposed component of the NUHOMS[®] system is specifically designed to withstand tornado generated missiles as discussed in the preceding paragraphs. The consequence of reduced shielding effects of adjacent HSMs is presented in Section 8.2.1.

8.2.2.4 <u>Transfer Cask Missile Impact Analysis</u>

The effects of a tornado missile impact on the loaded NUHOMS[®] transfer cask have been addressed in previous licensing correspondence. These documents are included in Appendix C for ease of reference.

8.2.3 <u>Earthquake</u>

8.2.3.1 <u>Cause of Accident</u>

As discussed in Section 3.2.3, enveloping design basis seismic forces are assumed to act on the NUHOMS[®] system components. For this conservative generic evaluation, the design response spectra of NRC Regulatory Guide 1.60 (8.35) are selected for the seismic analysis of the NUHOMS[®] system components.

8.2.3.2 Accident Analysis

As discussed in Section 3.2.3, and shown in Figure 8.2-2, the peak horizontal ground acceleration of 0.25g and the peak vertical ground acceleration of 0.17g are utilized for the design basis seismic analysis of the NUHOMS[®] components. Based on NRC Reg. Guide 1.61 (8.36), a damping value of three percent is used for the DSC seismic analysis. Similarly, a damping value of seven percent for DSC support steel and concrete is utilized for the HSM. An evaluation of the frequency content of the loaded HSM is performed to determine the dynamic amplification factors associated with the design basis seismic response spectra for the NUHOMS[®] HSM and DSC. The dominant structural frequencies calculated for a loaded HSM in the lateral direction are 20.51 Hz and 30.28 Hz for the DSC on the support structure and HSM concrete structure, respectively. Table 1 of NRC Regulatory Guide 1.60 requires amplification factors for these structural frequencies, which result in conservative horizontal accelerations of 0.384g. The dominant vertical frequencies of the loaded HSM exceed 33 Hz, corresponding to the zero period acceleration of 0.17g vertical.

The dominant frequencies of the HSM and DSC inside the HSM are determined as part of the response spectra analysis performed using an analytical model identical to that shown in Figure 8.1-22.

A. DSC Seismic Evaluation

As discussed above, the maximum calculated seismic accelerations for the DSC inside the HSM are 0.384g horizontally and 0.17g vertically. An analysis using these seismic loads shows that the DSC will not lift off of the support rails inside the HSM. The resulting stresses in the DSC shell due to vertical and horizontal seismic loads are also determined and included in the appropriate load combinations. The seismic evaluation of the DSC is described in the paragraphs that follow. The DSC support structure is also subjected to the calculated DSC seismic reaction loads as discussed in Paragraph C below.

(i) DSC Natural Frequency Calculation

Two natural frequencies, each associated with a distinct mode of vibration of the DSC are evaluated. These two modes are the DSC shell cross-sectional ovalling mode, and the mode with the DSC shell bending as a beam.

a. DSC Shell Ovalling Mode

t

The natural frequency for the DSC shell ovalling mode is determined from the Blevins (8.37) correlation as follows.

$$f = \frac{\lambda_i}{2\pi R} \sqrt{\frac{E}{\mu (1 - v^2)}}$$
 (Blevins, Table 12-1, Case 3) (8.2-16)

Where: R = 33.31 in., DSC mean radius

$$E = 26.5E6 \text{ psi}, \text{Youngs Modulus}$$

$$\upsilon = 0.3$$
, Poisson's ratio

$$\lambda_{i} = 0.289 \frac{t}{R} \frac{i(i^{2} - 1)}{\sqrt{1 + i^{2}}}$$
(8.2-17)

= 0.625 in., Thickness of DSC shell

$$\mu$$
 = 0.288/g, Steel mass density

The lowest natural frequency corresponds to the case when i = 2.

DSC shell stresses obtained from the analyses of vertical and horizontal seismic loads are summed absolutely. See Tables 8.2-13 and 8.2-14 for the Level C seismic stress evaluation of the 24P and 52B, respectively. The seismic load combination includes deadweight + pressure + 3g horizontal and 1g vertical.

As stated, in Section 4.2.3.2, an axial retainer is included in the design of the DSC support system inside the HSM to prevent sliding of the DSC in the axial direction during a postulated seismic event. The stresses induced in the DSC shell and bottom cover plate due to the restraining action of this retainer for a horizontal seismic load, applied along the axis of the DSC, are included in the seismic response evaluation of the DSC shell assembly.

The stability of the DSC against lifting off one of the support rails during a seismic event is evaluated by performing a rigid body analysis, using 0.42g horizontal and 0.17g vertical as bounding input spectral accelerations and a bounding DSC weight of 102 kips. The factor of 1.5 used in the DSC analysis to account for multimode behavior need not be included in the seismic accelerations for this analysis, as the potential for lift off is due to rigid body motion, and no frequency content effects are associated with this action. The horizontal equivalent static acceleration of 0.40g is applied laterally to the center of gravity of the DSC. The point of rigid body rotation of the DSC is assumed to be the center of the support rail, as shown in Figure 8.2-1. The applied moment acting on the DSC is calculated by summing the overturning moments. The stabilizing moment, acting to oppose the applied moment, is calculated by subtracting the effects of the upward vertical seismic acceleration of 0.17g from the total weight of the DSC and summing moments at the support rail. Since the stabilizing moment calculated below is greater than that of the applied moment, the DSC will not lift off the DSC support structure inside the HSM.

Referring to Figure 8.2-1, the margin of safety associated with DSC lift off is calculated as follows:

M_{am}	=	$yF_{\rm H}$	(8.2-19)

and

 $(F_{v1} - F_{v2})x$ Msm Where: Mam The applied seismic moment =

 M_{sm} The stabilizing moment

All other variables are defined in Figure 8.2-1.

=

=

Substituting yields:	M_{am}	=	1248 kip-in
and	Msm	=	1423 kip-in

(8.2-20)

Thus, the margin of safety (SF) against DSC lift off from the DSC support rails inside the HSM obtained from this bounding analysis is:

$$SF = \frac{M_{sm}}{M_{am}} = 1.14$$
 (8.12-21)

B. HSM Seismic Evaluation

To evaluate the seismic response of the HSM, a dynamic response spectra analysis of the BWR HSM, which is the more flexible of the HSM modules, is performed. *In this analysis, a bounding DSC weight of 89.5 kips was conservatively used instead of 80 kips.* Seismic loads in the horizontal directions are assumed to be resisted by frame and shear wall action of the HSM. Accordingly, the HSM is modeled with plate elements and the horizontal design basis response spectra loads are applied to the model in both horizontal directions. Similarly, the vertical response spectra load is applied to account for vertical seismic effects. Stresses resulting from the horizontal and vertical seismic response spectra include the effects of multimode excitation of the HSM. The results are included in the load combinations with the appropriate strength reduction factors. The factors used for the HSM are presented in Section 3.2.5. The load combination results for normal, off-normal, and accident conditions are presented in Section 8.2.10.

An analysis is also performed to establish the worst-case factor of safety against overturning and sliding for a single, free-standing module. This analysis consists of comparing the stabilizing moment produced by the weight of the HSM and DSC, reduced by 17 percent to account for the upward vertical seismic acceleration, against the overturning moment produced by applying the 0.4g load at the centroid of the HSM and DSC. For sliding of the HSM, the horizontal force of 0.4g acceleration is compared against the frictional resisting force of the foundation slab. In this manner, the factor of safety against sliding is established. The concrete coefficient of friction is taken as 0.6 as defined in Section 11.7.4.3 of ACI 318-83 (8.47).

The details of the seismic evaluation of the HSM are described in the paragraphs that follow.

(i) HSM Frequency Analysis

To determine the loaded HSM frequency content, an ANSYS (8.49) finite element model identical to that shown in Figure 8.1-22 is utilized as discussed previously. The lowest horizontal and vertical structural frequencies calculated for a single free standing HSM are 20.51 Hz and 44.53 Hz, respectively. The corresponding horizontal (conservatively) and vertical spectral accelerations are 0.4g and 0.17g.

(ii) HSM Seismic Response Spectrum Analysis

The horizontal and vertical seismic response spectra are applied to the HSM. The horizontal response spectrum is applied in two orthogonal horizontal directions. The response spectra are obtained from Regulatory Guide 1.60 (8.35) at 7% damping, factored by the 0.25g horizontal and 0.17g vertical peak ground accelerations. The horizontal and vertical response spectra utilized in the analysis are shown in Figure 8.2-2. The HSM concrete mass participating in each mode is multiplied by the corresponding spectral acceleration value to determine the applied loads. The mass of the DSC and DSC support structure are also included in the HSM analytical model. The resulting forces and moments in the HSM walls, roof and floor of a single HSM are calculated using the linear finite element modal shown in Figure 8.1-21, and the computer program ANSYS (8.49). The model responses are combined in accordance with Regulatory Guide 1.92 (8.62) using the grouping method for closely spaced modes. The directional responses are then combined by the square root of the sum of the squares (SRSS) method. The combined maximum moments and stress are reported in Table 8.2-3.

(iii) HSM Overturning Due to Seismic

The following conservative analysis is performed to show that a single, free-standing HSM will not overturn due to seismic loads. The HSM stabilizing moment (M_{st}) is:

 $M_{st} = Wd = 21,663 \ kip-in.$ (8.2-22) Where: $W = W_{HSM-BWR} (284 \ kips) + W_{DSC} (89.5 \ kips) = 373.5 \ kips$ d is defined in equation 8.2-1.

The seismic overturning moment is:

$$M_{ot} = Wa_v d + (W_{HSM} d_1 + W_{DSC} d_2) a_h = 18,503 kip-in.$$
 (8.2-23)

Where:

 M_{ot} = Overturning moment

- $a_v = 0.17g$, Maximum vertical seismic acceleration
- $a_h = 0.40g$, Maximum horizontal seismic acceleration
- d_1 = Vertical height of the unloaded HSM center of gravity = 98.32 in.
- d_2 = Vertical height of the DSC center of gravity

The result of this analysis indicates that a single free-standing HSM will not overturn during a seismic event. The margin of safety against overturning is *1.17*.

(iv) HSM Sliding Due to Seismic

To show that a single free-standing HSM will not slide due to the postulated horizontal and vertical seismic accelerations, the following conservative analysis is performed. The friction force resisting sliding (F_{sl}) is:

F_{s1}	=	$W\mu g = 186.0 \text{ kips}$	(8.2-24)
W	=	HSM loaded weight = 373.5 kips	
μ	=	Coefficient of friction between the HSM co	ncrete
		walls and the floor slab foundation $= 0.6$	
g	=	Net downward gravitational force	
	=	(1 - 0.17)g or 0.83g	

The applied horizontal seismic force is:

	F_{hs}	=	$Wa_H = 149.4 \text{ kips}$
Where:	F_{hs}	=	Induced horizontal seismic force
	aн	=	0.4g, Horizontal seismic acceleration

The force required to slide the HSM is larger than the resulting lateral seismic force and therefore, the HSM will not slide. The factor of safety against sliding is 1.25.

C. DSC Support Structure Seismic Evaluation

(i) DSC Support Structure Natural Frequency

The lowest structural frequency of the DSC support structure inside the HSM is dominated by the mass of the DSC. The DSC and support structure are included in the HSM analytical model. The dominant horizontal and vertical frequencies of the DSC/DSC support structure are 20.52 Hz and 44.53 Hz, respectively.

(ii) DSC Support Structure, Seismic Response Spectra Analysis

The horizontal and vertical seismic response spectra accelerations are applied to the support structure as previously described for the HSM. The modal summations and directional summations are also the same. For the support frame cross members, the maximum bending stress is 2.70 ksi and the maximum shear stress is 3.45 ksi. Similarly, the maximum *bending and shear* stresses in the support rails are 1.31 ksi and 1.43 ksi, respectively. These

compare with Code allowables of 34.1 ksi for bending and 18.1 ksi for shear and, as a result, have a considerable design margin.

The effect of concentrated anchor bolt forces is included in the design of the DSC support structure connection details. Similarly, each connection of the support rails to the support frame cross members is designed for the resulting seismic loads. This condition envelopes all other loading conditions for the individual bolts or structural elements of the DSC support structure.

The stresses in the support frame columns, cross members and rails due to seismic accelerations are included in the subsequent load combination results reported in Section 8.2.10.

(iii) DSC Axial Retainer Analysis

The DSC axial retainer detail, located inside the HSM access opening, is shown on the Appendix E drawings. The retainer bears against the bottom of the DSC shell and transfers the seismic load to the embedded tube.

The clearance between the DSC axial retainer and the DSC is designed for the maximum DSC thermal growth that occurs during the postulated HSM blocked vent case, as discussed in Section 8.2.7.

The evaluation below considers a DSC bounding spectral acceleration of 0.42g horizontal and a bounding DSC weight of 102 kips. The seismic load acting on the axial retainer is computed as follows:

$$P = 1.5W\{S_a - \mu(1 - S_v) / Cos(30)\}$$
(8.2-25)

Where,

- P = seismic load acting on the axial retainer, kips
- W = DSC weight, assumed to be 102 kips

 S_a = horizontal rigid range spectral acceleration of 0.42g

 S_v = vertical rigid range spectra acceleration = 0.17g

 μ = Coefficient of friction between DSC support rail and DSC = 0.25

1.5 = Impact factor

 $P = (1.5)(102 \text{ kips})\{(0.42g) - (0.25)(0.83)/\cos 30\} = 27.66 \text{ kips}$

The maximum shear and bending stresses in the DSC axial retainer are 6.9 ksi and 9.0 ksi, respectively. The allowable shear and bending stresses are 23.5 ksi and 44.3 ksi, respectively. Therefore, the DSC axial retainer stresses are within allowable values.

D. Transfer Cask Seismic Evaluation

The effects of a seismic event occurring when a loaded DSC is resting inside the transfer cask are conservatively postulated for two conditions that affect the transfer cask. All other conditions that exist during DSC loading or transfer operations are enveloped by the two cases postulated. The first case postulates a fully loaded transfer cask standing vertically in the plant's cask decontamination area during closure of the DSC. For this condition it is required that the transfer cask remain upright. The rigid body horizontal acceleration required to overturn a loaded transfer cask at a minimum gross weight of 190 kips is at least 0.40g. Each licensee shall ensure that the transfer cask is not subjected to accelerations greater than this magnitude while in the plant's decontamination area, or provide sufficient lateral restraint to prevent cask overturning.

The second case postulates a seismic event occurring during transfer of a loaded DSC, resting inside the transfer cask, in a horizontal position, secured to the support skid/transfer trailer. For the standardized cask this load case is conservatively enveloped by the postulated normal transfer load accelerations of ± 0.5 g acting in the vertical, axial, and transverse directions, applied simultaneously at the center of gravity of the transfer cask, as specified in Section 8.1.1.8. These accelerations envelop those that would result from a seismic event in the highly unlikely event that a design basis earthquake would occur during transfer of the loaded DSC to or from the HSM. Therefore, the calculated stress intensities for the normal transfer loads case for the cask structural shell are conservatively used as the standardized cask maximum seismic stresses in the load combination results reported in Section 8.2.10.

The analysis of the OS197 and OS197H casks applies peak amplification factors of 3.5 and 3.3 to the 0.25g and 0.17g peak ground spectral accelerations in the horizontal and vertical directions, respectively. A multimode factor of 1.5 is applied, resulting in accelerations of 1.31g and 0.84g in the horizontal and vertical directions, respectively.

The stabilizing moment to prevent overturning of the cask/trailer assembly due to the 0.25g horizontal and 0.17g vertical seismic ground accelerations is calculated and compared to the dead weight stabilizing moment. The results of this analysis show that there is a factor of safety of at least 2.0 against overturning that ensures that the cask/trailer assembly has sufficient margin for the design basis seismic loading.
	- (5)	HSM Internal Forces (kip/ft., ink/ft				
Structural Section	Force ⁽⁵⁾ Component	Tornado Winds	Tornado ⁽³⁾ Missile	Seismic	Flooding	Blocked Vents Thermal ⁽²⁾
Floor	Shear	3.54	8.68	1.67	3.31	2.74
Slab	Moment	21.98	54.11	5.64	23.08	36.7
Side	Shear	8.72	25.0 ⁽⁴⁾	5.17	9.53	8.64
Wall	Moment	68.85	118.48	15.67	65.95	266.3
Front	Shear	2.45	38.21	13.55	2.15	17.87
Wall	Moment	74.16	644.65	27.85	55.03	485.84
Rear	Shear	1.61	11.14	6.49	0.81	8.65
Wall	Moment	15.17	36.06	3.32	13.34	169.8
Roof	Shear	2.40	35.05	1.87	0.96	3.22
Slab	Moment	54.89	521.51	7.39	48.09	305.8

Table 8.2-3 Maximum HSM Reinforced Concrete Bending Moments and Shear Force for Accident Loads

- (2) Maximum moments are calculated using cracked section properties.
- (3) The maximum shear on the HSM rear shield wall for the DBT missile is 487.5 kips. The shield wall capacity for punching shear is calculated based on ACI-349 Section 11.11.2.1, and is 1598 kips.

(4) The maximum shear due to tornado missile is the maximum stress d/2 from the back wall inner face.

⁽¹⁾ Maximum loads shown are irrespective of location.

⁽⁵⁾ Out-of-plane shears and moments.

	Loading	Governir	g Load ⁽²⁾⁽⁵⁾	Сар	pacities
Combination	Combination Description	V _{max} (k/ft.)	M _{max} (k-in./ft.)	Vc (k/ft.) ⁽⁴⁾	M _u (k-in./ft.)
1	1.4D + 1.7L	19.10	212.33	40.5	881.00
2	1.4D + 1.7L + 1.7H	19.10	212.33	40.5	881.00
3	0.75(1.4D + 1.7L + 1.7H + 1.7T + 1.7W)	15.69	355.70	22.90	881.00
4	0.75(1.4D + 1.7L + 1.7H + 1.7T)	22.14	303.11	40.50	881.00
5	D+L+H+T+E	30.00	290.32	40.50	881.00
6	D + L + H + T + F	9.70	146.99	22.90	881.00
7 ⁽⁶⁾	$D + L + H + T_a^{(3)}$	28.85	532.09	38.40	788.00
8	D + L + H + T + WT	39.86	740.50	41.40	881.00
D = Dead Weight F = Flood Induced Loads E = Earthquake L = Live Load H = Lateral Soi Ta = Off-normal or Accident Condition T = Normal Co Thermal Load W = Design Ba WT = Tornado Wind and Missile Load W					oad, mal Load ad

 Table 8.2-18

 HSM Enveloping Load Combination Results

⁽¹⁾ Load combinations are based on ANSI-57.9 as shown in Table 3.2-5.

⁽²⁾ Loads reported have minimum margin to design capacity.

⁽³⁾ Thermal accident load (T_a) is based on -40 °F ambient with air inlets and outlets blocked (See Section 8.1.2.2) for either 40 hours or 5 days (Results of these two blocked vent cases are enveloped).

⁽⁴⁾ The shear capacity V_c is calculated using Equation 11-3 of ACI 349-85.

⁽⁵⁾ Results of load combinations 3 through 7 are based on cracked section. Others based on uncracked sections.

⁽⁶⁾ Material properties taken at 479 °F for load combination 7.

			Calculate	d Stress			Allowable	
Component	Load Combination	Axial (ksi)	Strong Axis Bending (ksi)	Weak Axis Bending (ksi)	Shear (ksi)	Interaction (Calc/ Allowable)	Shear Stress (ksi)	
	Normal Operation $DW_s + DW_c + HL_f + T_n$	3.11	2.85	4.10	0.24	0.55	18.1	
	Off-Normal Operation DW₅ + HLj	2.9	0.72	3.9	0.22	0.37	19.1	
Column	Accident DWs + DWc + HLf + DBE + Tn	5.76	3.75	4.33	0.24	0.78	18.1	
	Accident DWs + DWc + Ta	3.9	10.9	12.6	0.7	0.96	15.3	
	Normal Operation $DW_s + DW_c + HL_f + T_n$	1.06	3.81	6.85	3.81	0.53	18.1	
	Off-Normal Operation DW₅ + HLj	0.12	1.7	6.1	6.5	0.31	19.1	
Cross Beam	Accident DWs + DWc + HLf+ DBE + Tn	1.11	4.99	7.64	5.30	0.61	18.1	
	Accident DWs + DWc + Ta	2.59	8.4	20.6	7.1	0.96	15.3	

 Table 8.2-19

 DSC Support Structure Enveloping Load Combination Results

Table 8.2-19 DSC Support Structure Enveloping Load Combination Results

			Calculated S	Stress			Allowable
Component	Load Combination	Axial (ksi)	Strong Axis Bending (ksi)	Weak Axis Bending (ksi)	Shear (ksi)	Interaction (Calc/ Allowable)	Allowable Shear Stress (ksi)
	Normal Operation $DW_s + DW_c + HL_f + T_n$	1.31	2.39	10.97	2.61	0.65	18.1
	Off-Normal Operation DW _s + HL _j	6.5	6.58	9.3	3.74	0.93	19.1
Rail	Accident DWs + DWc + HLf+ DBE +Tn	1.79	2.45	12.38	3.08	0.73	18.1
	Accident DWs + DWc + Ta	1.1	4.8	34.6	3.3	0.39	15.3
Key: DW _s HL _j DW _c HL _f	 Dead Weight Support <i>i</i> Off-Normal Handling L Dead Weight Canister, Normal Loads Friction, 	Assembly, oads-Jam	med, -	DBE = Γn = Γa =	Seisn Norm Accid	nic Loads, al Thermal, ent Thermal	

(Concluded)

(1) Maximum stresses reported irrespective of location.

- (2) Allowable stresses taken at 270 °F for all combinations with T_n , taken at 100 °F for combination with HL_j, taken at 570 °F for combination with T_a
- (3) Allowables for $DW_s + DW_c + HL_f + T_n$ increased by 50%, $DW_s + DW_c + HL_f + DBE + T_n$ increased by 60%, allowables for HL_j increased by 33%, and $DW_s + DW_c + T_a$ increased by 70% in accordance with ANSI/ANS 57.9.

			Maximum	End Loads		
Load	Support Column			Lateral Brace		
Combination	Axial (k)	Shear (k)	Bending (ink)	Axial (k)	Shear (k)	Bending (ink)
Normal Operations DW _s + DW _c + HL _f +T _n	20.42	0.9	37.3	14.5	0.0	0.3
Off-Normal Operations HL _j	19.0	0.8	35.5	1.9	0.0	0.0
Accident DWs + DWc + HL f +DBE+Tn	37.91	0.90	39.43	15.93	0.01	0.35
Accident DWs + DWc + Ta	25.7	2.6	114.8	38.3	0.0	0.0
Key: DW _s = Dead Weight S HL _j = Off-Normal Ha DW _c = Dead Weight C HL _f = Normal Loads	Support Asse ndling Loads Canister, Friction,	embly, s-Jammed,		DBE = T _n = T _a =	Seismic L Normal TI Accident	oads, hermal, Thermal

Table 8.2-20 DSC Support Structure Enveloping Load Combination Results Support Member End Connection Loads

January 2024

NUHOMS[®] CoC 1004 APPENDIX A INSPECTIONS, TESTS, AND EVALUATIONS AND APPENDIX B TECHNICAL SPECIFICATIONS BASES

As discussed on page 10-1, with Amendment 11 to CoC 1004, the Technical Specifications (TS) were converted to the NUREG-1745 format and the TS bases were returned to this chapter. The numbering scheme for the TS changed a great deal as the TS were converted to the NUREG-1745 format. Additionally, as also discussed on Page 10-1, Amendment 16 further changed the numbering scheme for the licensing basis documents. Therefore there is not a documented basis for each CoC condition, ITE item, or TS and therefore the numbering scheme of this chapter, as reflected in the table of contents below, is not comprehensive.

TABLE OF CONTENTS

B 10 ITE 3.1	Site Specific Parameters and Analyses	10-12
B 10 ITE 3.2	Transfer Cask Dose Rates	10-13
B 10 ITE 3.3	HSM or HSM-H Dose Rate Evaluation Program	10-14
B 10 ITE 4.1	Leak Test	10-15
B 10 ITE 4.3	DSC Dye Penetrant Test of Closure Welds	10-15
B 10 TS 2	FUNCTIONAL AND OPERATING LIMITS	10-18
B 10 TS 3	LIMITING CONDITION FOR OPERATION (LCO) APPLICABIL	JTY 10-25
B 10 TS 3	SURVEILLANCE REQUIREMENT (SR) APPLICABILITY	10-28
B 10 TS 3.1	DSC FUEL INTEGRITY	10-32
B 10 TS 3.1.1	DSC Bulkwater Removal Medium and Vacuum Drying Pressure	
B 10 TS 3.1.2	DSC Helium Backfill Pressure	
B 10 TS 3.1.3	Time Limit for Completion of Transfer Operations (24PTH, 61BTH	
	Type 2 or 32PTH1, 69BTH or 37PTH DSC Only)	
B 10 TS 3.2	CASK CRITICALITY CONTROL	
B 10 TS 3.3.1	Maximum DSC Removable Surface Contamination	
B 10 TS 4.3.2	RADIATION PROTECTION PROGRAM	
B 10 TS 4.3.3	Hydrogen Gas Monitoring for Specified DSCs	
B 10 TS 4.3.6	HSM or HSM-H Thermal Monitoring Program	
B 10 TS 4.4	CASK TRANSFER CONTROLS	10-43
B 10 TS 4.4.1	TC/DSC Lifting/Handling Height Limits	
B 10 TS 4.4.2	Supplemental Shielding Drop onto OS197L TC	

NUH-003	D 10.11	
Revision 22	Page 10-11	January 2024
	All changes on this page are Amd 18.	

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NUH-003		
Revision 22	Page 10-16	January 2024
	All changes on this page are Amd 18.	

12.3 Aging Management Program

Aging effects that could result in the loss of in-scope SSCs' intended function(s) are managed during the extended storage period. Many aging effects are adequately managed for the extended storage period using TLAA, as discussed in Section 12.2. An AMP is used to manage those aging effects that are not managed by TLAA. The AMPs that manage each of the identified aging effects for all in-scope SSCs include the following:

- 1. DSC External Surfaces Aging Management Program
- 2. DSC Aging Management Program for the Effects of Choride-Induced Stress Corrosion Cracking (Coastal Locations, Near Salted Roads, or in the Path of Effluent Downwind from the Cooling Tower(s))
- 3. Horizontal Storage Module Aging Management Program for External and Internal Surfaces
- 4. Horizontal Storage Module Inlets and Outlets Ventilation Aging Management Program
- 5. Transfer Cask Aging Management Program
- 6. High Burnup Fuel Aging Management Program

The AMPs are summarized in Table 12.3-1 through Table 12.3-6. Additional details are available in [12.20].

Note: Aging Management Program inspections may require short duration ODHAs that place the system in an unanalyzed condition for tornado hazards (e.g., removal of HSM door to collect a sample from the DSC). The administrative controls identified in Section 5.1.1.5 shall be in place for these types of AMP inspection activities.

12.4 <u>Retrievability</u>

Retrievability is the ability to remove spent nuclear fuel from storage. ISG-2 Revision 1 [12.15] provides NRC staff guidance on the subject of fuel retrievability *and represents the guidance used for DSCs loaded through Amendment 17*.

The Standardized NUHOMS[®] System is designed to allow ready retrieval of the SFAs for further processing and disposal, in accordance with 10 CFR 72.122(1). As discussed in ISG-2, ready retrieval of the SFAs from the DSC requires: (1) the ability to transfer the DSC to a spent fuel pool (or other facility), and (2) the ability to unload the SFAs from the DSC for repackaging to allow removal from the reactor site, transportation, and ultimate disposition by the DOE.

The sliding surfaces of the DSC support rails of all the HSMs are fabricated from Nitronic[®] 60 austenitic stainless steel and are coated with a dry film lubricant to minimize friction during insertion and retrieval of the DSC. Graphite lubricants are suitable for very high and cryogenic temperature applications. The effect of radiation on these lubricants is minimal, since these are inorganic and consist entirely of graphite. The coefficient of friction associated with these lubricants is below 0.05, while the design basis calculations employed a coefficient of friction of 0.25. The mechanical system to be used for DSC transfer is capable of exerting an extraction force equal to the loaded weight of a DSC. Depending on the DSC type, an effective coefficient of friction ranging from 72 to 100% of the loaded DSC weight has been used for these "jammed DSC" analyses. The support structure is also designed for this loading. Therefore, loss of lubrication is not an aging effect requiring management since the dry film lubricant is not relied upon for DSC retrieval.

[12.19, Appendix 3N] presents the evaluation to demonstrate that the confinement function of the DSC is maintained and that the requirement of ready retrieval of the DSC from the HSM is met. This evaluation demonstrates that, even when conservatively assuming initial temperatures and internal pressure for normal storage conditions and an extraction force of 80 kips (about 2.5 times the expected sliding force per UFSAR, Section U.3.6.1.1 for the analyzed DSC), the DSC shell thickness could be reduced to 0.25 in. and the DSC shell stresses required to maintain confinement and to ensure retrievability are below the ASME Code Level A stress limits.

The results of the AMR, along with the AMAs, provide reasonable assurance that SFAs will be retrievable. [12.19, Appendix 3J] presents an assessment of HBU cladding stresses under normal storage conditions including the handling loads associated with retrievability of the FA from the DSC. The evaluation shows that cladding stresses due to handling of the FA are well below yield and do not impose ductility demands on the cladding. Other fuel assembly hardware (e.g., spacer grids, top and bottom nozzles, guide tubes, etc.) is less limiting. Thus, the SFAs will be capable of being retrieved by normal means. Based on the AMR results of the SFAs and the implementing AMPs for the DSC, HSM and HBU fuel, there is reasonable assurance that the SFAs will be retrievable by normal means during the period of extended operation.

ISG-2, Revision 2 [12.21] also defines ready retrieval or retrievability of spent fuel as the ability to remove a canister loaded with spent fuel assemblies from a storage cask/overpack (Option B).

	D 12.4.1	1 2024
Revision 22	Page 12.4-1	January 2024
	All changes on this page are Amd 18.	

- 12.17 DOE EPRI, "High Burnup Dry Storage Cask Research and Development Project -Final Test Plan," Electric Power Research Institute, February 27, 2014.
- 12.18 NRC Interim Staff Guidance 24, "The Use of a Demonstration Program as a Surveillance Tool for Confirmation of Integrity for Continued Storage of High Burnup Fuel Beyond 20 Years," Revision 0, July 11, 2014.
- 12.19 Enclosure 3, "Certificate of Compliance Renewal Application for the Standardized NUHOMS® System, Certificate of Compliance No. 1004 (Docket No. 72-1004), Revision 3 (Proprietary Version)," to Letter from Jayant Bondre (AREVA TN) to NRC Document Control Desk, "Response to Re-Issue of Second Request for Additional Information - AREVA Inc. Renewal Application for the Standardized NUHOMS® System - CoC 1004 (Docket No. 72-1004, CAC No. L24964)," dated September 29, 2016.
- 12.20 TN Americas, Calculation 67009-AMP, "CoC License Renewal Aging Management Programs - DSCs, HSMs, TCs," Revision 1.
- 12.21 Interim Staff Guidance, DSFM ISG-2, "Fuel Retrievability in Spent Fuel Storage Applications," Revision 2, April 26, 2016.

COMPONENT DESCRIPTION	CALCULATED WEIGHT (KIPS)
DSC Shell Assembly	13.52
DSC Top Shield Plug Assembly	8.95
DSC Internal Basket Assembly	22.92
Total Empty Weight	45.39
61 BWR Spent Fuel Assemblies	≤ 43.0
Total Loaded DSC Weight (Dry)	88.39
Water in Loaded DSC	13.4
Total Loaded DSC Weight (Wet)	101.79
Transfer Cask Empty Weight	111.25
Total Loaded Transfer Cask Weight	199.64
HSM Single Module Weight, Model 80 (Empty)	252.0
HSM Single Module Weight, Model 102 (Empty)	283.2
HSM Single Module Weight, Model 80 (Loaded)	340.4
HSM Single Module Weight, Model 102 (Loaded)	371.6

Table K.3.2-1Summary of the NUHOMS®-61BT System Component Weights

72.48

	NUHOMS®- 52B	NUHOMS [®] - 61BT	Ratio	Acceleration Scale Factor ⁽¹⁾	Total Scale Factor
DSC Weight	80 kips	88.4 kips	1.105		1.14
HSM Weight	283.2 kips	283.2 kips		1.032	
DSC + HSM Weight	<i>363.2</i> kips	<i>371.6</i> kips	1.025		1.06

Table K.3.7-10Weight Comparison – NUHOMS®-61BT vs. -52B

Note:

1. A 5% frequency shift at 33 Hz due to the weight increase results in an acceleration increase from 0.250g to 0.258g which results in a ratio of 1.032.

K.8.1.5 Transfer Cask Downending and Transfer to ISFSI

NOTE:

Ensure the administrative controls detailed in Section 5.1.1.5 are being implemented.

NOTE:

<u>Alternate Procedure for Downending of Transfer Cask</u>: Some plants have limited floor hatch openings above the cask/trailer/skid, which limit crane travel (within the hatch opening) that would be needed in order to downend the TC with the trailer/skid in a stationary position. For these situations, alternate procedures are to be developed on a plant-specific basis, with detailed steps for downending.

1. Drain the neutron shield to an acceptable location.

CAUTION: The radiation dose rates around the surface of the transfer cask without water in the neutron shield (through step K.8.1.5.10) are expected to be high. Use proper ALARA practices (e.g., use of temporary shielding, appropriate positioning of personnel, etc.) to minimize personnel exposure.

- 2. Re-attach the transfer cask lifting yoke to the crane hook, as necessary. Ready the transfer trailer and cask support skid for service.
- 3. Move the scaffolding away from the cask as necessary. Engage the lifting yoke and lift the cask over the cask support skid on the transfer trailer.
- 4. The transfer trailer should be positioned so that cask support skid is accessible to the crane with the trailer supported on the vertical jacks.
- 5. Position the cask lower trunnions onto the transfer trailer support skid pillow blocks.
- 6. Move the crane forward while simultaneously lowering the cask until the cask upper trunnions are just above the support skid upper trunnion pillow blocks.
- 7. Inspect the positioning of the cask to ensure that the cask and trunnion pillow blocks are properly aligned.
- 8. Lower the cask onto the skid until the weight of the cask is distributed to the trunnion pillow blocks.
- 9. Inspect the trunnions to ensure that they are properly seated onto the skid. Install the trunnion tower closure plates (optional for the OS197 TC and the OS197H TC).
- 10. Fill the neutron shield.
- 11. Remove the bottom ram access cover plate from the cask. Install the two-piece temporary neutron/gamma shield plug to cover the bottom ram access. Install the ram trunnion support

K.8.2 Procedures for Unloading the Cask

K.8.2.1 DSC Retrieval from the HSM

Note: Ensure the administrative controls detailed in Section 5.1.1.5 are being implemented.

- 1. Ready the transfer cask, transfer trailer, and support skid for service and tow the trailer to the HSM. If using the OS200 TC to unload, verify that it has been fitted with an internal aluminum sleeve and a cask spacer of appropriate height (refer to Drawings NUH-08-8004-SAR and NUH-08-8005-SAR provided in Appendix U, Section U.1.5).
- 2. Back the trailer as close to the HSM as compatible with HSM door removal, and remove the cask top cover plate.
- 3. Remove the HSM door. Remove the inner tube of the DSC axial retainer.
- 4. Using the skid positioning system, align the cask with the HSM and position the skid until the cask is docked with the HSM access opening.
- 5. Using optical survey equipment, verify alignment of the cask with respect to the HSM. The TC shall be aligned with respect to the HSM such that the longitudinal centerline of the DSC in the TC is within $\pm \frac{1}{8}$ inch of its true position when the TC is docked with the HSM front access opening.

If the alignment tolerance is exceeded, the following actions should be taken:

- a. Confirm that the transfer system is properly configured,
- b. Check and repair the alignment equipment, or
- c. Confirm the locations of the alignment targets on the TC and HSM.
- 5a. Install the cask restraints.
- 6. Install and align the hydraulic ram with the cask.
- 7. Extend the ram through the cask into the HSM until it is inserted in the DSC grapple ring.
- 8. Activate the arms on the ram grapple mechanism with the DSC grapple ring.
- 8a. From this point, until fuel has been removed from the DSC or the DSC has been removed from the TC, the DSC will be inspected for damage after any TC drop of 15 inches or greater.
- 9. Retract ram and pull the DSC into the cask.
- 10. Retract the ram grapple arms.
- 11. Disengage the ram from the cask.

	Component Description	Calculated Weight (Pounds)
1.	Dry Shielded Canister Shell Assembly	15,778
2.	DSC Top Shield Plug	7,859
3.	DSC Internal Basket Assembly	18,380
4.	DSC Inner and Outer Top Cover Plates	1,934
5.	24 PWR Spent Fuel Assemblies	≤40,368 ⁽⁴⁾
6.	Weight of Water in DSC Cavity	13,110
	Total Wet DSC Loaded Weight (w/o DSC inner and outer top cover plates.)	95,495
	Total Dry DSC Loaded Weight (w/ DSC inner and outer top cover plates.)	84,319
7.	Standardized Transfer Cask Empty Weight	107,091 ⁽¹⁾⁽³⁾
8.	Standardized Transfer Cask Max. Loaded Weight	198,099 ⁽²⁾⁽⁵⁾
9.	HSM Single Module Weight, Model 80 (empty)	243,000
10.	HSM Single Module Weight, Model 102 (empty)	273,100

Table L.3.2-1 Summary of the NUHOMS[®]-24PT2S System Component Weights

⁽¹⁾ Includes weight of cask top cover plate assembly.

⁽²⁾ Weight includes: DSC dry weight plus fuel, plus water in DSC and cask less DSC and cask top cover plate assemblies.

⁽³⁾ The as-built empty weight for the OS197 transfer cask is 111,250 lb, including neutron shield water. The as-built empty weight of the standardized cask is 106,700 lb including solid neutron shield and top cover.

⁽⁴⁾ The standard design DSC fuel assembly weight of 1,682 lb/assembly is used.

⁽⁵⁾ The maximum loaded weight for the OS197 transfer cask without 24PT2S DSC and OS197 top cover plates is 203,829 lb (199,249 lb without neutron shield water).

	Component Description	Calculated Weight (Pounds)
1.	Dry Shielded Canister Shell Assembly	14,720
2.	DSC Top Shield Plug	6,526
3.	DSC Internal Basket Assembly	18,420
4.	DSC Inner and Outer Top Cover Plates	1,934
5.	24 PWR Spent Fuel Assemblies	≤40,368 ⁽⁴⁾
6.	Weight of Water in DSC Cavity	13,350
	Total Wet DSC Loaded Weight (w/o DSC inner and outer top cover plates.)	93,384
	Total Dry DSC Loaded Weight (w/ DSC inner and outer top cover plates.)	81,968
7.	Standardized Transfer Cask Empty Weight	107,091 ⁽¹⁾⁽³⁾
8.	Standardized Transfer Cask Max. Loaded Weight	195,988 ⁽²⁾⁽⁵⁾
9.	HSM Single Module Weight, Model 80 (empty)	243,000
10.	HSM Single Module Weight, Model 102 (empty)	273,100

Table L.3.2-2 Summary of the NUHOMS®-24PT2L System Component Weights

⁽¹⁾ Includes weight of cask top cover plate assembly.

⁽²⁾ Weight includes: DSC dry weight plus fuel, plus water in DSC and cask less DSC and cask top cover plate assemblies.

⁽³⁾ The as-built empty weight for the OS197 transfer cask is 111,250 lb, including neutron shield water. The as-built empty weight of the standardized cask is 106,700 lb including solid neutron shield and top cover.

⁽⁴⁾ The standard design DSC fuel assembly weight of 1,682 lb/assembly is used.

⁽⁵⁾ The maximum loaded weight for the OS197 transfer cask without 24PT2L DSC and OS197 top cover plates is 201,969 lb (197,389 lb without neutron shield water).

presented in Section 8.2.3 cancel out on either side of the overturning equation. The resulting minimum factor of safety against overturning due to seismic remains unchanged at 1.24.

L.3.7.3.3.4 HSM Sliding Due to Seismic

The heavier weight of the NUHOMS[®]-24PT2 DSC does not have any effect on the HSM sliding stability due to seismic forces, since the HSM weight terms essentially cancel out on either side of the sliding equation presented in Section 8.2.3. Thus, the factor of safety against sliding due to seismic remains unchanged at 1.34 as evaluated in Section 8.2.3.

L.3.7.3.4 DSC Support Structure Seismic Evaluation

Using the same method discussed in Section L.3.7.3.3, Section 8 results are adjusted to account for the heavier NUHOMS[®]-24PT2 DSC. The evaluation includes the support frame, cross members, rails, anchor bolts, and cross member connections.

L.3.7.3.4.1 DSC Support Structure Natural Frequency

The lowest structural frequency of the DSC support structure inside the HSM is dominated by the mass of the DSC. The DSC and support structure are included in the HSM analytical model. The dominant horizontal and vertical frequencies of the DSC/DSC support structure reported in Section 8 are 20.51 Hz and 44.53 Hz, respectively. As discussed in Section L.3.7.3.3.1, a conservative frequency shift results in adjusted frequencies of 20.7 Hz and 44.7 Hz.

L.3.7.3.4.2 DSC Support Structure Seismic Response Spectra Analysis

Using the same method discussed in Section L.3.7.3.3.2, the stress ratios in the support frame columns, cross members and rails for the governing load combinations are reported in Table L.3.7-1.

L.3.7.3.5 DSC Axial Retainer Seismic Evaluation

The DSC axial retainer detail, located inside the HSM access opening, is shown on the Appendix E drawings. The retainer bears on the end of the DSC and transfers axial seismic loads to the HSM. The axial retainer is evaluated for the increased weight of the NUHOMS[®]-24PT2 DSC using the same methodology as presented in Section 8.2.3.2.C. The results of the evaluation are included in Table L.3.7-1.

L.3.7.3.6 <u>Transfer Cask Seismic Evaluation</u>

The effects of a seismic event occurring when a loaded NUHOMS[®]-24P or -52B DSC is resting inside the transfer cask are described in Section 8.2.3 paragraph D. The stabilizing moment to prevent overturning of the cask/trailer assembly due to the 0.25g horizontal and 0.17g vertical seismic ground accelerations is calculated and compared to the dead weight stabilizing moment. The results of this analysis show that there is a factor of safety of at least 2.0 against overturning

Commencent Description	CALCULATED WEIGHT (kips)					
Component Description	32PT-S100	32PT-S125	32PT-L100	32PT-L125		
DSC Shell Assembly ⁽¹⁾	13.06	14.28	13.24	14.46		
DSC Top Shield Plug Assembly ⁽²⁾	8.71	9.93	8.71	9.93		
DSC Internal Basket Assembly	22.74	22.40	23.55	23.21		
Total Empty Weight	44.52	46.62	45.51	47.61		
32 PWR Spent Fuel Assemblies	$\leq 43.68^{(3)} \leq 53.82^{(4)}$	$\leq 43.68^{(3)} \leq 53.82^{(4)}$	$ \leq 43.68^{(3)} \\ \leq 53.82^{(4)} $	$ \leq 43.68^{(3)} \\ \leq 53.82^{(4)} $		
Total Loaded DSC Weight (Dry)	88.20 ⁽³⁾ 98.34 ⁽⁴⁾	90.30 ⁽³⁾ 100.44 ⁽⁴⁾	89.19 ⁽³⁾ 99.33 ⁽⁴⁾	91.29 ⁽³⁾ 101.43 ⁽⁴⁾		
Water in Loaded DSC	6.81 ⁽⁵⁾ 13.61 ⁽⁷⁾	5.38 ⁽⁵⁾ 10.75 ⁽⁷⁾	6.40 ⁽⁶⁾ 14.23 ⁽⁷⁾	5.12 ⁽⁶⁾ 11.37 ⁽⁷⁾		
Total Loaded DSC Weight (Wet)	95.0 ⁽⁸⁾ 111.9 ⁽⁹⁾	95.7 ⁽⁸⁾ 111.2 ⁽⁹⁾	95.6 ⁽⁸⁾ 113.6 ⁽⁹⁾	96.4 ⁽⁸⁾ 112.8 ⁽⁹⁾		
Cask Spacer	1.10	1.10	0.79	0.79		
OS197 (OS197H) TC Empty Weight ⁽¹⁰⁾	106.67 111.25	106.67 111.25	106.67 111.25	106.67 111.25		
Total Loaded TC Weight	196.0 ⁽⁸⁾ 210.7 ⁽⁹⁾	198.1 ⁽⁸⁾ 212.8 ⁽⁹⁾	196.6 ⁽⁸⁾ 211.4 ⁽⁹⁾	198.7 ⁽⁸⁾ 213.5 ⁽⁹⁾		
HSM Single Module Weight Maximum (Empty)	273.1	273.1	273.1	273.1		
HSM Single Module Weight Maximum (Loaded)	361.3	368.8	368.7	369.5		

Table M.3.2-1 Summary of the NUHOMS®-32PT System Component Nominal Weight (with Standard HSM and OS197 and OS197H TC)

Notes:

- 1. Excludes top cover plates and shield plug.
- 2. Includes top cover plates and shield plug.
- 3. Based on a fuel weight of 1,365 lb per assembly. This is a limit for any 32PT DSCs for which the maximum lift weight of the loaded TC is to remain under 100 tons.
- 4. Based on B&W 15x15 fuel (with control components) weight of 1,682 lb per assembly.
- 5. Based on DSC water volume reduced to 50% of capacity to ensure that the maximum lift weight of the loaded TC is under 100 tons.
- 6. Based on DSC water volume reduced to 45% of capacity to ensure that the maximum lift weight of the loaded TC is under 100 tons.
- 7. Based on 100% water volume in DSC.
- 8. Based on fuel assembly weight of 1,365 lb and 50% water reduction in DSC.
- 9. Based on fuel assembly weight of 1,682 lb and 100% water in DSC.
- 10. Includes cask top cover plate. The first figure is when the neutron shield is not filled with demineralized water to ensure that the maximum lift weight of the loaded cask is under 100 tons. The second figure is when the neutron shield is filled with demineralized water.

The dominant frequencies of the HSM and DSC inside the HSM are determined by scaling the modal analysis results for an analytical model as shown in Figure 8.1-22.

HSM-HS

The 32PT DSC, HSM-HS and OS200 TC are also evaluated to a higher seismic design criteria consisting of an "enhanced" Regulatory Guide 1.60 response spectra, anchored to a 1.0g maximum horizontal and vertical direction accelerations, as described in Appendix U, Chapter U.2, Section U.2.2.3. The evaluations of the HSM-HS and OS200 TC presented in Appendix U, Section U.3.7 are applicable to this Appendix. No design modifications are required for the 32PT DSC to accommodate the higher seismic loads as the design of the 32PT DSC is controlled by the accident drop loads. The resulting seismic stresses of the 32PT DSC due to the higher seismic criteria are evaluated against ASME Code Service Level D allowables.

Using the same loading as Appendix U, Section U.3.7.2, and based on NRC Reg. Guide 1.61, a damping value of three (3) percent is used for the 32PT DSC high seismic load analysis. Based on the evaluation of the frequency content of the loaded HSM-HS, the amplified accelerations associated with the design basis seismic response spectra are determined and used for the structural evaluation of the 32PT DSC.

M.3.7.3.1 DSC Seismic Evaluation

Standard Seismic Criteria

The maximum calculated seismic accelerations for the DSC inside the HSM are 0.42g horizontally and 0.17g vertically. An analysis using these seismic loads shows that the DSC will not lift off the support rails inside the HSM. The resulting stresses in the DSC shell due to vertical and horizontal seismic loads are also determined and included in the appropriate load combinations. The seismic evaluation of the DSC is described in the paragraphs that follow.

where:	Е	=	26.5E6 psi, Young's Modulus,
	Ι	=	58,400 in.4, DSC moment of inertia,
	L	=	192.55 in., Total length of DSC,
	m	=	101,130/192.55 = 525/g lb/in, and
	λ	=	$i\pi$; for lowest natural frequency, $i = 1$.

Substituting yields: $f_1 = 45.1$ Hertz.

The DSC spectral accelerations at this frequency correspond to the zero period acceleration. These seismic accelerations are bounded by those of the ovalling mode frequency that are used in the subsequent stress analysis of the DSC shell.

M.3.7.3.1.2 DSC Seismic Stress Analysis

Standard Seismic Criteria

With the DSC conservatively assumed to be resting on a single support rail inside the HSM (Models 80/102), the stresses induced in the DSC shell are calculated due to the 1.0g horizontal and 0.68g vertical seismic accelerations, and increased by a factor of 1.5 to account for the effects of possible multimode excitation. Thus, the DSC shell is qualified to seismic accelerations of 1.5g horizontal and 1.0g vertical. The DSC shell stresses obtained from the analyses of vertical and horizontal seismic loads are summed absolutely. See Table M.3.7-9 for the Level C seismic stress evaluation results of the NUHOMS[®]-32PT DSC. The non-high seismic load combination includes deadweight + pressure + 1.5g horizontal and 1g vertical (load combinations HSM-7 and HSM-8 as shown in Table M.2-15). For evaluation of the high seismic load, results are presented in Table M.3.7-13 through Table M.3.7-15.

As stated, in Section 4.2.3.2, an axial retainer is included in the design of the DSC support system inside the HSM to prevent sliding of the DSC in the axial direction during a postulated seismic event. The stresses induced in the DSC shell and bottom cover plate due to the restraining action of this retainer for a horizontal seismic load, applied along the axis of the DSC, are included in the seismic response evaluation of the DSC shell assembly.

The stability of the DSC against lifting off one of the support rails during a non-high seismic event is evaluated by performing a rigid body analysis, using the 0.42g horizontal and 0.17g vertical input accelerations. A DSC radius of 33.625 in. was conservatively used. The factor of 1.5 used in the DSC analysis to account for multimode behavior need not be included in the seismic accelerations for this analysis, as the potential for lift off is due to rigid body motion, and no frequency content effects are associated with this action. The horizontal equivalent static acceleration of 0.42g is applied laterally to the center of gravity of the DSC. The point of rigid body rotation of the DSC is assumed to be the center of the support rail, as shown in Figure M.3.7-1. The applied moment acting on the DSC is calculated by summing the overturning moments. The stabilizing moment, acting to oppose the applied moment, is calculated by subtracting the effects of the upward vertical seismic

Referring to Figure M.3.7-1, the factor of safety associated with DSC lift-off is calculated as follows:

 $M_{am} = yF_{H},$

and

 $M_{sm} = (F_{v1} - F_{v2})x$.

where: M_{am} = the applied seismic moment, and

 M_{sm} = the stabilizing moment

All other variables are defined in Figure M.3.7-1.

Substituting yields: $M_{am} = 1248 \text{ kip-in.}$ and $M_{sm} = 1423 \text{ kip-in.}$

Thus, the factor of safety (SF) against DSC lift off from the DSC support rails inside the HSM obtained from this bounding analysis is:

$$SF = \frac{M_{sm}}{M_{am}} = 1.14$$

High Seismic Criteria

The stability evaluation of 32PTH1 DSC inside the high-seismic HSM-HS design as presented in Appendix U, Section U.3.7.2 is applicable to the HSM-HS loaded with 32PT DSC.

In addition based on the frequency analysis of HSM-HS with the bounding 32PTH1 DSC, the maximum calculated accelerations for the 32PT DSC inside the HSM-HS when considering the higher seismic criteria are 2.0g transverse and 1.6g axial in horizontal directions and 1.0g in vertical direction.

The stresses in 32PT DSC shell due to vertical and horizontal high seismic loads criteria are determined and included in appropriate load combinations.

As stated in Section M.3.7.3.1, the maximum calculated seismic accelerations for the 32PT DSC inside the HSM-HS, when considering the higher seismic criteria, are 2.0g transverse and 1.6g axial in the horizontal directions and 1.0g in the vertical direction. See Table M.3.7-13 through Table M.3.7-15 for the high seismic case stress evaluations results for the 32PT DSC shell assembly components.

As indicated in Section M.3.7.3.1, the stability evaluation of the 32PTH1 DSC inside the HSM-HS for the Level D seismic loads presented in Appendix U, Section U.3.7.2 is applicable to the HSM-HS loaded with the 32PT DSC.

is included in the seismic load combination results summarized in Section 8, Table 8.2-3, Table 8.2-18, Table 8.2-19 and Table 8.2-20.

The details of the seismic evaluation of the HSM when loaded with NUHOMS[®]-32PT DSC are described in the paragraphs that follow.

M.3.7.3.3.1 HSM Frequency Analysis

The lowest horizontal and vertical structural frequencies calculated for a single free standing HSM loaded with a 24P DSC are 20.51 Hz and 44.53 Hz, respectively. An increase in the NUHOMS®-32PT DSC weight of approximately 14% relative to the NUHOMS®-24P DSC results (89.5 kips was conservatively used, see Section 8.2.3.2) in a conservative frequency shift estimated to be approximately 6%. The adjusted frequencies are 19.21 Hz and 41.71 Hz, respectively. The corresponding horizontal (conservatively) and vertical spectral accelerations are 0.40g and 0.17g.

M.3.7.3.3.2 HSM Seismic Analysis

The HSM structural qualification evaluations provided in Sections 8.1 and 8.2, which were originally based on a NUHOMS[®] 24P DSC weight of 80 kips (89.5 kips was conservatively used, see Section 8.2.3.2), consider a bounding DSC weight of 102 kips. This bounds the weight of the NUHOMS[®]-32PT DSC is approximately 13% greater (101.43 kips for the 32PT DSC versus 89.5 kips for the 24P DSC). The effects of the increased weight of the 32PT are considered by scaling the results for the HSM with the 24P DSC as summarized in Section 8.2, Table 8.2-3 and Table 8.2-18 for the seismic load combination.

M.3.7.3.3.3 HSM Overturning Due to Seismic

The following conservative analysis is performed to show that a single, free standing HSM loaded with a 32PT DSC will not overturn due to the postulated seismic loads. The HSM stabilizing moment (M_{st}) and overturning moment (M_{ot}) are calculated as follows:

$= M_{st} = (W_{hsm} + W_{dsc})^* d$
= 22,388 kip-in.
$= M_{ot} = (W_{hsm} * a_{v1} + W_{dsc} * a_{v2}) * d + W_{hsm} * a_{h1} * d_1 + W_{dsc} * a_{h2} * d_2$
= 19,903 kip-in.
ISM = 284 kips
OSC = 102 kips
I seismic acceleration $= 0.17$ g
l seismic acceleration $= 0.17$ g
ntal seismic acceleration = 0.42 g
ntal seismic acceleration = 0.42 g
SM without the DSC = 98.32 in.
the DSC = 102 in.
from CG to corner = 58.0 in.

Because the stabilizing moment is greater than the overturning moment the HSM will not overturn during a seismic event. The factor of safety against overturning is equal to: 22,388/19,903 = 1.12 > 1.1 (OK)

M.3.7.3.3.4 HSM Sliding Due to Seismic

The following conservative analysis is performed to show that a single free-standing HSM loaded with a 32PT DSC will not slide due to the postulated seismic loads.

The friction force resisting sliding = $F_{st} = [W_{hsm}(1-a_{v1}) + W_{dsc} (1-*a_{v2})]\mu = 192.2$ kips The applied horizontal seismic force = $F_{hs} = [W_{hsm}a_{h1} + W_{dsc} a_{h2}] = 162.1$ kips Where,

 μ = concrete-to-concrete coefficient of friction, taken as 0.6 as defined in Section 11.7.4.3 of ACI 318-83 [3.17]. All other terms are as defined above.

The force required to slide the HSM is larger than the resulting lateral seismic force and therefore, the loaded HSM will not slide. The factor of safety against sliding is 192.2/162.1 = 1.19

M.3.7.3.4 DSC Support Structure Seismic Evaluation

Using the same method discussed in Section M.3.7.3.3, DSC support structure seismic results are obtained by scaling up the results for the DSC support structure with a NUHOMS[®] 24P to account for the heavier NUHOMS[®] 32PT DSC. The evaluation includes the support frame, cross members, rails, anchor bolts, and cross member connections.

M.3.7.3.4.1 DSC Support Structure Natural Frequency

The lowest structural frequency of the DSC support structure inside the HSM is dominated by the mass of the DSC. The DSC and support structure are included in the HSM analytical model. The dominant horizontal and vertical frequencies of the DSC/DSC support structure reported in Section 8 are 20.51 Hz and 44.53 Hz, respectively. As discussed in Section M.3.7.3.3.1, a conservative frequency shift due to the heavier 32PT DSC is estimated to be 6%. The adjusted frequencies are 19.21 Hz and 41.71 Hz.

M.3.7.3.4.2 DSC Support Structure Seismic Analysis

Using the same method discussed in Section M.3.7.3.3.2, the stress ratios in the support frame columns, cross members and rails for the governing load combinations are reported in Section 8, Table 8.2-19 and Table 8.2-20.

- 1a. In accordance with Technical Specification 4.3.2, verify that the NS is filled before the draining operation in Step 2 is initiated and continually monitored during the first five minutes of the draining evolution to ensure the NS remains filled.
- 2. Open the cask drain port valve and remove the remaining water from the cask/DSC annulus.
- 3. Install the automatic welding machine onto the outer top cover plate and place the outer top cover plate with the automatic welding system onto the DSC. Verify proper fit up of the outer top cover plate with the DSC shell.
- 4. Tack weld the outer top cover plate to the DSC shell. Place the outer top cover plate weld root pass.
- 5. Helium leak test the inner top cover plate and vent/siphon port plate welds using the leak test port in the outer top cover plate in accordance with CoC Appendix A Inspections, Tests, and Evaluations Item 4.1 limits. Verify that the personnel performing the leak test are qualified in accordance with SNT-TC-1A [8.6]. Alternatively, this can be done with a test head in Step M.8.1.4.1.
- 6. If a leak is found, remove the outer cover plate root pass, the vent and siphon port plugs and repair the inner cover plate welds. Repeat procedure steps from M.8.1.3 step 18.
- 7. Perform dye penetrant examination of the root pass weld. Weld out the outer top cover plate to the DSC shell and perform dye penetrant examination on the weld surface in accordance with the CoC Appendix A Inspections, Tests, and Evaluations Item 4.3 requirements.
- 8. Seal weld the prefabricated plug over the outer cover plate test port and perform dye penetrant weld examinations.
- 9. Remove the automatic welding machine from the DSC.
- 10. If using the OS200 TC to load, place a sleeve ring spacer at the top of the aluminum sleeve (refer to Drawing NUH-08-8004-SAR provided in Appendix U, Section U.1.5). Rig the cask top cover plate and lower the cover plate onto the TC.
- 11. Bolt the cask cover plate into place, tightening the bolts to the required torque in a star pattern.
- Verify that the TC radial dose rates measured at the surface of the Transfer Cask are compliant with limits specified in CoC Appendix A Inspections, Tests, and Evaluations Item 3.2. The configuration for determining the TC radial surface dose rates shall be in accordance with CoC Appendix A Inspections, Tests, and Evaluations Item 3.2.

M.8.1.5 TC Downending and Transfer to ISFSI

NOTE: Ensure the administrative controls detailed in Section 5.1.1.5 are being implemented.

1. If loading 32PT-S100 or 32PT-L100 DSC (qualified for 100-ton crane capacity), drain the neutron shield to an acceptable location.

CAUTION: The radiation dose rates around the surface of the transfer cask without water in the neutron shield (through step M.8.1.5.10) are expected to be high. Use proper ALARA practices (e.g., use of temporary shielding, appropriate positioning of personnel, etc.) to minimize personnel exposure.

M.8.2 Procedures for Unloading the Cask

M.8.2.1 DSC Retrieval from the HSM

Note: Ensure the administrative controls detailed in Section 5.1.1.5 are being implemented.

- 1. Ready the TC, transfer trailer, and support skid for service and tow the trailer to the HSM. If using the OS200 TC to unload, verify that it has been fitted with an internal aluminum sleeve and a cask spacer of appropriate height (refer to Drawings NUH-08-8004-SAR and NUH-08-8005-SAR provided in Section U.1.5).
- 2. Back the trailer as close to the HSM as compatible with HSM door removal, and remove the cask top cover plate.
- 3. Cut any welds from the door and remove the HSM door. Remove the DSC drop-in retainer.
- 4. Using the skid positioning system align the cask with the HSM and position the skid until the cask is docked with the HSM access opening.
- 5. Using optical survey equipment, verify alignment of the cask with respect to the HSM. The TC shall be aligned with respect to the HSM such that the longitudinal centerline of the DSC in the TC is within $\pm \frac{1}{8}$ inch of its true position when the TC is docked with the HSM front access opening.

If the alignment tolerance is exceeded, the following actions should be taken:

- a. Confirm that the transfer system is properly configured,
- b. Check and repair the alignment equipment, or
- c. Confirm the locations of the alignment targets on the TC and HSM.
- 5a. Install the cask restraints.
- 6. Install and align the hydraulic ram with the cask.
- 7. Extend the ram through the cask into the HSM until it is inserted in the DSC grapple ring.
- 8. Activate the arms on the ram grapple mechanism with the DSC grapple ring.
- 8a. From this point, until fuel has been removed from the DSC or the DSC has been removed from the TC, the DSC will be inspected for damage after any TC drop of 15 inches or greater.
- 9. Retract ram and pull the DSC into the cask.
- 10. Retract the ram grapple arms.
- 11. Disengage the ram from the cask.
- 12. Remove the cask restraints.
- 13. Using the skid positioning system, disengage the cask from the HSM.
- 14. If using the OS200 TC to unload, place a sleeve ring spacer at the top of the aluminum sleeve (refer to Drawing NUH-08-8004-SAR provided in Section U.1.5).
- 15. Install the cask top cover plate and ready the trailer for transfer.
- 16. Replace the door on the HSM.

TABLE OF CONTENTS

Page

P.1	General	Discussio	on		P.1-1	
	P.1.1	Introduct	ion		P.1-3	
	P.1.2	General Description of the NUHOMS [®] -24PTH System				
		P.1.2.1	NUHOMS	[®] -24PTH System Characteristics	P.1-5	
			P.1.2.1.1	NUHOMS [®] -24PTH DSC	P.1-5	
			P.1.2.1.2	NUHOMS [®] -HSM-H Module	P.1-6	
			P1213	NUHOMS [®] -OS197FC Transfer Cask	P 1-7	
		P122	Operation	al Features	Р 1-7	
		F.1.2.2	P1221	General Features	Р.1.7 Р 1_7	
			P1222	Sequence of Operations	Р.1.7 Р 1_8	
			P 1 2 2 3	Identification of Subjects for Safety and	1.1-0	
			1.1.2.2.3	Paliability Analysis	D18	
		D123	Cask Cont	rents		
	D12	I.I.Z.J Idoptified	Cask Colli	unts and Contractors		
	Г.1.J D 1 4	Generic	Coale Arrouge		D 1 10	
	Г.1. 4 D 1 5	Generic C	Cask Allays		F.1-10 D 1 11	
	P.1.3	Suppleme	ental Data		P.1-11	
	P.1.6	Kelerenc	es		P.1-12	
P.2	Principa	al Design	Criteria		P.2-1	
	P.2.1	Spent Fuel To Be Stored				
		P.2.1.1 General Operating Functions				
	P.2.2	Design Criteria for Environmental Conditions and Natural Phenomena				
		P.2.2.1	Tornado V	Vind and Tornado Missiles	P.2-6	
			P.2.2.1.1	Applicable Design Parameters	P.2-6	
			P.2.2.1.2	Determination of Forces on Structure	P.2-6	
			P.2.2.1.3	Tornado Missiles	P.2-7	
		P.2.2.2	Water Lev	rel (Flood) Design	P.2-8	
		P.2.2.3	Seismic D	esign	P.2-8	
		P.2.2.4 P.2.2.5	Snow and	Ice Loading	P.2-8	
			Combined	Load Criteria	P.2-8	
			P.2.2.5.1	NUHOMS [®] -24PTH DSC Structural Design		
				Criteria	P.2-8	
		P.2.2	P.2.2.5.2	NUHOMS [®] HSM-H Structural Design		
				Criteria	P.2-11 <i>b</i>	
	P.2.3	Safety Pr	otection Sy	stems	P.2-14	
		P.2.3.1	General		P.2-14	
		P.2.3.2	Protection	By Multiple Confinement Barriers and Systems	P.2-14	
		P.2.3.3	Protection	By Equipment and Instrumentation Selection	P.2-14	
		P.2.3.4	Nuclear C	riticality Safety	P.2-14	
			P.2.3.4.1	Control Methods for Prevention of		
				Criticality	P.2-14	
			P.2.3.4.2	Error Contingency Criteria	P.2-15	
			P.2.3.4.3	Verification Analysis-Benchmarking	P.2-15	
			P.2.3.5	Radiological Protection	P.2-15	
			P.2.3.6	Fire and Explosion Protection	P.2-15	
	P.2.4	Decomm	issioning C	onsiderations	P.2-16	

I

	P.2.5	Summar	y of NUHO	MS [®] -24PTH DSC and HSM-H Design Criteria	P.2-17
		P.2.5.1	24PTH D	SC Design Criteria	P.2-17
		P.2.5.2	HSM-H [Design Criteria	P.2-17
	P.2.6	Reference	es		P.2-18
P.3	Structu	Iral Evaluation			P.3.1-1
	P.3.1	Structura	P.3.1-1		
	1.0.1	P.3.1.1	Discussio	n	P 3 1-1
		1.5.1.1	P 3 1 1 1	General Description of the 24PTH DSC	P 3 1-1a
			P 3 1 1 2	General Description of the HSM-H	P 3 1-4a
			P 3 1 1 3	General Description of the HSM Model 102	P 3 1-5
			P 3 1 1 4	General Description of the OS197FC TC	P 3 1-5
			P 3 1 1 5	General Description of the Standardized	
			1.5.1.1.5	Transfer Cask	P 3 1-6
		P312	Design Ci	riteria	P 3 1-6
		1.5.1.2	P 3 1 2 1	24PTH DSC Shell Assembly Confinement	
			1.5.1.2.1	Boundary	P 3 1-6
			P3122	24PTH DSC Basket	P 3 1_7
			P 3 1 2 3	Alternatives to the ASME Code for the	1
			1.3.1.2.3	24PTH DSC	P 3 1-7
	P32	Weights	and Center	s of Gravity	P 3 2-1
	P 3 3	Mechanical Properties of Materials			P 3 3-1
	1.5.5	P 3 3 1	24PTH D	SC Material Properties	P 3 3-1
		P 3 3 2	HSM-H N	Asterial Properties	P 3 3-2a
		P 3 3 3	Materials	Durability	P 3 3-2 <i>a</i>
	P34	General	P 3 4-1		
	1.5.1	P 3 4 1	Chemical	and Galvanic Reactions	P 3 4-1
		P 3 4 2	Positive (losure	P 3 4-7
		P.3.4.3	Lifting De	evices	P 3 4-7
		P 3 4 4	Heat and	Cold	P 3 4-8
		1.5.1.1	P 3 4 4 1	Summary of Pressures and Temperatures	P 3 4-8
			P 3 4 4 2	Differential Thermal Expansion	P 3 4-8
			P 3 4 4 3	Thermal Stress Calculations	P 3 4-13c
	P.3.5	Fuel Roo	1s		P 3 5-1
	P.3.6	Structura	P.3.6-1		
	1.0.0	P.3.6.1	Normal O	peration Structural Analysis	P.3.6-1
		1.0.011	P.3.6.1.1	Normal Operating Loads	P 3.6-1
			P.3.6.1.2	Dry Shielded Canister Analysis	P.3.6-3
			P.3.6.1.3	NUHOMS [®] -24PTH Basket Structural	
				Analysis	P.3.6-6
			P.3.6.1.4	NUHOMS [®] HSM-H Structural Analysis	P.3.6-10
			P.3.6.1.5	OS197/OS197H/OS197FC On-Site TC	
				Analysis	P.3.6-12
		P.3.6.2	Off-Norm	al Load Structural Analysis	P.3.6-13
			P.3.6.2.1	Jammed DSC during Transfer	P.3.6-15
			P.3.6.2.2	Off-Normal Thermal Loads Analysis	P.3.6-16
			P.3.6.2.3	HSM-H Off-Normal Loads	P.3.6-17
					/

I

		P.3.6.2.4	OS197/OS197H/OS197FC Off-Normal	
			Loads	P.3.6-17
	P.3.6.3	Damaged	Fuel Integrity Assessment for Normal and Off-	D 2 (10
	D 2 6 4	Normal L		P.3.0-18
D 2 7	P.3.0.4			P.3.0-19a
P.3./	Structura	I Analysis (Accidents)	P.3./-1
	P.3.7.1	Tornado V	Vinds/Iornado Missile	P.3.7-2
		P.3.7.1.1	Effect of DBT Wind Pressure Loads on	D 2 7 2
	D 2 7 2	D (1 1	HSM-H	P.3.7-2
	P.3./.2	Earthquak		P.3./-4
		P.3./.2.1	DSC Seismic Evaluation	P.3./-5
		P.3.7.2.2	Basket Seismic Evaluation	P.3./-6a
		P.3.7.2.3	HSM-H Seismic Evaluation	P.3./-6c
	D 2 7 2	P.3.7.2.4	TC Seismic Evaluation	P.3.7-8
	P.3./.3	Flood		P.3./-8a
		P.3./.3.1	HSM-H Flooding Analysis	P.3./-8a
	D 2 7 4	P.3.7.3.2	DSC Flooding Analyses	P.3.7-10
	P.3./.4	Accidenta	I IC Drop	P.3./-10
		P.3.7.4.1	General Discussion	P.3./-11
		P.3./.4.2	24PTH DSC Shell Assembly Drop	D 2 7 10
		D 2 7 4 2		P.3.7-12
		P.3./.4.3	24PTH Basket Assembly Drop Evaluation	P.3./-15
		P.3./.4.4	On-site TC Horizontal and Vertical Drop	D 2 7 10
		D 2 7 4 5	Evaluation	P.3./-18
	D 2 7 5	P.3./.4.3	Loss of Neutron Shield	P.3./-18
	P.3./.3	Lightning		P.3./-18
	P.3./.6	Blockage	of HSM-H Air Inlet and Outlet Openings	P.3./-18
	P.3././	DSC Leak		P.3.7-19
	P.3./.8	Accident	Pressurization of DSC.	P.3.7-19
	P.3./.9	Reduced I	HSM Air Inlet and Outlet Shielding	P.3./-19
	P.3./.10	Fire and E		P.3.7-19
	P.3./.11	Load Con		P.3./-19
		P.3./.11.1	DSC Load Combination Evaluation	P.3.7-19
		P.3./.11.2	DSC Fatigue Evaluation	P.3.7-20
		P.3./.11.3	TC Load Combination Evaluation	P.3.7-20
		P.3./.11.4	IC Fatigue Evaluation	P.3.7-20
		P.3./.11.3	HSM –H Load Combination Evaluations	P.3./-20a
D 3 0		P.3./.11.6	HSM-H Stress Analysis	P.3./-21
<i>P.3.8</i>	24PTH 1	ype 3 Bask	et Structural Analysis	P.3.8-1
	<i>P.3.8.1</i>	General L	Description	P.3.8-1
	<i>P.3.8.2</i>	Key Dime	nsions and Materials	P.3.8-1
	P.3.8.3	Material I	Properties	P.3.8-2
	<i>P.3.8.4</i>	Temperat	ure Data	P.3.8-2
	P.3.8.5	Fuel Data	ſ	P.3.8-2
	<i>P.3.8.6</i>	Methodol	0gy	P.3.8-2
		P.3.8.6.1	Finite Element Model for Side Loads	P.3.8-2

			P.3.8.6.2	Finite Element Model for Thermal Loads	P.3.8-4
			P.3.8.6.3	Material Properties in Analyses	P.3.8-4
			P.3.8.6.4	Loads	P.3.8-4
			P.3.8.6.5	Criteria	P.3.8-5
			P.3.8.6.6	Creep Evaluation for Long Term Storage	P.3.8-6
		P.3.8.7	Results	1 5 6 6	P.3.8-6
			P.3.8.7.1	Results for On-Site DW+Handling and	
				Thermal Stress Analysis	P.3.8-6
			P.3.8.7.2	Aluminum Components – Long Term	
				Storage Deadweight Bearing Stress	P.3.8-7
			P.3.8.7.3	Results for Analysis of 75g Accident Side	
				Loading	P.3.8-7
			P.3.8.7.4	75g Accident End Drop Loading	
				Calculations	P.3.8-8
			P.3.8.7.5	Adjacent Fuel Compartment Relative	
				Displacements	P.3.8-9
		P.3.8.8	Evaluatio	n of Potential Crack Propagation and Growth	P.3.8-10
		P.3.8.9	Conclusio	9 1 8 MS	P.3.8-10
	P.3.9	Reference	ces		P. 3.9-1
P 4	Therm	al Evaluat	ion		P 4-1
1	Р <u>4</u> 1	Discussi	on		Р 4_1
	РЛ 7	Summar	v of Therm	al Properties of Materials	Ρ.4-1 Ρ.4-4
	1.т.2 Дарана	Summar	y of Therma		1.1
	P.4.3	Specifica	ations for C		P.4-13
	P.4.4	Thermal	Analysis o	t HSM Model 102 and HSM-H with 24PTH DSC.	P.4-14
		P.4.4.1	Ambient	Temperature Specification	P.4-14
		P.4.4.2	Thermal A	Analysis of HSM-H with 24PTH DSC	P.4-14
		P.4.4.3	HSM-H A	Air flow Analysis (Stack Effect Calculations)	P.4-16
		P.4.4.4	Descriptio	on of the Thermal Model of HSM-H with 24PTH	54466
			DSC		P.4-19f
		P.4.4.5	Descriptio	on of the HSM-H Blocked Vent Model	P.4-23
		P.4.4.6	Descriptio	on of Cases Evaluated for the HSM-H	P.4-24
		P.4.4.7	HSM-H T	hermal Model Results	P.4-25
			P.4.4.7.1	Normal and Off-normal Operating	
				Condition Results	P.4-25
			P.4.4.7.2	Accident Condition Results	P.4-25
		P.4.4.8	Evaluatio	n of HSM-H Performance	P.4-25
	P.4.5	Thermal	Analysis of	f Transfer Casks with 24PTH DSC	P.4-27
		P.4.5.1	Thermal A	Analysis of the NUHOMS® Standardized Cask wit	h
			24PTH D	SC	P.4-27
		P.4.5.2	Thermal I	Model of 24PTH DSC in the OS197FC TC	P.4-27
			P.4.5.2.1	SINDA/FLUINT TM Thermal Desktop [®]	
				General Code Description	P.4-28
			P.4.5.2.2	OS197FC TC SINDA/FLUINT [™] Thermal	
				Model	P.4-28
			P.4.5.2.3	DSC Steady State and Transient Conditions	
				Thermal Models	P.4-29

I

		P.4.5.2.4	Natural Convection Heat Transfer	
			Coefficients	P.4-29
		P.4.5.2.5	Neutron Shield Effective Thermal	
			Conductivity	P.4-30
	P.4.5.3	Analysis (Cases for OS197FC TC with 24PTH DSC	P.4-31
	P.4.5.4	Standardi	zed TC Thermal Model Results	P.4-31
	P.4.5.5	OS197FC	TC Thermal Model Results	P.4-31
		P.4.5.5.1	Normal and Off-Normal Conditions Results	P.4-31
		P.4.5.5.2	Normal and Off-Normal Operations with	
			Air Circulation Results	P.4-33
		P.4.5.5.3	Accident Conditions	P.4-35
	P.4.5.6	Evaluatio	n of OS197FC TC Performance	P.4-37
P.4.6	NUHON	∕IS [®] -24PTH	DSC Basket Thermal Analysis	P 4-38
11110	P 4 6 1	NUHOM	$\mathbb{S}^{\mathbb{R}}$ 24PTH DSC Basket and Pavload Model	P 4-38
	P 4 6 2	Mesh Sen	sitivity Study	P 4-39
	P 4 6 3	Boundary	Conditions for the DSC Basket Model	P 4-39
	Г. ч .0.5 РЛ6Л	Heat Gen	eration for the DSC Basket Model	Р Л_30
	Г. т .0.т Р/165	DSC The	mal Evaluation for Normal Conditions of Stora	1
	1	and Trans	for	$\mathbf{P} \mathbf{A}_{-10}$
		P/651	Boundary Conditions Storage	P /_/0
		P 4 6 5 2	Boundary Conditions, Storage	P Λ_Λ
		P 4 6 5 3	Maximum Temperatures	D / /1
		P.4.0.3.3	Maximum Internel Pressures	D 4 41
		P 4.0.3.4	Maximum Thermal Stragge	D 4 44
		P.4.0.3.3	Fueluation of 24DTH DSC Derformance for	Γ.4-44
		F.4.0.3.0	Normal Conditions	D / //
	D166	DSC That	mal Evaluation for Off Normal Conditions	F.4-44
	r.4.0.0	DSC THE	Off Normal Ambient Temperatures during	Γ.4-44
		P.4.0.0.1	Storage	D 4 44
		D4662	Devendents Canditions Off Normal Stars	P.4-44
		P.4.0.0.2	Boundary Conditions, OII-Normal Storage	P.4-44
		P.4.0.0.3	Transfer	D 4 44
		DACCA	$\frac{1}{1} = \frac{1}{1} = \frac{1}$	P.4-44
		P.4.6.6.4	Boundary Conditions, OII-Normal Transfer	P.4-45
		P.4.6.6.5	24PTH DSC Thermal Model Results for	
			UII-Normal Conditions of Storage and	D 4 45
		DACCC		P.4-45
		P.4.6.6.6	OII-Normal 24PTH DSC Maximum Internal	D 4 45
		D 4 6 6 7	Pressure during Storage/Transfer	P.4-45
		P.4.6.6.7	Maximum Thermal Stresses	P.4-46
		P.4.6.6.8	Evaluation of 24PTH DSC Performance for	D 4 4 4
	D 4 4 7		UII-Normal Conditions	P.4-46
	P.4.6.7	DSC The	mai Evaluation for Accident Conditions	P.4-46
		P.4.6.7.1	Blocked Vent Accident Evaluation	P.4-47
		P.4.6.7.2	Iranster Accident Evaluation	P.4-47
		P.4.6.7.3	Hypothetical Fire Accident Evaluation	P.4-47
		P.4.6.7.4	Fuel Cladding and Basket Materials	P.4-48

		P.4.6.7.5	Maximum Internal Pressures	P.4-48
		P.4.6.7.6	Evaluation of the 24PTH DSC Performance	
			During Accident Conditions	P.4-49
	P.4.6.8	Thermal A	analysis of OS200 TC with 24PTH DSC	P.4-49
	P.4.6.9	Thermal E	valuation of 24PTH DSC with Damaged FAs	P.4-49c
P.4.7	Thermal	Evaluation	for Loading/Unloading Conditions	P.4-50
	P.4.7.1	Maximum	Fuel Cladding Temperatures During Vacuum	
		Drying		P.4-50
	P.4.7.2	Evaluation	n of Thermal Cycling of Fuel Cladding During	
		Vacuum D	Orying, Helium Backfilling and Transfer Operatio	nsP.4-50
	P.4.7.3	Reflooding	g Evaluation	P.4-51
P.4.8	Determin	ation of Eff	fective Thermal Properties of the Fuel, Basket and	t
	Air With	in the HSM	-H Closed Cavity	P.4-54
	P.4.8.1	Determina	tion of Bounding Effective Fuel Thermal	
		Conductiv	ity	P.4-54
		P.4.8.1.1	Fuel Assemblies Evaluated	P.4-54
		P.4.8.1.2	Summary of Thermal Properties of Materials	P.4-54
		P.4.8.1.3	Calculation of Fuel Axial Effective Thermal	
			Conductivity	P.4-54
		P.4.8.1.4	Calculation of Fuel Transverse Effective Therma	al
			Conductivity	P.4-54
		P.4.8.1.5	Results	P.4-56
	P.4.8.2	Calculatio	n of Fuel Effective Specific Heat and Density	P.4-57
	P.4.8.3	24PTH DS	SC Basket Effective Thermal Properties	P.4-58
	P.4.8.4	Effective A	Air Conductivity in the HSM-H Closed Cavity	P.4-58
P.4.9	Determin	ation of Co	nvection Heat Transfer Coefficients for the HSM	-H
	Surfaces	and Compo	nents	P.4-61
	P.4.9.1	Convectio	n Coefficient for the HSM-H Side Heat Shield	P.4-61
	P.4.9.2	Convectio	n Coefficient for the HSM-H Top Heat Shield	P.4-66
	P.4.9.3	Combinati	on of Heat Transfer Coefficients for the HSM-H	
		Roof and I	Front Wall	P.4-66
P.4.10	Thermal	Evaluations	s of 24PTH Type 1 DSC Loaded with HLZC #6	P.4-67
P.4.11	Thermal	Evaluation	of 24PTH-S-LC DSC in OS197 TC	P.4-69
P.4.12	Thermal	Evaluation	of NUHOMS 24PTH Type 3 DSC	P.4-70a
	<i>P.4.12.1</i>	Storage A	nalysis of 24PTH Type 3 DSC in HSM-H	P.4-70a
		P.4.12.1.1	Bounding Storage Condition	P.4-70a
		P.4.12.1.2	Material Properties	P.4-70b
		<i>P.4.12.1.3</i>	Computer-Aided Design and Meshing	P.4-70d
		<i>P.4.12.1.4</i>	CFD Modeling	P.4-70l
		<i>P.4.12.1.5</i>	Results	P.4-70r
	<i>P.4.12.2</i>	Transfer A	Inalysis of 24PTH Type 3 DSC in OS197	P.4-70t
		<i>P.4.12.2.1</i>	Bounding Transfer Condition	P.4-70t
		<i>P.4.12.2.2</i>	Material Properties	P.4-70t
		P.4.12.2.3	Computer-Aided Design and Meshing	P.4-70u
		P.4.12.2.4	CFD Modeling	P.4-70v
		P.4.12.2.5	Results	$\dots P.4-70x$

		<i>P.4.12.3</i>	Impact of	Top and Bottom Forging modifications on 24PTH-	S-
			LC DSCs		P.4-70z
		<i>P.4.12.4</i>	Acceptanc	e Criteria for Basket Plate Coating Damage	P.4-70aa
	P.4.13	Reference	es		P.4-71
P.5	Shieldi	ng Evaluat	ion		P.5-1
	P.5.1	Discussio	n and Resu	lts	P.5-5
	P.5.2	Source Sp	pecification		P.5-6
		P.5.2.1	Gamma So	ource Term for MCNP	P.5-9
			P.5.2.1.1	Design Basis Gamma Fuel Assembly Source	
				Terms	P.5-9
			P.5.2.1.2	Design Basis CC Source Terms	P.5-9
			P.5.2.1.3	Uncertainty in Gamma Source Terms	P.5-10
		P.5.2.2	Neutron Se	ource Term for MCNP	P.5-10
		P.5.2.3	Axial Peak	king	P.5-11
		P.5.2.4	ANISN Ev	valuation for Bounding Source Terms	P.5-12
		P.5.2.5	Reconstitu	ted Fuel	P.5-14
		P.5.2.6	SCALE6.0	/ORIGEN-ARP Source Terms	P.5-15
	P.5.3	Material I	Densities		P.5-16
	P.5.4	Shielding	Evaluation		P.5-17
		P.5.4.1	Computer	Program	P.5-17
		P.5.4.2	Spatial So	urce Distribution	P.5-17
		P.5.4.3	Cross Sect	ion Data	P.5-18
		P.5.4.4	Flux-to-Do	ose-Rate Conversion	P.5-18
		P.5.4.5	Methodolo)gy	P.5-18
		P.5.4.6	Assumptio	ns	P.5-18
			P.5.4.6.1	Source Term Assumptions	P.5-19
			P.5.4.6.2	HSM-H Dose Rate Analysis Assumptions	P.5-19
			P.5.4.6.3	HSM-Model 102 Dose Rate Analysis	
				Assumptions	P.5-19
			P.5.4.6.4	OS197FC TC and Standardized TC Dose	
				Rate Analysis Assumptions	P.5-20
		P.5.4.7	Normal Co	ondition Models	P.5-20
			P.5.4.7.1	24PTH-L DSC in HSM-H	P.5-20
			P.5.4.7.2	24PTH-S-LC DSC in HSM-Model 102	P.5-21
			P.5.4.7.3	24PTH-L DSC in OS197FC TC	P.5-23
			P.5.4.7.4	24PTH-S-LC in Standardized TC	P.5-24
			P.5.4.7.5	24PTH-S-LC DSC in the OS197/OS197H	P 5 24a
		D548	A agidant N	I c	D 5 24u
		D 5 4 0	ACCIDENT N	TC Models During Fuel Logding Operations	D 5 240
		P 5 / 10	Impact on	Dose Rates due to Reduced Density Concrete and	
		1.3.4.10	Gaps betw	een HSMs	P.5-25
		P.5.4.11	Shielding A	Analysis with a Loading of 0.380 MTU per Fuel	
			Assembly		P.5-25
	P.5.5	Appendix			P.5-26

		P.5.5.1 Sample SAS2H/ORIGEN-S Input File	P.5-26
		P.5.5.2 Sample HSM-H MCNP4C2 Model	P.5-27
		P.5.5.3 Sample OS197FC TC MCNP4C2 Model	P.5-43
		P.5.5.4 Sample ANISN Model (TC –Group 23)	P.5-58
	P.5.6	References	P.5-63
P.6	Critica	lity Evaluation	P.6-1
	P.6.1	Discussion and Results	P.6-2
	P.6.2	Package Fuel Loading	P.6-4
	P.6.3	Model Specification	P.6-6
		P.6.3.1 Description of Calculational Model	P.6-6
		P.6.3.2 Package Regional Densities	P.6-8
	P.6.4	Criticality Calculations	P.6-9
		P.6.4.1 Calculational Method	P.6-9a
		P.6.4.1.1 Computer Codes	P.6-9a
		P.6.4.1.2 Physical and Nuclear Data	P.6-10
		P.6.4.1.3 Bases and Assumptions	P.6-10
		P.6.4.1.4 Determination of k _{eff}	P.6-12
		P.6.4.2 Fuel Loading Optimization	P.6-12
		P.6.4.3 Criticality Results	P.6-25
	P.6.5	Critical Benchmark Experiments	P.6-26
		P.6.5.1 Benchmark Experiments and Applicability	P.6-26
		P.6.5.2 Results of the Benchmark Calculations	P.6-27
		P.6.5.3 Benchmarking of SCALE 6.0	P.6-27
	P.6.6	Appendix	P.6-28
		P.6.6.1 References	P.6-28
		P.6.6.2 Sample CSAS25 Input Files	P.6-29
		P.6.6.3 Design Basis Case CSAS25 Input Deck	P.6-68j
		P.6.6.4 Type 3 Basket Sensitivity Analysis	P.6-87a
P.7	Confir	nement	P.7-1
	P.7.1	Confinement Boundary	P.7-2
		P.7.1.1 Confinement Vessel	P.7-2
		P.7.1.2 Confinement Penetrations	P.7-2
		P.7.1.3 Seals and Welds	P.7-3
		P.7.1.4 Closure	P.7-3
	P.7.2	Requirements for Normal Conditions of Storage	P.7-4
		P.7.2.1 Release of Radioactive Material	P.7-4
		P.7.2.2 Pressurization of Confinement Vessel	P.7-4
	P.7.3	Confinement Requirements for Hypothetical Accident Conditions.	P.7-5
		P.7.3.1 Fission Gas Products	P.7-5
		P.7.3.2 Release of Contents	P.7-5
	P.7.4	References	P.7-6

ļ

ĺ

P.8	Operating Systems					
	P.8.1	Procedures for Loading the Cask			P.8-2	
		P.8.1.1	Preparatio	n of the TC and DSC	P.8-2	
		P.8.1.2	DSC Fuel	Loading	P.8-3	
		P.8.1.3	DSC Dryi	ng and Backfilling	P.8-5	
		P.8.1.4	DSC Seal	ing Operations	P.8-8a	
		P.8.1.5	TC Down	ending and Transfer to ISFSI	P.8-9	
		P.8.1.6	DSC Tran	sfer to the HSM	P.8-10	
		P.8.1.7	Monitorin	g Operations	P.8-11a	
	P.8.2	Procedures for Unloading the Cask			P.8-15	
		P.8.2.1	DSC Retr	ieval from the HSM	P.8-15	
		P.8.2.2	Removal	of Fuel from the DSC	P.8-15 <i>a</i>	
	P.8.3	Identific	ation of Sub	jects for Safety Analysis	P.8-24	
	P.8.4	Fuel Har	P.8-24			
	P.8.5	Other Op	P.8-24			
	P.8.6	Operatio	n Support S	ystem	P.8-24	
	P.8.7	Control 1	P.8-24			
	P.8.8	Analytical Sampling				
	P 8 9	Referenc	es	,	P 8-25	
DO	1.0.9	T	1 \ 1 \		1 1	
P.9	Accept	oduction - 1				
P.9	Accept	ance Tests	s and Mainte	enance Program	P.9-1	
	P.9.1	Acceptance Tests			P.9-1	
		P.9.1.1	Visual Ins	pection	P.9-1	
		P.9.1.2	Structural	Tests	P.9-1	
		P.9.1.3	Leak Test	S	P.9-1	
		P.9.1.4	Compone	nt Tests	P.9-1	
		P.9.1.5	Shielding	Integrity Tests	P.9-2	
		P.9.1.6	Thermal A	Acceptance Tests	P.9-2	
		P.9.1.7	Poison Ac	cceptance	P.9-2	
			P.9.1.7.1	Borated Aluminum	P.9-3	
			P.9.1./.2	Boron Carbide / Aluminum Metal Matrix		
			D0172	Composites (MMC)	P.9-3	
			P.9.1.7.3	BURAL ⁻	P.9-4	
			P.9.1./.4	Other Visual Inspections Criterio	P.9-4	
			F.9.1.7.5 D0176	Thermal Conductivity Testing of Poison Plates	F.9-4	
			P 0 1 7 7	Specification for Acceptance Testing of Neutror	······································	
			1.7.1././	Absorber Content	P 9-6	
			P.9.1.7.8	Specification for Qualification Testing of Metal		
			1.9.11.1.0	Matrix Composites	P.9-8	
			P.9.1.7.9	Specification for Process Controls for Metal	0	
				Matrix Composites	P.9-12	
		P.9.1.8	High-Stre	ngth Low-Alloy Steel for Basket Type 3	P.9-12a	
	P.9.2	Maintena	ance Progra	m	P.9.13	

I

	P.9.3	Referenc	es	P.9-14
P.10	Radiati	on Protect	ion	P.10-1
	P.10.1	.10.1 Occupational Exposure		
	P.10.2	Off-Site	Dose Calculations	P.10-3
	-	P.10.2.1	Activity Calculations	P.10-5
		P.10.2.2	Dose Rates	P.10-6
	P.10.3	Reference	es.	P.10-8
P 11	Accide	nt Analyse		P 11-1
	P 11 1	Off-Norr	P 11-2	
		P 11 1 1	Off-Normal Transfer Loads	P 11-2
		1.11.1.1	P 11 1 1 1 Postulated Cause of Event	P 11-2
			P 11 1 1 2 Detection of Event	P 11-2
			P 11 1 1 3 Analysis of Effects and Consequences	P 11-2
			P 11 1 1 4 Corrective Actions	P 11-2
		P.11.1.2	Extreme Temperatures	P.11-3
		1.111.1.2	P.11.1.2.1 Postulated Cause of Event	P.11-3
			P.11.1.2.2 Detection of Event	
			P.11.1.2.3 Analysis of Effects and Consequences	P.11-3
			P.11.1.2.4 Corrective Actions	P.11-3
		P.11.1.3	Off-Normal Releases of Radionuclides	P.11-4
			P.11.1.3.1 Postulated Cause of Event	P.11-4
			P.11.1.3.2 Detection of Event	P.11-4
			P.11.1.3.3 Analysis of Effects and Consequences	P.11-4
			P.11.1.3.4 Corrective Actions	P.11-4
		P.11.1.4 Radiological Impact from Off-Normal Operations		P.11-4
	P.11.2	Postulate	ed Accidents	P.11-5
		P.11.2.1	Reduced HSM Air Inlet and Outlet Shielding	P.11-5
			P.11.2.1.1 Cause of Accident	P.11-5
			P.11.2.1.2 Accident Analysis	P.11-5
			P.11.2.1.3 Accident Dose Calculations	P.11-5
			P.11.2.1.4 Corrective Actions	P.11-5
		P.11.2.2	Earthquake	P.11-6
			P.11.2.2.1 Cause of Accident	P.11-6
			P.11.2.2.2 Accident Analysis	P.11-6
			P.11.2.2.3 Accident Dose Calculations	P.11-6
			P.11.2.2.4 Corrective Actions	P.11-6
		P.11.2.3	Extreme Winds and Tornado Missiles	P.11-6
			P.11.2.3.1 Cause of Accident	P.11-6
			P.11.2.3.2 Accident Analysis	P.11-6a
			P.11.2.3.3 Accident Dose Calculations	P.11-13
		P.11.2.4	Flood	P.11-13a
			P.11.2.4.1 Cause of Accident	P.11-13a
			P.11.2.4.2 Accident Analysis	P.11-13a
			P.11.2.4.3 Accident Dose Calculations	P.11-13a
			P.11.2.4.4 Corrective Actions	P.11-14

	P.11.2.5	Accidental TC Drop	P.11-14	
		P.11.2.5.1 Cause of Accident	P.11-14	
		P.11.2.5.2 Accident Analysis	P.11-14	
		P.11.2.5.3 Accident Dose Calculations for Loss of		
		Neutron Shield	P.11-15	
		P.11.2.5.4 Corrective Action	P.11-15	
	P.11.2.6	Lightning	P.11-15	
	P.11.2.7	Blockage of Air Inlet and Outlet Openings	P.11-15	
		P.11.2.7.1 Cause of Accident	P.11-15	
		P.11.2.7.2 Accident Analysis	P.11-15	
		P.11.2.7.3 Accident Dose Calculations	P.11-15a	
		P.11.2.7.4 Corrective Action	P.11-16	
	P.11.2.8	DSC Leakage	P.11-16	
	P.11.2.9	Accident Pressurization of DSC	P.11-16	
		P.11.2.9.1 Cause of Accident	P.11-16	
		P.11.2.9.2 Accident Analysis	P.11-16	
		P.11.2.9.3 Accident Dose Calculations	P.11-16	
		P.11.2.9.4 Corrective Actions	P.11-16	
	P.11.2.1	P.11.2.10 Fire and Explosion		
		P.11.2.10.1 Cause of the Accident	P.11-17	
		P.11.2.10.2 Accident Analysis	P.11-17	
		P.11.2.10.3 Accident Dose Calculations	P.11-17	
		P.11.2.10.4 Corrective Actions	P.11-17	
	P.11.3 Reference	ces	P.11-18	
D 10				
P.12	Specifications	ask Use - Operating Controls and Limits or Technical	P.12-1	
P.13	Quality Assurance	ce	P.13-1	
P.14	Decommissionin	g	P.14-1	
LIST OF TABLES

Table P.1-1	Key Design Parameters of the NUHOMS [®] -24PTH System ⁽²⁾	P.1-13
Table $D = 2$	Thermal and Dadialagical Characteristics for Control Components	1
Table P.2-2	Stored in the NULLOMS [®] 24DTU DSC	D 2 21
Table D 2 2	DWD Fuel Assembly Design Characteristics for the NUHOMS [®]	F.2-21
Table F.2-5	- 24DTU DSC	ра аа
Table D 2 4	24PTI DSC	P.2-22
Table P.2-4		P.2-25
Table P.2-5		P.2-23
Table P.2-3a $T_{a}h_{1a} = D 2 G$	Dalatad	P.2-23a
Table P.2-0	Deleted	P.2-20
Table $P.2-7$		P.2-27
Table P.2-8		P.2-28
Table P.2-9		P.2-29
Table P.2-10		P.2-30
Table P.2-11	Deleted	P.2-31
Table P.2-12	Deleted	P.2-32
Table P.2-13	Deleted	P.2-33
Table P.2-14	Summary of 24PTH-DSC Load Combinations	P.2-35
Table P.2-15	Summary of Stress Criteria for Subsection NB Pressure Boundary	
T 11 D A 16	Components	P.2-39
Table P.2-16	Summary of Stress Criteria for Subsection NG Components	P.2-40
Table P.2-17	Classification of NUHOMS [®] -24PTH DSC Components	P.2-41
Table P.2-18	Summary of NUHOMS [®] -24PTH DSC and HSM-H Component Design	
	Loadings ⁽¹⁾	P.2-42
Table P.2-19	Design Pressures for Tornado Wind Loading	P.2-45
Table P.2-20	B10 Specification for the NUHOMS [®] -24PTH Poison Plates	P.2-45
Table P.2-21	Maximum Allowable Heat Load for the NUHOMS [®] -24PTH DSC	P.2-45
Table P.2-22	Deleted	P.2-45a
Table P.2-23	Deleted	P.2-45b
Table P.2-24	Deleted	P.2-45c
Table P.3.1-1		P.3.1-8
Table P.3.1-2	~	P.3.1-10
Table P.3.2-1	Summary of the NUHOMS [®] -24PTH System Component Nominal	
	Weights	P.3.2-2
Table P.3.2-2	Summary of the NUHOMS [®] -24PTH System Component Nominal	
	Weights (with HSM-HS and OS200 TC)	P.3.2-3
Table P.3.3-1	ASME Code Materials Data For SA-240 Type 304 and SA-182 Type	
	F304 Stainless Steel	P.3.3-3
Table P.3.3-2	Materials Data For ASTM A36 Steel	P.3.3-4
Table P.3.3-3	Static Mechanical Properties for ASTM B29 Lead	P.3.3-5
Table P.3.3-4	ASME Code Properties for 6061 Aluminum	P.3.3-6
Table P.3.3-5	Analysis Properties for Aluminum Transition Rails	P.3.3-7
Table P.3.3-6	Additional Material Properties	P.3.3-8
Table P.3.3-7	Concrete Properties	P.3.3-9
Table P.3.3-8	Reinforcing Steel Material Properties at Temperature	P.3.3-10
Table P.3.3-9	Materials Data for ASTM A992 Steel	P.3.3-11
<i>Table P.3.3-10</i>	Materials Properties, High Strength Low Alloy Steel	<i>P</i> .3.3-11a

<i>Table P.3.3-</i>	11 Material Properties – SA-516 Gr 70 and ASTM A516 Gr 70	<i>P.3.3-11b</i>
<i>Table P.3.3-</i>	12 Material Properties – Aluminum ASTM B221 or B209 Alloy 6061-O.	<i>P.3.3-11c</i>
<i>Table P.3.3-</i>	13 Material Properties – SA-564 Gr. 630 H1100	P.3.3-11d
Table P.3.4-	1 Summary of Thermal Stress Results - 24PTH Basket	P.3.4-16
Table P.3.4-2	2 Summary of Thermal Forces and Moments in the HSM-H Concrete	
	Components	P.3.4-16
Table P.3.6-1	NUHOMS [®] 24PTH System Normal Operating Loading Identification	P.3.6-20
Table P.3.6-2	Maximum NUHOMS [®] -24PTH-S / 24PTH-L DSC Shell Assembly	
	Stresses for Normal and Off-Normal Loads	P.3.6-21
Table P.3.6-3	Maximum NUHOMS [®] -24PTH-S-LC DSC Shell Assembly Stresses for	
	Normal and Off-Normal Loads	P.3.6-22
Table P.3.6-4	NUHOMS [®] -24PTH <i>Types 1 and 2</i> Basket Model Components,	
	Element Types and Materials	P.3.6-23
Table P.3.6-5	Material Properties Used in Normal Condition 24PTH <i>Types 1 and 2</i>	
	Basket Analyses	P.3.6-24
Table P.3.6-6	Normal Condition Stress Summary for 24PTH Types 1 and 2 Basket	
	Components –Vertical DW/Handling Loads	P.3.6-25
Table P.3.6-7	Normal Condition Stress Summary for 24PTH Types 1 and 2 Basket	
	Components Horizontal DW/Handling	P.3.6-26
Table P.3.6-8	Normal Condition Fuel Compartment Tubes-to-Steel Insert Plates	
	(Straps) Weld Loads for 24PTH Types 1 and 2 Basket	P.3.6-27
Table P.3.6-9	NUHOMS [®] Off-Normal Operating Loading Identification	P.3.6-28
Table P.3.6-1	0 Maximum NUHOMS [®] HSM-H Concrete Component Forces and	
	Moment for Normal and Off-Normal Loads	P.3.6-29
Table P.3.6-1	1 Comparison of ANSYS Results at TC Top Lid Center	P.3.6-30
Table P.3.6-1	2 TC Enveloping Thermal Stresses for Load Combinations	P.3.6-31
Table P.3.6-1	3 OS197/OS197H/OS197FC TC Combined Stresses For Normal	
	Condition Loads(1)(2)	P.3.6-32
Table P.3.6-1	4 OS197/OS197H/OS197FC TC Structural Shell Stresses at TC	
	Trunnions	P.3.6-33
Table P.3.6-1	5 Parameters of PWR Fuel Assemblies	P.3.6-34
Table P.3.6-1	6 Fuel Cladding Computed Stresses and Ratios to Yield Stress	P.3.6-35
Table P.3.6-1	7 Stress Intensities of Fuel Tubes for One Foot Side Drop Load	P.3.6-36
Table P.3.7-1	Maximum NUHOMS [®] -24PTH-S/24PTH-L DSC Stresses for Drop	
	Accident Loads	P.3.7-26
Table P.3.7-2	2 Maximum NUHOMS [®] -24PT-S-LC DSC Stresses for Drop Accident	
T 11 D 2 T 2	Loads	P.3.7-27
Table P.3.7-3	List of Drop Condition LS-DYNA Stress Analyses of the 24PTH <i>Types</i>	
	<i>I and 2</i> Basket Assembly	P.3.7-28
Table P.3.7-4	Summary of Material Properties for Drop Accident Analyses of the	
T 11 D 2 7 6	24P1H Types 1 and 2 Basket Assembly	P.3.7-29
Table P.3.7-3	24P1H Types 1 and 2 Basket, Enveloping Stress Results - 75g Side	D 2 7 20
T 11 D 2 7 (Drops	P.3./-30
Table $P.3.7-6$	24P1H <i>Types 1 and 2</i> Basket, Enveloping Stress Results - 60g End	D 2 7 21
T-11- D 2 7 7	$Drop \dots Drop n $	P.3./-31
1 able P.3./-/	Drop Condition ANSYS Stability Analyses for the 24PTH Types T	D 2 7 22
	ana 2 Basket Assembly	P.3./-32

Table P.3.7-8	NUHOMS [®] -24PTH-S/24PTH-L DSC Enveloping Load Combination	
	Results for Normal and Off-Normal Loads	P.3.7-33
Table P.3.7-9	NUHOMS [®] -24PTH-S-LC DSC Enveloping Load Combination Results	
	for Normal and Off-Normal Loads	P.3.7-34
Table P.3.7-10	NUHOMS [®] -24PTH-S/24PTH-L DSC Enveloping Load Combination	
	Results for Accident Loads	P.3.7-35
Table P.3.7-11	NUHOMS [®] -24PT-S-LC DSC Enveloping Load Combination Results	
	for Accident Loads	P.3.7-36
Table P.3.7-12	NUHOMS [®] -24PTH-S/24PTH-L DSC Enveloping Load Combination	
1001011007 12	Results for Accident Loads	P.3.7-37
Table P.3.7-13	NUHOMS [®] -24PTH-S-LC DSC Enveloping Load Combination Results	
	for Accident Loads	P.3.7-38
Table P.3.7-14	DSC Enveloping Load Combination (Notes to Table P.3.7-8 through	
	Table P.3.7-13	P.3.7-39
Table P.3.7-15	Summary of OS197/OS197H/OS197FC TC Stresses(1)(2)(3)	P.3.7-40
Table P.3.7-16	HSM-H Concrete Load Combinations	P.3.7-41
Table P.3.7-17	HSM-H Support Steel Structure Load Combinations	P.3.7-42
Table P.3.7-18	Ultimate Capacities of Concrete Components	P.3.7-43
Table P.3.7-19	Maximum NUHOMS [®] HSM-H Concrete Component Forces and	
140101.517 19	Moments for Accident Loads	P 3 7-44
Table P 3 7-20	Comparison of Highest Combined Shear Forces/Moments with the	
140101.51, 20	Capacities	P 3 7-45
Table P.3.7-21	Maximum/Minimum Forces/Moments in the Rail Components in the	
140101.01, 21	Local System	P.3.7-46
Table P.3.7-22	Maximum/Minimum Forces/Moments in the Rail Extension Plates in	
140101.5.7 22	the Local System	P 3 7-47
Table P.3.7-23	Maximum/Minimum Axial Forces in the Cross Member Components	P.3.7-48
Table P.3.7-24	Rail Component Results	P.3.7-49
Table P.3.7-25	Extension Plates and Cross Members Results	P.3.7-50
Table P.3.7-26	NUHOMS [®] -24PTH Basket. Enveloping Stress Results – High Seismic	
140101.51, 20	Loading	P.3.7-50a
Table P 3 7-27	NUHOMS [®] -24PTH DSC Components Stress Results for Deadweight +	
140101.5.7 27	Internal Pressure + High Seismic Load Combination [Ton End]	P 3 7-50h
Table P 3 7-28	NUHOMS [®] -24PTH DSC Components Stress Results for Deadweight +	.1.5.7 500
140101.5.7 20	Internal Pressure + High Seismic Load Combination [Bottom End]	P 3 7-50c
Table P 3 7-20	$MIHOMS^{\mathbb{R}}_{2}$ 24PTH DSC Weld Stress for Deadweight + Internal	1 .3.7-300
1 autor 1 .3.7-29	Pressure + High Seismic Load Combination	P 3 7-50d
Table P 3 & 1	24PTH Type 3 Resket Assembly Stress Criteria for Subsection NG	. 1 . <i>J</i> .7- <i>J</i> 0u
<i>Tuble 1</i> .5.0-1	Components	D 2 8 11
Table D 2 9 2	Components	D 2 0 17
Table P.5.0-2	<i>Communication of the stress of the second of the second s</i>	F.J.0-12
Table P.3.8-3	Component Allowable Stresses (Normal / Off-Normal)	P.3.8-13
<i>Table P.3.8-4</i>	Basket Grid Plate Accident Drop Strain Design Criteria	P.3.8-14
Table P.3.8-5	24PTH Type 3 Basket Stress Summary – Enveloped DW + Handling	D 4 0 1 5
	+ Thermal	<i>P.3.8-15</i>
<i>Table P.3.8-6</i>	24PTH Type 3 Basket Grid Plate Strain – Side Drops with Bolts and	D A C C C
	Tie Rods	<i>P.3.8-16</i>
<i>Table P.3.8-7</i>	24PTH Type 3 Basket Bounding Grid Plate Strain from the Updated	
	Model – Side Drops with and without Bolts and Tie Rods	<i>P.3.8-16</i>

<i>Table P.3.8-8</i>	24PTH Type 3 Basket Buckling Analysis Results Summary	<i>P.3.8-17</i>
<i>Tuble 1</i> .J.0-9	241 111 Type 5 Daskei Dounding Duckling Analysis Results from the Undated Model	P 3 8-17
Table P 3 8-10	24PTH Type 3 Basket Maximum Adjacent Fuel Compartment	1.5.0-17
140101.5.0 10	<i>Relative Displacements</i>	P 3 8-18
<i>Table</i> P.3.8-11	24PTH Type 3 Basket Bounding Maximum Adjacent Fuel	
100001.0.011	Compartment Relative Displacements from the Undated Model	
Table P.4-1	Bulk Air Temperatures at Specified HSM-H Regions for the Various	
	Cases(1)	P.4-74
Table P.4-2	HSM-H Components Normal and Off-Normal Maximum	
	Temperatures, 40.8 kW Heat Load	P.4-75
Table P.4-3	HSM-H Components Normal and Off-Normal Maximum	
	Temperatures, 31.2 kW Heat Load	P.4-76
Table P.4-4	HSM-H Components Normal and Off-Normal Maximum	
	Temperatures, 24 kW Heat Load	P.4-77
Table P.4-5	HSM-H Components Maximum Temperatures (°F), 40.8 kW Decay	
	Heat Load, 117°F Ambient, Blocked Vent Accident (Case 9) ⁽²⁾	P.4-78
Table P.4-6	Single HSM-H Components Maximum Temperatures, 40.8 kW Heat	
	Load, -40°F Ambient, Blocked Vent Accident (Case 10) ⁽¹⁾	P.4-79
Table P.4-7	Summary of OS197FC Cases	P.4-80
Table P.4-8	Cask DSC Gap Hydraulic Characteristics as Function of	
	Circumferential Position	P.4-81
Table P.4-9	OS197FC TC Components and DSC Shell Temperatures with 40.8	
— 11 — 140	kW Decay Heat Load under Normal and Off-Normal Conditions	P.4-82
Table P.4-10	OS197FC TC Components and DSC Shell Temperatures with 31.2	
	kW Decay Heat Load, without Aluminum Inserts under Normal and	
	Off-Normal Conditions	P.4-83
Table P.4-11	OS197FC TC Components and DSC Shell Temperatures with 31.2	
	kW Decay Heat Load, with Aluminum Inserts under Normal and	
	Off-Normal Conditions	P.4-84
Table P.4-12	Steady-State Temperatures for a Loss of Neutron Shield	P.4-85
Table P.4-13	Fire Accident Temperatures with 40.8 kW Decay Heat Load	P.4-86
Table P.4-14	Fuel Cladding Normal Condition Maximum Temperatures	P.4-87
Table P.4-15	DSC Basket Assembly Maximum Normal Operating Component	
	Temperatures; HLZC 1 (40.8 kW)	P.4-88
Table P.4-16	DSC Basket Assembly Maximum Normal Operating Component	
	Temperatures; HLZC 4 (31.2 kW)	P.4-89
Table P.4-17	DSC Basket Assembly Maximum Normal Operating Component	
	Temperatures; HLZC 5 (24 kW)	P.4-90
Table P.4-18	24PTH DSC Initial Helium Fill Gas Molar Quantities	P.4-91
Table P.4-19	24PTH DSC Maximum Normal Operating Condition Pressures	P.4-92
Table P.4-20	Fuel Cladding Off-Normal Condition Maximum Temperatures	P.4-93
Table P.4-21	DSC Basket Assembly Maximum Off-Normal Operating	
m 11 p :	Component Temperatures, HLZC 1 ⁽⁴⁾ (40.8 kW)	P.4-94
Table P.4-22	DSC Basket Assembly Maximum Off-Normal Operating	
	Component Temperatures, HLZC 4 (31.2 kW)	P.4-95

Table P.4-23	DSC Basket Assembly Maximum Off-Normal Operating	
	Component Temperatures, HLZC 5 (24 kW)	P.4-96
Table P.4-24	24PTH DSC Maximum Off-Normal Operating Condition Pressures	P.4-97
Table P.4-25	Fuel Cladding Accident Condition Maximum Temperatures	P.4-98
Table P.4-26	DSC Basket Assembly Accident Maximum Component	
	Temperatures; HLZC 1 (40.8 kW)	P.4-99
Table P.4-27	DSC Basket Assembly Accident Maximum Component	
	Temperatures; HLZC 4 (31.2 kW)	P.4-100
Table P.4-28	DSC Basket Assembly Accident Maximum Component	
	Temperatures; HLZC 5 (24 kW)	P.4-101
Table P.4-29	24PTH DSC Maximum Accident Condition Pressures	P.4-102
Table P.4-30	Vacuum Drying Fuel Cladding Maximum Temperatures (°F)	P.4-103
Table P.4-31	DSC Basket Assembly Maximum Component Temperatures during	
	Vacuum Drving, HLZC 1 (40.8 kW)	P.4-104
Table P.4-32	DSC Basket Assembly Maximum Component Temperatures during	
	Vacuum Drving, HLZC 4 (31.2 kW)	P.4-105
Table P.4-33	DSC Basket Assembly Maximum Component Temperatures during	
	Vacuum Drving, HLZC 5 (24 kW)	P.4-106
Table P.4-34	24PTH-S-LC DSC Shell Temperatures for Storage in HSM Model 102	P.4-107
Table P.4-35	NUHOMS [®] -24PTH DSC Cavity Free Volumes	P.4-108
Table P.4-36	Fuel Rod Helium Fill Gas Released per DSC	P.4-109
Table P.4-37	Fission Gas Released per DSC	P.4-110
Table P.4-38	CC Gas Released per DSC	P.4-111
Table P.4-39	24PTH-S-LC DSC Shell Maximum Temperatures during Transfer in	
	Standardized TC with 24 kW Heat Load	P.4-112
Table P.4-40	Comparison Of Peak Component Temperatures For 117°F Ambient	
	With 40.8 kW Decay Heat Load	P.4-113
Table P.4-41	Maximum Normal and Off-Normal OS197 TC Component	
	Temperatures with 40.8 kW Decay Heat Load (with Air Circulation)	P.4-114
Table P.4-42	Maximum Normal and Off-Normal OS197 TC Component	
	Temperatures with 31.2 kW Decay Heat Load (with Air Circulation)	P.4-115
Table P.4-43	HSM-H Concrete and DSC Shell temperatures with and without Side	
	Heat Shield Fins	P.4-116
Table P.4-44	Design Load Cases for 24PTH Type 3 DSC during Storage	
	Conditions	P.4 - 116a
<i>Table P.4-45</i>	List of Materials in the ANSYS FLUENT Model for HSM-H Loaded	
	with 24PTH Type 3 DSC	<i>P.4-116b</i>
Table P.4-46	Effective Properties of Composite Plate of Steel and MMC Plates for	
	Region 1 of Repetitive Segment	P.4 - 116d
Table P.4-47	Effective Properties of Composite Plate of Steel, MMC and	
	Aluminum Plates for Region 2 of Repetitive Segment of Center	
	Plates	P.4 - 116e
<i>Table P.4-48</i>	Effective Properties of Composite Plate of Steel, MMC and	
	Aluminum Plates for Region 2 of Repetitive Segment of Off-Center	
	Plates	P.4 - 116f

I

Table P.4-49	<i>Effective Properties of Outer Steel Plate with Gap Between Plate and Rail</i>	P.4-116g
Table P.4-50	<i>Bounding Effective Properties of PWR Fuel Assemblies for 24PTH DSC Basket</i>	P.4-116h
Table P.4-51	<i>List of Basket Assembly Components and Materials in 24PTH Type 3</i> DSC	P.4-116i
<i>Table P.4-52</i>	<i>Applied Peaking Factors for PWR Fuel Assemblies in 24PTH Type 3</i> DSC	P.4-116i
Table P.4-53	<i>Peaking Factors for Fuel Assemblies in the 24PTH Type 3 DSC Model with Coarse Mesh</i>	P.4-116k
<i>Table P.4-54</i>	Maximum Component Temperatures for 24PTH Type 3 DSC in HSM-H for Normal Storage with 106 °F Ambient Temperature	P 4-1161
Table P 4-55	GCI Calculations for HSM-H Loaded with 24PTH Type 3 DSC	P 4-116m
<i>Table P.4-56</i>	Average Temperatures of Key Components in Hottest Section for 24PTH Type 3 DSC Basket Assembly	P.4-116n
Table P.4-57	Diametrical Hot Gan for 24PTH Type 3 DSC Basket Assembly	P.4-116n
Table P.4-58	Maximum Temperatures of Key Components in HSM-H loaded with	
	24PTH Type 3 DSC for Bounding Storage Condition	P.4 - 1160
<i>Table P.4-59</i>	Average Temperatures of Key Components in HSM-H Loaded with	
	24PTH Type 3 DSC for Bounding Storage Condition	P.4 - 1160
<i>Table P.4-60</i>	Not Used	<i>P.4-1160</i>
<i>Table P.4-61</i>	Design Load Cases for 24PTH Type 3 DSC during Transfer	
	Conditions	P.4 - 116p
<i>Table P.4-62</i>	Not Used	P.4 - 116p
<i>Table P.4-63</i>	Not Used	P.4 - 116p
<i>Table P.4-64</i>	Maximum Temperatures of Key Components of the OS197FC TC	
	Loaded with 24PTH Type 3 DSC	P.4 - 116q
<i>Table P.4-65</i>	GCI Calculation for OS197FC TC Loaded with 24PTH Type 3 DSC	P.4 - 116r
Table P.4-66	Comparison of Maximum Temperatures between 24PTH Type 3	P / 116a
Table P 5-1	Summary of NUHOMS [®] -24PTH-L DSC in HSM-H Maximum and	1.4-1105
140101.5-1	Average Dose Rates Configuration 2	P 5-65
Table P 5-2	Summary of NUHOMS [®] -24PTH-S-I C DSC in HSM-Model 102	1
140101.5-2	Maximum and Average Dose Rates, Configuration 5	P 5-66
Table P 5-3	Summary of NUHOMS [®] -24PTH-L Type 2 DSC OS197FC TC	1
10001.55	Maximum Dose Rates During Transfer Operations Configuration 2	P 5-67
Table P 5-3a	Summary of NUHOMS [®] -24PTH-1 Type 3 DSC OS107 FC	1
140101.5 54	Maximum Dose Rates During Transfer Operations Configuration?	P 5-67a
Table P 5-4	Summary of NUHOMS [®] -24PTH-L. Type 2 DSC. OS197FC TC	<i>1</i> 07 u
10001.5 4	Maximum Dose Rates During Decontamination and Welding	
	Operations Configuration 2	P 5-68
Table P 5-4a	Summary of NUHOMS [®] -24PTH-1 Type 3 DSC OS107 FC	1
100101.5-70	Maximum Dose Rates During Decontamination and Wolding	
	Operations Configuration?	P 5-68a
	орогинония, Сонугдигинон 2	1 .5-000

Table P.5-5	Summary of NUHOMS [®] -24PTH-S-LC <i>Type 2</i> DSC, Standardized	
	TC Maximum Dose Rates During Transfer Operations,	
	Configuration 5	P.5-69
Table P.5-5a	Summary of NUHOMS [®] -24PTH-S-LC Type 3 DSC, Standardized TC	
	Maximum Dose Rates During Transfer Operations, Configuration 5	P.5-69a
Table P.5-6	PWR Fuel Assembly Material Mass	P.5-70
Table P.5-7	Elemental Composition of LWR Fuel-Assembly Structural Materials	P.5-71
Table P.5-8	Flux Scaling Factors By Fuel Assembly Region	P.5-72
Table P.5-9	Gamma and Neutron Source Term for 2.0 kW Fuel in TC (62	
	GWd/MTU, 3.4 wt. % U-235 and 5.6-Year Cooled Fuel)	P.5-73
Table P.5-10	Gamma and Neutron Source Term for 2.0 kW Fuel in HSM-H (41	
	GWd/MTU, 3.3 wt. % U-235 and 3.0-Year Cooled Fuel)	P.5-74
Table P.5-11	Gamma and Neutron Source Term for 1.5 kW Fuel in TC or HSM	
	(32 GWd/MTU, 2.6 wt. % U-235 and 3.0-Year Cooled Fuel)	P.5-75
Table P.5-12	Design-Basis CC Source Terms	P.5-76
Table P.5-13	Source Term Peaking Factor Summary	P.5-77
Table P.5-14	Shielding Material Densities	P.5-78
Table P.5-15	Material Densities for Fuel/Basket Region Used in ANISN Models	P.5-79
Table P.5-16	Neutron Source for ANISN Calculation	P.5-80
Table P.5-17	ANISN Response Function for the OS197FC TC	P.5-81
Table P.5-18	ANISN Response Function for the HSM-H	P.5-82
Table P.5-19	Flux to Dose Rate Conversion Factors	P.5-83
Table P.5-20	Gamma and Neutron Macroscopic Cross Sections	P.5-84
Table P.5-21	Surface Average Dose Rates on HSM-Model 102 with 24PTH-S-LC	
100101021	Type 2 DSC	P.5-85
Table P.5-22	Maximum Dose Rates on HSM-Model 102 with 24PTH-S-LC	
	Type 2 DSC	P.5-86
Table P.5-23	OS917FC TC Total Dose Rates (mrem/hr) at Cask Centerline for 2.0	
	kW Case ⁽¹⁾	P.5-87
Table P.5-24	HSM-H Total Dose Rates (mrem/hr) at Roof for 2.0 kW Case ⁽¹⁾	P.5-88
Table P.5-25	OS197FC TC Total Dose Rates (mrem/hr) at Cask Centerline for 1.5	
	kW Case ⁽¹⁾	P.5-89
Table P.5-26	HSM-H Total Dose Rates (mrem/hr) at Roof for 1.5 kW Case ⁽¹⁾	P.5-90
Table P.5-27	Summary of Experimental Samples as a Function of Burnup Range	P.5-90a
Table P.5-28	HLZC#2 2.0 kW Design Basis HSM Source Term	P.5-90b
Table P.5-29	HLZC#2 2.0 kW Design Basis TC Source Term	P.5-90c
Table P.5-30	HLZC#6 0.6 kW (Inner) Design Basis HSM and TC Source Term	P.5-90d
Table P.5-31	HLZC#6 0.6 kW (Outer) Design Basis HSM Source Term	P.5-90e
Table P.5-32	HLZC#6 1.3 kW Design Basis HSM Source Term	.P.5-90f
Table P.5-33	HLZC#6 2.5 kW Design Basis HSM and TC Source Term	P.5-90g
Table P.5-34	HLZC#6 0.6 kW (Outer) Design Basis TC Source Term	P.5-90h
Table P.5-35	HLZC#6 1.3 kW Design Basis TC Source Term	.P.5-90i
Table P.6-1	Minimum B10 Content in the Neutron Poison Plates	P.6-88
Table P.6-2	Authorized Contents for NUHOMS [®] -24PTH System	P.6-89
Table P.6-3	Maximum Assembly Average Initial Enrichment for Each	
	Configuration (Intact Fuel)	P.6-90

Table P.6-4	Maximum Assembly Average Initial Enrichment for Each	
	Configuration (Damaged Fuel)	P.6-92
Table P.6-4a	Maximum Assembly Average Initial Enrichment for Each	
	Configuration (Damaged/Failed Fuel)	P.6-92a
Table P.6-5	Parameters For PWR Assemblies	P.6-93
Table P.6-6	NUHOMS [®] -24PTH Basket Dimensions	P.6-95
Table P.6-7	Description of the Basic KENO Model Units for Intact Fuel	P.6-96
Table P.6-8	Material Property Data	P.6-97
Table P.6-9	Most Reactive Fuel Type Evaluation Results	P.6-98
Table P.6-10	Transition Rail Material Evaluation Results	P.6-100
Table P.6-11	Fuel Clad OD Thickness Evaluation Results	P.6-101
Table P.6-12	Poison Plate Thickness Evaluation Results	P.6-102
Table P.6-13	Fuel compartment tube Width Evaluation Results	P.6-103
Table P.6-14	Fuel compartment tube Thickness Evaluation Results	P.6-104
Table P.6-15	B&W 15x15 Class Assembly without CCs Final Results	P.6-105
Table P.6-16	B&W 15x15 Class Assembly with CCs Final Results	P.6-112
Table P.6-17	B&W 15x15 Class Assembly BORAL® Poison Results	P.6-115
Table P.6-18	CE 14x14 Class Assembly without CCs Final Results	P.6-116
Table P.6-19	CE 14x14 Class Assembly With CCs Final Results	P.6-118
Table P.6-20	CE 15x15 Class Assembly without CCs Final Results	P.6-119
Table P.6-21	CE 16x16 Class Assembly without CCs Final Results	P.6-125
Table P.6-22	WE 14x14 Class Assembly without CCs Final Results	P.6-127
Table P.6-23	WE 15x15 Class Assembly without CCs Final Results	P.6-128
Table P.6-24	WE 15x15 Class Assembly with CCs Final Results	P.6-134
Table P.6-25	WE 17x17 Class Assembly without CCs Final Results	P.6-137
Table P.6-26	WE 17x17 Class Assembly with CCs Final Results	P.6-144
Table P.6-27	Summary of Maximum keff for Each Fuel Assembly Class Final	
	Results	P.6-147
Table P.6-28	Key Parameters Utilized in the Damaged/Failed Assembly	
	Calculations	P.6-148
Table P.6-29	Rod Pitch Study Results	P.6-149
Table P.6-30	Optimum Rod Pitch with Addition and Deletion of Rods	P.6-155
Table P.6-31	Single Ended Shear Evaluation Results	P.6-159
Table P.6-32	Double Ended Shear Break Evaluation Results	P.6-163
Table P.6-33	Evaluation of Shifting of Fuel Rods beyond Poison	P.6-165
Table P.6-34	Comparison of Various Damaged Assembly Configurations	P.6-166
Table P.6-35	Dancoff Factor Calculation Results	P.6-167
Table P.6-36	Damaged Assembly/Intact Assembly Final Results	P.6-170
Table P.6-37	Criticality Results for Intact Fuel Assemblies with 23.145" "Egg-	
	Crate"	P.6-173a
Table P.6-38	Criticality Results for Damaged Fuel Assemblies with with 23.145"	D 6 172h
Table P 6-30	Summary of Criticality Results for Intact Fuel Assemblies	r.u-1/30 P 6_172h
Table D 6 10	Summary of Criticality Results for Damaged Fuel Assemblies	D 6 172;
Table D 6 11	Benchmarking Results	D 6 174
Table P 6-17	USI_1 Reculte	р 6_175
Table D 6 12	USL Determination for Criticality Analysis	ра 176
1 auto 1 .0-45	USL Determination for Unitedity Analysis	1.0-1/0

Table P.6-44	Summary of Criticality Results for Damaged Fuel Assemblies	P.6-177
Table P.6-45	Summary of Criticality Results for Failed Fuel Assemblies	P.6-177a
Table P.6-46	Benchmarking Results	P.6-178
Table P.6-47	USL-1 Results	P.6-182
Table P.6-48	USL Determination for Criticality Analysis	P.6-183
Table P.6-49	Comparison of the Intact Fuel Results for Type 3D Basket to Type	
	1C/2C Basket – Nominal Compartment Width	<i>P.6-183a</i>
Table P.6-49a	Comparison of the Intact Fuel Results for Type 3D Basket to Type	
	1C/2C Basket – Minimum Compartment Width	<i>P.6-183b</i>
Table P.6-50	Comparison of the Damaged Fuel Results for Type 3D Basket to	
	<i>Type 1C/2C Basket – Nominal Compartment Width</i>	<i>P.6-183c</i>
Table P.6-50a	Comparison of the Damaged Fuel Results for Type 3D Basket to	
	<i>Type 1C/2C Basket – Minimum Compartment Width</i>	<i>P.6-183c</i>
Table P.6-51	Comparison of the Failed Fuel Results for Type 3D Basket to Type	
	1C/2C Basket – Nominal Compartment Width	P.6-183d
Table P.6-51a	Comparison of the Failed Fuel Results for Type 3D Basket to Type	
	1C/2C Basket – Minimum Compartment Width	<i>P.6-183d</i>
Table P.9-1	B10 Specification for the NUHOMS [®] -24PTH Poison Plates	P.9-15
Table P.10-1	Occupational Exposure Summary, 24PTH System	P.10-9
Table P.10-1a	Measured Occupational Exposures	P.10-9a
Table P.10-2	Total Annual Exposure, 24PTH-L Within HSM-H	P.10-10
Table P.10-3	Total Annual Exposure, 24PTH-S-LC Within HSM-Model 102	P.10-11
Table P.10-4	HSM-H/HSM-Model 102 Gamma-Ray Spectrum Calculation	
	Results	P.10-12
Table P.10-5	HSM-H/HSM-Model 102 Neutron Spectrum Calculation Results	P.10-13
Table P.10-6	Summary of ISFSI Surface Activities, 24PTH-L DSC Within	
	HSM-H.	P.10-14
Table P.10-7	Summary of ISFSI Surface Activities, 24PTH-S-LC DSC Within	
	HSM-Model 102	P.10-15
Table P.10-8	MCNP Front Detector Dose Rates for 2x10 Array, 24PTH-L DSC	
	Within HSM-H	P.10-16
Table P.10-9	MCNP Back Detector Dose Rates for the Two 1x10 Arrays,	
	24PTH-L DSC Within HSM-H	P.10-17
Table P.10-10	MCNP Side Detector Dose Rates, 24PTH-L DSC Within HSM-H	P.10-18
Table P.10-11	MCNP Front Detector Dose Rates for 2x10 Array, 24PTH-S-LC	
	DSC Within HSM-Model 102	P.10-19
Table P.10-12	MCNP Back Detector Dose Rates for the Two 1x10 Arrays,	
	24PTH-S-LC DSC Within HSM-Model 102	P.10.20
Table P.10-13	MCNP Side Detector Dose Rates, 24PTH-S-LC DSC Within HSM-	
	Model 102	P.10.21
Table P.11-1	Comparison of Total Dose Rates for HSM-H Loaded with	
	24PTH-S-LC, with and without Adjacent HSM Shielding Effects	P.11-19
Table P.11-2	Calculated Accident Dose Rates on the Side of the OS197FC TC and	-
	Standardized TC	P.11-20

I

Figure P.1-1	NUHOMS [®] -24PTH DSC Components	P.1-14
Figure P.1-2	Disassembled View of the NUHOMS [®] 24PTH DSC <i>Types 1 and 2</i>	
8	Basket	P.1-15
Figure P.1-3	NUHOMS [®] HSM-H Schematic	P.1-16
Figure P.1-4	Schematic View of the HSM-H—Support Structure	P.1-17
Figure P.1-5	NUHOMS [®] OS197FC TC Top Lid (Bottom View)	P.1-18
Figure P.1-6	NUHOMS® Cask Support Skid for OS197FC TC	P.1-19
Figure P.2-1		P.2-46
Figure P.2-2		P.2-47
Figure P.2-3		P.2-48
Figure P.2-4		P.2-49
Figure P.2-5		P.2-50
Figure P.2-6		P.2-51
Figure P.2-7	24PTH-S and 24PTH-L DSC Pressure Boundary	P.2-52
Figure P.2-8	24PTH-S-LC DSC Pressure Boundary	P.2-53
Figure P.2-9	-	P.2-54
Figure P.3.1-1	24PTH-S and 24PTH-L DSC Pressure Boundary	P.3.1-12
Figure P.3.1-2	24PTH-S-LC DSC Pressure Boundary	P.3.1-13
Figure P.3.3-1	Stress-Strain Relationship for SA-240 Type 304 / SA-182 Type F304	
-	Material Used in the Elastic-Plastic Analysis	P.3.3-12
Figure P.3.4-1	Potential Versus pH Diagram for Aluminum-Water System	P.3.4-13
Figure P.3.4-2	Applied Bounding Temperatures for Thermal Stress Analysis of	
-	24PTH DSC	P.3.4-14
Figure P.3.6-1	24PTH-S / 24PTH-L DSC Shell Assembly Top End 90° Analytical	
C	Model	P.3.6- <i>37</i>
Figure P.3.6-2	24PTH-S / 24PTH-L DSC Shell Assembly Bottom End 90°	
e	Analytical Model	P.3.6- <i>38</i>
Figure P.3.6-3	Partial View of 24PTH-S / 24PTH-L DSC Shell Assembly Bottom	
e	End 180° Analytical Model Showing End Plates and Grapple	
	Assembly	P.3.6- <i>39</i>
Figure P.3.6-4	24PTH-S-LC DSC Shell Assembly Axisymmetric Analysis ANSYS	
e	Model	P.3.6-40
Figure P.3.6-5	24PTH-S-LC DSC Shell Assembly Top and Bottom End 3D	
e	ANSYS Models	P.3.6-41
Figure P.3.6-6	24PTH Types 1 and 2 Basket LS-DYNA Stress Analysis Model	P.3.6-42
Figure P.3.6-7	24PTH Types 1 and 2 Basket LS-DYNA Finite Element Stress	
C	Analysis Model	P.3.6-43
Figure P.3.6-8	24PTH Types 1 and 2 Basket Model Showing Fuel Compartment	
-	Tubes, Steel Insert Plates (Straps), and Beam Elements Modeling	
	Connection Welds	P.3.6-44
Figure P.3.6-9	24PTH Types 1 and 2 Basket LS-DYNA Model Analyses Results –	
	Deadweight Stresses	P.3.6-45

Figure P.3.6-10	24PTH Types 1 and 2 Basket LS DYNA Model Analysis Results –	
-	Thermal Stresses	P.3.6-46
Figure P.3.6-11	OS197FC TC Top Lid (1/32 Segment) ANSYS Models with (Top	
-	View) and without (Bottom View) Vent Cutouts	P.3.6-47
Figure P.3.6-12	Detailed View of TC Lid Model without (Top View) and with	
-	(Bottom View) Vent Cutouts	P.3.6-48
Figure P.3.6-13	OS197FC TC Temperature Distribution for 40.8 kW with Air	
C	Circulation	P.3.6-49
Figure P.3.6-14	OS197FC TC Temperature Distribution for 31.2 kW without Air	
U	Circulation	P.3.6-50
Figure P.3.6-15	OS197FC TC Thermal Stress Analysis Model	P.3.6-51
Figure P.3.6-16	OS197FC TC Thermal Stress Analysis Results for 40.8 kW with Air	
0	Circulation	P.3.6-52
Figure P.3.6-17	OS197FC TC Thermal Stress Analysis Results for 31.2 kW without	
0	Air Circulation	P.3.6-53
Figure P.3.6-18	Geometry Model #1: Central Crack in Finite Width Under Tension	
8	[3.29]	P.3.6-54
Figure P.3.6-19	Geometry Model #2: Through-Wall Circumferential Crack in	
1.8.101.010 13	Cylinder Under Bending [3.30]	P.3.6-55
Figure P.3.7-1	DSC Lift-Off Evaluation	P.3.7-51
Figure P 3 7-2	0° Side Drop Stresses 24PTH Types 1 and 2 Basket (TC Support	
1 iguie 1 :5:7 2	Rails at +18 5°)	P 3 7-52
Figure D 2 7 2	A5° Side Drop Strogger 24DTH Types Land 2 Desket (TC Support	1
Figure F.S./-S	45 Side Diop Silesses, 24F IH Types I and 2 Basket (IC Support	D 2 7 5 2
Eigene D 2 7 4	Kalls at $\pm 10.5^{\circ}$)	P.3./-33
Figure P.3./-4	24PTH Types T and 2 Basket LS-DYNA Stability Analysis Model	
	(IC Support Rails at $\pm 18.5^{\circ}$)	P.3.7-54
Figure P.3.7-5	0° Drop Stability Analysis for 24PTH Types 1 and 2 Basket -	
	Displaced Shape at 172g	P.3.7-55
Figure P.3.7-6	Displacement Time History for 0° Drop Stability Analysis (TC	
	Support Rails at ±18.5°)	P.3.7-56
Figure P.3.7-7	45° Drop Stability Analysis for 24PTH Types 1 and 2 Basket -	
	Resultant Displacements at 158g	P.3.7-57
Figure P.3.7-8	Displacement Time History for 45° Drop Stability Analysis	P.3.7-58
Figure P.3.7-9	180° Drop Stability Analysis for 24PTH Types 1 and 2 Basket –	
C	Displaced Shape at 167g	P.3.7-59
Figure P.3.7-10	Displacement Time History for 180° Drop Stability Analysis	P.3.7-60
Figure P.3.7-11	ANSYS Model of the HSM-H for Stress Analysis	P.3.7-61
Figure P.3.7-12	ANSYS Model of the DSC and the DSC Support Structure	P.3.7-62
Figure P.3.7-13	Symbolic Notations of Force and Moment Capacities (Also for	
0	Computed Forces and Moments)	P.3.7-63
Figure P.3.7-14	Components of HSM-H Support Structure	P.3.7-64
Figure P.3.7-15	24PTH-S-LC Plastic Strain Plot – 60g Bottom End Drop + 20 psi	
C I	Off-Normal Pressure	P.3.7-65
Figure P.3.8-1	24PTH Type 3 Basket Assembly ANSYS Model – Isometric View	P.3.8-19
<i>Figure P.3.8-2</i>	24PTH Type 3 Basket Assembly ANSYS Model – Isometric View	
C	(Upper-Left Quadrant)	P.3.8-20

Figure P.3.8-3	24PTH Type 3 Basket Assembly ANSYS Model – Fuel Load Applied	
Eiguno D 2 9 1	as Pressure	P.3.8-21
Figure P.5.6-4	Comparison of Applied Temperature Profile to Data from Thermal Analysis for 24PTH Type 2 Basket Hottest groups section I C#1	
	Analysis for 241 111 Type 5 Buskel – Hollest cross section, LC#1, Horizontal Normal Hot Transfer in OS107EC TC Outdoor	D 2 8 77
Figure D 3 8 5	24PTH Type 2 Resket Assembly ANSVS Model Applied Bounding	1
Figure 1 .5.0-5	241 111 Type 5 Dasket Assembly ANSTS Model - Applied Dounding Theymal Profile	D 2 8 7 2
Figure D 3 8 6	24PTH Type 2 Resket 210° 75 a Side Drop (with holts and the rods)	1
Figure 1 .5.0-0	241 III Type 5 Daskei 210 / 5g State Drop (with oblis and ite roas) –	D 2 0 7 /
Eiguna D 2 9 7	Gria Piales, Em + Eb (Equivalent Piastic Strain, In/In)	
Figure P.5.6-7	24PTH Type 5 Basket 210 / 5g State Drop (without boils and the	D 2 0 25
	$roas$) – Gria Plates, $\varepsilon_m + \varepsilon_b$ (Equivalent Plastic Strain, in/in)	P.3.8-23
Figure P.3.8-8	24PTH Type 3 Basket 210° / 5g Side Drop (without bolts and tie	
	roas, with gria plate slot gaps) - Gria Plates, $\varepsilon_m + \varepsilon_b$ (Equivalent	D 2 0 20
E:	Plastic Strain, in/in)	P.3.8-20
Figure P.3.8-9	ANSIS Model for Eigenvalue Buckling Analysis of the 24P1H Type	D 2 0 17
E	3 Basket Bottom Gria Plates Assembly	P.3.8-2/
Figure P.4-1	HSM-H Air Flow Diagram	P.4-11/
Figure P.4-2 $E_{\rm example}$ D 4-2	24DTH DSC Shall A growther in USM H Einite Element Madal	P.4-118
Figure P.4-3 E_{1}^{2}	24PTH DSC Shell Assembly in HSM-H Finite Element Model	P.4-119
Figure P.4-4	Single HSM-H with 24PTH DSC Shell Assembly Finite Element	D 4 120
E	Model	P.4-120
Figure P.4-5	Analysis	D / 101
Figura D 1 6	Tomporature Distribution in USM H and 24DTH S LC DSC Shall	F . 4 -121
Figure F.4-0	Assembly 24 kW Heat Load 117°E Ambient	D / 122
Figure D 4 7	Assembly, 24 KW Heat Load, 117 F Alliblent	F.4-122
rigule r.4-/	Assembly 24 kW Uset Lead 409E Ambient	D 4 1 2 2
Eigung D 4 9	Assembly, 24 kW Heat Load, -40°F Amblent	P.4-123
Figure P.4-8	A second by 21.2 how the state of 11705 A which the	D 4 104
E	Assembly, 31.2 kw Heat Load, 11/°F Amblent	P.4-124
Figure P.4-9	remperature Distribution in HSM-H and 24PTH-S or -L DSC Shell	D 4 107
D' D 4 10	Assembly, 31.2 kW Heat Load, -40°F Ambient	P.4-125
Figure P.4-10	1 emperature Distribution in HSM-H, Heat Shield, Support Rail, and	
	24P1H-S or -L DSC Shell Assembly, 31.2 kW Heat Load, without	D 4 10 (
D' D (11	Fins on the Side Heat Shield, 11/°F Ambient	P.4-126
Figure P.4-11	Temperature Distribution in HSM-H, Heat Shield, Support Rail, and	
	24PTH-S or –L DSC Shell Assembly, 40.8 kW Heat Load, 117°F	
D D 1 1 0	Ambient	P.4-127
Figure P.4-12	Temperature Distribution in HSM-H, Heat Shield, Support Rail, and	
	24PTH-S or –L DSC Shell Assembly, 40.8 kW Heat Load, 100°F	
	Ambient	P.4-128
Figure P.4-13	Temperature Distribution in HSM-H and 24PTH DSC Shell	_
	Assembly, 40.8 kW Heat Load, -40°F Ambient	P.4-129
Figure P.4-14	Temperature Distribution in HSM-H and 24PTH DSC Shell	
	Assembly, 40.8 kW heat load, at 38.5 (typical) hours of Blocked	
	vent, 117°F ambient	P.4-130

Figure P.4-15	5 Temperature-Time Histories of HSM-H Model Components during		
	Blocked Vents Accident Case, 40.8 kW, 117°F Ambient		
Figure P.4-16	4-16 Temperature Distribution in a Single HSM-H and 24PTH DSC She		
	Assembly, 40.8 kW Heat Load, -40°F Ambient, Maximum		
	Temperature Gradients through Concrete Walls	P.4-132	
Figure P.4-17	Temperature Distribution in a Single HSM-H, 40.8 kW Heat Load, -		
C	40°F Ambient, Maximum Temperature Gradients through Concrete		
	Walls. Blocked Vent Transient at 38.5 Hours	P.4-133	
Figure P.4-18	Plan & Elevation Views of Short and Long Canister Spacers	P.4-134	
Figure P.4-19	OS197FC TC Lid With Slots For Air Exhaust	P.4-135	
Figure P.4-20	Perspective View of OS197FC TC Assembly Thermal Model	P.4-136	
Figure P.4-21	Perspective View of Thermal Model for Closure Lid, TC Cover,		
0	Neutron Shield, and TC Spacer	P.4-137	
Figure P.4-22	Perspective View of Thermal Model For DSC Shell & Ends Used		
0	For Steady-State Analyses	P.4-138	
Figure P.4-23	Perspective View of Thermal Model For DSC Shell, Ends, & Basket		
8	Used For Transient Analyses in OS197FC TC	P.4-139	
Figure P.4-24	Temperature Distribution at 11.5 hours for OS197FC TC during		
0	Transfer of 24PTH DSC, 40.8 kW Heat Load and 117°F Ambient	P.4-140	
Figure P.4-25	Temperature Distribution at 11.5 hours for 24PTH DSC Shell		
8	Assembly during Transfer in OS197FC TC, 40.8 kW Heat Load and		
	117°F Ambient	P.4-141	
Figure P.4-26	Temperature Distribution at 28.3 hours for OS197FC TC during		
8	Transfer of 24PTH DSC, 31.2 kW Heat Load and 117°F Ambient	P.4-142	
Figure P.4-27	Temperature Distribution at 28.3 hours for 24PTH DSC Shell		
8	Assembly during Transfer in OS197FC TC, 31.2 kW Heat Load and		
	117°F Ambient		
Figure P.4-28	Transient Temperature Response during Loading of 24PTH DSC		
1.8.10111.20	with 40.8 kW into OS197FC TC 100°F without Insolation (Cask		
	Vertical)	P 4-144	
Figure P.4-29	Transient Temperature Response during Loading of 24PTH DSC		
1190101112)	with 31.2 kW into OS197FC TC 100°F without Insolation (Cask		
	Vertical)	P 4-145	
Figure P 4-30	Transient Temperature Response during Transfer of 24PTH DSC		
1 igure 1 : 1 50	with 40.8 kW into OS197EC TC 100°E with Insolation (Cask		
	Horizontal)	P 4-146	
Figure P 4-31	Transient Temperature Response during Transfer of 24PTH DSC	11-10	
1 igure 1 .+ 51	with 40.8 kW into OS197FC TC and Loss of Air Circulation		
	Accident (Cask Horizontal)	P 4-147	
Figure P 4-32	Transient Temperature Response during Transfer of 24PTH DSC		
1 igure 1 : 1 52	with 31.2 kW into OS197FC TC and Loss of Air Circulation		
	Accident (Cask Horizontal)	P 4-148	
Figure P 4-33	Loss of Neutron Shield and Air Circulation (if used) Accident		
1 15010 1 .7 55	Transient Temperature Response with 40.8 kW (Cask Horizontal)	P.4-149	
Figure P.4-34	Loss of Neutron Shield and Air Circulation (if used) Accident		
	Transient Temperature Response with 31.2 kW (Cask Horizontal)	P.4-150	
	1 1 - · · · · · · · · · · · · · · · · ·		

Figure P.4-35	24PTH DSC in OS197FC TC Fire Accident Transient Response with	D 4 151
Figure D / 36	40.8 KW	
1 igure 1 . 4 -30	Heat	
Figure P.4-37	24PTH-S and 24PTH-L DSC HLZC 4, 31.2 kW Maximum Decay	
11801011137	Heat	P.4-153
Figure P.4-38	24PTH-S-LC DSC HLZC 5, 24 kW Maximum Decay Heat	P.4-154
Figure P.4-39	24PTH DSC Thermal ANSYS Model	P.4-155
Figure P.4-40	24PTH DSC Thermal ANSYS Model, Basket Components	P.4-156
Figure P.4-41	Temperature Distribution in 24PTH DSC for 100°F Transfer Case	
C	with HLZC 4	P.4-157
Figure P.4-42	DELETED	P.4-158
Figure P.4-43	Finite Element Model of B&W 15x15 Fuel Assembly	P.4-159
Figure P.4-44	Axial Fuel Effective Thermal Conductivity, All Fuels	P.4-160
Figure P.4-45	Axial Fuel Effective Thermal Conductivity, B&W 15x15 Fuel Types	P.4-161
Figure P.4-46	Fuel Transverse Effective Thermal Conductivity in Helium, All	
	Fuels	P.4-162
Figure P.4-47	Fuel Transverse Effective Thermal Conductivity in Vacuum, All	
	Fuels	P.4-163
Figure P.4-48	Fuel Transverse Effective Thermal Conductivity in Helium, B&W	
	15x15 Fuels	P.4-164
Figure P.4-49	Fuel Transverse Effective Thermal Conductivity in Vacuum, B&W	
	15x15 Fuels	P.4-165
Figure P.4-50	Gaps Used in the 24PTH DSC ANSYS Model	P.4-166
Figure P.4-51	Elevation View of Model Layout	P.4-167
Figure P.4-52	Isometric View of Model Layout	P.4-167
Figure P.4-53	Model View from underside of HSM-H	P.4-168
Figure P.4-54	DSC within HSM-H	P.4-169
Figure P.4-55	Perspective View of Meshing at X-Y Plane of HSM-H	P.4-170
Figure P.4-56	Schematic View of Egg-crate Structure of 24PTH Basket Plates	<i>P.4-171</i>
Figure P.4-57	Staggered Basket Plates Repetitive Segments in 24PTH Type 3 DSC	<i>P</i> . 4- 172
Figure P.4-58	Internal Arrangement of Horizontal and Vertical Basket Plates for	
	24PTH DSC Type 3 Basket Assembly	<i>P.4-173</i>
Figure P.4-59	Bounding Helium Gap within the Slots in 24PTH DSC Thermal	D (17 (
		<i>P</i> .4 - 1/4
Figure P.4-60	Cross Sectional View of Thermal Model of 24PTH DSC Type 3	D 4 175
	Basket Assembly	P.4-1/3
Figure $P.4-61$	Transition Rails in 24PTH Type 3 DSC Basket Assembly	<i>P</i> .4 - 1/0
Figure P.4-62	Computational Domain for HSM-H with the 24P1H Type 3 DSC and	D / 177
Eigung D 1 62	External Air Domain	<i>P</i> .4 - 1//
Figure P.4-05	Axiai view oj ine Hexanearai Mesn on ine Symmetricai Mia-piane oj	D / 170
Figure D 1 61	110/11-11	<i>F</i> .4 - 1/ð
r igure F.4-04	Cross Sectional view of the Haij-symmetrical Hexanearal Mesh for HSM H at the Middle Vertical Plane	D / 170
Figure P 1 65	3D View of the Combined Mesh of HSM_H with 21DTH Type 2 DSC	1.4-1/9
1 igure 1 .4-0J	Basket Assembly and Wind Domain	P 1_180
	Dusiver 1155 Chiefy and It ind Domain	

Figure P.4-66	Peaking Factor Curve for PWR Fuel Assemblies in 24PTH Type 3	
	DSC	<i>P.4-181</i>
Figure P.4-67	Exterior Boundary Conditions for HSM-H loaded with 24PTH	
	Type 3 DSC	<i>P.4-182</i>
Figure P.4-68	Temperature Profiles of HSM-H with 24PTH Type 3 DSC under	
	Normal Storage Condition, Coarse Mesh (LC #S-1)	<i>P.4-183</i>
Figure P.4-69	Velocity Profiles on the Transverse DSC Middle Plane of the HSM-	
	H with 24PTH Type 3 DSC under Normal Storage Condition with	
	Bounding Side Wind, HLZC #1, Coarse Mesh (LC #S-1)	<i>P.4-185</i>
Figure P.4-70	Streamlines of Airflow inside the HSM-M Cavity for Normal Hot	
-	Storage Condition (LC #S-1)	<i>P.</i> 4-186
Figure P.4-71	Isometric View of CAD Model of OS197 with 24PTH Type 3 DSC	<i>P.4-187</i>
Figure P.4-72	Time History of Fuel Cladding for Transient LCs T-1, T-2 and T-3	
0	during Transfer Operations	<i>P.4-188</i>
Figure P.4-73	Temperature Profiles for OS197FC TC Loaded with 24PTH Type 3	
8	DSC for LC #T-1.	<i>P.4-189</i>
Figure P.4-74	Temperature Profiles for OS197FC TC Loaded with 24PTH Type 3	
.8.	DSC for LC $\#T-2$.	P.4-191
Figure P.4-75	Temperature Profiles for OS197FC TC Loaded with 24PTH Type 3	
.8.	DSC for LC #T-3	P.4-193
Figure P.4-76	Temperature Profiles for OS197FC TC Loaded with 24PTH Type 3	
8	DSC for $LC #T-4$.	P.4-195
Figure P.5-1	ANISN HSM-H Model	P.5-91
Figure P.5-2	ANISN OS197FC TC Model	P.5-92
Figure P.5-3	24PTH-L Type 2 DSC Within HSM-H. Side View at Centerline of	
8	DSC	P.5-93
Figure P.5-4	24PTH-L Type 2 DSC Within HSM-H. Head-on View at X=0	P.5-94
Figure P.5-5	24PTH-L <i>Type 2</i> DSC Within HSM-H. Head-on View Showing Top	
8	Vents	P.5-95
Figure P.5-6	24PTH-L Type 2 DSC Within HSM-H. Head-on View at Lid End of	
8	DSC (X=225 cm)	P.5-96
Figure P.5-7	24PTH-L Type 2 DSC Within HSM-H. Head-on View at Bottom	
1 18010 1 10 1	End of DSC (X=-225 cm)	P.5-97
Figure P.5-8	24PTH-L Type 2 DSC Within OS197FC TC. Axial View of Transfer	
1 18010 1 10 0	Model	P.5-98
Figure P.5-9	24PTH-L Type 2 DSC Within OS197FC TC. Top View of Transfer	
1 18010 1 10 3	Model Showing Cask Lid with Gap. Top Nozzle, and Plenum	P 5-99
Figure P.5-10	24PTH-L Type 2 DSC Within OS197FC TC. Bottom View of	
11801011010	Transfer Model Showing Cask Bottom and Bottom Nozzle	P.5-100
Figure P.5-11	24PTH-L Type 2 DSC Within OS197FC TC, Radial Cut View of	
11gui 0 1.0 11	Transfer Models Showing Fuel Locations	P 5-101
Figure P 5-12	24PTH-S-LC Twpe 2 DSC Within Standardized TC Axial View of	
1150101.512	Transfer Model	P 5-102
Figure P 5-13	24PTH-S-LC Type 2 DSC Within Standardized TC. Ton View of	
1150101.515	Transfer Model Showing Cask Lid with Gan. Top Nozzle and	
	Plenum	P 5-103
	T 101101111	

Figure P.5-14	24PTH-S-LC Type 2 DSC Within Standardized TC, Bottom View of	
e	Transfer Model Showing Cask Bottom and Bottom Nozzle	P.5-104
Figure P.5-15	24PTH-S-LC <i>Type 2</i> DSC Within Standardized TC, Radial Cut	
0	Views of Transfer Model Showing Fuel Locations	P.5-105
Figure P.5-16	HSM-H with 24PTH-L <i>Type 2</i> DSC, Front Door Centerline Dose	
0	Rate	P.5-106
Figure P.5-17	HSM-H with 24PTH-L Type 2 DSC, Roof Centerline Dose Rate	P.5-107
Figure P.5-18	HSM-H with 24PTH-L <i>Type 2</i> DSC, Side Shield Wall Surface at	
0	DSC Centerline Dose Rate	P.5-108
Figure P.5-19	OS197FC TC with 24PTH-L <i>Type 2</i> DSC, Side Surface Dose Rate	P.5-109
Figure P.5-20	OS197FC TC with 24PTH-L <i>Type 2</i> DSC, Top Surface Dose Rate	P.5-110
Figure P.5-21	OS197FC TC with 24PTH-L <i>Type 2</i> DSC. Bottom Surface Dose	
1.8.10110 21	Rate	P.5-111
Figure P.5-22	Standardized Transfer Cask with 24PTH-S-LC Type 2 DSC, Side	
8	Surface Dose Rate	P.5-112
Figure P.5-23	Standardized Cask with 24PTH-S-LC <i>Type 2</i> DSC. Top Surface	
8	Dose Rate	P.5-113
Figure P.5-24	Standardized Cask with 24PTH-S-LC Type 2 DSC, Bottom Surface	
8	Dose Rate	P.5-114
Figure P.5-25	24PTH-L Type 3 DSC Cross-Section	P.5-115
Figure P.6-1	NUHOMS [®] -24PTH DSC Cross Section	P.6-184
Figure P.6-2	Basket Views and Dimensions	P.6-185
Figure P.6-3	Basket Model Compartment Wall (View G)	P.6-186
Figure P.6-4	Basket Model Compartment Wall (View F)	P.6-187
Figure P.6-5	Basket Model Compartment Wall With Fuel Assembly (View G)	P.6-188
Figure P.6-6	Basket Model Compartment Wall With Fuel Assembly (View F)	P.6-189
Figure P.6-7	Basket Compartment With Fuel Assembly (Section A)	P.6-190
Figure P.6-8	Basket Compartment With Fuel Assembly (Section B)	P.6-191
Figure P.6-9	Fuel Position and Poison Plate Location in the 24PTH DSC Design	P.6-192
Figure P.6-10	Fuel Position and Poison Plate Location in the KENO Model of	
-	24PTH DSC	P.6-193
Figure P.6-11	KENO V.a UNits and Radial Cross Sections of the Model of 24PTH	
-	DSC	P.6-194
Figure P.6-12	Exxon 15x15 Fuel Assembly with Radial Variation in Enrichment	P.6-195
Figure P.6-13	B&W 15x15 Class Assembly KENO Model	P.6-196
Figure P.6-14	CE 14x14 Class Assembly KENO Model	P.6-197
Figure P.6-15	CE 15x15 Class Assembly KENO Model	P.6-198
Figure P.6-16	CE 16x16 Class Assembly KENO Model	P.6-199
Figure P.6-17	WE 14x14 Class Assembly KENO Model	P.6-200
Figure P.6-18	WE 15x15 Class Assembly KENO Model	P.6-201
Figure P.6-19	WE 17x17 Class Assembly KENO Model	P.6-202
Figure P.6-20	WE 14x14 Class Assembly, Single Shear Study Model	P.6-203
Figure P.6-21	CE 16x16 Class Assembly, Double Shear Study Model	P.6-204
Figure P.6-22	CE 14x14 Class Assembly, 8 Damaged / 16 Intact Fuel Assemblies	P.6-205
Figure P.6-23	WE 15x15 Class Assembly, 12 Damaged / 12 Intact Fuel Assemblies.	P.6-206
Figure P.6-24	Basket Model Compartment Wall (View G)	P.6-207

Figure P.6-25	Basket Model Compartment Wall (View F)	P.6-208
Figure P.6-26	WE 17x17 Class Assembly, 8 Failed / 16 Intact	P.6-209
Figure P.6-27	Poison plate lengths used in the Type 3 KENO model	<i>P.6-210</i>
Figure P.8-1	NUHOMS [®] System Loading Operations Flow Chart	P.8-12
Figure P.8-2	NUHOMS [®] System Retrieval Operations Flow Chart	P.8-21
Figure P.10-1	Annual Exposure from the ISFSI as a Function of Distance, 24PTH-	
	L DSC Within HSM-H	P.10-22
Figure P.10-2	Annual Exposure from the ISFSI as a Function of Distance, 24PTH-	
	S-LC DSC Within HSM-Model 102	P.10-23
Figure P.11-1	HSM-H Dimensions for Missile Impact Stability Analysis	P.11-21

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P.1 <u>General Discussion</u>

This Appendix to the Updated NUHOMS[®] Final Safety Analysis Report (UFSAR) addresses the Important to Safety aspects of adding the NUHOMS[®]-24PTH system to the Standardized NUHOMS[®] system described in the UFSAR.

The NUHOMS[®]-24PTH system is a modular canister based spent fuel storage and transfer system, similar to the Standardized NUHOMS[®]-24P system described in the UFSAR. The NUHOMS[®]-24PTH system consists of the following components:

- A dual purpose (Storage/Transportation) Dry Shielded Canister (DSC), with three alternate configurations, designated as DSC Type NUHOMS[®]-24PTH-S, -24PTH-L, and -24PTH-S-LC,
- A 24PTH DSC basket design, which is provided with *three* alternate options: with aluminum inserts (Type 1), without aluminum inserts (Type 2) as shown in Figure P.1-1, *and with composite plate compartments (Type 3), see Drawings NUH24PTHS-5012-SAR, NUH24PTH-L-5012-SAR, and NUH24PTH-S-LC-5012-SAR.* In addition, depending on the boron content in the basket poison plates, each basket type is designated as Type A (low B10), Type B (moderate B10), Type C, *and Type D (high B10),* which results in *seven different basket types (Type 1A, 1B, 1C, 2A, 2B, 2C, and 3D),*
- A modified version of the Standardized Horizontal Storage Module (HSM) Model 102 described in the UFSAR, designated as HSM-H, equipped with special design features which provide enhanced shielding and heat rejection capabilities, and
- The OS197/OS197H Transfer Cask (TC) described in the UFSAR, is provided with an optional modified top lid to allow air circulation through the TC/DSC annulus during transfer operations at certain heat loads when time limits for transfer operations cannot be satisfied. The OS197 TC with a modified top lid is designated as the OS197FC TC. The OS197H TC with a modified top lid is designated as the OS197HFC TC. Throughout this Appendix, "OS197FC" is a generic designation intended to apply to the OS197FC or OS197HFC TCs unless otherwise explicitly stated.
- An upgraded version of the HSM-H, designated as HSM-HS, is provided to allow storage of the NUHOMS[®]-24PTH *DSCs with Type 1 and 2 baskets* in locations where higher seismic levels exist. The HSM-HS design configuration, described in U.1, is modified to accommodate the smaller diameter of the NUHOMS[®]-24PTH DSC.
- The NUHOMS[®]-24PTH *DSCs with Type 1 and 2 baskets are* also transferred in a modified version of the OS200/OS200FC TC described in U.1. The OS200/OS200FC TC is fitted with an aluminum sleeve and a spacer to accommodate the smaller diameter and shorter length of the 24PTH DSC.

The 24PTH DSC is designed to accommodate up to 24 intact or up to 12 damaged (with up to 8 failed fuel cans loaded with failed fuel) with the remainder intact, PWR fuel assemblies with or without Control Components (CCs), with characteristics as described in Appendix P.2, *or dummy fuel, or empty slots.* The 24PTH-S and 24PTH-L are the short and long cavity configurations of the 24PTH DSC designed for a maximum heat load of 40.8 kW. They are transferred to the ISFSI for storage in the HSM-H/HSM-HS in either the OS197/OS197H/OS200 or OS197FC/OS200FC TC depending upon the heat load *and basket type*.

NUH-003		
Revision 22	Page P.1-1	January 2024
	All changes on this page are Amd 18.	

The 24PTH-S-LC DSC is a modified version of 24PTH-S DSC, provided with thinner top and bottom lead shield plugs instead of steel, resulting in a longer cavity length. This DSC type is designed for a maximum heat load of 24 kW per DSC and may be stored in either the currently licensed Standardized HSM Model 102, or in the new HSM-H, while the currently licensed Standardized TC (with a solid neutron shield) or OS197/OS197H TC (with a liquid neutron shield) are used for onsite transfer.

Fuel assemblies with CCs are to be stored in 24PTH-S, 24PTH-L and 24PTH-S-LC DSC Types.

System Configuration	24PTH DSC Type ⁽¹⁾	Basket Type	Max. Heat Load (kW) per DSC	Transfer Cask	Storage Module
1	24PTH-S or 24PTH-L 1A,	$10.10 \text{ or } 10^{(2)}$	40.8	OS197FC or OS200FC	HSM-H or HSM-HS
I			31.2	OS197/OS197H or OS200	HSM-H or HSM-HS
2	2 24PTH-S or 2A, 2B, or 2C ⁽³⁾ 31.2		OS197FC/OS200 FC	HSM-H or HSM-HS	
3	24PTH-S-LC	2A, 2B, or 2C ⁽³⁾	24.0	Standardized TC (solid neutron shield)/OS197/OS 197H	HSM (Model 102 or 202) or HSM-H or HSM-HS
4 24PTH-S or 24PTH-L ⁽¹⁾		3D	40.8	OS197FC	HSM-H
			31.2	OS197/OS197H ⁽⁴⁾	HSM-H
5	24PTH-S or 24PTH-L ⁽¹⁾	3D	31.2	OS197FC ⁽⁴⁾	HSM-H
6	24PTH-S-LC ⁽¹⁾	3D	24.0	Standardized TC (solid neutron shield)/OS197/OS 197H	HSM (Model 102 or 202) or HSM-H

These *six* alternate NUHOMS[®]-24PTH System configurations are summarized below:

(1) Allows storage of Control Components

(2) With heat conductive aluminum inserts in the R45 basket transition rail

(3) With no heat conductive aluminum inserts in the R45 basket transition rail

(4) For the same total heat load, transfer operations without time limits use OS197/OS197H and transfer operations with time limits require the use of OS197FC depending on the heat load zoning configurations (HLZC). Chapter P.4, Section P.4.12.2.5.3 presents the discussion on time limits for transfer operations for various HLZCs related to the Type 3 basket.

The NUHOMS[®]-24PTH system provides structural integrity, confinement, shielding, criticality control and passive heat removal independent of any other facility structures or components.

The format of this Appendix follows the guidance provided in NRC Regulatory Guide 3.61 [1.1]. The analysis presented in this Appendix shows that the NUHOMS[®]-24PTH system meets all the requirements of 10CFR72 [1.2]. A separate analysis will be submitted to address the safety related aspects of transporting spent fuel in the NUHOMS[®]-24PTH DSC in accordance with 10CFR71 [1.3].

NUH-003		
Revision 22	Page P.1-2	January 2024
	All changes on this page are Amd 18.	

Several sections of this Appendix have been identified as "No change". For these sections, the description or analysis presented in the corresponding sections of the UFSAR for the Standardized NUHOMS[®] system is also applicable to the 24PTH system. In addition, Tables and Figures presented in the UFSAR which remain unchanged due to the addition of the 24PTH system to the Standardized NUHOMS[®] system are not repeated in this Appendix.

Note: References to sections or chapters within this Appendix are identified with a prefix P (e.g., Section P.2.3 or Appendix P.2 or Chapter P.2). References to sections or chapters of the UFSAR outside of this Appendix (main body of the UFSAR) are identified with the applicable UFSAR section or chapter number (e.g., Section 2.3 or Chapter 2). The references used in this appendix are identified as [X.X] (e.g., [1.1] is reference 1.1 at the end of Section P.1).

Aging Management Program Requirements

Aging Management Program (AMP) requirements for use of the 24PTH System during the period of extended storage operations are contained in Section 12.3. Applicable TLAAs performed for the initial CoC 1004 renewal application are provided in Section 12.2.

NUH-003		
Revision 22	Page P.1-2a	January 2024
	All changes on this page are Amd 18.	

P.1.1 Introduction

The NUHOMS[®]-24PTH system is designed to store up to 24 intact (including reconstituted) B&W 15x15, WE 17x17, CE 15x15, WE 15x15, CE 14x14, and WE 14x14 class PWR fuel assemblies. WE 15x15 Partial Length Shield Assemblies (PLSAs) are also authorized to be stored in the 24PTH system. The fuel to be stored is limited to a maximum assembly average initial enrichment of 5.0 wt. %, a maximum assembly average burnup of 62 GWd/MTU, and a minimum cooling time of 2.0 years. The 24PTH-S, 24PTH-L and 24PTH-S-LC DSC types are also designed to store up to 24 Control Components (CCs) which include Burnable Poison Rod Assemblies (BPRAs), Thimble Plug Assemblies (TPAs), Control Rod Assemblies (CRAs), Rod Cluster Control Assemblies (RCCAs), Axial Power Shaping Rod Assemblies (APSRAs), Orifice Rod Assemblies (ORAs), Vibration Suppression Inserts (VSIs), Neutron Source Assemblies (NSAs) and Neutron Sources. Furthermore, materials that are positioned or operated within the envelope of the fuel assembly during reactor operation are also considered as CCs. The design characteristics, including physical and radiological parameters of the payload, are described in Appendix P.2.

Reconstituted assemblies containing up to 10 replacement stainless steel rods per assembly or unlimited number of lower enrichment UO₂ rods instead of Zircaloy clad enriched UO₂ rods are acceptable for storage in 24PTH DSC as intact fuel assemblies. The maximum number of irradiated stainless steel rods in reconstituted assemblies per DSC is 40.

Fuel assemblies containing up to 10 stainless steel rods irradiated throughout the irradiation cycles are allowed for loading under the requirements of reconstituted fuels with irradiated stainless steel rods.

Provisions have been made for storage of up to 12 damaged fuel assemblies in lieu of an equal number of intact assemblies in cells located at the outer edge of the 24PTH basket. Damaged PWR fuel assemblies are assemblies containing missing or partial fuel rods, fuel rods with known or suspected cladding defects greater than hairline cracks or pinhole leaks. The extent of damage in the fuel assembly, including non-cladding damage, is to be limited such that a fuel assembly is able to be handled by normal means and the retrievability is ensured following normal and off-normal conditions. *The fuel compartment and the top and bottom end cap together form the "acceptable alternative," per NUREG-2215 Revision 1 for confinement of damaged fuel. If fuel particles are released from the damaged assembly, the top and bottom end caps provide for the confinement of gross fuel particles to a known volume. Similarly, the FFC provides confinement of the FFC contents to a known volume, and has lifting features to allow the ability to unload the FFC. Additionally, consistent with ISG-2, Revision 2, ready retrieval of the damaged and failed fuel as well as intact fuel is based on the ability to remove a canister from the HSM.*

Provisions have also been made for storage of up to 8 failed fuel assemblies in lieu of an equal number of intact and/or damaged assemblies in cells located at the outer edge of the 24PTH basket as described in Appendix P.2.

The NUHOMS®-24PTH system consists of the following components:

• A 24PTH DSC, with *six* alternate configurations, described in detail in Section P.1.2, provides confinement, an inert environment, structural support, and criticality control for the 24 PWR fuel assemblies,

	All changes on this nage are Amd 18.	Sumury 2024
Revision 22	Page P 1-3	January 2024
NUH-003		

- An HSM-H module, described in Section P.1.2, or an HSM-HS module (described in Appendix U.1, Section U.1.2) is provided for environmental protection, shielding and heat rejection during storage, and
- OS197-FC or OS200FC transfer cask for onsite transfer of the 24PTH-S and 24PTH-L DSCs. The NUHOMS[®]-24PTH-S and 24PTH-L DSCs with Types 1A, 1B, 1C baskets can also be transferred in the OS197 or OS197H or OS200 TCs if the total heat load is 31.2 kW or less.

In addition to these new or modified components listed above, the 24PTH-S-LC DSC requires the use of the existing Standardized HSM Model 102 or the new HSM-H for storage and the Standardized Transfer Cask or OS197/OS197H TC for transfer.

The NUHOMS[®]-24PTH system requires the use of non-safety related auxiliary transfer equipment described in Chapter 1, Section 1.3.2.2 of the UFSAR. There is no change to any of these items except for the cask support skid. The cask support skid is modified by adding two industrial grade motor driven redundant blowers with associated ductwork for connecting to the TC ram cover plate opening. This modification provides a reliable source of external air circulation for the OS197FC TC.

Approval of the NUHOMS[®]-24PTH system components described in Section P.1.2 is sought under the provisions of 10CFR 72, Subpart L for use under the general license provisions of 10 CFR 72, Subpart K. The 24PTH system components are intended for storage on a reinforced concrete pad.

P.1.2 <u>General Description of the NUHOMS®-24PTH System</u>

P.1.2.1 <u>NUHOMS®-24PTH System Characteristics</u>

P.1.2.1.1 <u>NUHOMS[®]-24PTH DSC</u>

Each NUHOMS[®]-24PTH DSC consists of a DSC shell assembly (cylindrical shell, canister bottom and top cover plates and shield plugs or shield plug assemblies) and a basket assembly. A sketch of the NUHOMS[®]-24PTH DSC components is shown in Figure P.1-1.

The 24PTH DSC is provided with three alternate configurations depending on the DSC shell assembly length and DSC cavity length shown in Table P.1-1.

These three DSC design configurations allow flexibility to accommodate the payload fuel types and control components described in Section P.2, and are compatible with the lifting capacity of most of the fuel handling cranes in the United States. The key design parameters and estimated weights of the NUHOMS[®]-24PTH DSC are listed in Table P.1-1.

The 24PTH DSC shell assembly geometry and the materials used for its fabrication are shown on drawings NUH-24PTH-1001-SAR and NUH-24PTH-1002-SAR included in Section P.1.5.

The primary confinement boundary for the NUHOMS[®]-24PTH DSC consists of the DSC shell, the top and bottom inner cover plates, (or the top and bottom inner cover plates of the shield plug assemblies for the 24PTH-S-LC), the siphon and vent block, the siphon and vent port cover plates, and the associated welds. Figure P.3.1-1 and Figure P.3.1-2 provide a pictorial representation of the confinement boundary for the 24PTH DSC. The outer top cover plate and associated welds form the redundant confinement boundary.

The cylindrical shell and the inner bottom cover plate boundary welds are fully compliant to Subsection NB of the ASME Code [1.4] and are made during fabrication. The top closure confinement welds are multi-layer welds applied after fuel loading and comply with the requirements of the alternative ASME Code Case N-595-2. The outer top cover plate is welded to the shell subsequent to the leak testing of the confinement boundary to the leak-tight criteria of ANSI N14.5-1997 [1.5]. There are no credible accidents which could breach the confinement boundary of the 24PTH DSC as documented in Chapter P.11.

NUH-003		
Revision 22	Page P.1-5	January 2024
	All changes on this page are Amd 18.	

The 24PTH *Types 1 and 2* DSC basket structure, shown schematically in Figure P.1-2, consists of 24 stainless steel fuel tubes with the space between adjacent tubes sandwiched by aluminum and neutron poison plates. Each fuel tube is welded together at selected elevations along the axial length of the basket through stainless steel insert plates, which separate the aluminum and poison plates arranged in an egg crate configuration. The 24PTH Type 3 basket structure consists of composite plates of steel, neutron poison, and aluminum plates that fit together to form the grid structure. The Type 3 basket is based on the EOS-37PTH basket design and methodology that is approved in CoC 1042 [1-6].

The poison plates are made of either Borated aluminum or Metal Matrix Composites (MMCs) or Boral® that provide the necessary criticality control. The aluminum plates, together with the poison plates, provide a heat conduction path from the fuel assemblies to the canister shell. The transition rails provide the transition between the rectangular basket structure and the cylindrical DSC shell. There are four R90 solid aluminum rails located at 0°, 90°, 180°, and 270° and eight R45 transition rails located on both sides of 45°, 135°, 225°, and 275° locations inside the DSC cavity. There are three types of R45 transition rail versions. The 24PTH Type 1 basket utilizes an open steel frame running axially down the length of the DSC with aluminum inserts installed to increase heat conduction. The 24PTH Type 2 basket utilizes the steel frame as described for the Type 1 without the aluminum inserts. The 24PTH Type 3 basket uses extruded aluminum rails open sections, reinforced with internal steel angles to provide structural strength. The transition rails support the fuel tubes and transfer mechanical loads to the DSC shell. They also provide the thermal conduction path from the basket assembly to the canister shell wall, making the basket assembly efficient in rejecting heat from its payload. The nominal clear dimension of each fuel tube opening is sized to accommodate the limiting assembly with sufficient clearance around the fuel assembly.

The 24PTH DSC basket geometry and the materials used for its fabrication are shown on *Drawings* NUH24PTH-1003-SAR, NUH24PTH-1004-SAR, *NUH24PTH-S-5012-SAR*, *NUH24PTH-L-5012-SAR*, *and NUH24PTH-S-LC-5012-SAR* included in Section P.1.5.

Page P.1-5a All changes on this page are Amd 18.

The failed fuel assemblies are to be placed in individual Failed Fuel Cans (FFCs). Each FFC is constructed of sheet metal and is provided with a welded bottom closure and a removable top closure which allows lifting of the FFC with the enclosed damaged assembly/debris. The FFC is provided with screens at the bottom and top to contain fuel debris and allow fill/drainage of water from the FFC during loading operations. The FFC is protected by the fuel compartment tubes and its only function is to confine the failed fuel.

The FFC geometry and the materials used for its fabrication are shown on drawing NUH24PTH-72-1008 for basket Types 1 and 2 and NUH24PTH-5014-SAR for the Type 3 basket, included in Section P.1.5. The geometry and materials used in the fabrication of a 24PTH Type 1 and 2 basket assembly with FFCs is shown on drawing NUH24PTH-72-1009 for Type 1 and 2 basket assemblies and NUH24PTH-L-5012-SAR, NUH24PTH-S-5012-SAR, and NUH24PTH-S-LC-5012-SAR for Type 3 basket assemblies included in Section P.1.5.

During dry storage of the spent fuel in the NUHOMS[®]-24PTH system, no active systems are required for the removal and dissipation of the decay heat from the fuel. The NUHOMS[®]-24PTH DSC is designed to transfer the decay heat from the fuel to the canister body via the basket and ultimately to the ambient via either the HSM-H in storage mode or the TCs in the transfer mode.

Each canister is identified by a Mark Number, W-24PTH-X-Y-Z, where:

W is user specific designations;

X refers to the DSC Type as described previously (X = S or L or S-LC);

Y refers to the basket type (1A, 2A, 1B, 2B, 1C, 2C, or 3D) and

Z is a number corresponding to a specific canister.

P.1.2.1.2 <u>NUHOMS®-HSM-H Module</u>

As shown in the Systems Configuration tables in the introduction to P.1, the NUHOMS[®]-24PTH DSC variations may be stored in either the HSM-H, HSM-HS, HSM-102, or HSM-202.

The Standardized HSM Model 102 is described in Chapter 1 and in the drawings included in Appendix E of the UFSAR. *The HSM Model 202 is described in Chapter V.1 and drawings are included in Section V.1.5 of the UFSAR.*

The modifications made to the HSM-HS design configuration to accommodate the smaller diameter and shorter length of the NUHOMS[®]-24PTH DSC are described in Appendix U.1, Section U.1.2 and are not discussed further in this section.

The HSM-H module design is similar to the design of HSM Model 102 with the following features provided to improve the heat rejection and shielding capabilities:

• Use of a thicker roof with no uniform gap between the adjacent modules,

	All changes on this nage are Amd 18.	000000092027
Revision 22	Page P.1-6	January 2024
NUH-003		

Figure P.1-4 shows these features in a cross sectional view of the HSM-H. The key design parameters and estimated weights of the HSM-H module are shown in Table P.1-1. The geometry and materials used to fabricate the HSM-H module are shown in the Parts List on Drawings NUH-03-7001-SAR included in Section P.1.5.

P.1.2.1.3 <u>NUHOMS®-OS197FC Transfer Cask</u>

The modifications made to the OS200/OS200FC transfer cask design configuration to accommodate the smaller diameter and shorter length of the NUHOMS[®]-24PTH DSC are described in Appendix U.1, Section U.1.2 and are not discussed further in this section.

The OS197FC TC is a modified version of the OS 197/OS197H TC described in the UFSAR and in the drawings included in Appendix E of the UFSAR.

The top lid of the OS197/OS197H TC is scalloped out at sixteen locations on the lid underside (See Figure P.1-5) to provide slots that provide an exit path for air circulation through the TC/DSC annulus. This external air circulation feature is needed *for 24PTH-S or 24PTH-L DSCs* during the transfer mode *for all basket types based on the HLZC. Chapter P.4 presents additional details on the various time limits for transfer operations.*

To achieve this air circulation, the NUHOMS[®] TC support skid is modified by the addition of two motor-driven redundant industrial grade blowers and associated hoses (See Figure P.1-6) which are connected via a cone adapter to the ram access opening. The TC spacer inside the TC cavity also requires minor modifications to ensure distribution of the airflow to the perimeter region of the TC. The air circulation system is sized to provide a minimum capacity of 450 cfm.

The modifications necessary to convert OS197/OS197H TC into a OS197FC TC are shown on Drawings NUH-03-8000-SAR, included in Appendix E.3, and NUH-03-8006-SAR, included in Section P.1.5.

P.1.2.2 <u>Operational Features</u>

P.1.2.2.1 <u>General Features</u>

The NUHOMS[®]-24PTH DSC is designed to safely store 24 intact standard PWR fuel assemblies or up to 12 damaged, with up to 8 failed fuel cans loaded with failed fuel with the remainder intact PWR fuel assemblies with or without CCs. The NUHOMS[®]-24PTH DSC is designed to maintain the fuel cladding temperature below allowable limits during normal storage, short-term accident conditions, short-term off-normal conditions and fuel loading/transfer operations. The criticality control features of the NUHOMS[®]-24PTH DSC are designed to maintain the neutron multiplication factor k-effective less than the upper subcritical limit equal to 0.95 minus benchmarking bias and modeling bias under all conditions.

	All changes on this page are Amd 18.	
Revision 22	Page P.1-7	January 2024
NUH-003		

P.1.2.2.2 <u>Sequence of Operations</u>

The sequence of operations to be performed in loading fuel into the NUHOMS[®]-24PTH DSCs is presented in Appendix P.8.

P.1.2.2.3 Identification of Subjects for Safety and Reliability Analysis

P.1.2.2.3.1 Criticality Prevention

Criticality is controlled by geometry, soluble boron in spent fuel pool and by utilizing fixed neutron poison material in the fuel basket. During storage, with the DSC cavity dry and sealed from the environment, criticality control measures within the installation are not necessary because of the low reactivity of the fuel in the dry NUHOMS[®]-24PTH DSC and the assurance that no water can enter the DSC cavity during storage.

P.1.2.2.3.2 Chemical Safety

There are no chemical safety hazards associated with operations of the NUHOMS[®]-24PTH system.

P.1.2.2.3.3 Operation Shutdown Modes

The NUHOMS[®]-24PTH DSC system is a totally passive system so that consideration of operation shutdown modes is unnecessary.

P.1.2.2.3.4 Instrumentation

No change to Chapter 3, Section 3.3.3.2 and Chapter 4, Section 4.3.12.

P.1.2.2.3.5 <u>Maintenance Techniques</u>

No change to Chapter 4, Section 4.3.9.

P.1.2.3 Cask Contents

The NUHOMS[®]-24PTH DSC system is designed to store 24 intact or up to 12 damaged, with up to 8 failed fuel cans loaded with failed fuel with the remainder intact PWR fuel assemblies with or without control components. The fuel that may be stored in the NUHOMS[®]-24PTH DSC is presented in Appendix P.2.

Appendix P.3 provides the structural analysis. Appendix P.4 includes the thermal analysis. Appendix P.5 provides the shielding analysis. Appendix P.6 covers the criticality safety of the NUHOMS[®]-24PTH DSC system and its contents, listing material densities, moderator ratios, and geometric configurations.

	All changes on this page are Amd 18.	5unuury 2024
Revision 22	Page P 1-8	January 2024
NUH-003		

P.1.3 Identification of Agents and Contractors

TN Americas, LLC (TN) provides the design, analysis, licensing support and quality assurance for the NUHOMS[®]-24PTH system. Fabrication of the NUHOMS[®]-24PTH system cask is done by one or more fabricators qualified under TN's quality assurance program described in Chapter P.13. This program is written to satisfy the requirements of 10 CFR 72, Subpart G and covers control of design, procurement, fabrication, inspection, testing, operations and corrective action. Experienced TN operations personnel provide training to utility personnel prior to first use of the NUHOMS[®]-24PTH system and prepare generic operating procedures.

Managerial and administrative controls, which are used to ensure safe operation of the casks, are provided by the host utility. NUHOMS[®]-24PTH system operations and maintenance are performed by utility personnel. Decommissioning activities will also be performed by utility personnel in accordance with site procedures.

TN provides specialized services for the nuclear fuel cycle that support transportation, storage and handling of spent nuclear fuel, radioactive waste and other radioactive materials. TN is the holder of Certificate of Compliance 1004.

P.1.5 <u>Supplemental Data</u>

The following *TN* drawings are enclosed:

DSC

- NUHOMS[®]-24PTH Transportable Storage DSC, for PWR Fuel, Main Assembly NUH24PTH-1001-SAR.
- NUHOMS[®]-24PTH Transportable Storage DSC, for PWR Fuel, Shell Assembly, NUH24PTH-1002-SAR.
- NUHOMS[®]-24PTH Transportable Storage DSC, for PWR Fuel Basket Assembly, NUH24PTH-1003-SAR.
- NUHOMS[®]-24PTH Transportable Storage DSC, for PWR Fuel, Transition Rails, NUH24PTH-1004-SAR.
- NUHOMS[®] Transportable Canister 24PTH Type 3 Basket Damaged Fuel End Caps, NUH24PTH-5013-SAR.
- NUHOMS[®] Transportable Canister 24PTH Type 3 Basket Failed Fuel Canister, NUH24PTH-5014-SAR.
- NUHOMS[®]-24PTHF Transportable Canister for PWR Fuel, Failed Fuel Can, NUH24PTH-72-1008.
- NUHOMS[®]-24PTHF Transportable Canister for PWR Fuel, Basket Assembly, NUH24PTH-72-1009.
- NUHOMS[®] Transportable Canister 24PTH-S Type 3 Basket Transition Rails, NUH24PTH-S-5011-SAR.
- NUHOMS[®] Transportable Canister 24PTH-S Type 3 Basket Assembly, NUH24PTH-S-5012-SAR.
- NUHOMS[®] Transportable Canister 24PTH-L Type 3 Basket Transition Rails, NUH24PTH-L-5011-SAR.
- *NUHOMS*[®] *Transportable Canister 24PTH-L Type 3 Basket Assembly, NUH24PTH-L-5012-SAR.*
- NUHOMS[®] Transportable Canister 24PTH-S-LC Type 3 Basket Transition Rails, NUH24PTH-S-LC-5011-SAR.
- NUHOMS[®] Transportable Canister 24PTH-S-LC Type 3 Basket Assembly, NUH24PTH-S-LC-5012-SAR.

ТС

• General License NUHOMS[®] ISFSI OS197FC Onsite Transfer Cask Main Assembly, NUH-03-8006-SAR.

HSM

- Standardized NUHOMS[®] ISFSI HSM-H, Main Assembly, NUH-03-7001-SAR.
- Standardized NUHOMS[®] ISFSI, HSM-H/HSM-HS Dose Reduction Hardware, NUH-03-7004-SAR.

P.1.6 <u>References</u>

- 1.1 U.S. Nuclear Regulatory Commission, Regulatory Guide 3.61, Standard Format and Content for a Topical Safety Analysis Report for a Spent Fuel Dry Storage Cask, February 1989.
- 1.2 10CFR72, Rules and Regulations, Title 10, Chapter 1, Code of Federal Regulations -Energy, U.S. Nuclear Regulatory Commission, Washington, D.C., "Licensing Requirements for the Independent Storage of Spent Nuclear Fuel and High-Level Radioactive Waste."
- 1.3 10CFR71, Rules and Regulations, Title 10, Chapter 1, Code of Federal Regulations -Energy, U.S. Nuclear Regulatory Commission, Washington, D.C., "Packaging and Transportation of Radioactive Material."
- American Society of Mechanical Engineers, ASME Boiler And Pressure Vessel Code, Section III, Division 1 - Subsections NB, NG and NF, 1998 edition including 2000 Addenda.
- 1.5 ANSI N14.5-1997, "Leakage Tests on Packages for Shipment," February 1998.
- 1.6 CoC 1042 Updated Final Safety Analysis Report (UFSAR) for the NUHOMS[®] EOS System, Revision 3, June 2020.

NUH-003		
Revision 22	Page P.1-12	January 2024
All changes on this page are Amd 18.		

Descenter	24PTH DSC Type		
rarameter	24PTH-S	24PTH-L	24PTH-S-LC
DSC Length (in.)	186.55 (Maximum)	192.55 (Maximum)	186.67 (Maximum)
DSC Outside Diameter (in)	67.19	67.19	67.19
DSC Cavity Length (in.)	169.6	175.1	173.28
DSC Shell Thickness (in)	0.5	0.5	0.5
DSC Loaded Weight, Dry ⁽¹⁾ (kips)	92.4/89.0/86.1	93.7/90.1/87.1	NA/89.5/86.6
DSC Loaded Weight, Wet ⁽¹⁾ (kips)	96.6/93.2/90.9	98.4/94.8/92.4	NA/95.1/91.6
HSM-H Single Module Weight, Empty (kips)	335.7		
HSM-H Single Module Weight, Loaded (kips)	428.1	429.4	425.2
HSM Model 102 Weight, Empty (kips)	NA	NA	273.1
HSM Model 102 Weight, Loaded (kips)	NA	NA	362.6

 Table P.1-1

 Key Design Parameters of the NUHOMS[®]-24PTH System⁽²⁾

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HSM-H	
Overall Length (without shield walls), in	248
Overall Width (without shield walls), in	116
Overall Height, in	222

Notes: (1) The weights are provided for Type 1/Type 2/Type 3 baskets where applicable.
(2) Unless stated otherwise, nominal values are provided.

Amd 18



Note: *Type 1 basket is shown.* The DSC top and bottom shield plugs and cover plates are not shown for clarity.

Figure P.1-1 NUHOMS[®]-24PTH DSC Components

Page P.1-14 All changes on this page are Amd 18.



Figure P.1-2 Disassembled View of the NUHOMS[®] 24PTH DSC *Types 1 and 2* Basket

NUH-003		
Revision 22		

Page P.1-15 All changes on this page are Amd 18. January 2024

Proprietary and Security Related Information for Drawing NUH24PTH-1001-SAR, Rev. 7 Withheld Pursuant to 10 CFR 2.390

Proprietary and Security Related Information for Drawing NUH24PTH-1002-SAR, Rev. 3 Withheld Pursuant to 10 CFR 2.390
Proprietary and Security Related Information for Drawing NUH24PTH-1003-SAR, Rev. 6 Withheld Pursuant to 10 CFR 2.390

Proprietary and Security Related Information for Drawing NUH24PTH-1004-SAR, Rev. 5 Withheld Pursuant to 10 CFR 2.390

Proprietary and Security Related Information for Drawing NUH24PTH-5013-SAR, Rev. 0 Withheld Pursuant to 10 CFR 2.390

Proprietary and Security Related Information for Drawing NUH24PTH-5014-SAR, Rev. 0 Withheld Pursuant to 10 CFR 2.390

Proprietary and Security Related Information for Drawing NUH24PTH-72-1008, Rev. 0 Withheld Pursuant to 10 CFR 2.390

Proprietary and Security Related Information for Drawing NUH24PTH-72-1009, Rev. 0 Withheld Pursuant to 10 CFR 2.390

Proprietary and Security Related Information for Drawing NUH24PTH-S-5011-SAR, Rev. 0 Withheld Pursuant to 10 CFR 2.390

Proprietary and Security Related Information for Drawing NUH24PTH-S-5012-SAR, Rev. 0 Withheld Pursuant to 10 CFR 2.390

Proprietary and Security Related Information for Drawing NUH24PTH-L-5011-SAR, Rev. 0 Withheld Pursuant to 10 CFR 2.390

Proprietary and Security Related Information for Drawing NUH24PTH-L-5012-SAR, Rev. 0 Withheld Pursuant to 10 CFR 2.390

Proprietary and Security Related Information for Drawing NUH24PTH-S-LC-5011-SAR, Rev. 0 Withheld Pursuant to 10 CFR 2.390

Proprietary and Security Related Information for Drawing NUH24PTH-S-LC-5012-SAR, Rev. 0 Withheld Pursuant to 10 CFR 2.390







P.2.1 Spent Fuel To Be Stored

As described in Appendix P.1, there are *six* design configurations for the NUHOMS[®]-24PTH DSC; S, L and S-LC. Each of the DSC configurations is designed to store intact (including reconstituted) and/or damaged and/or failed PWR fuel assemblies as specified in Table P.2-1 and Table P.2-3. The fuel to be stored is limited to a maximum assembly average initial enrichment of 5.0 wt. % U-235. The maximum allowable assembly average burnup is limited to 62 GWd/MTU. The nominal assembly width for intact and damaged fuel is 8.536 inches. The minimum required cool time for fuel to be stored with 380, 475, and 492 kgU/FA is explicitly specified as a function of burnup and enrichment in Tables M.2-5 through M.2-14f. For fuel with a kgU/FA loading between these values, the minimum required cool time for fuel to be stored as a function of burnup and enrichment is determined by using the interpolation methodology specified in the notes and examples following Table M.2-14f.

The 24PTH-S, 24PTH-L and 24PTH-S-LC DSCs are also designed to store control components (CCs) with thermal and radiological characteristics as listed in Table P.2-2. The CCs include burnable poison rod assemblies (BPRAs), thimble plug assemblies (TPAs), control rod assemblies (CRAs), rod cluster control assemblies (RCCAs), axial power shaping rod assemblies (APSRAs), orifice rod assemblies (ORAs), vibration suppression inserts (VSIs), neutron source assemblies (NSAs), and neutron sources. Non-fuel hardware that are positioned within the fuel assembly after the fuel assembly is discharged from the core such as guide tube or instrument tube tie rods or anchors, guide tube inserts, BPRA spacer plates or devices that are positioned and operated within the fuel assembly during reactor operation such as those listed above are also considered as CCs.

Partial length shield assemblies (PLSAs) for the Westinghouse 15x15 class, where part of the active fuel is replaced with steel are also included as authorized.

The NUHOMS[®]-24PTH DSC is also authorized to store fuel assemblies containing blended low enriched uranium (BLEU) fuel material. Fuel pellets containing BLEU fuel material are no different than UO₂ fuel pellets except for the presence of a higher quantity of cobalt impurity. The consideration of cobalt impurity only affects the gamma source terms for fuel assemblies located in the DSC periphery. This does not affect any criticality, thermal or structural analysis inputs for evaluation of fuel assemblies with BLEU material. The qualification of fuel assemblies containing BLEU fuel pellets will require an additional cooling time of three years to ensure that the source terms calculated with UO₂ material are bounding.

Revision 22	Page P.2-2	January 2024
NUH-003	D D D D D	1 2024

time as the remaining fuel rods of the assembly. The reconstituted UO_2 rods are assumed to have the same irradiation history as the entire fuel assembly. The reconstituted rods can be at any location in the fuel assemblies. The maximum number of irradiated stainless steel rods in reconstituted assemblies per DSC is 40.

Fuel assemblies containing up to 10 stainless steel rods irradiated throughout the irradiation cycles are allowed for loading under the requirements of reconstituted fuels with irradiated stainless steel rods.

The NUHOMS[®]-24PTH DSCs can also accommodate up to a maximum of 12 damaged fuel assemblies placed in cells located at the outer edge of the DSC as shown in Figure P.2-6.

Damaged PWR fuel assemblies are assemblies containing missing or partial fuel rods, or fuel rods with known or suspected cladding defects greater than hairline cracks, or pinhole leaks. The extent of damage in the fuel assembly, including non-cladding damage, is to be limited such that a fuel assembly is able to be handled by normal means. The extent of damage in the fuel rods is to be limited such that a fuel pellet is not able to pass through the damaged cladding during handling and retrievability is assured following normal and off-normal conditions. The DSC basket cells which store damaged fuel assemblies are provided with top and bottom end caps to assure retrievability.

The NUHOMS[®]-24PTHF DSC, an alternative version of the NUHOMS[®]-24PTH DSC, is designed to accommodate up to a maximum of 8 failed fuel assemblies encapsulated in individual failed fuel cans and placed in cells located at the outer edge of the DSC as shown in Figure P.2-6. Failed fuel is defined as ruptured fuel rods, severed fuel rods, loose fuel pellets, or fuel assemblies that cannot be handled by normal means. Failed fuel assemblies may contain breached rods, grossly breached rods, and other defects such as missing or partial rods, missing grid spacers, or damaged spacers to the extent that the assembly cannot be handled by normal means.

Fuel debris and damaged fuel rods that have been removed from a damaged fuel assembly and placed in a rod storage basket are also considered as failed fuel. Loose fuel debris, not contained in a rod storage basket may also be placed in a failed fuel can for storage, provided the size of the debris is larger than the failed fuel can screen mesh opening and it is located at least 10" above the top of the bottom shield plug of the DSC.

Fuel debris may be associated with any type of UO₂ fuel provided that the maximum uranium content and initial enrichment limits are met. The total weight of each failed fuel can plus all its contents shall be less than 1682 lb *for Type 1 and Type 2 baskets and 1715 lb for the Type 3 basket*.

A 24PTH DSC containing less than 24 fuel assemblies may contain either empty slots or dummy fuel assemblies in the empty slots. The dummy assemblies are unirradiated, stainless steel encased structures that approximate the weight and center of gravity of a fuel assembly.

NUH-003		
Revision 22	Page P.2-3	January 2024
	All changes on this page are Amd 18.	

The NUHOMS[®]-24PTH-S and 24PTH-L DSCs may store up to 24 PWR fuel assemblies arranged in any of the five alternate heat load zoning configurations shown in Figure P.2-1 through Figure P.2-4 and Figure P.2-9 with a maximum decay heat of 2.5 kW per assembly and a maximum heat load of 40.8 kW per canister.

The 24PTH-S-LC may store up to 24 B&W 15x15 fuel assemblies arranged in accordance with heat load zoning configuration No. 5 with a maximum decay heat of 1.5 kW per assembly and a maximum heat load of 24.0 kW per DSC, as shown in Figure P.2-5.

The 24PTH DSC basket is designed with 3 alternate options: Type 1 basket, which includes aluminum inserts in the R45 transition rails, Type 2 basket which does not include any aluminum inserts, *and Type 3 basket, which utilizes composite plate compartments*. Type 1 basket is the preferred option for canisters with high decay heat loads, since the aluminum inserts allow a more direct heat conduction path from the basket edge to the DSC shell. Type 2 basket offers the advantage of an adequate thermal performance but with a lower lifting weight requirement. *The Type 3 basket combines the high heat transfer performance and the advantage of the lower weight into a single design*.

The NUHOMS[®]-24PTH DSC basket is designed with three alternate poison materials: Borated Aluminum alloy, Boron Carbide/Aluminum Metal Matrix Composite (MMC) and Boral[®]. For criticality analysis, 90% of B-10 content present in the borated aluminum and MMC poison plates is credited, while only 75% is credited for Boral[®].

For each poison material, the NUHOMS[®]-24PTH DSC basket is analyzed for *seven* alternate basket *poison* configurations, depending on the boron loadings analyzed (designated as "A" basket for low B-10 loading, "B" basket for moderate B-10 loading, "C" or "D" basket for high B-10 loading) and Basket-Type (Type 1, Type 2 or Type 3).

A summary of the alternate poison loadings considered and the corresponding credit taken in the criticality analysis for each poison material as a function of basket types is presented below:

Poison Type	24PTH Basket Type ⁽¹⁾	Poison Loading (B-10 mg/cm ²)	% Credit Used in Criticality Analysis
	1A or 2A	7	
Borated Aluminum Alloy/MMC	1B or 2B	15	00
	1C or 2C	32	90
	3D ⁽²⁾	35	
Boral®	1A or 2A	9	
	1B or 2B	19	75
	1C or 2C	40	

(1) Type 1A = Basket Type 1 with aluminum inserts in the R45 transition rails and Type A poison plate configuration; Type 2A = Basket Type 2 without aluminum inserts in the R45 transition rails and Type A poison plate configuration;

(2) Borated Aluminum is not applicable for the Type 3 basket

Table P.2-4 summarizes the maximum assembly average initial enrichment as a function of soluble boron concentration and basket neutron poison requirements for intact fuel assemblies. Table P.2-5 summarizes the maximum assembly average initial enrichment as a function of soluble boron concentration and basket neutron poison requirements for up to a maximum of 12 damaged fuel assemblies. Table P.2-5a summarizes the maximum assembly average initial enrichment as a function of soluble boron concentration and basket neutron poison requirements for up to a maximum of 12 damaged fuel assemblies. Table P.2-5a summarizes the maximum assembly average initial enrichment as a function of soluble boron concentration and basket neutron poison requirements for up to a maximum of 8 damaged and/or failed fuel assemblies.

NUH-003		
Revision 22	Page P.2-4	January 2024
	All changes on this page are Amd 18.	

The method for determining the minimum required cooling times for the fuel assemblies with heavy metal loads between 380 and 492 kgU/FA is provided in Chapter 7, Section 7.2.3.2.

The NUHOMS[®]-24PTH DSC is inerted and backfilled with helium at the time of loading. The maximum fuel assembly weight with a CC is 1682 lbs *for Basket Types 1 and 2 and 1715 lbs for Basket Type 3*.

The maximum fuel cladding temperature limit of 400 °C (752 °F) is applicable to normal conditions of storage and all short term operations from spent fuel pool to ISFSI pad including vacuum drying and helium backfilling of the NUHOMS[®]-24PTH DSC per NUREG-1536 [2.1]. In addition, NUREG-1536 [2.1] does not permit thermal cycling of the fuel cladding with temperature differences greater than 65 °C (117 °F) during DSC drying, backfilling and transfer operations.

The maximum fuel cladding temperature limit of 570 °C (1058 °F) is applicable to accidents or off-normal thermal transients [2.1].

Calculations were performed to determine the fuel assembly type which was most limiting for each of the analyses including shielding, criticality, thermal and confinement. These evaluations are performed in Chapter P.5, P.6, P.4 and P.7, respectively. The fuel assembly classes considered are listed in Table P.2-3. It was determined that the B&W 15x15 may be used as a representative fuel assembly for dose rate calculations. For criticality safety, the B&W 15x15 assembly is the most reactive assembly type for a given enrichment. This assembly is used to determine the most reactive configuration in the DSC. Using this most reactive configuration, criticality analysis for all other fuel assembly classes is performed to determine the maximum enrichment allowed as a function of the soluble boron concentration and fixed poison plate loading. For thermal analysis, the WE 14x14 fuel assembly is limiting for the 24PTH-S and -L DSCs, and B&W 15x15 fuel assembly for the 24PTH-S-LC DSC since they result in the lowest fuel conductivity. The confinement analysis is based on B&W 15x15 fuel assembly, since it results in a smaller free volume inside the DSC cavity as compared to a 14x14 fuel assembly.

For calculating the maximum internal pressure in the NUHOMS[®]-24PTH DSC, it is assumed that 1% of the fuel rods are damaged for normal conditions, up to 10% of the fuel rods are damaged for off normal conditions, and 100% of the fuel rods will be damaged following a design basis accident event. A minimum of 100% of the fill gas and 30% of the fission gases within the ruptured fuel rods are assumed to be available for release into the DSC cavity, consistent with NUREG-1536 [2.1].

Revision 22	Dage D 2 /a	January 2024
	All changes on this page are Amd 18.	Sumury 2024

evaluation as recommended in NUREG-0800, Section 3.5.3 [2.7]. The results of these evaluations are reported in Appendix P.11.

The evaluation of tornado-generated missile loads on the transfer cask summarized in Chapter 8, Section 8.2 of the UFSAR remains unchanged.

P.2.2.2 <u>Water Level (Flood) Design</u>

No change to Chapter 3, Section 3.2.2.

P.2.2.3 <u>Seismic Design</u>

The seismic design criteria for the TC and the HSM-H is consistent with the criteria set forth in Section 3.2.3, with the exception that the NRC Regulatory Guide 1.60 (R.G. 1.60) [2.11] response spectra is anchored to a maximum ground acceleration of 0.30g (instead of 0.25g) for the horizontal components and 0.20g (instead of 0.17g) for the vertical component. The results of the frequency analysis of the HSM-H structure (which includes a simplified model of the DSC) yield a lowest frequency of 22.1 Hz in the transverse direction and 28.2 Hz in the longitudinal direction. The lowest vertical frequency exceeds 33 Hz. Thus, based on the R.G. 1.60 response spectra amplifications, the corresponding seismic accelerations used for the design of the HSM-H are 0.387g and 0.331g in the transverse and longitudinal directions respectively and 0.20g in the vertical direction. The corresponding accelerations applicable to the DSC are 0.427g and 0.344g in the transverse and longitudinal directions, respectively, and 0.20g in the vertical direction. The seismic analysis of the HSM-H and 24PTH DSC are further discussed in Section P.3.7.

The seismic criteria for the high seismic HSM-HS is an "enhanced" NRC Regulatory Guide 1.60 response spectra anchored at 1.0g maximum horizontal acceleration and 1.0g maximum vertical acceleration as shown in Appendix U, Figure U.2-4.

The seismic design criteria for the HSM Model 102 does not change from that documented in Chapter 8, Section 8.2.

P.2.2.4 <u>Snow and Ice Loading</u>

No change to Chapter 3, Section 3.2.4.

P.2.2.5 <u>Combined Load Criteria</u>

The NUHOMS[®]-24PTH system is subjected to the same types of loads as the existing NUHOMS[®]-24P or -52B System. The load combination criteria for the TCs for transfer are the same as those shown in Chapter 3, Table 3.2-7. The criteria applicable to the NUHOMS[®]-24PTH DSC and HSM-H are discussed in the following subsections.

P.2.2.5.1 <u>NUHOMS®-24PTH DSC Structural Design Criteria</u>

The NUHOMS[®]-24PTH DSC is designed using the ASME Boiler and Pressure Vessel Code [2.2] criteria given in the existing UFSAR, Chapter 3, except as noted in the following sections. A summary of the NUHOMS[®]-24PTH DSC load combinations is presented in Table P.2-14.

P.2.2.5.1.1 <u>NUHOMS®-24PTH DSC Shell Stress Limits</u>

The stress limits for the NUHOMS[®]-24PTH DSC shell are taken from the ASME Boiler and Pressure Vessel Code, Section III, Subsection NB, Article NB-3200 [2.2] for normal condition loads (Level A) and NB-3225, Appendix F for accident condition loads (Level D). The stress limits for Level B and Level C are taken from ASME, Section III, Subsection NB, Paragraph NB-3223 and 3224.

Local yielding is permitted at the point of contact where the Level D load is applied. If elastic stress limits cannot be met, the plastic system analysis approach and acceptance criteria of Appendix F of ASME Section III are used.

The allowable stress intensity value, S_m , as defined by the Code is based on the temperature calculated for each service load condition or a bounding temperature.

P.2.2.5.1.2 <u>NUHOMS[®]-24PTH DSC Basket Stress Limits - Types 1 and 2</u>

The basket fuel compartment tube wall thickness is established to meet heat transfer, nuclear criticality, and structural requirements. The basket structure provides sufficient rigidity to maintain a subcritical configuration under the applied loads.

No credit is taken for neutron poison plates in any of the stress or stability analyses except for through the thickness compression (bearing) loads.

Normal Conditions

Normal Condition Stress Criteria for Steel Elements

As summarized in Table P.2-16, the normal condition stress criteria for the fuel compartment tubes and the transition rails, is based on Subsection NG of the ASME Code, Section III [2.2].

Normal Condition Stress Criteria for R90 Aluminum Transition Rails

The aluminum transition rail bodies (R90) perform their function (support of the fuel compartment tubes) by remaining in place. The loads on the rail bodies are primarily bearing from the fuel compartment tubes. "Failure" of the transition rail would require that the rail no longer provide support to the fuel compartment tubes. Since the aluminum rail bodies are constrained between the DSC shell and the fuel support compartment tubes, this cannot occur.

Therefore, for deadweight and handling condition loads, stress in the aluminum bodies will be compared to the allowable bearing stress, equal to S_y, from NG-3227.1(a). Values of S_y are taken from Table P.3.3-4 for annealed 6061 aluminum material at temperature (as described in Section P.3.3, these yield stresses are lower bound values).

Normal Condition Stability Criteria

Stability criteria are addressed in two parts:

NUH-003		
Revision 22	Page P.2-9	January 2024
All changes on this page are Amd 18.		

In addition, supplementary hand calculations were performed using the criteria of F-1334.3(b) for members under axial compression.

B. Under lateral loads, stability of the basket structure is demonstrated using detailed finite element models and the Collapse Load criteria from F-1341.3 [2.2]. These criteria establish the allowable load as 90% of the Limit Analysis Collapse Load where the Limit Analysis Collapse Load is the maximum load determined using elastic-perfectly plastic material properties with a yield stress equal to the lesser of 2.3Sm or 0.7Su.

In addition, supplementary hand calculations were performed using the criteria of F-1334.3(b) for members under axial compression.

P.2.2.5.1.3 <u>NUHOMS[®] - 24PTH DSC Basket Stress Limits - Basket Type 3</u>

The ASME Boiler and Pressure Vessel (B&PV) code is not applicable to the 24PTH Type 3 basket since the primary structural components (i.e., the steel plates) are qualified as described in Section 2.4 of CoC Appendix A - Inspections, Tests, and Evaluations (ITE) [2.18]. However, the ASME code [2.16] provides the basis of the design criteria for the Type 3 basket for normal and off-normal conditions as described in this section. For accident conditions, strain-based criteria and consideration of permanent deformation are used instead.

The Type 3 basket is made up of interlocking, slotted plates to form an egg-crate type structure. The egg-crate structure forms a grid of 24 fuel compartments that house PWR spent fuel assemblies (SFAs). A typical stack-up of grid plates is composed of a structural steel plate, an aluminum plate for heat transfer and a neutron absorber plate (neutron poison) for criticality. This design utilizes the same concept as the EOS-37PTH DSC basket assembly that is designed and licensed under CoC 1042 [2-14].

The steel of the basket plates and the steel angles in the R45 transition rails are credited with the structural function of supporting the fuel assemblies in normal, off-normal, and accident conditions. The solid aluminum R90 rails are designed to resist the bearing loads due to the deadweight of the loaded basket while stored in the HSM.

Normal Conditions

Normal Condition Stress Criteria for Steel

The basis for the steel basket stress allowables is the ASME Code, Section III, Subsection NG [2-16]. Stress limits for Level A service loading conditions are summarized in Table P.3.8-1. Although the basket components are specified as "non-code", the ASME Code, Section III [2-16] serves as a design guide for determining the steel basket stress allowables based on the stress limits for normal (Level A) service loading conditions. The design stress intensity, S_m, is defined as the lower of 2/3S_y or 1/3 S_u (Appendix 2 of ASME B&PV, Section II [2-17]).

NUH-003			
Revision 22	Page P.2-11	January 2024	
All changes on this page are Amd 18.			

Normal Condition Stress Criteria for R90 Aluminum Transition Rails

Similar to the Type 1 and 2 baskets, the aluminum transition rail bodies (R90) perform their function (support of the fuel compartment tubes) by remaining in place. As such, the loads on the rail bodies are primarily bearing from the fuel compartment tubes over 80 years while stored in the HSM. "Failure" of the transition rail would require that the rail no longer provide support to the fuel compartment tubes. Since the aluminum rail bodies are constrained between the DSC shell and the fuel support compartment tubes, this cannot occur. Consistent with CoC 1042 Section 3.9.2.1.6.3 [2-14] and [2-15], the allowable bearing stresses in the basket aluminum components, to limit creep strain to 0.01 in 550,000 hours, are as follows:

- 0.254 ksi in the hottest aluminum plate, with a starting temperature of 680 °F.
- 0.758 ksi in the hottest R90 rail, with a starting temperature of 470 °F.
- 0.876 ksi in a less than hottest R90 rail, based on a starting temperature of 440 °F.

Although 550,000 hours is approximately 63 years, the creep strain time curve is very flat at 550,000 hours, such that the change in allowable bearing stress for 80 years is insignificant. Additional information regarding the creep evaluation is found in Section P.3.8. Annealed 6061 aluminum material properties are used for the basket evaluation, and are provided in Table P.3.3-12.

Accident Conditions

Accident Condition Stress Criteria for Steel Elements - Basket Type 3

Hypothetical impact accidents are evaluated as short duration Level D conditions. The structural steel plate displacements are evaluated against the acceptable permanent deformation that can be sustained by the basket structure while maintaining criticality control. Secondary and peak stresses are not required to be evaluated for Level D events, but should be evaluated to ensure that they are not a source of uncontrolled crack initiation.

The basket transition rails are classified as "non-code," and Section P.3.8 does not perform any stress analysis of the rail aluminum or steel plates for accident conditions. The membrane equivalent plastic strain in the steel grid plate is limited to 1%. Membrane + bending equivalent plastic strain is limited to 3% and peak equivalent plastic strain is limited to 10%. This ensures that displacement and permanent deformation of the steel grid is small and within failure limits for high-strength low-alloy steel such as American Iron and Steel Institute (AISI) 4130 material. The Level D Design Criteria are summarized in Table P.3.8-4.

Further discussion of the 24PTH Type 3 basket stress criteria is provided in Section P.3.8.6.5.

NUH-003			
Revision 22	<i>Page P.2-11</i> a	January 2024	
All changes on this page are Amd 18.			

P.2.2.5.2 <u>NUHOMS[®] HSM-H Structural Design Criteria</u>

A summary of the design loads for the HSM-H System is provided in Table P.2-18. The table also presents the applicable codes and standards for development of these loads. The design criteria discussed below comply with the requirements of 10CFR72.122 [2.10], and ANSI 57.9 [2.9].

P.2.2.5.2.1 HSM-H Normal Loads

(A) <u>Dead Loads (DW)</u>

Dead load includes the weight of the HSM-H concrete structure and the steel structure (the 24PTH-DSC weight is considered as a live load rather than a dead load).

The dead load is varied by +5% from the estimated value to simulate the most adverse loading condition in accordance with ANSI-57.9 [2.9].

(B) <u>Live Loads (LL)</u>

Live loads include the roof design basis snow and ice load of 110 psf conservatively derived from ASCE 7-95 [2.8]. A total live load of 200 psf (which includes snow and ice load) is used to envelope all postulated live loading, including such items as ladders, handrails, conduits, etc. added for personnel protection. In addition, the normal handling loads (RO), and off-normal handling loads (RA), and the 24PTH-DSC weight are treated as live loads for the concrete component evaluation.

In accordance with ANSI-57.9 [2.9], the live load is varied between 0% and 100% of the estimated load to simulate the most adverse conditions for the structure.

(C) <u>Normal Operating Thermal Loads (TN)</u>

The normal thermal loads on HSM-H include the effects of design basis internal heat load (40.8 kW maximum heat load for the 24PTH system) generated by the canister plus the effects of normal ambient conditions (0°F and 100°F).

	All changes on this nage are Amd 18.	•
Revision 22	Page P.2-11b	January 2024
NUH-003		

P.2.5 Summary of NUHOMS[®]-24PTH DSC and HSM-H Design Criteria

P.2.5.1 <u>24PTH DSC Design Criteria</u>

The principal design criteria for the NUHOMS[®]-24PTH DSC are presented in Table P.2-18. The NUHOMS[®]-24PTH DSC is designed to store intact and/or damaged and/or failed PWR fuel assemblies with or without CCs with assembly average burnup, initial enrichment and cooling time as described in Table P.2-1 and Table P.2-3. The maximum total heat generation rate of the stored fuel is limited to 2.5 kW per fuel assembly (1.5 kW for 24PTH-S-LC DSC) and 40.8 kW per canister (24.0 kW for 24PTH-S-LC DSC) in order to keep the maximum fuel cladding temperature below the limit [2.5] necessary to ensure cladding integrity. The fuel cladding integrity is assured by the NUHOMS[®]-24PTH DSC and basket design which limits fuel cladding temperature and maintains a nonoxidizing environment in the DSC cavity as described in Appendix P.4.

The NUHOMS[®]-24PTH DSC (shell and closure) is designed and fabricated as a Class 1 component in accordance with the rules of the ASME Boiler and Pressure Vessel Code, Section III, Subsection NB [2.2], and the alternative provisions to the ASME Code as described in Table P.3.1-1.

The NUHOMS[®]-24PTH DSC is designed to maintain a subcritical configuration during loading, handling, storage and accident conditions. A combination of fixed neutron absorbers, soluble boron in the pool and favorable geometry are employed to maintain the upper subcritical limit of 0.9411. The fixed neutron absorbers are in the form of borated aluminum metallic plates or Boral[®]. The *Type 1 and Type 2 baskets are* designed and fabricated in accordance with the rules of the ASME Boiler and Pressure Vessel Code, Section III, Subsection NG, Article NG-3200 [2.2] and the alternative provisions to the ASME Code as described in Table P.3.1-2. *The design criteria for the Type 3 basket is discussed in Section P.2.2.5.1.3.*

The NUHOMS[®]-24PTH DSC design, fabrication and testing are covered by TN America's Quality Assurance Program, which conforms to the criteria in Subpart G of 10 CFR Part 72.

The NUHOMS[®]-24PTH DSC is designed to withstand the effects of severe environmental conditions and natural phenomena such as earthquakes, tornadoes, lightning and floods. Appendix P.11 describes the NUHOMS[®]-24PTH DSC behavior under these accident conditions.

P.2.5.2 <u>HSM-H Design Criteria</u>

The principal design criteria for the NUHOMS[®] HSM-H module and steel support structure are presented in Table P.2-18. The load combination and design criteria for concrete and support structure components are the same as those described in Chapter 3, Section 3.2.5.1. These criteria, provided in Chapter 3, Tables 3.2-4, 3.2-5, 3.2-8 and 3.2-10 are also applicable to the HSM-H design.

	All changes on this page are Amd 18.	
Revision 22	Page P.2-17	January 2024
NUH-003		

P.2.6 <u>References</u>

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- 2.9 ANSI/ANS 57.9-1984, "Design Criteria for an Independent Spent Fuel Storage Installation (Dry Storage Type)," American Nuclear Society.
- 2.10 Title 10, Code of Federal Regulations, Part 72 (10CFR72), "Licensing Requirements for the Storage of Spent Fuel in the Independent Spent Fuel Storage Installation," U.S. Nuclear Regulatory Commission, August 31, 1988.
- 2.11 Regulatory Guide 1.60, "Design Response Spectra for Seismic Design of Nuclear Power Plants," U.S. Atomic Energy Commission, Revision 1, December 1973.
- 2.12 Regulatory Guide 1.61, "Damping Values for Seismic Design of Nuclear Power Plants," U.S. Atomic Energy Commission, October 1973.
- 2.13 Bechtel Topical Report, "Design of Structures for Missile Impact," BC-TOP-9-A, Revision 2, September 1974.
- 2.14 CoC 1042, Updated Final Safety Analysis Report (UFSAR) for the NUHOMS[®] EOS System, Revision 3, June 2020.
- 2.15 AREVA TN Technical Report, "Evaluation of Creep of NUHOMS[®] Basket Aluminum Components under Long Term Storage Conditions," E-25768, Rev. 0 (Structural Integrity Associates, Inc. File No. TNI-20Q-302, Rev. 0).

	All changes on this page are Amd 18.	r
Revision 22	Page P.2-18	January 2024
NUH-003		

- 2.16 American Society of Mechanical Engineers, ASME Boiler and Pressure Vessel Code, Section III, Division 1 - Subsection NG, 2010 edition including 2011 Addenda.
- American Society of Mechanical Engineers, ASME Boiler and Pressure Vessel Code, 2.17 Section II, Materials Specifications, 2010 edition including 2011 Addenda.
- *CoC 1004 Technical Specifications for the Standardized NUHOMS[®] Horizontal Modular* 2.18 Storage System, Amendment 18.

NUH-003	
Revision 22	

*Page P.2-18*a

Table P.2-18 Summary of NUHOMS®-24PTH DSC and HSM-H Component Design Loadings⁽¹⁾

(continued)

Component	Design Load Type	SAR Section Reference	Design Parameters	Applicable Codes
HSM-H Module				ACI 349-97, ACI 318-95 (for construction only)
	Flood	P.2.2.5.2.3(C)	Maximum water height: 50 ft. Maximum velocity of water 15'/sec.	10 CFR 72.122(b)
	Seismic	P.2.2.5.2.3(D)	Standard Seismic Criteria: Horizontal ground acc: 0.30g Vertical ground acc.: 0.20g (b) High Seismic Alternate: Horizontal ground acc.: 1.0g Vertical ground acc.: 1.0g	NRC Reg. Guides 1.60 & 1.61 [2.11] and [2.12]
	Dead Load	P.2.2.5.2.1(A)	<i>167.1</i> pcf concrete structure and weight of support steel structure	ANSI 57.9-1984 [2.9]
	Normal and Off-Normal Operating Temperature	P.2.2.5.2.1(C) P.2.2.5.2.2(A)	Normal: Ambient air temperature 0 °F -100 °F Off Normal: Ambient air temperature -40 °F to 117 °F	ANSI 57.9-1984 [2.9]
	Normal Handling Loads	P.2.2.5.2.1(D)	1. Hydraulic ram load of 80,000 lb. (DSC HSM insertion) 60,000 lb (DSC HSM extraction) on the rails	ANSI 57.9-1984 [2.9]
	Off-Normal Handling Loads	P.2.2.5.2.2(B)	Hydraulic ram load of: 80,000 lb (DSC insertion) 80,000 lb (DSC extraction) on both rails	ANSI-57.9-1984 [2.9]
	Design Basis Wind Load	P.2.2.5.2.1(E)	Conservatively assumed to be same as tornado generated wind load.	ASCE 7-95 [2.8]
	Live Load	P.2.2.5.2.1(B)	200 psf (including snow and ice load) on the roof DSC weight (110 kips)	ANSI-57.9-1984 [2.9] ASCE 7-95 [2.8]
	Accident Temperature	P.2.2.5.2.3(A)	Ambient air temperature of – 40 °F and 117 °F with inlet and outlet vents blocked number for condition depending upon heat load	10 CFR 72.122(n)
	Tornado Wind Load	P.2.2.5.2.3(B)	Maximum wind speed of 360 mph and a pressure drop of 3 psi	ASCE 7-95 [2.8] NRC Regulatory Guide 1.76 [2.6]
	Tornado Missile Load	P.2.2.5.2.3(B)	See Section P.2.2.1.3 for missiles considered.	NUREG-0800 Section 3.5.1.4 [2.7]

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The detailed information associated with this figure can be found in Technical Specifications Figure 1-11 [1.TS].

Figure P.2-1

NUH-003	
Revision 22	

The detailed information associated with this figure can be found in Technical Specifications Figure 1-12 [1.TS].

Figure P.2-2

NUH-003	
Revision 22	

Page P.2-47

January 2024

All changes on this page are Amd 18.

The detailed information associated with this figure can be found in Technical Specifications Figure 1-13 [1.TS].

Figure P.2-3

NUH-003	
Revision 22	

The detailed information associated with this figure can be found in Technical Specifications Figure 1-14 [1.TS].

Figure P.2-4

NUH-003	
Revision .	22

I

Page P.2-49 All changes on this page are Amd 18. January 2024

The detailed information associated with this figure can be found in Technical Specifications Figure 1-15 [1.TS].

Figure P.2-5

NUH-003	
Revision 22	

I

Page P.2-50

January 2024

All changes on this page are Amd 18.

The detailed information associated with this figure can be found in Technical Specifications Figure 1-16 [1.TS].

Figure P.2-6

NUH-003	
Revision 22	

I

Page P.2-51 All changes on this page are Amd 18. January 2024

The detailed information associated with this figure can be found in Technical Specifications *Figure* 1-15a [1.TS].

Figure P.2-9

NUH-003	
Revision 22	

I

Page P.2-54 All changes on this page are Amd 18. January 2024
P.3 <u>Structural Evaluation</u>

P.3.1 <u>Structural Design</u>

P.3.1.1 <u>Discussion</u>

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This section describes the structural evaluation of the NUHOMS[®]-24PTH system. The NUHOMS[®]-24PTH system consists of the NUHOMS[®] 24PTH DSC basket and shell assemblies, the HSM-H and HSM Model 102, and the OS197/OS197H/OS197FC Transfer Casks (TCs). The 24PTH DSC is a dual purpose canister that is designed to accommodate up to 24 intact PWR fuel assemblies (or up to 12 damaged assemblies, with the remaining intact) with total heat load of up to 40.8 kW. The HSM-H is an enhanced version of the NUHOMS[®] Standardized HSM and incorporates design features to enable storage of the higher heat load 24PTH DSC. The OS197FC TC is the OS197/OS197H TC with a modified top lid to improve the TC's thermal performance for the higher thermal loads during transfer.

The 24PTH DSC may also use the OS200 on-site transfer cask (TC) for transfer operations and the HSM-HS for storage operations. The HSM-HS is a "high seismic" HSM version for use in high seismic regions. The OS200 TC and HSM-HS components are described and evaluated in UFSAR Appendix U for transfer and storage of the 32PTH1 DSC. The 32PTH1 DSC bounds the loaded DSC weight and total heat load of the 24PTH; therefore, the Appendix U evaluations form the basis for acceptance of the 24PTH DSC in the OS200 TC and HSM-HS. Other transfer/storage component combinations are also acceptable, e.g., use of the OS197 TC with the HSM-HS storage module or the OS200 TC with the HSM (Model 102) or HSM-H, since the 24PTH DSC has been evaluated for transfer and storage in each of these components.

Certain modifications are made to the licensed OS200 TC and HSM-HS in order to enable their use with the smaller diameter 24PTH DSC. These modifications are summarized below:

- 1. When used with the 24PTH DSC, the OS200 TC is fitted with an internal aluminum sleeve that renders the radial gap between the 24PTH DSC outer diameter and the inside diameter of the OS200 TC equal to the gap when the 24PTH DSC is in the OS197 TC. The thermal evaluation of the 24PTH with the OS200 TC fitted with the internal sleeve is described in Section P.4.6.8. This evaluation shows that the thermal performance of the 24PTH DSC loaded in the OS200 TC fitted with the aluminum sleeve remains bounded by that of the 24PTH DSC in the OS197 TC. Therefore, the thermal stress results of the 24PTH in the OS197 TC remain applicable when the 24PTH DSC is used with the OS200 TC.
- 2. The OS200 TC sleeve provides radial support to the 24PTH DSC that is equivalent to that in the OS197 TC. Furthermore, the sleeve design is designed such that the cask support rails are maintained at the same locations as in the OS197 TC (at ± 18.5 from the bottom centerline of the TC), as shown in Section A-A, drawing NUH-08-8004-SAR in Section U.1.5 of Appendix U. These design features make the OS200 TC equivalent to the OS197 TC. Therefore, the existing stress analyses of the 24PTH DSC in the OS197 TC for normal, off-normal, and accident conditions documented in this appendix remain applicable when the 24PTH DSC is transferred in the OS200 TC.

	All changes on this page are Amd 18.	· · · · · · · · · · · · · · · · · · ·
Revision 22	Page P.3.1-1	January 2024
NUH-003		

3. The licensed HSM-HS design as described in UFSAR Appendix U is modified to allow use of the HSM-HS with the smaller diameter 24PTH DSC. These design modifications are consistent with those for smaller diameter DSCs shown for the HSM-H in Section P.1.5 and shown in the HSM-HS drawings in Appendix U, Section U.1.5. An assessment of the thermal performance of the 24PTH when stored in the HSM-HS is described in Section P.4.1 and concludes that the existing thermal evaluation of the 24PTH DSC remains applicable when the 24PTH DSC is stored in the HSM-HS. Therefore, the associated thermal stress results of the 24PTH DSC remain applicable when the 24PTH DSC is stored in the HSM-HS.

The generic term "transfer cask" or "TC", as used in this Chapter, refers to the OS197/OS197H/OS200 transfer cask, except when a specific transfer cask configuration is called out. Similarly, when the generic term HSM is used, it is meant to refer to any of the applicable HSMs (Models 102/HSM-H/HSM-HS) except when a specific HSM configuration is called out.

Both the Alternates 1 and 2 of the Bottom Forging Type 5 for the 24PTH-S-LC DSC consist of components including the grapple ring support and outer bottom cover plate, for which the thicknesses are no smaller than those for the configuration of the 24PTH-S-LC DSC considered in the stress analyses presented in Sections P.3.6 and P.3.7. Therefore, the analysis results for the 24PTH DSC remain applicable.

Where the new components have an effect on the structural evaluations presented in the FSAR, the changes are included in this section. Sections that do not have an effect on the evaluations presented in the FSAR include a statement that there is no change to the FSAR. In addition, a complete evaluation of the 24PTH DSC shell assembly and basket components and the HSM-H has been performed and is summarized in this section. This section also summarizes the OS197FC TC stress evaluation of the modified top cask lid, and the TC evaluations for the thermal profiles associated with the higher heat loads. The TC's thermal stress evaluations are applicable to the OS197H/OS197FC TCs for heat loads above 24 kW.

P.3.1.1.1 General Description of the 24PTH DSC

The 24PTH DSC shell assembly is shown on drawings NUH-24PTH-1001-SAR and NUH-24PTH-1002-SAR provided in Section P.1.5. Figure P.1.1-1 shows a schematic view of the 24PTH DSC.

There are three design types configurations for the 24PTH DSC, as shown in *Table P.1-1 and described in Chapter P.1. In addition, the introduction to Chapter P.1 describes six system configurations that provide a summary of the interfaces with other NUHOMS*[®] System components.

NUH-003		
Revision 22	Page P.3.1-1a	January 2024
	All changes on this page are Amd 18.	

24PTH DSC Shell Assembly

The NUHOMS[®]-24PTH DSC shell assembly is the same as the NUHOMS[®]-24P DSC (or the 24P Long Cavity DSC) with the following exceptions:

- The nominal DSC shell thickness is reduced to 0.5 inch thick from 0.625 inch thick.
- The nominal thickness of the outer top cover plate is increased from 1.25 inches to 1.50 inches.
- The nominal thickness of the inner top cover plate is increased from 0.75 inches to 1.25 inches (for 24PTH-S and -L DSCs) or replaced by an integral inner top forging/lead shield plug design (for the 24PTH-S-LC DSC), similar to the 24PT4 DSC [3.17].
- For the 24PTH-S and -L DSCs, the nominal thickness of the inner bottom cover plate is increased from 0.75 inches to 1.75 inches and is designed for the internal pressure loads without taking credit for the structural support of the bottom shield plug and outer bottom cover plate. An optional configuration is added for the inner bottom cover plate that allows the use of a forging to provide the same structural function as the plate design. Also, a single forging 7.50-inch thick (equal to the sum of the individual bottom plates and bottom shield plug) is also allowed. For the 24PTH-S-LC DSC, a bottom forging and outer bottom cover plate are used to encapsulate the lead shield plug.

- The nominal thickness of the top shield plug is reduced from 8.25 inches to 6.25 inches for the 24PTH-S and 24PTH-L. For the 24PTH-S-LC DSC an integral inner top forging/lead shield plug is implemented.
- The nominal thickness of the bottom shield plug is reduced from 6.25 inches to 4.00 inches for the 24PTH-S and 24PTH-L. For the 24PTH-S-LC an integral inner bottom forging/lead shield plug is implemented.
- A test port has been added to the outer top cover plate to allow testing of the inner top cover plate welds and vent and siphon port cover plate welds to a leak tight criteria.

24PTH DSC Basket Assembly

The 24PTH DSC basket is provided with three alternate options: with aluminum inserts in the R45 transition rails (Type 1), without aluminum inserts (Type 2), and with interlocking slotted plates (Type 3). In addition, depending on the boron content in the basket poison plates, each basket type is designated as type A, B, C, or D which results in seven different basket types (types 1A, 1B, 1C, 2A, 2B, 2C, and 3D).

The NUHOMS[®]-24PTH *Types 1 and 2* basket assembly is shown on drawings NUH-24PTH-1003-SAR and -1004-SAR provided in Section P.1.5. The basket assembly consists of 24 stainless steel tubes that make up a fuel compartment structure designed to accommodate up to 24 PWR fuel assemblies. The basket assembly consists of the fuel compartment structure, made up of the steel tubes, and the transition rails. Sandwiched in between the tubes are aluminum alloy 1100 plates used as heat transfer material, and neutron absorbing plates for criticality control. The tubes are welded at 8 elevations along the axial length of the basket to stainless steel insert (strap) plates. The aluminum and neutron absorbing plates, which are arranged in an egg crate configuration, are separated along the basket length by the steel insert plates. No credit is taken for the structural capacity of the aluminum heat transfer plates or neutron absorbing materials in the structural evaluation except for through-thickness bearing (compression) loads.

The basket transition rails provide the transition between the "rectangular" fuel support compartment tubes and the cylindrical internal diameter of the DSC shell. There are two types of transition rails. The aluminum rails, located on the 0° , 90° , 180° and 270° axes, are referred to as the "R90" transition rails. The steel transition rails are located on the 45° , 135° , 225° and 315° axes, and are referred to as the "R45" transition rails.

The R90 transition rails are made from sections of 6061 aluminum alloy. The structural evaluation of these rails uses properties for annealed aluminum (no credit is taken for enhanced properties obtained by heat treatment).

The R45 steel transition rails are welded steel structures fabricated with 3/8" thick Type 304 stainless steel. The stiffener plates are 3/8" thick, which are welded at 15 locations along the axial length of each rail.

No credit is taken for the aluminum inserts in the structural evaluation of the steel transition rails.

NUH-003		
Revision 22	Page P.3.1-3	January 2024
	All changes on this page are Amd 18.	

The 24PTH Type 3 basket assembly is shown on drawings NUH-24PTH-S-5012-SAR, NUH-24PTH-L-5012-SAR, and NUH-24PTH-S-LC-5012-SAR. The Type 3 basket is made up of interlocking, slotted plates to form an egg-crate type structure, resulting in no welds in the basket assembly. Extruded aluminum transition rails are bolted to the perimeter of the grid plate assembly. Each of the R90 transition rails is composed of two solid aluminum sections held with tie rods, and each of the R45 transition rails is a closed section reinforced with internal steel angle plates.

For the Types 1 and 2 basket, the connections between the transition rails and fuel compartment tubes are not required to maintain structural capacity of the basket assembly. These connections allow free thermal expansion of the connected parts and are designed primarily to enhance thermal performance, and simplify fabrication.

The basket structure is open at each end such that longitudinal fuel assembly loads are applied directly to the DSC/cask body and not to the basket structure. The fuel assemblies are laterally supported by the fuel compartment tube structure, which is laterally supported by the basket transition rails and the DSC inner shell.

Inside the TC, the DSC rests on two 3" wide rails ("cask rails"), attached to the inside of the TC at \pm -18.5° from the bottom centerline of the DSC. In the HSM-H and HSM Model 102, the DSC is supported by rails located at \pm -30° from the bottom centerline of the DSC.

The nominal open dimension of each fuel compartment cell is 8.90 in. x 8.90 in. This cross section dimension is sufficient to allow insertion of the controlling fuel assembly with enough clearance. The overall basket length is less than the DSC cavity length to allow for thermal expansion and tolerances.

The 12 fuel compartment tubes around the perimeter of the basket may be loaded with damaged fuel. End caps are installed at the bottom and top of the basket fuel compartment tube cells to contain the damaged fuel. These end caps are shown in drawing NUH24PTH-1003-SAR *for the Types 1 and 2 basket and in drawing NUH24PTH-5013-SAR for the Type 3 basket* included in Section P.1.5.

NUH-003		
Revision 22	Page P.3.1-4	January 2024
	All changes on this page are Amd 18.	

P.3.1.1.2 General Description of the HSM-H

The HSM-H is a freestanding reinforced concrete structure designed to provide environmental protection and radiological shielding for the 24PTH-DSC. The HSM-H is designed to accommodate all three 24PTH DSC configurations (24PTH-S DSC, 24PTH-L DSC, and 24PTH-S-LC DSC). Each HSM-H provides a self contained modular structure for the storage of a 24PTH-DSC containing up to 24 PWR SFAs. The HSM-H provides heat rejection from the spent fuel decay heat by a combination of radiation, conduction and convection. Schematic sketches of the HSM-H showing the different components are provided in Figure P.1.1-2 and Figure P.1.1-3. Drawing NUH-03-7001-SAR, included in Section P.1.5, provides the nominal dimensions, materials of construction, and design parameters of the HSM-H.

The HSM-H is a reinforced concrete structure consisting of two separate units: a base, where the 24PTH-DSC is stored, and a roof that serves to provide environmental protection and radiation shielding. The roof is attached to the base by 4 vertical ties or by 4 angle brackets. Three-foot thick shield walls are installed behind each HSM-H (single row array only) and at the ends of each row to provide additional shielding and protection against missile impact.

The HSM-H modules may be prefabricated offsite, then transported to the ISFSI site and installed on a reinforced concrete basemat. The HSM-Hs are placed next to adjacent module(s) to form continuous single or double row (back-to-back) arrays. An array must have a minimum of two HSM-Hs in a row in order to meet stability requirements under the postulated design loads.

NUH-003		
Revision 22	<i>Page P.3.1-4</i> a	January 2024
	All changes on this page are Amd 18.	

P.3.1.2.2 <u>24PTH DSC Basket</u>

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The basket is designed to meet heat transfer, nuclear criticality, and structural requirements. The basket structure provides sufficient rigidity to maintain a subcritical configuration under the applied loads. The stainless steel fuel compartment tube sections in the NUHOMS[®]-24PTH *Types 1 and 2* basket are the primary structural components. *For the Type 3 basket, high strength low alloy (HSLA) steel compartments are used.* The aluminum heat transfer plates and neutron poison plates are the primary heat conductors, and provide the necessary criticality control. The stress analyses of the basket do not take credit for the neutron absorbing/heat transfer plate material. The transition rails provide support to the fuel compartment tube structure for mechanical loads and also transfer heat from the fuel compartment tubes to the DSC shell.

For Types 1 and 2 basket, the basket structural design criteria is provided in Section P.2.2. The basis for the allowable stresses for the stainless steel components in the basket assembly is Section III, Division 1, Subsection NG of the ASME Code [3.1]:

- Normal conditions are evaluated using criteria from NG-3200.
- Accident conditions are classified as Level D events and are evaluated using stress and stability criteria from Section III, Appendix F of the ASME Code [3.1].

Structural design criteria for the Type 3 basket are provided in Section P.2.2.5.1.3.

P.3.1.2.3 <u>Alternatives to the ASME Code for the 24PTH DSC</u>

The primary confinement boundary of the NUHOMS[®]-24PTH DSC consists of the DSC shell, the inner top cover plate, the inner bottom cover plate, (or the inner top and bottom forgings for the 24PTH-S-LC), the siphon and vent block, and the siphon/vent port cover plates. Even though the ASME B&PV code is not strictly applicable to the DSC, it is Transnuclear's (TN's) intent to follow Section III, Subsection NB of the Code as closely as possible for design and construction of the confinement vessel. The DSC may, however, be fabricated by other than N-stamp holders and materials may be supplied by other than ASME Certificate Holders. Thus the requirements of NCA are not imposed. TN's quality assurance requirements, which are based on 10 CFR Part 72 Subpart G and NQA-1 are imposed in lieu of the requirements of NCA-3800. The SAR is prepared in place of the ASME design and stress reports. Surveillances are performed by TN and utility personnel rather than by an Authorized Nuclear Inspector (ANI).

The basket is designed, fabricated and inspected in accordance with the ASME Code Subsection NG. The following alternative provisions to the ASME Code Section III requirements are taken:

The poison plates, and aluminum heat transfer plates are not considered for structural integrity. Therefore, these materials are not required to be Code materials. The quality assurance requirements of NQA-1 is imposed in lieu of NCA-3800. The basket is not Code stamped. Therefore, the requirements of NCA are not imposed. Fabrication and inspection surveillances are performed by TN and utility personnel rather than by an ANI.

A complete list of the alternatives to the ASME Code and corresponding justification for the NUHOMS[®]-24PTH DSC and basket is provided in Table P.3.1-1 and Table P.3.1-2. respectively.

NUH-003		
Revision 22	Page P.3.1-7	January 2024
	All changes on this page are Amd 18.	

	CALCULATED WEIGHT (kips) ⁽¹⁾				
Component Description	24PTH-S	24PTH-L	24PTH-S-LC	Line Number	
DSC Shell Assembly ⁽²⁾	13.1	13.3	12.2	1	
DSC Top Shield Plug Assembly ⁽³⁾	8.8	8.8	9.7	2	
DSC Internal Basket Assembly ⁽⁴⁾	30.1/26.7/23.0	31.2/27.6/23.8	NA/27.2/23.5	3	
Total Empty Weight ⁽⁴⁾	52.0/48.6/44.9	53.3/49.7/45.9	NA/ 49.1/45.4	4=1+2+3	
24 PWR Spent Fuel Assemblies ⁽⁵⁾	<u>≤40.4/≤40.4/≤41.2</u>	<u>≤40.4/≤40.4/≤41.2</u>	<u>≤40.4/≤40.4/≤41.2</u>	5	
Total Loaded DSC Weight (Dry) ⁽⁴⁾	92.4/89.0/86.1	93.7/90.1/87.1	NA/ 89.5/86.6	6=4+5	
Water in Loaded DSC ⁽⁶⁾	4.2/4.2/4.8	4.7/4.7/5.3	NA/5.6/5.0	7	
Total Loaded DSC Weight (Wet) ⁽⁴⁾	96.6/93.2/90.9	98.4/94.8/92.4	NA/95.1/91.6	8=6+7	
TC Spacer	1.1	0.8		9	
TC Empty Weight ⁽⁷⁾	111.3/106.7	111.3/106.7	111.3/106.7	10	
Total Loaded TC Weight ⁽⁴⁾⁽⁷⁾	204.8/196.8	205.8/197.6	200.8/196.2	11=6+9+10	
HSM-H Single Module Weight Max. (Empty)	335.7	335.7	335.7	12	
HSM Model 102 ⁽⁸⁾			273.1	12	
HSM-H Single Module Weight Max. (Loaded)	428.1	429.4	425.2	13=6+12	
HSM Model 102 ⁽⁸⁾			362.6	13-0+12	

Table P.3.2-1 Summary of the NUHOMS®-24PTH System Component Nominal Weights

(with HSM (Model 102), HSM-H and OS197 TC)

Notes:

- 1. All numbers are rounded up to the next hundred pounds
- 2. Excludes top cover plates and shield plug.
- 3. Includes top cover plates and shield plug.
- 4. Weights provided are for the Type 1/Type 2/Type 3 baskets. For the 24PTH-S-LC, the Type 1 basket is not applicable.
- 5. Based on B&W 15x15 fuel weight of 1,682 lbs and 1,715 lbs per assembly (with control components) for Types 1 and 2 basket and Type 3 basket, respectively.
- 6. Weights listed correspond to weight of water in DSC after draining 640 gallons (5,476 lbs) for hydrogen control. Total weight of water in the DSC is 9.7 kips, 10.2 kips, and 11.1 kips for 24PTH-S, 24PTH-L, and 24PTH-S-LC, Types 1 and 2 respectively. The water weight without aluminum inserts is conservatively considered for both Types 1 and 2 baskets. Total weight of water in the DSC for 24PTH-S, 24PTH-L, and 24PTH-S-LC Type 3 DSCs is 10.3 kips, 10.8 kips, and 10.5 kips, respectively.
- 7. Includes the TC top cover plate. The TC weights provided in line 10 are with and without the weight of demineralized water in the neutron shield. The TC loaded weight (line 11) is provided using the heaviest DSC from line 6.
- 8. The 24PTH-S-LC DSC can also be stored in the HSM Model 102. The weight for Model 102 is from Table 8.1-4.

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P.3.3 Mechanical Properties of Materials

P.3.3.1 <u>24PTH DSC Material Properties</u>

The DSC shell and inner and outer top and bottom cover plates are fabricated from Type 304 stainless steel. The 24PTH-S-LC DSC shell assembly's top and bottom ends are fabricated from stainless steel forgings (material specification SA182 Type F304). Properties of the forging material are the same as the Type 304 plate material. The properties for the Type 304 material are from ASME Code Section II Part D [3.2] and are listed in Table P.3.3-1.

The 24PTH-S and 24PTH-L top and bottom shield plugs are fabricated from A36 carbon steel or Type 304 stainless steel. The properties for A36 carbon steel used in the analysis are from ASME Code Section II Part D [3.2], as listed in Table P.3.3-2. The 24PTH-S-LC top and bottom end steel forgings encase the lead shield plug material (ASTM B29). Properties for the ASTM B29 lead are in Table P.3.3-3.

For the 24PTH Types 1 and 2 basket, the fuel compartment tubes are fabricated with Type 304 stainless steel. The properties of this material are from ASME Code Section II, Part D [3.2] and are listed in Table P.3.3-1.

The steel transition rails (R45 rails) in the 24PTH *Types 1 and 2* basket are fabricated with Type 304 stainless steel. The properties of this material are from ASME Code Section II, Part D [3.2] and are listed in Table P.3.3-1.

For the 24PTH Types 1 and 2 basket, the aluminum transition rails (R90 rails) use sections of Type 6061 aluminum. Analysis properties are taken from [3.3] for annealed aluminum. Use of properties for annealed material ensures that no credit is taken for enhanced properties obtained by heat treatment. The selection of properties for annealed material is based on the possibility that the maximum temperature in the rails may exceed the temperatures for which strength properties are provided (for aluminum) in the ASME Code (see Table P.3.3-4). This is acceptable for the following reasons:

- The R90 transition rails are not pressure boundary parts. Loading on the rails is primarily bearing and the transition rails are "captured" between the fuel compartment tube structure and the DSC shell. Deformation of the transition rails (to conform to the inside diameter of the DSC shell) will distribute the applied loads and will not adversely impact the basket structure.
- For applications where the aluminum properties result from heat treatment, it is necessary to limit the maximum temperature to values below which the effects of the heat treatment are maintained. Heat treatment provides significant differences in strength properties at low temperatures. However, as temperature increases, the effect(s) of heat treatment on strength properties decreases. The strength properties used in the design of the 24PTH are based on annealed aluminum. Thus, changes in strength which may occur under exposure to temperatures exceeding 400 °F have no adverse impact on the properties used in the design.

	All changes on this page are Amd 18.	r
Revision 22	Page P.3.3-1	January 2024
NUH-003		

For the stress analyses of the 24PTH DSC, material properties for the Type 304 steel materials are taken from Table P.3.3-1. For elastic-plastic analyses, the plastic slope is taken as 0.05E (5% of the elastic modulus at temperature). Figure P.3.3-1 shows the stress-strain relationship used for the elastic-plastic analysis. Properties for the aluminum rails are taken directly from Table P.3.3-5 [3.3]. For elastic-plastic analyses, the plastic slope of the aluminum is taken as 0.01E. This approximates elastic-perfectly plastic properties while providing a small stiffness to enhance *numerical* stability.

Table P.3.3-6 provides additional material properties.

For the Type 3 basket, the primary structural material for the fuel compartments is a highstrength low-alloy (HSLA) steel. Basket component stress intensity allowables used for the evaluation of normal and off-normal conditions (ASME Code Service Level A and B) are developed based on the mechanical properties (S_u and S_y) listed in Table P.3.3-10. A strainbased criterion is used for evaluation of the basket for accident conditions (Service Level D). Thus, the basket is regarded as a non-ASME Code component. If ASTM 829 Gr 4130 is used, ORANO test report [3.42], which is Reference 3.9.2-5 of CoC 1042 [3.46] and provides material qualification and testing requirements for ASTM 829 Gr 4130, determines the optimum tempering for the desired toughness and the corresponding minimum yield and tensile strength. The A829 Gr 4130 steel plates are heat-treated and tempered per

] Specification and acceptance testing of the HSLA steel are included in Section *P.9.1.8.*

The aluminum plates in the basket perform only a heat conducting function with no credit taken for their strength in supporting the fuel in the various loading conditions. The aluminum 6061 peripheral transition rails are entrapped between the fuel compartment structure and the DSC shell. For normal and off-normal loading conditions the primary stresses are limited to S_y. For accident conditions, qualification of the fuel compartment demonstrates that the rails perform their structural support safety function. The transition rails are specified as ASTM B221 or B209 Alloy 6061. The important-to-safety (ITS) Cat C rail fasteners are specified as ASTM A564 TYPE 630 H1100 material. The mechanical properties for the aluminum 6061 used for the basket transition rails are taken in the annealed (T0) condition to consider the effect of creep due to long term storage at the service temperature near 400 °F. Therefore, the material may be supplied in any temper condition. Creep behavior of these rails is discussed in Section P.3.8.6.6.

The fixed neutron absorber plates are composed of boron carbide/aluminum metal matrix composite. These materials perform no structural function in supporting the fuel in the various loading conditions. They are subject to TN Americas specification and acceptance testing described in Section P.9.1.7

The properties of the materials used in the 24PTH Type 3 basket are listed in Table P.3.3-10 through Table P.3.3-13.

NUH-003		
Revision 22	Page P.3.3-2	January 2024
	All changes on this page are Amd 18.	

P.3.3.2 <u>HSM-H Material Properties</u>

The temperature dependent material properties for concrete and reinforcing steel are taken from [3.26] and are provided in Table P.3.3-7 and Table P.3.3-8 respectively.

The material properties of the ASTM A992 steel used for fabrication of the rails of the support structure are listed in Table P.3.3-9. The material properties used for the Type 304 stainless steel used for the heat shield support plate and the A36 steel used for the rail assembly extension plates are provided in Table 8.1-3. The heat shield fins, the aluminum backing sheet, and the louvered heat shield are made of commercial grade aluminum.

P.3.3.3 <u>Materials Durability</u>

The materials used in the fabrication of the NUHOMS[®]-24PTH system are shown in Table P.3.3-1 through Table P.3.3-9. Essentially all of the materials meet the appropriate requirements of the ASME Code, ACI Code, and appropriate ASTM Standards. The durability of the DSC shell assembly and basket assembly stainless steel components and the HSM-H steel components is well beyond the design life of the applicable components. The aluminum material used in the basket is only relied upon for its thermal conductivity and bearing strength properties. The poison material selected for criticality control of the NUHOMS[®]-24PTH system has been tested and is currently in use for similar applications. Additionally, the NUHOMS[®]-24PTH basket assembly resides in an inert helium gas environment for the majority of the design life. The specifications controlling the mix of concrete, specified minimum concrete strength requirements, and fabrication control ensure durability of the materials for this application. Therefore, the materials used in the NUHOMS[®]-24PTH system will maintain the required properties for the design life of the system.

NUH-003		
Revision 22	<i>Page P.3.3-2</i> a	January 2024
	All changes on this page are Amd 18.	

Temp (°F)	E ⁽¹⁾ (10 ³ ksi)	Sy ⁽¹⁾⁽³⁾ (ksi)	Su ⁽¹⁾⁽⁴⁾ (ksi)	Thermal Expansion 10 ⁻⁶ in/(in-°F) (1)(5)	Thermal Conductivity Btu/(hr-ft-°F) ⁽¹⁾⁽⁵⁾	Specific Heat Btu/(lb-°F) ⁽¹⁾	Density Ibs/in³
-20	29.3	100.2	105.2				
70	29.0	96.4	101.2				
100	28.9	95.4	100.2	6.50	23.6		
200	28.4	91.6	96.2	6.70	23.5	0.110	
300	28.0	87.7	92.1	6.90	23.4		0 202(1)
400	27.6	83.9	88.1	7.10	23.1	0.120	0.203
500	27.0	80.0	84.0	7.30	22.7		
600	26.2	76.1	79.9	7.40	22.2	0.130	
700	25.2	71.3	74.9	7.60	21.6		
800	24.1	66.0	69.3	7.80	21.0	0.145	

Table P.3.3-10Materials Properties, High Strength Low Alloy Steel

Notes:

(1) Listed values for yield stress calculated from rate of reduction provided in Figure 2.3.1.1.1, Figure 2.3.1.1.4 for modulus of elasticity, and Figure 2.3.1.0 for thermal properties from Reference [3.43].

(2) Listed values based on Reference [3.43].

(3) Yield stress values calculated based on 80 ksi @ 500 °F.

(4) Ultimate strength conservatively determined based on 1.05 S_y. However, ultimate strength values 20% greater than those listed above may be used provided that they are supported by test data.

(5) Thermal expansion and thermal conductivity values conservatively represents the lower numbers for high strength low alloy steels (such as ASTM A829 Gr. 4130 or ASME SA-517 Gr A, B, E or P).

NUH-003		
Revision 22	<i>Page P.3.3-11</i> a	January 2024
	All changes on this page are Amd 18.	

Temp (°F)	S _m (ksi)	S _y (ksi)	S _u (ksi)	E (10 ³ ksi)	α _{INST} (10 ⁻⁶ °F ⁻¹)	α _{AVG} (10 ⁻⁶ °F ⁻¹)	ρ (Ib/in³)	K (Btu/hr-ft-°F)	C _ρ (Btu/lb-°F)
-100				30.3					
-20 – 100	23.3	38.0	70.0						
70				29.4	6.4	6.4		34.9	0.103
100					6.6	6.5		34.7	0.106
150	23.3	35.7			6.8	6.6		34.2	0.110
200	23.2	34.8	70.0	28.8	7.0	6.7		33.7	0.114
250		34.2			7.2	6.8		33.0	0.117
300	22.4	33.6	70.0	28.3	7.3	6.9		32.3	0.119
350					7.5	7.0		31.6	0.122
400	21.6	32.5	70.0	27.9	7.7	7.1	0.280	30.9	0.124
450					7.8	7.2		30.1	0.126
500	20.6	31.0	70.0	27.3	8.0	7.3		29.4	0.128
550					8.2	7.3		28.7	0.131
600	19.4	29.1	70.0	26.5	8.3	7.4		28.0	0.134
650	18.8	28.2	70.0		8.5	7.5		27.3	0.136
700	18.1	27.2	70.0	25.5	8.7	7.6		26.6	0.140
750		26.3	69.1		8.8	7.7		26.0	0.143
800		25.5	64.3	24.2	9.0	7.8		25.3	0.147
ASME	Table 2A p. 274 line 26	Table Y-1 p. 546-547 Line 40	Table U pg 465	Table TM-1 C≤0.30% p. 738	Table p. Gro	e TE-1 708 up 1	Table PRD	Calculated fro p. 726, (m Table TCD Group A

Table P.3.3-11Material Properties – SA-516 Gr 70 and ASTM A516 Gr 70

Source: ASME Section II, Part D – Properties, 2011a Edition [3.39]

NUH-003		
Revision 22		

All changes on this page are Amd 18.

Temp (°F)	E (10 ³ ksi)	Elongation in 4D, %	Su (ksi)	S _y (ksi)	α _{AVG} (10 ⁻⁶ °F ⁻¹)	ρ (Ib/in³)	K (Btu/hr-ft- °F)	C₅ (Btu/lb- ℉)
-100								
-20								
70					12.1		96.1	0.213
75	9.9	30	18.0	8.0				
100					12.4		96.9	0.215
150					12.7		98.0	0.218
200					13.0		99.0	0.221
212	9.5	30	18.0	8.5				
250					13.1	0.098	99.8	0.223
300	9.1	35	15.0	9.5	13.3		100.6	0.226
350	8.9	45	12.0	8.5	13.4		101.3	0.228
400	8.6	60	10.0	7.5	13.6		101.9	0.230
450	8.3	75	8.5	6.0	13.8			
500	7.9	80	7.0	5.5	13.9			
550					14.1			
600	6.8	80	5.0	4.2	14.2			
ASME	Kaufman, p. 163 ⁽¹⁾	Kaufman, p. 163 ⁽¹⁾	Kaufman, p. 163 ⁽¹⁾	Kaufman, p. 163 ⁽¹⁾	Table TE-2 p. 714 Aluminum Alloys	Table PRD p. 744	Calculated based on Table TCD p. 735, group A96061	

Table P.3.3-12Material Properties – Aluminum ASTM B221 or B209 Alloy 6061-0

Source: ASME Section II, Part D – Properties, 2011a Edition [3.39]

Notes:

(1) Annealed values used for analysis are typical tensile properties from [3.44] p. 163.

(2) Mechanical properties are used for design of the basket peripheral transition rails. The thermal design analysis uses values for density, thermal conductivity, and heat capacity that are lower than those in this table.

(3) Thermal conductivity and heat capacity used in the design analyses are lower than those shown in the table.

vision 22	Page P.3.3-11c	January 2024
JH-003		1 2024

Temp (°F)	Sm (ksi)	S	S _y (ksi)	S _u (ksi)	E (10 ³ ksi)	а _{іNST} (10 ⁻⁶ °F ⁻¹)	α _{AVG} (10 ⁻⁶ °F ⁻¹)	ρ (Ib/in³)	K (Btu/hr-ft-℉)	C₄ (Btu/lb-℃F)
-20	46.7	40.0								
70	46.7	40.0	115	140	28.5	5.3	5.3		10	0.188
100	46.7	40.0	115	140		5.4	5.4		10.1	0.189
150			109.2			5.6	5.5		10.3	0.189
200	46.7	40.0	106.3	140	27.8	5.7	5.5		10.6	0.189
250			103.9			5.8	5.6		10.9	0.19
300	46.7	40.0	101.8	140	27.2	6	5.7	101	11.2	0.19
350						6.1	5.7	404	11.5	0.19
400	45.4	38.9	98.3	136.1	26.7	6.2	5.8		11.7	0.19
450						6.3	5.8		12	0.19
500	44.5	38.1	95.2	133.4	26.1	6.4	5.9		12.3	0.19
550						6.4	5.9		12.5	0.19
600	43.8	37.5	92.7	131.4	25.5	6.5	6.0		12.8	0.189
650	43.4	37.2	91.5	130.1		6.6	6.0		13	0.188
ASME	Table 2A p. 290 line 14	Table 1A p. 48 Line 25	Table Y-1 p. 582-583 Line 8	Table U p. 479 Line 19	Table TM-1 S17400	Table TE-1 p. 710 Group F 17 Cr Steels		Table PRD	Table p. 727,	TCD Group I

Table P.3.3-13Material Properties – SA-564 Gr. 630 H1100

Nominal Composition: 17Cr-4Ni-4Cu

Source: ASME Section II, Part D - Properties, 2011a Edition [3.39]

All changes on this page are Amd 18.

P.3.4 <u>General Standards for Casks</u>

P.3.4.1 Chemical and Galvanic Reactions

The materials of the 24PTH DSC shell and basket have been reviewed to determine whether chemical, galvanic or other reactions among the materials, contents and environment might occur during any phase of loading, unloading, handling or storage. This review is summarized below:

The 24PTH DSC is exposed to the following environments:

- During loading and unloading, the DSC is placed inside of the TC. The annulus between the cask and DSC is filled with demineralized water and an inflatable seal is used to cover the annulus between the DSC and cask. The exterior of the DSC will not be exposed to pool water.
- The space between the top of the DSC and inside of the TC is sealed to prevent contamination. For PWR plants the pool water is borated. This affects the interior surfaces of the DSC, the shield plug, and the basket. The TC and DSC are kept in the spent fuel pool for a short period of time, typically about 6 hours to load or unload fuel, and 2 hours to lift the loaded TC/DSC out of the spent fuel pool.
- During storage, the interior of the DSC is exposed to an inert helium environment. The helium environment does not support the occurrence of chemical or galvanic reactions because both moisture and oxygen must be present for a reaction to occur. The DSC is thoroughly dried before storage by a vacuum drying process. It is then backfilled with helium, thus stopping corrosion. Since the DSC is vacuum dried, galvanic corrosion is also precluded as no water is present at the point of contact between dissimilar metals.
- During storage, the exterior of the DSC is protected by the concrete NUHOMS[®] HSM Model 102 or HSM-H/HSM-HS. The HSM Model 102 and the HSM-H/HSM-HS is vented, so the exterior of the DSC is exposed to the atmosphere. The DSC shell and cover plates are fabricated from austenitic stainless steel and are resistant to corrosion.

The NUHOMS[®]-24PTH DSC materials are shown in the Parts List on Drawings NUH-24PTH-1001-SAR through NUH-24PTH-1004-SAR provided in Section P.1.5. The DSC shell material is SA-240 Type 304 Stainless Steel. The top and bottom shield plug material is A36 carbon steel. The top shield plug is coated with a corrosion resistant electroless nickel coating. Alternatively, the top shield plug may be fabricated from Type 304 stainless steel (without coating). The bottom shield plug is sealed within the shell and inner and outer bottom cover plates and, thus, it does not come in contact with the external environment. For the 24PTH-S-LC DSC, the shell assembly top and bottom ends include stainless steel-enclosed and sealed lead in the shield plugs. The lead is not exposed to the external environment and is thus not subject to any chemical reactions.

The *Types 1 and 2* basket fuel compartment structure is composed of tube assemblies made from Type 304 stainless steel. Sandwiched between the tube assemblies are plates of Type 1100 aluminum and neutron absorbing materials composed of either enriched borated aluminum alloy, natural boron, or Boral[®] plates. These plates are not fastened to the fuel compartment tube structure but are captured along the axial length of the basket by stainless steel insert plates (straps) that are welded to the fuel compartment tubes. NUH-003 Revision 22 Page P.3.4-1 January 2024

All changes on this page are Amd 18.

For the Types 1 and 2 basket, there are two types of transition rails that provide the transition between the fuel compartment structure and the DSC shell. The aluminum transition rails (R90 rails) are made of Type 6061 aluminum. The stainless steel rails (R45 rails) consist of welded Type 304 stainless steel plates with optional Type 1100 aluminum inserts between the stiffener plates. The transition rails are attached to the grid structure using corrosion resistant fasteners. Similarly, the optional Type 1100 aluminum inserts installed in between the stiffener plates in the R45 transition rails are attached using corrosion resistant fasteners.

For the Type 3 basket, a typical stack-up of fuel compartment grid plates is composed of a highstrength low-alloy (HSLA) steel plate, a Type 1100 aluminum plate and a neutron absorber plate. The aluminum 6061 peripheral transition rails are entrapped between the fuel compartment structure and the DSC shell.

Potential sources of chemical or galvanic reactions are the interaction between the aluminum, aluminum-based neutron poison and stainless steel within the basket and the pool water. Additionally, an interaction exists with the stainless steel top and bottom plates and the top shield plug.

Behavior of Aluminum in Borated Water

Aluminum is used for many applications in spent fuel pools. In order to understand the corrosion resistance of aluminum within the normal operating conditions of spent fuel storage pools, a discussion of each of the types of corrosion is addressed separately. None of these corrosion mechanisms is expected to occur in the short time period that the cask is submerged in the spent fuel pool.

General Corrosion

General corrosion is a uniform attack of the metal over the entire surfaces exposed to the corrosive media. The severity of general corrosion of aluminum depends upon the chemical nature and temperature of the electrolyte and can range from superficial etching and staining to dissolution of the metal. Figure P.3.4-1 shows a potential-pH diagram for aluminum in high purity water at 77 °F and 140 °F. The potential for aluminum coupled with stainless steel and the limits of pH for PWR pools are shown in the diagram to be well within the passivation domain at both temperatures. The passivated surface of aluminum (hydrated oxide of aluminum) affords protection against corrosion in the domain shown because the coating is insoluble, non-porous and adherent to the surface of the aluminum. The protective surface formed on the aluminum is known to be stable up to 275 °F and in a pH range of 4.5 to 8.5.

The water aluminum reactions are self-limiting because the surface of the aluminum becomes passive by the formation of a protective and impervious coating making further reaction impossible until the coating is removed by mechanical or chemical means.

The ability of aluminum to resist corrosion from boron ions is evident from the wide usage of aluminum in the handling of borax and in the manufacture of boric acid. Aluminum storage racks with Boral plates (aluminum 1100 exterior layer) in contact with 800 ppm borated water showed only small amounts of pitting after 17 years in the pool at the Yankee Rowe Power Plant. These racks maintained their structural integrity.

Revision 22	Page P.3.4-2	January 2024
	All changes on this page are Amd 18.	

Stress Corrosion

Stress corrosion is failure of the metal by cracking under the combined action of corrosion and stresses approaching the yield stress of the metal. During spent fuel pool operations, the 24PTH-DSC is upright and there is negligible load on the basket assembly. The stresses on the basket are small, well below the yield stress of the basket materials.

Behavior of Austenitic Stainless Steel in Borated Water

The fuel compartment structure is made from Type 304 stainless steel tubes and the transition rails that support the fuel compartments are made from aluminum Type 6061 (R90 rails) and welded Type 304 stainless steel plates (R45 rails). Stainless steel does not exhibit general corrosion when immersed in borated water. Galvanic attack can occur between the aluminum in contact with the stainless steel in the water. However, the attack is mitigated by the passivity of the aluminum and the stainless steel in the short time the pool water is in the DSC. Also the low conductivity of the pool water tends to minimize galvanic reactions.

Stress corrosion cracking in the Type 304 stainless steel welds of the basket is also not expected to occur, since the baskets are not highly stressed during normal operations. There may be some residual fabrication stresses as a result of welding of the stainless steel plates together.

Of the corrosive agents that could initiate stress corrosion cracking in the stainless steel basket welds, only the combination of chloride ions with dissolved oxygen occurs in spent fuel pool water. Although stress corrosion cracking can take place at very low chloride concentrations and at low temperatures such as those in spent fuel pools (less than 10 ppb and 160°F, respectively), the effect of low chloride concentration and low temperature greatly increases the induction time. That is, the time period during which the corrodent is breaking down the passive oxide film on the stainless steel surface is increased. Below 60 °C (140 °F), stress corrosion cracking of austenitic stainless steel does not occur at all. At 100°C (212 °F), chloride concentration on the order of 15% is required to initiate stress corrosion cracking [3.5]. At 288 °C (550 °F), with tensile stress at 100% of yield in PWR water that contains 100 ppm O₂, time to crack is about 40 days in sensitized 304 stainless steel [3.6]. Thus, the combination of low chlorides, low temperature and short time of exposure to the corrosive environment eliminates the possibility of stress corrosion cracking in the basket and DSC welds.

The chloride content of all expendable materials which come in contact with the basket materials are restricted and water used for cleaning the baskets is restricted to 1.0 ppm chloride.

The HSLA steel plates of the Type 3 basket are

or

alternative surface treatment will provide short-term corrosion protection, sufficient for the manufacturing process and short-term immersion in the pool. It can be expected that a small amount of rust will form, but this will be insufficient to affect the performance of design functions or to cause turbidity in pool water during loading operations.

NUH-003		
Revision 22	Page P.3.4-4	January 2024
	All changes on this page are Amd 18.	

Behavior of Aluminum Based Neutron Poison in Borated Water

To investigate the use of borated aluminum in a spent fuel pool, tests were performed by Eagle Picher to evaluate its dimensional stability, corrosion resistance and neutron capture ability. These studies showed that borated aluminum performed well in a spent fuel pool environment.

The 1100 series aluminum component is a ductile metal having a high resistance to corrosion. Its corrosion resistance is provided by the buildup of a protective oxide film on the metal surface when exposed to a water or moisture environment. As stated above, for aluminum, once a stable

Page P.3.4-4a All changes on this page are Amd 18.

weight with a NUHOMS[®] 24PTH DSC loaded in the OS200 TC is approximately 229,500 lbs. Therefore, the OS200 cask is acceptable when loaded with any NUHOMS[®]-24PTH DSC.

P.3.4.4 <u>Heat and Cold</u>

P.3.4.4.1 <u>Summary of Pressures and Temperatures</u>

Temperatures and pressures for the 24PTH DSC and basket are calculated in Section P.4. Section P.4.4 provides the thermal evaluation of the HSM-H/HSM Model 102/HSM-HS. Section P.4.5 provides the thermal evaluation of the transfer cask. Section P.4.6 provides the thermal evaluation of the DSC. Section P.4.6.8 describes the thermal analysis of the OS200 TC with the 24PTH DSC.

Section P.4.6 also provides/addresses the maximum pressures during normal, off-normal and accident conditions which are used in the evaluations presented later in this Appendix.

The pressures and temperatures of the 24PTH DSC in the OS200 TC and HSM-HS have been evaluated and found to be bounded by those in the OS197/OS197H TCs and HSM-H as described in Section P.4.

P.3.4.4.2 <u>Differential Thermal Expansion</u>

Clearances are provided between the various components of the 24PTH DSC to accommodate differential thermal expansion and to minimize thermal stress. In the radial direction clearance is provided between the basket outer diameter and DSC cavity inside diameter, and between the poison/aluminum plates and the interfacing basket components. In the axial direction clearances are provided between the DSC cavity and all the basket parts *or the grid plates for the Type 3 basket*. Additionally, the connections between the transition rails and the fuel support structure are designed to permit relative axial growth.

- In the axial direction, required clearances are determined using hand calculations.
- In the "radial" direction, clearance between the neutron absorbing/aluminum heat transfer plate materials and the transition rails is evaluated using hand calculations.
- In the "radial" direction, clearance between the *Types 1 and 2* basket assembly was included in the LS-DYNA thermal stress analyses described in Section P.3.4.4.3.1. The normal and off- normal condition stress analyses are described in P.3.6 and the accident condition analyses are described in P.3.7. *The analyses for the Type 3 basket are described in P.3.8.* Thus, stresses due to any thermal interference are included in the stress results.

P.3.4.4.2.1 <u>Types 1 and 2 DSC Basket</u>

The thermal analyses of the basket for the handling/transfer and storage conditions are described in Section P.4.6. As described there, thermal analyses are performed to determine the temperature distributions in the 24PTH DSC for the following cases:

• Vacuum Drying Operations

NUH-003		
Revision 22	Page P.3.4-8	January 2024
	All changes on this page are Amd 18.	

Relative Axial Thermal Growth (Vacuum Drying)	Component Growth (in)	Cavity Growth (in)	Required Clearance ⁽¹⁾ (in)
Fuel Support Tube Structure to Cavity	0.873/0.849	0.228/0.225	0.65/0.62
R45 Steel Transition Rails to Cavity	0.873/0.849	0.228/0.225	0.65/0.62
R90 6061 Transition Rails to Cavity	1.229/1.200	0.228/0.225	1.00/0.98

Notes: 1. The actual clearances provided in the design are 1.0 in. for the tube structure and R45 rails (steel components) and 2.0 in. for the R90 rails (aluminum components). Therefore, cavity clearance is adequate for thermal expansion.

The thermal expansion of the aluminum/poison plate segments, which are captured in between the steel straps (2.375 in. wide), along the axial length of the basket is calculated below:

Component	T _{max} (°F)	α _{avg} (°F ⁻¹)	L ⁽¹⁾ (in)	∆L (in)
Tube (24PTH-S/-L)	580	9.8E-06	20.875.	0.104
Tube (24PTH-S-LC)	573	9.8E-06	21.395	0.105
Aluminum/ Poison Plates (24PTH-S/-L)	572	1.41E-05	20.8	0.147
Aluminum/ Poison Plates (24PTH-S-LC)	567	1.41E-05	21.3	0.149

24PTH Axial Thermal Expansion, Vacuum Drying

Notes: 1 For the tube L is the clear distance between steel straps. For the aluminum/poison plates, L is the height of the plate.

$$\Delta L_{Tube} = \alpha_{steel} L_{segment} \Delta T$$

= (9.80×10⁻⁶ °F⁻¹)(20.875 in)(580 °F - 70 °F)
= 0.104 in

The differential thermal expansion or required clearance is 0.147-0.104 = 0.04 inches, which is less than the 0.1 in. gap provided in the design.

	All changes on this nage are Amd 18.	<i>.</i>
Revision 22	Page P.3.4-13	January 2024
NUH-003		

P.3.4.4.2.2 <u>Type 3 DSC Basket</u>

Minimum Gaps within the Interlocking Slots

The NUH24PTH Type 3 DSC basket assembly is made up of interlocking slotted plates to form an egg-crate type structure. To avoid any interference between the perpendicular basket assembly plates, the location of slots within the aluminum/MMC plates should not extend past the location of the slots within the steel plates. The thermal expansion of the basket assembly plates is calculated as:

 $L_{Hot,i} = L_{Cold,i} + [L_{Cold,i} \times \alpha_i (T_{avg,B} - T_{ref})]$

where

 $L_{Hot,i} = Hot \ length \ of \ the \ steel \ plates \ (L_{Hot,St}) \ and \ the \ aluminum \ plates \ (L_{Hot,Al})$ $L_{Cold,i} = Cold \ length \ of \ the \ steel \ plates \ (L_{Cold,St}) \ and \ the \ aluminum \ plates \ (L_{Cold,Al})$ $\alpha_i = Thermal \ expansion \ coefficient \ of \ the \ steel \ (\alpha_{St}) \ and \ aluminum \ plates \ (\alpha_{Al}) \ at \ T_{avg,B}$ $T_{avg,B} = Average \ temperature \ of \ the \ basket \ assembly \ plates \ based \ at \ hottest \ cross \ section \ T_{ref} = Reference \ ambient \ temperature$

The effective net gap left for each slots within the steel plates and the aluminum/MMC plates is calculated as:

 $\Delta_{Net-gap} = Minimum(L_{Hot-Steel_max}, L_{Hot-Al_max}) - Maximum(L_{Hot-Steel_min}, L_{Hot-Al_min})$

The effective net gaps left in slots within the composite plates is more than the total thicknesses of the composite plate at respective slots in hot condition. Therefore, there is no interference between intersecting plates.

Axial Gaps between the Basket Assembly Plates

To accommodate the axial thermal growth between the various basket assembly plates, the aluminum/MMC plates are designed to be smaller than the paired steel plates. Each aluminum/MMC plate and the steel plate have a nominal cold gap of [] and the hot gap between the steel and aluminum/MMC plates due to the axial thermal expansion of the basket assembly plates is [] There is sufficient clearance for the thermal growth of aluminum/MMC plates.

Radial Gap between the Basket Assembly and the DSC Shell

The minimum radial gap between the basket assembly and the DSC shell is **[]** Therefore, there is no interference between the basket assembly and the DSC shell.

Axial Gaps between Fuel Assemblies and the DSC Cavity

For the fuel assemblies loaded in the 24PTH Type 3 DSC, the bounding average fuel assembly temperature during normal/off-normal conditions of transfer and storage is lower than the average fuel assembly temperature considered in computation of thermal expansion and clearance between fuel assemblies and 24PTH Type 1 DSC. Therefore, no further analysis is required.

Axial Gap between the Basket Assembly and the DSC Cavity

The following steps present the methodology to determine a bounding cold gap between the basket assembly and the DSC cavity that will encompass any variations due to the different fuel assemblies.

1. The maximum hot lengths of the basket assemblies are calculated using the cold dimension.

]

 $L_{BSK,S,Hot} = L_{BSK,S}[1 + \alpha_{BSK}(T_{BSK} - 70)] =$

where,

 α_{BSK} = Coefficient of thermal expansion of basket assembly (AISI 4130) T_{BSK} = Average temperature of basket assembly $L_{BSK,S}$ = Cold length of the short basket assembly $L_{BSK,S,Hot}$ = Nominal hot length of the short basket assembly

2. Assuming a zero gap under hot conditions, the maximum hot length of the DSC cavity is assumed to be equal to the hot length of the basket assembly.

 $L_{BSK,S,Hot} = L_{DSC,S,Hot}$

where $L_{DSC,S,Hot} = Nominal hot length of the DSC cavity$

3. Using the hot length of the DSC cavity, the cold lengths of the DSC cavity are determined as:

 $L_{DSC,S} = L_{BSK,S,Hot} / [1 + \alpha_{DSC}(T_{DSC} - 70)]$

where $\alpha_{DSC} = Coefficient of thermal expansion of DSC Shell$ $T_{DSC} = Average temperature of DSC shell$ $L_{DSC,S} = Cold length of the short DSC$

4. The net gap at cold conditions between the DSC cavity and the basket assembly is determined.

 $\Delta DSC_S-BSK_S = LDSC,S$ - LBSK,S

*Page P.3.4-13*b

5. As long as the cold gap calculated in Step 4 is maintained, there will be no interference under hot conditions. Similarly, for other configurations of the DSC, there will be no interference under hot conditions.

The bounding net cold gap is **[]** and, to bound any uncertainties, a minimum axial cold gap of **[]** is specified between the DSC cavity and the basket assembly.

Axial Gap between the Transition Rails and the DSC Cavity

To determine the bounding cold gap to avoid interference between the transition rails and the DSC cavity, the steps outlined for the axial gap between the basket assembly and the DSC cavity are repeated for the transition rails.

The bounding net cold gap is **[**] and, to bound any uncertainties, a minimum axial cold gap of **[**] is recommended between the DSC cavity and the transition rails.

Axial Gap between the OS197FC TC Cavity and the DSC Shell

Thermal expansion of the DSC shell loaded with the 24PTH Type 3 basket is less than the expansion in the bounding load case for the Type 1 DSC because the thermal evaluations of the Type 3 DSC and basket are bounded by the Type 1 for the normal conditions of transfer and storage. Therefore, no further analysis is required for the axial gap between the OS197FC TC cavity and HSM-H cavity.

Axial Gap between the HSM-H Support Structure and the HSM-H cavity

Thermal expansion of the HSM-H support structure in the case of a DSC shell loaded with the 24PTH Type 3 basket is less than the expansion in the bounding load case for the Type 1 DSC because the thermal evaluation of the Type 3 DSC is bounded by the Type 1 DSC for the normal condition of storage. Therefore, no further analysis is required for the axial gap between the HSM-H support structure and the HSM-H cavity.

P.3.4.4.3 <u>Thermal Stress Calculations</u>

The thermal stress calculations for the 24PTH DSC basket assembly is presented in this section. *This section applies to the Types 1 and 2 basket only. The analysis of the Type 3 basket is presented in Section P.3.8.* A summary of the thermal stress evaluations for HSM-H, and OS197/OS197H/OS197FC TCs are also presented in this section. The thermal stress evaluations for the 24PTH DSC shell assemblies, the HSM-H, and the TCs are provided in Section P.3.6 (for normal and off-normal conditions) and in Section P.3.7 for accident conditions. The thermal stresses for the Standardized TC and HSM Model 102 are not changed from those reported in Chapter 8 because they are based on a maximum heat load of 24 kW which is the same as the heat load for the 24PTH-S-LC DSC.

Thermal stresses are considered separately and in combination with other loads. Only the separate thermal stresses are presented here. Thermal stresses in combination with other loads are addressed in the appropriate sections.

	All changes on this page are Amd 18.	ý
Revision 22	<i>Page P.3.4-13</i> c	January 2024
NUH-003		

P.3.4.4.3.3 OS197/OS197H/OS197FC Thermal Stress Calculations

The OS197/OS197H/OS197FC is used for transfer of a 24PTH DSC for heat loads of up to 31.2 kW with basket type 1. For DSCs with basket type 1 with heat load above 31.2 kW or DSCs with basket type 2, use of the OS197FC TC is required. The only difference between the OS197/OS197H TC and the OS197FC TC is the TC top lid vents (which allow for air circulation) and the optional wedge-shaped plates added to the TC bottom provided in the OS197FC TC. The thermal analysis of the TC is based on the bounding temperature profiles for 31.2 kW (steady state with and without air circulation) and 40.8 kW (with air circulation) *which is bounding for the Type 3 basket as well*. Therefore, the thermal stress analyses are applicable to the OS197/OS197H and OS197FC TCs.

The OS197FC thermal stress calculations are described in Section P.3.6.1.5.

The controlling stresses from these analyses are tabulated in Table P.3.6-2 and Table P.3.6-3 for the 24PTH-S/-L DSC and the 24PTH-S-LC DSC, respectively.

(E) <u>Evaluation of the Results</u>

The maximum calculated DSC shell stresses induced by normal operating load conditions are shown in Table P.3.6-2 for the 24PTH-S/-L DSCs and Table P.3.6-3 for 24PTH-S-LC DSC. The calculated stresses for each load case are combined in accordance with the load combinations presented in Table P.2-14. The resulting stresses for the controlling load combinations are reported in Section P.3.7.11 along with the ASME Code allowable stresses.

P.3.6.1.3 <u>NUHOMS®-24PTH Basket Structural Analysis</u>

This section applies to the Types 1 and 2 basket only. The analysis of the Type 3 basket is presented in Section P.3.8.

Stresses in the basket assembly are determined using a combination of hand calculations and three-dimensional LS DYNA finite element models. The following loads are addressed:

- Dead Weight
- Thermal Stresses
- Handling/Transfer Loads
- Accident Drops
- Seismic Loads

Thermal loads for the basket are addressed in Section P.3.4.4. The drop loads are Level D loads and are addressed in Section P.3.7. The seismic loads are Level C loads, which are enveloped by the on-site handling loads as described in Section P.3.6.1.3.2.

P.3.6.1.3.1 LS-DYNA Finite Element Model Analysis

(A) LS DYNA Finite Element Model Description

A finite element model of the basket assembly is developed using the LS-DYNA computer program [3.18]. LS-DYNA is used for the analysis of the 24PTH basket because of its robust contact algorithms which are able to model contact between the different components of the basket assembly.

The LS DYNA model of the 24PTH basket assembly is shown in Figure P.3.6-6. The model uses fully integrated shell elements (with five integration points through the thickness) to represent the fuel compartment tubes, the steel insert plates (straps) that are welded to the tubes, and the R45 transition rails. Fully integrated solid elements are used for the aluminum R90 transition rails. The model is a 24-inch-long section of the basket assembly. This span corresponds to the 24" periodicity of the basket assembly steel insert plates (straps) and strap-to-fuel compartment tube welds, and to twice (12") the periodicity of the stiffener plates in the R45 transition rails. The steel insert (straps) plates, steel insert plates-to-tube welds, and a full-thickness R45 transition rail stiffener plate are modeled at Z=0.0". The model is extended halfway to the next strap plate/weld location to Z=+12" and Z=-12". Half-thickness R45 stiffeners are included at the ends of the model (Z=+12"). The model includes a segment of the DSC shell,

NUH-003		
Revision 22	Page P.3.6-6	January 2024
	All changes on this page are Amd 18.	

For an operating NUHOMS[®] System, off-normal events could occur during fuel loading, TC handling, trailer towing, canister transfer and other operational events. Two off-normal events are defined which bound the range of off-normal conditions. The limiting off-normal events are defined as a jammed DSC during loading or unloading from the HSM Model 102/HSM-H and the extreme ambient temperatures of -40 °F (winter) and +117 °F (summer). These events envelope the range of expected off-normal structural loads and temperatures acting on the DSC, TC, and HSM Model 102/HSM-H. These off-normal events are described in Section 8.1.2.

The analysis of the Type 3 basket is presented in Section P.3.8.

P.3.6.4 Failed Fuel Cans

Up to 8 failed fuel cans may be loaded in the 24PTH basket with failed fuel with the remainder intact, PWR fuel assemblies with or without Control Components (CCs). The basket structure consists of a welded assembly of stainless steel tubes with the space between adjacent tubes filled with aluminum and neutron poison plates and surrounded by support rails.

The failed fuel assemblies are to be placed in individual Failed Fuel Cans (FFCs) in cells located at the outer edge of the 24PTH basket as described in Chapter P.2. Each FFC is constructed of sheet metal and is provided with a welded bottom closure and a removable top closure which allows lifting of the FFC with the enclosed failed fuel. The FFC is provided with screens at the bottom and top to contain fuel debris and allow fill/drainage of water from the FFC during loading operations. The FFC is protected by the fuel compartment tubes and its only function is to confine the failed fuel and allow its retrievability from the basket fuel compartment under normal and off-normal conditions.

The maximum fuel assembly load applied to each associated basket compartment location bounds the load due to the FFC. Therefore, the 24PTH basket analyses with intact fuel are applicable when the basket is loaded with failed fuel.

The FFC is evaluated for a load of 1.5g which bounds the loads associated with lifting, handling and other normal and off-normal loads. Thermal loads for the FFC are not considered based on the following: (1) NF does not require evaluation of internal thermal stresses, (2) during lifting and handling, when primary stresses in the FFC are largest, there are no significant thermal gradients, (3) the more significant thermal gradients occur when the FFC is in the horizontal position when the transfer stresses occur, which are much lower than the lifting and handling stresses, and (4) similar thermal gradients and stresses occur in the basket which are already qualified. The controlling stresses due to the 1.5g loading are compared to normal condition allowable stresses based on NF criteria ([3.1] for the Types 1 and 2 basket FFC and [3.39] for the Type 3 basket FFC). The maximum allowable stresses based on a conservative temperature of 750 °F, are shown in the following table for the Types 1 and 2 basket FFC:

Stress Category	Maximum Allowable Stress (ksi)
Tensile / Combined	Min $(S_m; S_y) = 15.8$
Bending	$1.5 \times S_{\rm m} = 23.7$

FFC	Allo	wable	Stresses
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Conservative hand calculations based on [3.10] demonstrate that maximum handling stresses meet the allowable stress criteria. The controlling stresses and comparison to allowable stresses are summarized below *for the Types 1 and 2 basket FFC*:

Location Type of Stress		Calculated Stress (ksi)	Allowable Stress (ksi)			
FFC Wall	Tensile	3.0	15.8			
Bottom Lid	Bending	13.5	23.7			

FFC Summary	of Stresses
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NUH-003		
Revision 22	Page P.3.6-19a	January 2024
	All changes on this page are Amd 18.	

The FFC for the 24PTH Type 3 basket is similar to the FFC for the EOS-37PTH basket evaluated in Section 3.9.2.1A of [3.46]. The controlling stresses and comparison to allowable stresses are summarized below for the Type 3 basket FFC:

Location	Type of Stress	Calculated Stress (ksi)	Allowable Stress (ksi)		
FFC Wall	Tensile	2.9	15.5		
Bottom Lid	Bending	10.4	23.2		

FFC Summary of Stresses

Based on the summary above, the FFC meets the normal allowable stress criteria for a conservative lift and handling load of 1.5g. Therefore, the structural integrity and retrievability of the FFC is assured.

Table P.3.6-4NUHOMS® -24PTH Types 1 and 2 Basket Model Components, Element Types and
Materials

Structural Component	LS DYNA Element Type	Material
Fuel Compartment Tube Structure	Fully Integrated Shell	Type 304 Stainless Steel
DSC Shell	Fully Integrated Shell	Type 304 Stainless Steel
R45 Transition Rails	Fully Integrated Shell	Type 304 Stainless Steel
R90 Transition Rails	Fully Integrated Solid	Type 6061 Aluminum
TC Shell & TC Rails	Fully Integrated Shell	N/A (Rigid Bodies)
Steel Insert Plates (Straps)-to- Tube Welds	Beam	Type 304 Stainless Steel

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Table P.3.6-5 Material Properties Used in Normal Condition 24PTH Types 1 and 2 Basket Analyses

Component	Material ^{(2) (3)}	Evaluation Temperature ⁽¹⁾
Fuel Compartment	1/4" Thick, Type 304	800 °F
Tube Structure	Stainless Steel	(All conditions)
Steel Insert Plates	Type 304	800 °F
(Straps)	Stainless Steel	(All conditions)
Welded R45 Steel	3/8" Thick Type 304	800 °F
Transition Rails	Stainless Steel	(All conditions)
R90 Aluminum Transition Rails	6061 Aluminum Alloy	600 °F

Notes:

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- 1. For the steel components, stress checks were performed at the enveloping temperatures listed.
- 2. ASME Code properties for Type 304 Stainless Steels from Table P.3.3-1.
- 3. Properties for 6061 Aluminum from Table P.3.3-5.

NUH-003 Pavision 22	Page D 3 6 24	Lanuary 2024
	All changes on this page are Amd 18.	Sumury 2024

Table P.3.6-6Normal Condition Stress Summary for 24PTH Types 1 and 2 Basket Components –Vertical
DW/Handling Loads

	Stres				
Component	Calculated Stress (ksi)	Allowable Stress (ksi)	Ratio	Notes	
Fuel Compartment Tubes	0.087	7.70	0.01	DW, Type 304, 800 °F	
Fuel Compartment Tubes	0.17	7.70	0.02	Handling, Type 304, 800 °F	
R45 Transition Rails	0.14	7.70	0.02	DW, Type 304, 800 °F	
R45 Transition Rails	0.28	7.70	0.04	Handling, Type 304, 800 °F	
R90 Transition Rails	0.017	4.2	< 0.01	DW, 800 °F, Type 6061, 600 °F	
R90 Transition Rails	0.034	4.2	0.01	Handling, Type 6061, 600 °F	

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Table P.3.6-7 Normal Condition Stress Summary for 24PTH Types 1 and 2 Basket Components Horizontal DW/Handling

	Stross Maximum SI			Allowable	Stress Ratios			
Component	Category	OS197 DW (ksi)	HSM DW (ksi)	Handling (ksi)	SI (ksi)	OS197 DW	HSM DW	Handling
	Pm	1.87	1.54	3.74	15.2	0.12	0.10	0.25
Fuel Tubes	Pm + Pb	2.84	2.55	5.69	22.8	0.12	0.11	0.25
	P _m + P _b +Q	9.65	8.68	13.5	45.6	0.21	0.19	0.30
	Pm	1.53	6.08	3.06	15.2	0.10	0.40	0.20
R45 Main	Pm + Pb	6.11	6.42	12.21	22.8	0.27	0.28	0.54
Fiales	Pm + Pb +Q	14.83	15.14	20.93	45.6	0.33	0.33	0.46
	Pm	1.03	6.65	2.06	15.2	0.07	0.44	0.14
R45 Stiffonors	Pm + Pb	2.22	6.68	4.45	22.8	0.10	0.29	0.20
Sulleners	P _m + P _b +Q	5.22	9.62	7.44	45.6	0.11	0.21	0.16
Dealast	Pm	0.85	0.34	1.71	15.2	0.06	0.02	0.11
Basket	Pm + Pb	2.81	1.75	5.62	22.8	0.12	0.08	0.25
Suaps	P _m + P _b +Q	8.17	7.11	11.0	45.6	0.18	0.16	0.24

Stainless Steel Components

Note: Level A allowables for SA-240 Type 304 at 800 °F

Aluminum (R90 Transition Rails)

Component	Strees	Maximum SI			Stress Ratios			
	Category	OS197 DW (ksi)	HSM DW (ksi)	Handling (psi)	Yield S _y , 6061	OS197 DW	HSM DW	Handling
R90 Rails	Max. Stress	17	134	268	4,200	0.004	0.03	0.06

Notes: 1. Conservatively, the yield stress corresponding to annealed 6061 aluminum at 600 °F is used.

2. Handling loads are 2 x DW loads.

NUH-003				
Revision 22	Page P.3.6-26	January 2024		
All changes on this page are Amd 18.				

Table P.3.6-8Normal Condition Fuel Compartment Tubes-to-Steel Insert Plates (Straps) Weld Loads for
24PTH Types 1 and 2 Basket

Load Condition	Enveloping Load (Kips)
OS197 Deadweight	1.2
HSM-H Deadweight	0.8
Thermal Loads	1.7

Note: 1. Handling loads are 2 x DW loads.



Table P.3.6-10 Maximum NUHOMS[®] HSM-H Concrete Component Forces and Moment for Normal and **Off-Normal Loads**

	Concrete Component	Forces/Moments					
Load Case		Shear, V ₀₁ (kips/ft)	Shear, V ₀₂ (kips/ft)	Moment, M₁ (kip-in/ft)	Moment, M ₂ (kip-in/ft)		
Dead Load (DW)	Rear Wall	1.30	0.60	6.10	22.40		
	Side Wall	4.80	3.0	27.60	22.80		
	Front Wall	6.0	5.80	83.50	211.60		
	Roof	3.10	3.90	50.30	151.50		
	Rear Wall	1.40	0.60	6.70	20.10		
Live Load (LL)	Side Wall	1.20	0.80	8.50	9.60		
Live Load (LL)	Front Wall	30.20	23.80	344.60	510.60		
	Roof	0.90	1.30	16.00	47.20		
	Rear Wall						
Operational	Side Wall	holuded in Live Lood (LL)					
Handling Load (RO)	Front Wall						
	Roof						
Off-Normal Handling Load (RA)	Rear Wall	Included in Live Load (LL)					
	Side Wall						
	Front Wall						
	Roof						
	Rear Wall	4.88	2.20	81.50	124.88		
Design Wind Load	Side Wall	27.00	10.87	190.50	135.00		
(WW)	Front Wall	12.75	12.12	179.00	289.12		
	Roof	3.25	2.50	135.50	80.88		

Notes:

(1) V_{01} and V_{02} are out of plane shears. (2) M_1 and M_2 are out of plane moments.

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NUH-003				
Revision 22	Page P.3.6-42	January 2024		
All changes on this page are Amd 18.				

Figure P.3.6-6	
24PTH Types 1 and 2 Basket LS-DYNA Stress Analysis Mo	del



(T24_OS197_45_STRESS) 45 DEGREE DROP IN Time = 0




DYNA STRESS ANALYSIS MODEL - BASKET ASSEMBLY MESH

Figure P.3.6-7 24PTH *Types 1 and 2* Basket LS-DYNA Finite Element Stress Analysis Model

NUH-003	
Revision 22	

Page P.3.6-43 All changes on this page are Amd 18. January 2024





-Tubes not shown for clarity.-

Figure P.3.6-8



All changes on this page are Amd 18.				
Revision 22	Page P.3.6-44	January 2024		
NUH-003				



Note: These stresses are effective von Mises stresses

Figure P.3.6-9 24PTH *Types 1 and 2* Basket LS-DYNA Model Analyses Results – Deadweight Stresses

Page P.3.6-45 All changes on this page are Amd 18.



Note: These stresses are effective von Mises stresses

Figure P.3.6-10 24PTH *Types 1 and 2* Basket LS DYNA Model Analysis Results – Thermal Stresses

Page P.3.6-46 All changes on this page are Amd 18. January 2024

resulting seismic stresses of the 24PTH DSC due to the higher seismic criteria are evaluated against ASME Code Service Level D allowables.

Using the same loading as Appendix U, Section U.3.7.2, and based on NRC Reg. Guide 1.61, a damping value of three (3) percent is used for the 24PTH DSC high seismic load analysis. Based on the evaluation of the frequency content of the loaded HSM-HS, the amplified accelerations associated with the design basis seismic response spectra are determined and used for the structural evaluation of the 24PTH DSC.

P.3.7.2.1 DSC Seismic Evaluation

Standard Seismic Criteria

Based on the results of the frequency analysis of the HSM-H, the maximum calculated seismic accelerations for the DSC inside the HSM-H are 0.427g and 0.344g in the horizontal directions and 0.20g in the vertical direction. An analysis using these seismic accelerations shows that the DSC will not lift off the support rails inside the HSM-H. The stresses in the DSC shell due to vertical and horizontal seismic loads are also determined and included in the appropriate load combinations. The seismic evaluation of the DSC shell assembly and DSC basket assembly is described in the paragraphs that follow.

P.3.7.2.1.1 DSC Natural Frequency Calculation

The DSC shell is conservatively assumed to be simply supported at the two ends of the DSC. The beam bending mode natural frequency of the DSC was calculated from the Blevins [3.16] correlation:

	\mathbf{f}_{i}	=	$\frac{\lambda_{i}^{2}}{2\pi L^{2}} \sqrt{\frac{EI}{m}} \qquad (Blevins, Table 8.1, Case 5)$
where:	Е	=	26.5E6 psi, Young's Modulus,
	Ι	=	58,400 in. ⁴ , DSC moment of inertia,
	L	=	192.55 in., Total length of DSC,
	m	=	94,000/192.55 = 488/g lb/in, and
	λ	=	$i\pi$; for lowest natural frequency, $i = 1$.
Q-1-4'+-+'	. c	16-1	II

Substituting yields: $f_1 = 46.1$ Hertz.

The DSC spectral accelerations at this frequency correspond to the zero period acceleration.

P.3.7.2.1.2 DSC Seismic Stress Analysis

Standard Seismic Criteria

With the DSC conservatively assumed to be resting on a single support rail inside the HSM-H, the stresses induced in the DSC shell are conservatively evaluated to seismic accelerations of 1.5g horizontal and 1.0g vertical. The DSC shell stresses obtained from the analyses of vertical and horizontal seismic loads are summed absolutely. See Table P.3.7-10 and Table P.3.7-11 for the Level C seismic stress evaluation of the NUHOMS[®]-24PTH DSC. The seismic load combination for the DSC shell include deadweight + pressure + 1.5g horizontal and 1g vertical (load combinations HSM-7 and HSM-8 as shown in Table P.2-14).

As stated, in Section 4.2.3.2, an axial retainer is included in the design of the DSC support structure inside the HSM-H to prevent sliding of the DSC in the axial direction during a postulated seismic event. The stresses induced in the DSC shell and bottom cover plate due to the restraining action of this retainer for a horizontal seismic load, applied along the axis of the DSC, are included in the seismic response evaluation of the DSC shell assembly.

The stability of the DSC against lifting off from one of the support rails during a seismic event is evaluated by performing a rigid body analysis, using the 0.43g horizontal and 0.20g vertical input accelerations. The horizontal equivalent static acceleration of 0.43g is applied laterally to the center of gravity of the DSC. The point of rigid body rotation of the DSC is assumed to be the center of the support rail, as shown in Figure P.3.7-1. The applied moment acting on the DSC is calculated by summing the overturning moments. The stabilizing moment, acting to oppose the applied moment, is calculated by subtracting the effects of the upward vertical seismic acceleration of 0.20g from the total weight of the DSC and summing moments at the support rail. Since the stabilizing moment calculated below is greater than that of the applied moment, the DSC will not lift off the DSC support structure inside the HSM-H.

Referring to Figure P.3.7-1, the factor of safety associated with DSC lift-off is calculated as follows:

	M_{am}	=	yFн,
and	M_{sm}	=	$(F_{v1} - F_{v2})x$.
where:	Mam	=	the applied seismic moment, and
	M_{sm}	=	the stabilizing moment

All other variables are defined in Figure P.3.7-1.

Substituting yields: $M_{am} = 11.93 \text{ W}$ and $M_{sm} = 13.44 \text{ W}$

Thus, the factor of safety (SF) against DSC lift off from the DSC support rails inside the HSM-H obtained from this bounding analysis is:

resulting amplified accelerations are 0.387g and 0.331g in the transverse and longitudinal directions, respectively and 0.20g in the vertical direction. For conservatism, a value of 0.387g is used for both horizontal directions in the seismic analysis of the HSM-H.

P.3.7.2.3.2 Seismic Stress Analysis

An equivalent static analysis of the HSM-H is performed using the ANSYS model described in Section P.3.7.11.6 and the seismic accelerations of 0.387g horizontally (longitudinal and transverse directions) and 0.2g vertically. These amplified accelerations are determined based on the frequency analysis of the HSM-H.

The responses for each orthogonal direction are combined using the SRSS method. The seismic analysis results are incorporated in the loading combination C4C (Table P.3.7-16) and C4S (Table P.3.7-17) for the concrete and support structure components respectively.

P.3.7.2.3.3 HSM-H Seismic Overturning Analysis

The following conservative analysis is performed to show that a single freestanding HSM-H without an end shield wall (in an array of two or more loaded modules) will not overturn due to seismic loads. Overturning about the long axis (i.e., in the short direction of the module) is considered.

Stabilizing moment = $M_{st} = (W_{hsm} + W_{dsc}) b/2$

Overturning moment = $M_{ot} = (W_{hsm} 0.4a_{v1} + W_{dsc} 0.4a_{v2})b/2 + W_{hsm} d_1a_{h1} + W_{dsc} d_2a_{h2}$

(100% of horizontal acceleration is combined with 40% of vertical acceleration, Ref. [3.19].)

$ W_{DSC} = 110 \ kips, Weight of DSC (conservatively assumed) $	
b/2 = 52 in, Horizontal distance from CG to corner(half width of the HSM-H) d_1 = 125.71 in, Height of CG of HSM-H without the DSC d_2 = 102 in, Height of the DSC center line a_{v1} = 0.20g, HSM-H peak vertical seismic acceleration a_{v2} = 0.20g, DSC peak vertical seismic acceleration a_{h1} = 0.387g, HSM-H peak horizontal seismic acceleration a_{h2} = 0.43g, DSC peak horizontal seismic acceleration (conservatively	
a_{v1} =0.20g, HSM-H peak vertical seismic acceleration a_{v2} =0.20g, DSC peak vertical seismic acceleration a_{h1} =0.387g, HSM-H peak horizontal seismic acceleration a_{h2} =0.43g, DSC peak horizontal seismic acceleration (conservatively	
$a_{v2} = 0.20$ g, DSC peak vertical seismic acceleration $a_{h1} = 0.387$ g, HSM-H peak horizontal seismic acceleration $a_{h2} = 0.43$ g, DSC peak horizontal seismic acceleration (conservatively	
$a_{h1} = 0.387g$, HSM-H peak horizontal seismic acceleration $a_{h2} = 0.43g$, DSC peak horizontal seismic acceleration (conservatively	
$a_{h2} = 0.43g$, DSC peak horizontal seismic acceleration (conservatively	
assumed)	
$M_{st} = 23,176.4 kip-in$	
$M_{ot} = 23,010.4 \ kip-in$	

Because stabilizing moment is greater than the overturning moment the HSM-H will not overturn during the seismic event.

P.3.7.2.3.4 HSM-H Seismic Sliding Analysis

The friction force resisting sliding = $F_{st} = W_{hsm}(1-0.4*a_{v1})+W_{dsc}(1-0.4*a_{v2})]\mu$

The applied horizontal seismic force = $F_{hs} = [W_{hsm}a_{h1}+W_{dsc}a_{h2}]$

Where:

coefficient of friction between concrete HSM-H base on concrete basemat = 0.6.

W_{hsm}, W_{dsc}, a_{v1}, a_{v2}, a_{h1}, a_{h2} are defined above.

$$\begin{array}{rcl} F_{st} & = & 246.0 \ kips \\ F_{hs} & = & 177.2 \ kips \end{array}$$

=

The force required to slide the HSM-H is larger than the resulting lateral seismic force and therefore, the loaded HSM-H will not slide.

P.3.7.2.4 <u>TC Seismic Evaluation</u>

Standard Seismic Criteria

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The seismic evaluation for the OS197/OS197H in Chapter 8, Section 8.2.3.2(D), is based on very conservatively derived seismic accelerations of 1.31g horizontal and 0.84g vertical. These amplified accelerations were obtained by applying amplification factors of 3.5 and 3.3 for the horizontal and vertical directions, respectively, and, furthermore, applying a "multimode" factor of 1.5 to the base seismic criteria values of 0.25g and 0.17g for the horizontal and vertical directions, respectively.

The frequency analysis for a similar NUHOMS[®] TC documented in Reference [3.37] showed that the TC can be considered a rigid component (the first mode frequency of the TC in [3.37] is on the order of 69 Hz. This frequency content is well in the rigid range relative to the frequency content of the seismic input motion (33 Hz). Therefore, no significant response amplification is expected due to seismic load for the OS197 type cask, and, thus, the maximum accelerations used in the seismic evaluation of the OS197/OS197H as discussed above are deemed to be more than adequate to meet the increased seismic criteria of 0.3g horizontal and 0.20g vertical. Consequently, the seismic stress evaluations and results as described in the UFSAR are applicable and no further evaluation is required.

The seismic stability evaluation described in Section 8.2.3.2(D) for the TC mounted horizontally in the transfer trailer and subjected to the 0.25g and 0.17g seismic accelerations shows a factor of safety of 2.0 against overturning. For the increased accelerations, the factor of safety is approximately 1.7. Thus, there is sufficient margin to accommodate the increased seismic accelerations.

High Seismic Criteria

As described in Appendix U, Section U.3.7.2.5, the effects on the OS200 TC due to Service Level D high seismic accelerations (including those due to potential tipover of the OS200 TC/trailer assembly) are bounded by those due to the accident drop conditions. This applies to the OS200 TC loaded with the 24PTH DSC since the weight of the NUHOMS[®]-24PTH DSC is bounded by the 32PTH1 DSC weight used in Appendix U.

sliding of the HSM-H is $0.6 \ge 354$ or 212.5 kips. The drag force acting on a HSM-H (considering a minimum of two modules in an array) is $0.5 \ge 8.07$ kips/ft $\ge 20.67 = 83.4$ kips total acting on the side wall of a single HSM-H, due to a flood velocity of 15 fps. The resulting factor of safety against sliding of a free standing HSM-H due to the design basis flood water velocity is 2.55.

Therefore, a minimum of two (2) HSM-Hs adjacent to each other are required to prevent sliding.

P.3.7.3.2 DSC Flooding Analyses

The DSC is evaluated for the design basis 50-foot hydrostatic head of water producing external pressure on the DSC shell and outer cover plates. To determine design margin which exists for this condition, the allowable external pressure on the DSC shell is calculated for Service Level C stress using the methodology presented in NB-3133.3 of the ASME Code [3.1]. The resulting allowable pressure of 45.0 psi is about 2 times the maximum external pressure of 21.7 psi due to the postulated 50- foot flood height. This demonstrates stability of the DSC under the worst-case external pressure due to flooding.

The DSC shell stresses for the postulated flood condition are determined using the ANSYS analytical model shown in Figure P.3.6-1 and Figure P.3.6-2 (24PTH-S/-L DSCs) and Figure P.3.6-4 (24PTH-S-LC DSC). The 21.7 psig external pressure is applied to the model as a uniform pressure on the outer surfaces of the top cover plate, DSC shell and bottom cover plate. The maximum DSC shell primary membrane plus bending stress intensity for the 21.7 psi external pressure is 3.00 ksi for the 24PTH-S/-L and 5.78 ksi for the 24PTH-S-LC. Both these stresses are considerably less than the Service Level C allowable primary membrane plus bending stress in the flat heads of the DSC occurs in the inner bottom cover plate for the 24PTH-S/-L and in the bottom forging for the 24PTH-S/-L. The maximum primary membrane plus bending stresses are 1.54 ksi for the 24PTH-S/-L and 4.44 ksi for the 24PTH-S/-L. Both these stresses are also considerably less than the Service Level C allowable for primary membrane plus bending stresses are 1.54 ksi for the 24PTH-S/-L and 4.44 ksi for the 24PTH-S/-L. Both these stresses are also considerably less than the Service Level C allowable for primary membrane plus bending stresses are also considerably less than the Service Level C allowable for primary membrane plus bending. These stresses are combined using the load combinations shown in Table P.2-14.

P.3.7.4 Accidental TC Drop

This section addresses the structural integrity of the standardized NUHOMS[®] on-site TC, the DSC and its internal basket assembly when subjected to postulated TC drop accident conditions.

TC drop evaluations include the following:

- DSC Shell Assembly (P.3.7.4.2),
- Basket Assembly (P.3.7.4.3 for Types 1 and 2 and P.3.8 for Type 3),
- On-Site TC (P.3.7.4.4), and
- Loss of the TC Neutron Shield (P.3.7.4.5).

NUH-003	$D_{2} = 0.2710$	L		
Revision 22 Page P.5.7-10 January 2024 All changes on this page are Amd 18				

P.3.7.4.3 24PTH Basket Assembly Drop Evaluation

This section applies to the Types 1 and 2 basket only. The analysis of the Type 3 basket is presented in Section P.3.8.

As discussed in previous chapters, the structural components of the basket assembly include the fuel compartment tube structure and the transition rails.

The DSC resides in the TC for all drop conditions. Horizontally, the DSC is supported in the TC by two TC rails that are integral to the TC wall. The effect of these TC rails are included in the horizontal drop evaluations.

Vertical drops are non-mechanistic for the 24PTH horizontal storage system, therefore, as noted in Section P.3.7.4.1, no end drops are postulated. However, to provide an enveloping load for the postulated 25g corner drop, a 60g end drop is evaluated. For this drop, the end of the DSC/basket assembly is supported by the ends of the TC.

The stress evaluation of the 24PTH DSC basket assembly is presented in three parts:

- 1. Basket assembly horizontal drop stress analysis, which includes evaluation of the fuel compartment tube structure and transition rails using the LS-DYNA model described in Section P.3.6.1.3.
- Basket assembly horizontal drop stability evaluations which use the LS-DYNA model described in Section P.3.7.4.3.3 and the criteria of the ASME B&PV Code, Appendix F-1341.3. As noted, the LS-DYNA models include the fuel compartment tube structure and the transition rails.
- 3. Basket assembly vertical drop analysis which includes a stress evaluation of the fuel compartment tube structure and transition rails using hand calculations as described in Section P.3.6.1.3 for vertical deadweight. The stress criteria used for the vertical drop analysis also provides assurance of structural stability.

Within the basket structure, captured between the fuel compartment tubes, are Type 1100 aluminum plates and neutron absorbing plates which perform heat transfer and criticality functions. The hand-calculated bounding accident condition axial stress in the plates is 0.14 ksi, due to the 60g end drop, which is below the yield stress value of 1.3 ksi (Type 1100 aluminum at 800°F). This ensures that the plates remain in position to perform their heat transfer and criticality functions. For the 75g side drop loading, the aluminum plates are supported in the transverse direction along their length by the fuel compartment tube structure. Thus, displacements of the aluminum plates are limited.

P.3.7.4.3.1 <u>24PTH Basket Assembly Horizontal Drop Analysis</u>

P.3.7.4.3.1.1 Basket and Basket Rail Stress Analysis

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The LS-DYNA model described in Section P.3.6.1.3 is used to perform stress analyses of the 24PTH basket assembly for horizontal drop accident loads. The LS-DYNA model includes the fuel compartment tube structure, transition rails, DSC shell, and the effects of the TC rails. Contact elements between the parts of the structure are active for all the stress analyses.

All changes on this page are Amd 18.				
Revision 22	Page P.3.7-15	January 2024		
NUH-003				

load. The computed maximum ductility ratio for the door is less than 5 (compared to the allowable ductility of 20).

For the door anchorage, the controlling load is tornado generated differential pressure drop load. The maximum tensile force per bolt (there are four bolts that attach the door assembly to the front concrete wall of the HSM-H) is 8.56 kips. This is less than the allowable load per bolt of 44.3 kips. The concrete pull-out strength is conservatively estimated as 24 kips. Half of the concrete pull-out strength (12 kips) is greater than the tension load of 8.56 kips per bolt, thus satisfying the ductility requirements of the ACI Code.

P.3.7.11.6.6 Evaluation of the HSM-H Heat Shields

The top heat shield (louvers) consists of six panels. Each panel has two aluminum mounting bars. The aluminum louvers are mounted on the mounting bars. Each mounting bar is suspended from the roof by two threaded rods. The natural lateral frequency of a typical rod is conservatively estimated to be 9.0 Hz. The combined axial and bending stress in the hanger rods is 25.29 ksi. The allowable axial and bending stress is 84.3 ksi.

The side heat shields consists of three panels. Each panel is suspended from the roof by two threaded rods, and supported laterally and longitudinally by four rods. The maximum axial plus bending stress in the lateral and longitudinal support rods is 87.79 ksi. The allowable axial and bending stress is 89.0 ksi. The maximum temperature used in the stress analysis of the heat shields bounds the maximum temperature reported in Chapter P.4.

The alternate top heat shield consists of two panels made of stainless steel plate. The panels are suspended from the roof by fifteen $\frac{1}{2}$ " diameter rods threaded into concrete embedments. The combined axial and bending stress in the rods is 62.17 ksi. The allowable stress is 70.2 ksi.

The alternate side heat shield configuration may consist of four panels made from aluminum or stainless steel. The panels are supported off the base unit side wall by thirty four rod stand-offs threaded into concrete embedments. For the aluminum heat shield configuration, the maximum axial and bending stress in the rods is about 1 ksi and 53.88 ksi, respectively. For the stainless steel heat shield configuration, the maximum axial and bending stress in the rods is about 1 ksi and 53.88 ksi, respectively. For the stainless steel heat shield configuration, the maximum axial and bending stress in the rods is about 1.42 ksi and 79.69 ksi, respectively. The axial and bending stress allowable for the rods is 67.9 ksi and 112.3 ksi, respectively.

P.3.7.11.6.7 Evaluation of the HSM-H Seismic Retainers

The seismic retainer consists of a capped tube steel embedment located within the bottom center of the round access opening of the HSM-H, and a tube steel retainer assembly that drops into the embedment cavity after 24PTH-DSC transfer is complete. The drop-in retainer extends approximately 4" above the rail to provide axial restraint of the 24PTH-DSC. The maximum seismically induced shear load in the retainer is 61 kips. The maximum shear stress in the retainer is 15.25 ksi. The allowable shear stress is 17.8 ksi.

P.3.7.11.6.8 Thermal Cycling of the HSM-H

No change to Section 8.2.10.5.

Table P.3.7-3List of Drop Condition LS-DYNA Stress Analyses of the 24PTH Types 1 and 2Basket Assembly

Case	Load	Support Conditions
1 75g Side Drop at 0° (Si		TC (Support Rails at \pm 18.5°)
2	75g Side Drop at 30° from bottom center	TC (Support Rails at \pm 18.5°)
3	75g Side Drop at 45° from bottom center	TC (Support Rails at \pm 18.5°)

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Table P.3.7-4Summary of Material Properties for Drop Accident Analyses of the 24PTH Types 1 and 2Basket Assembly (1) (2)

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		Drop Condition Analysis	Material Properties	Stress
Component	Material	Stress Analysis	Stability Analysis	Evaluation Temperature
Fuel Compartment Tube	1/4" Thick, Type 304 Stainless Steel	$\begin{array}{l} \text{Bilinear Elastic-Plastic} \\ \text{S}_{y} &= \text{Code S}_{y} \left(\text{Table P.3.3-1} \right) \\ \text{E}_{\text{tan}} &= .05 \text{E}_{\text{Code}} \left(\text{Table P.3.3-1} \right) \end{array}$	$ Bilinear Elastic-Perfectly \\ Plastic (F-1341.3): \\ S_y = min(2.3S_m, 0.7S_u) \\ E_{tan} = 0 $	800 °F
R45 Steel Transition Rails	3/8" Thick Type 304 Stainless Steel	$\begin{array}{l} \text{Bilinear Elastic-Plastic} \\ \text{S}_{y} &= \text{Code S}_{y} \left(\text{Table P.3.3-1} \right) \\ \text{E}_{\text{tan}} &= .05 \text{E}_{\text{Code}} \left(\text{Table P.3.3-1} \right) \end{array}$	$ Bilinear Elastic-Perfectly \\ Plastic (F-1341.3): \\ S_y = min(2.3S_m, 0.7S_u) \\ E_{tan} = 0 $	800 °F
R90 Aluminum Transition Rails	6061 Aluminum Alloy	Bilinear Elastic-Plastic $S_y = (Table P.3.3-5)$ $E_{tan} = .01E (Table 3.3-5)$	Bilinear Elastic-Plastic $S_y = (Table P.3.3-5)$ $E_{tan} = .01E (Table P.3.3-5)$	Note 3

Notes: 1. Prior to application of drop loads, the structure was initialized to the temperature profile shown in Figure P.3.4-2.

- 2. For the steel components, stress checks were performed at the enveloping temperatures listed.
- 3. For accident condition loading, the transition rails support the fuel compartment tubes such that stresses and displacements in the fuel compartment tubes are acceptable. Since the transition rails are entrapped between the fuel compartment tubes and the DSC shell, no additional checks (of the aluminum) are required for accident/drop loading. Qualification of the fuel tube structure demonstrates that the rails perform their intended function.

NUH-003			
Revision 22	Page P.3.7-29	January 2024	
All changes on this page are Amd 18.			

Component	Stress Category	Maximum Drop SI	Allowable Sl	Stress Ratio
Fuel	Pm	37.9	44.0	0.86
Compartment	Pm + Pb	48.2	56.5	0.85
lubes	Pm + Pb +Q	N/A	N/A	N/A
D45 Transition	Pm	39.1	44.0	0.89
R45 Transition Rail Main	Pm + Pb	53.9	56.5	0.95
Plates	Pm + Pb +Q	N/A	N/A	N/A
D45 Transition	Pm	31.1	44.0	0.71
Rail	P _m + P _b	39.5	56.5	0.70
Stimeners	Pm + Pb +Q	N/A	N/A	N/A
Stool Incort	Pm	20.9	44.0	0.47
Plates (Straps)	Pm + Pb	31.8	56.5	0.56
	Pm + Pb +Q	N/A	N/A	N/A

Table P.3.7-524PTH Types 1 and 2 Basket, Enveloping Stress Results - 75g Side Drops

Note: Level D allowables for SA-240 Type 304 at 800 °F

NUH-003					
Revision 22	Page P.3.7-30	January 2024			
All changes on this page are Amd 18.					

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	Stress (A				
Component	Calculated Stress (ksi)	Allowable Stress (ksi)	Ratio	Notes	
Fuel Compartment Tube	5.25	14.8	0.35	Fa, Level D Type 304, 800 °F	
R45 Steel Transition Rails	8.47	14.8	0.57	F _a , Level D Type 304, 800 °F	
R90 Aluminum Transition Rails	1.03	4.20	.25	S _Y , 6061 Al., 600 °F	

Table P.3.7-624PTH Types 1 and 2 Basket, Enveloping Stress Results - 60g End Drop

NUH-003	3
Revision	22

 Table P.3.7-7

 Drop Condition ANSYS Stability Analyses for the 24PTH Types 1 and 2 Basket Assembly

Case	Load/Drop Orientation	Maximum Stable Load (LS-DYNA Stability Analyses)	ASME F-1341.3 Allowable Load	Support Conditions
1	Side drop at 0°	160 g	144 g	TC (Support Rails at \pm 18.5°)
2	Side drop at 45° from bottom center	150 g	135 g	TC (Support Rails at \pm 18.5°)
3	Side drop at 180° from bottom center	160 g	144 g	N/A (cask rails not impacted)

Note: As described in F-1341.3, the allowable load is 90% of the Limit Analysis Collapse Load.

NUH-003	
Revision 22	

Table P.3.7-19 Maximum NUHOMS[®] HSM-H Concrete Component Forces and Moments for Accident Loads

	Conorata	Forces/Moments					
Load Case	Component	Shear, V ₀₁ ⁽¹⁾ (kips/ft)	Shear, V ₀₂ (1) (kips/ft)	Moment, M1 ⁽²⁾ (kip-in/ft)	Moment, M ₂ ⁽²⁾ (kip-in/ft)		
	Rear Wall	5.4	1.5	27.0	102.0		
Earthquaka (EO)	Side Wall	8.3	6.3	55.7	73.0		
	Front Wall	18.5	14.5	138.1	559.8		
	Roof	1.3	1.1	46.9	73.0		
	Rear Wall	6.34	3.42	146.03	106.63		
Flood (FL)	Side Wall	49.04	19.28	340.62	248.39		
FIODA (FL)	Front Wall	20.5	17.57	309.27	351.48		
	Roof	3.05	1.83	230.46	75.03		
Tornado Wind (WT)	Rear Wall	4.88	3.81	151.94	124.88		
	Side Wall	51.75	21.25	349.75	259.50		
	Front Wall	16.62	13.94	295.69	289.12		
	Roof	5.75	4.25	248.06	112.25		

Notes:

(1) V_{01} and V_{02} are out of plane shears. (2) M_1 and M_2 are out of plane moments.

	Load		V.	V.	V a	M	Ma
Component	Comb. ⁽¹⁾	Quantity	Vi Kips/ft	v _{o1} kips/ft	v _{o2} kips/ft	kip-in/ft	kip-in/ft
		Computed	14.5	7.8	9.2	148.1	269.2
	Comb 1c	Capacity	76.8	14.5	14.5	298.2	298.2
Rear Wall	thru 6c	Ratio	0.19	0.54	0.63	0.50	0.90
(upper)		Computed	18.5	8.6	6.1	124.3	229.2
(Comb7c	Canacity	69.6	13.8	13.8	273.8	273.8
	Combre	Ratio	0.27	0.62	0.44	0.45	0.84
		Computed	17.3	10.2	13.3	159.4	165.3
	Comb 1c	Capacity	98.4	36.2	36.2	778.1	757.9
Rear Wall	thru 6c	Ratio	0.18	0.28	0.37	0.20	0.22
(Lower)		Computed	6.9	4.8	14.8	111.0	180.6
()	Comb7c	Capacity	90.1	34.3	34.3	696.3	696.3
	Combre	Ratio	0.08	0.14	0.43	0.16	0.26
		Computed	19.1	14.3	13.9	179 1	165.0
	Comb 1c	Canacity	54.4	14.8	14.8	196.9	196.9
Side Walls	thru 6c	Ratio	0.35	0.97	0.94	0.91	0.84
(Upper)		Computed	22.6	12.6	13.7	132.5	96.1
(Oppoi)	Comb7c	Canacity	50.5	14.0	14.0	180.8	180.8
	001110710	Ratio	0 45	0 90	0.98	0.73	0.53
		Computed	35.4	23.1	21.1	305.8	261.6
	Comb 1c	Canacity	64 0	23.4	23.4	322.9	314.6
Side Walls	thru 6c	Ratio	0.55	0.99	0.90	0.95	0.83
(Lower)		Computed	19.5	19.7	22.0	97.2	177.8
(201101)	Comb7c	Canacity	58.7	22.2	22.0	289.0	289.0
	001110710	Ratio	0.33	0.89	0.99	0.34	0.62
		Computed	13.2	9.7	29.2	485.3	1028.5
	Comb1c	Canacity	177.6	59.1	59.2	2375.0	2375.0
	Thru 6c	Ratio	0.07	0.16	0.49	0.20	0.43
Roof		Computed	7.8	11.6	28.8	384.9	903.4
	Comb7c	Canacity	162.4	56.1	56.1	2181 7	2181 7
	Combre	Ratio	0.05	0.21	0.51	0.18	0.41
		Computed	42.0	52.2	37.5	1399.9	1914 4
	Comb 1c	Canacity	174 7	56.3	56.3	2257.3	2257.3
Front Wall (Upper) Comb7c	thru 6c	Ratio	0.24	0.93	0.67	0.62	0.85
		Computed	32.7	39.0	19.7	1355.3	1940.9
	Comb7c	Capacity	159.6	53.4	53.4	2073.5	2073.5
	0011070	Ratio	0.21	0.73	0.37	0.65	0.94
		Computed	29.5	32.4	37.9	1783.6	884 1
	Comb1c	Capacity	192.1	73.6	73.6	3042.5	3042.5
Front Wall	thru 6c	Ratio	0.15	0.44	0.52	0.59	0.29
(Lower)		Computed	31.3	33.6	29.8	1359.6	346.0
()	Comb7c	Capacity	176.0	69.8	69.8	2722.4	2722.4
	00111010	Ratio	0.18	0.48	0.43	0.50	0.13

 Table P.3.7-20

 Comparison of Highest Combined Shear Forces/Moments with the Capacities

Note: (1) Comb 1c thru 6c includes normal thermal. Comb 7c includes accident thermal. (See Table P.3.7-16).

 Table P.3.7-21

 Maximum/Minimum Forces/Moments in the Rail Components in the Local System

L Coml	oad bination	F _x Kips	F _y Kips	F _z Kips	M _x kip-in	M _y kip-in	Mz Kip-in
C1S	MAX	0.1	33.0	65.2	63.5	231.3	213.7
	MIN	-0.1	-41.0	-61.3	-52.4	-1146.5	-236.2
C2S	MAX	38.4	39. 9	77.0	0.21	428.2	247.8
	MIN	-28.9	-39.8	-60.9	-0.23	-1137.4	-247.8
C3S	MAX	86.5	30.7	89.6	63.6	592.8	199.5
	MIN	-86.5	-38.2	-63.1	-52.4	-1422.2	-230.4
C4S	MAX	23.2	38.4	103.5	63.6	577.5	-268.3
	MIN	-23.2	-46.4	-99.8	-52.4	-1898.9	-290.9
C5S	MAX	0.1	49.5	76.1	183.6	264.9	267.3
	MIN	-0.1	-54.1	-74.7	-159.3	-1433.8	-267.0

72.48

 Table P.3.7-22

 Maximum/Minimum Forces/Moments in the Rail Extension Plates in the Local System

Lo Comb	oad Dination	F∗ Kips	F _y Kips	F _z Kips	M _x kip-in	M _y kip-in	M₂ Kip-in
C1S	MAX	0.07	0.85	-0.25	2.64	6.57	13.73
	MIN	-0.07	-3.98	-0.73	-2.71	-4.24	-45.88
C2S	MAX	40.0	2.61	-0.4	0.12	5.25	26.02
	MIN	-30.06	-2.61	-0.53	-0.10	-2.59	-26.02
C3S	MAX	79.98	0.76	-0.15	2.65	7.21	13.55
	MIN	-79.85	-3.90	-0.76	-2.81	-4.13	-44.85
C4S	MAX	40.26	1.56	0.05	2.68	9.39	17.15
	MIN	-40.25	-4.68	-1.02	-2.77	-5.79	-53.37
C5S	MAX	0.09	0.98	0.35	9.41	12.20	18. <i>16</i>
	MIN	-0.09	-7.52	-1.47	-9.50	-9.71	-94.64

 Table P.3.7-23

 Maximum/Minimum Axial Forces in the Cross Member Components

Load Co	nbination	Fx Kips
C1S	MAX	6.09
	MIN	5.19
C2S	MAX	6.41
	MIN	5.86
C3S	MAX	5.17
	MIN	2.62
C4S	MAX	6.10
	MIN	5.18
C5S	MAX	6.93
	MIN	2.77

72.48

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Load Comb.	Interaction Ratio ⁽¹⁾	Shear Stress Ratio ⁽²⁾	Stiffener Plate Stress Ratio ⁽³⁾
C1S	0.35	0.67	0.19
C2S	0.57	0.85	0.00
C3S	0.57	0.93	0.22
C4S	0.50	0.97	0.18
C5S	0.38	0.63	0.55

Table P.3.7-24Rail Component Results

Notes:

- Axial and bending stresses are computed using axial (F_x) and bending moment (M_y, M_z) results from Table P.3.7-21. Interaction ratios are based on appropriate equations from Chapter H of AISC [3.20]. See Tables 3.2-10 and Table P.3.7-17.
- (2) Shear stresses are computed using shear forces (F_y, F_z) from Table P.3.7-21. Shear stress ratio is the computed shear stress/shear stress allowable. See Tables 3.2-10 and Table P.3.7-17.
- (3) Flexural stresses in the stiffener plates are computed using torsional moment (M_x) result from Table P.3.7-21. Stiffener plate stress ratio is the bending stress in the plate/bending allowable stress. See Tables 3.2-10 and Table P.3.7-17.

Load Comb.	Extension Plates Interaction Ratio ⁽¹⁾	Cross Members Stress Ratio ⁽²⁾
C1S	0.77	0.25
C2S	0.77	0.32
C3S	0.71	0.21
C4S	0.61	0.25
C5S	0.71	0.33

Table P.3.7-25Extension Plates and Cross Members Results

Notes:

- (1) Axial and bending stresses are computed using axial (F_x) and bending moment (M_y, M_z) results from Table P.3.7-22. Interaction ratios are based on appropriate equations from Chapter H of AISC [3.20]. See Tables 3.2-10 and Table P.3.7-17.
- (2) Axial stresses in the cross members are computed using axial (F_x) force results from Table P.3.7-23. Cross member stress ratio is the axial stress in the member/axial allowable stress. See Tables 3.2-10 and Table P.3.7-17.



WHERE:

- R = 33.595 in., DSC outer radius
- $\theta = 30^{\circ}$
- $X = R \sin \theta = 16.8 \text{ in.}$
- Y = R Cos θ = 29.1 in.
- $F_{v_1} = W = weight of DSC$
- F_{v2} = W(0.20g) = upward vertical seismic load
- $F_{H} = W(0.43g) = horizontal seismic load$

72.48

Figure P.3.7-1 DSC Lift-Off Evaluation



Note: These stresses are effective von Mises stresses.

Figure P.3.7-2 0° Side Drop Stresses, 24PTH *Types 1 and 2* Basket (TC Support Rails at ±18.5°)

Page P.3.7-52 All changes on this page are Amd 18.



Note: These stresses are effective von Mises stresses.

Figure P.3.7-3 45° Side Drop Stresses, 24PTH *Types 1 and 2* Basket (TC Support Rails at ±18.5°)

Page P.3.7-53 All changes on this page are Amd 18.



Figure P.3.7-4 24PTH *Types 1 and 2* Basket LS-DYNA Stability Analysis Model (TC Support Rails at ±18.5°)

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Page P.3.7-54 All changes on this page are Amd 18. January 2024



Figure P.3.7-5 0° Drop Stability Analysis *for 24PTH Types 1 and 2 Basket* - Displaced Shape at 172g

1	NUH-003
I	Revision 22

Page P.3.7-55 All changes on this page are Amd 18.



Figure P.3.7-7 45° Drop Stability Analysis *for 24PTH Types 1 and 2 Basket* - Resultant Displacements at 158g

NUH-003	
Revision 22	

Page P.3.7-57



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Figure P.3.7-9 180° Drop Stability Analysis for 24PTH Types 1 and 2 Basket – Displaced Shape at 167g

NUH-003		
Revision 22	Page P.3.7-59	January 2024
	All changes on this page are Amd 18.	

P.3.8 <u>24PTH Type 3 Basket Structural Analysis</u>

This section evaluates the structural integrity of the NUHOMS[®] 24PTH Type 3 basket for normal, off-normal, and side and end drop accident loads. The 24PTH Type 3 basket is based on the EOS-37PTH basket design [3.46], and the analysis methodologies and design criteria presented in this section are based on those for the EOS-37PTH basket described in Section 3.9.2 of the EOS SAR [3.46].

P.3.8.1 <u>General Description</u>

The NUHOMS® 24PTH Type 3 DSC consists of the 24PTH DSC shell assembly that provides confinement and shielding, and the 24PTH Type 3 basket assembly that locates and supports the SFAs. Structural evaluations of the DSC shell for the 24PTH Type 3 basket are described in Sections P.3.6 and P.3.7 for normal/off-normal loads and accident loads, respectively. The 24PTH Type 3 basket is made up of interlocking, slotted plates to form an egg-crate type structure, which forms a grid of 24 fuel compartments that house SFAs. A typical stack-up of grid plates is composed of a structural steel plate, an aluminum plate for heat transfer and a neutron absorber plate (neutron poison) for criticality.

Extruded aluminum transition rails are bolted to the perimeter of the grid plate assembly to provide the transition to a cylindrical exterior surface that matches the DSC shell's inside surface. Each of the transition rails at the 0°, 90°, 180°, and 270° locations (R90 transition rails) is composed of two solid aluminum sections, held with tie rods to extended grid plates.

] Each of the rails at the other locations (R45 transition rails) is a closed section that is reinforced with internal steel angle plates. There are no welds in the basket assembly.

The minimum open dimension of each fuel compartment cell is sized to allow storage of the applicable fuel, which provides clearance around the FAs. The same three alternate configurations described in Section P.1, namely, 24PTH-S, 24PTH-L, and 24PTH-S-LC, are available for the 24PTH Type 3 basket. The basket length is less than the DSC cavity length to allow for thermal expansion and tolerances.

The TC and HSM models in which the 24PTH Type 3 DSC can be loaded are provided in Section P.1. In Section P.3.8, generic terms "TC" and "HSM" are used to refer to those TC and HSM models unless specified otherwise. The basket is keyed to the DSC at 0° and 180° and, therefore, its orientation with respect to the DSC always remains fixed. Under normal transfer conditions, the DSC rests on the inner two 3-inch wide, 0.12-inch thick rails attached to the inside of the TC at 161.5° and 198.5° (or +/- 18.5° off 180°). Under normal storage conditions, the DSC rests on the HSM rails.

P.3.8.2 <u>Key Dimensions and Materials</u>

The key basket dimensions and materials are provided in Drawings NUH-24PTH-S-5012-SAR, NUH-24PTH-L-5012-SAR, and NUH-24PTH-S-LC-5012-SAR (Section P.1.5).

NUH-003		
Revision 22	Page P.3.8-1	January 2024
	All changes on this page are Amd 18.	

P.3.8.3 <u>Material Properties</u>

The mechanical properties of structural materials used for the basket assembly as a function of temperature are shown in Section P.3.3.

P.3.8.4 <u>Temperature Data</u>

Temperature data from the thermal analyses in Section P.4.12 at the axial location of hottest temperatures are considered for the thermal stress analysis and component evaluations. A bounding temperature gradient is used in the thermal stress analysis.

P.3.8.5 Fuel Data

Section P.2.1 provides design characteristics for the types of PWR FAs to be considered. Fuel loads are applied as uniform pressures for side loads including the deadweight, handling, and on-site accident side drop load.

P.3.8.6 <u>Methodology</u>

ANSYS 17.1 [3.38] is used for the evaluation of side loads and thermal loads. Hand calculations are performed to calculate the stresses due to the axial handling load and on-site axial end drop loads. Axial loads are combined with the corresponding side loads, as applicable. Load conditions for the vertical orientation of the DSC/TC are not controlling. However, the temperature gradient applied in the thermal analysis bounds the gradients applicable to both the horizontal and vertical orientations (see Section P.3.8.6.4).

P.3.8.6.1 Finite Element Model for Side Loads

Proprietary Information on This Page Withheld Pursuant to 10 CFR 2.390

NUH-003		
Revision 22	Page P.3.8-3	January 2024
All changes on this page are Amd 18.		

I

P.3.8.6.3 <u>Material Properties in Analyses</u>

The components of the basket and DSC in the ANSYS model are based on lower bound material properties. For normal/off-normal conditions, the material properties used for stress analyses (except thermal stress analyses) are based on bounding average temperature values at the hottest section for off-normal transfer in the TC. Elastic analyses are used for all normal and off-normal conditions. For the accident side drop analyses, the material properties are based on average temperature values. For elastic-plastic strain and buckling analyses, bilinear material stress-strain curves are used with a 1% tangent modulus for all materials except the bolts and tie rods.

P.3.8.6.4 Loads

For side loading, the fuel weight load is modeled using a pressure load equivalent to the applicable acceleration times the FA weight divided by the basket fuel compartment area associated with the active fuel region length and the fuel compartment width between slots (8.9 inches). A fuel load of 11.5 lbf/in acting on the fuel compartment width between slots is applied to bound the load distribution in the active fuel region for all PWR fuel types identified in Section P.2.1. Figure P.3.8-3 shows the application of fuel weight pressure loads to the model.

For 0° and 180° side load orientations, the equivalent FA pressure acts only on the horizontal plates. For 90° and 270° side load orientations, the equivalent FA pressure acts only on the vertical plates. For other orientations, the equivalent FA pressure acts on the horizontal and vertical plates, proportioned based on the cosine and sine of the orientation angle.

The following bounding normal side load conditions (DSC and basket in horizontal position) are evaluated for the normal and off-normal conditions to consider the handling loads described in Section P.3.6.1.3.2:

• DW + lg Vertical

- *DW* + 0.5g Vert. + 0.5g Transverse
- DW + 1.0g Transverse

	All changes on this page are Amd 18.	
Revision 22	Page P.3.8-4	January 2024
NUH-003		

For the accident side drop analyses, a drop load of 75g is evaluated to bound the acceleration during a side drop accident as in Section P.3.7.4.1. A 75g end drop is also considered to conservatively envelop the effects of a corner drop. The following accident side drop load conditions (DSC and basket in horizontal position) are evaluated:

- 0° Side Drop away from TC Rails
- 180° Side Drop on TC Rails
- 210° Side Drop on one TC Rail
- 225° Side Drop away from TC Rails
- 270° Side Drop away from TC Rails

P.3.8.6.5 <u>Criteria</u>

The basis for the steel basket stress allowables is the ASME Code, Section III, Division 1, Subsection NG [3.39]. Stress limits for Level A through D service loading conditions are summarized in Table P.3.8-1. Allowable stresses for the threaded fasteners, used to connect the transition rails to the basket grid structure, are from Section NG-3230 of [3.39]. The criteria are summarized in Table P.3.8-2. The hypothetical impact accidents are evaluated as short duration Level D conditions.

The component allowable stress values for normal/off-normal conditions are summarized in Table P.3.8-3. The temperatures considered bound the average temperatures at the hottest section for the grid plates and transition rails, respectively, summarized in Section P.4.12.2 for off-normal transfer conditions in a horizontal TC.

For the accident side drop analyses, the strain criteria for the basket grid plates are shown in Table P.3.8-4. The strain criteria in the table ensure that displacement and permanent deformation of the steel grid is small and within failure limits for high-strength low-alloy steel such as American Iron and Steel Institute (AISI) 4130 material.

]

P.3.8.6.6 <u>Creep Evaluation for Long Term Storage</u>

The aluminum R90 rails are designed to resist the bearing loads due to the deadweight of the loaded basket for 80 years while stored in the HSM. For long-term creep effects, where loading on the aluminum transition rail redistributes over time, an average bearing stress is an appropriate value to consider. Conservatively, it is assumed that the entire weight of the basket is resisted by the two pieces of a single aluminum R90 rail. The 1g deadweight load from the entire weight of a 6-inch long portion of the basket is approximately 2,555 lb. The area of the corresponding 6 inch long portion of the R90 rail that resists the load is approximately 120 in². However, credit for the outer portion of the width of the rail is excluded by conservatively considering only half of the rail width. The corresponding bearing stress is:

Basket 1g vertical bearing stress = 0.046 ksi. (on aluminum R90 transition rail) The individual compartment load at each SFA location on the supporting aluminum plate gives a much lower bearing stress:

SFA 1g vertical bearing stress = 0.0013 ksi. (on aluminum plate) The allowable bearing stresses are based on Reference [3.40]; they represent the stress in Aluminum 1100 to produce a strain of 0.01 in 550,000 hours (approximately 63 years). However, the creep strain curve is flat enough that the values at 80 years are approximately the same. The allowable bearing stress for Aluminum 1100 represents a conservative lower bound. The initial temperature values (time = 0) and the corresponding allowable bearing stresses in the basket aluminum components, to limit creep strain to 0.01, are as follows:

- 0.254 ksi in the hottest aluminum plate, with a starting temperature of 680 °F
- 0.758 ksi in the hottest R90 rail, with a starting temperature of 470 °F
- 0.876 ksi in a less than hottest R90 rail, based on a starting temperature of 440 °F

From Section P.4.12.1 for normal conditions (applicable to long-term storage conditions) at the hottest cross-section of the basket, the average R90 transition rail temperature is 470 °F, which is the same as the above temperature of 470 °F for the hottest R90 rail. Similarly, the hottest basket plate temperature is not more than 572 °F, which is less than the above temperature of 680 °F for the hottest aluminum plate. Based on this comparison of temperatures, and since the heat dissipation rate for the 24PTH Type 3 basket is better than that for the basket temperature data (temperature versus time) used in Reference [3.40], the allowable creep stresses given above are applicable to the aluminum components of the 24PTH Type 3 basket.

P.3.8.7 <u>*Results*</u>

P.3.8.7.1 <u>Results for On-Site DW+Handling and Thermal Stress Analysis</u>

Combined results for basket component stress results for normal condition deadweight + handling loads and thermal stress analysis are shown in Table P.3.8-5. The tabulated results show that all stresses meet the corresponding code limits.

NUH-003		
Revision 22	Page P.3.8-6	January 2024
	All changes on this page are Amd 18.	
P.3.8.7.2 <u>Aluminum Components – Long Term Storage Deadweight Bearing Stress</u>

The aluminum R90 rails are designed to resist the bearing loads due to the deadweight of the loaded basket for 80 years while stored in the HSM. A review of the R90 transition rail stresses shows that for the 1g deadweight loading, the R90 rail carries most of the loading. The aluminum R45 rails take some of the bearing load but are not controlling. For long-term creep effects, where loading on the aluminum transition rail redistributes over time, an average bearing stress is a more appropriate value to consider. The stresses calculated in Section P.3.8.6.6 are compared to allowable stress values that are reduced to limit the effect due to creep:

Component	Bearing Stress	Allowable Creep Stress	Stress Ratio
Aluminum Rail	0.046 ksi	0.758 ksi	0.0594
Aluminum Plate	0.0013 ksi	0.254 ksi	0.0051

Since the aluminum bearing stresses are significantly lower than allowable creep stresses, creep under long term storage conditions is not an issue.

P.3.8.7.3 Results for Analysis of 75g Accident Side Loading

75g accident side drop loads are analyzed using the ANSYS model described in Section *P.3.8.6.1*. Equivalent static elastic-plastic analyses are performed for computing the equivalent plastic strains.

Basket grid plate equivalent plastic strain results for accident 75g side drop loads are shown in Table P.3.8-6. Results based on the updated model for the bounding orientation of 210°, as well as the sensitivity analysis results based on the model including the nominal gap at the intersecting plate slots and without bolts and tie rods, are shown in Table P.3.8-7. An ANSYS strain contour plot corresponding to the bounding equivalent plastic strain values is shown in Figures P.3.8-6 and P.3.8-7 for with bolts and tie rods and without bolts and tie rods, respectively. A strain contour plot corresponding to the sensitivity analysis is shown in Figure P.3.8-8. The tabulated results show that all strains meet the corresponding allowable strain limits.

Side drop accelerations beyond 75g are considered and the last converged load step is considered the buckling load, which is compared with 75g, the required g-load for accident conditions. The buckling analysis results are shown in Table P.3.8-8 and results based on the updated model for the bounding orientation of 210°, as well as the results for the sensitivity analysis, are shown in Table P.3.8-9. The minimum factor of safety is 1.25.

The only significant stress in the basket aluminum rails is a bearing type stress where the transition rail is compressed between the basket grid plates and the inside surface of the DSC. Since bearing stresses are not required to be evaluated for accident conditions, no further evaluation of the basket transition rails is required.

NUH-003				
Revision 22	Page P.3.8-7	January 2024		
All changes on this page are Amd 18.				

P.3.8.7.4 <u>75g Accident End Drop Loading Calculations</u>

Compressive stress associated with the 75g end drop condition is calculated using conservative loads and geometry. For the 75g end drop load condition, the steel grid plates are assumed to carry their own weight plus the weight of all of the aluminum components. The fuel assembly loads are applied directly to the cover plates/shield plugs of the DSC shell assembly and not to the basket assembly. The basket weight considered below bounds the weight summarized in Section P.3.2. The axial stress calculated below represents the general membrane stress in the steel grid plates. The local bearing and peak stresses at the intersections of the slots are not required to be evaluated for accident conditions. There is no significant out-of-plane bending in the grid plates for the 75g end drop condition.

 $\sigma_{axial_{75g}} = 75(W_{basket})/A_s$ where $W_{basket} = 32.0$ kips (conservative) $A_s = 135.2$ in²

Therefore,

 $\sigma_{axial_{75g}} = 17.75 \ ksi$

This stress value is well below the yield stress, such that the 75g end drop load condition strains do not control and no further evaluation is required.

However, a buckling evaluation is performed in accordance with Reference [3.47]. The bottom basket grid plates are subjected to the greatest compressive stress during an end drop condition and, therefore, are considered in the buckling evaluation. Two different configurations, representing different dimensions and boundary conditions for a given grid plate, are analyzed for buckling. The first configuration consists of a grid plate representing a single span of a compartment. This configuration is considered as a plate simply supported on the loaded sides and is connected to the plates of adjacent compartments through middle portions of the unloaded edges, as shown in Section P.1.5 on Drawings NUH24PTH-L-5012-SAR, NUH24PTH-S-5012-SAR, and NUH24PTH-S-LC-5012-SAR. Since the plate is connected with adjacent plates through a portion of the unloaded edges, the plate is considered simply supported on that portion of the edge and free on the rest of the edge. The buckling load is determined by an eigenvalue buckling analysis performed by ANSYS using the model shown in Figure P.3.8-9. The resulting buckling stress is 102.7 ksi, and the allowable stress accounting for the safety factor of 2/3 is 68.45 ksi, which is substantially greater than the compressive stress of 17.75 ksi.

The second configuration consists of the top cantilever portion of the plate in the first configuration, which is considered as a plate with two free unloaded edges. The elastic buckling stress of such a plate based on the most conservative effective length factor of 2.1 is 47.59 ksi. The allowable stress is, therefore, 31.73 ksi, which is substantially greater than the compressive stress of 17.75 ksi. As such, no part of the 24PTH Type 3 basket plates will buckle under accident end drop loading.

Revision 22	Page P.3.8-8	January 2024		
All changes on this page are Amd 18.				

P.3.8.7.5 <u>Adjacent Fuel Compartment Relative Displacements</u>

The maximum relative perpendicular displacement from one fuel compartment plate to another is determined from the ANSYS results for the accident side drops. These differences are addressed in the criticality evaluations to ensure that the fuel assembly array pitch does not significantly change due to the accident side drop. Maximum relative displacements for those adjacent compartments that have moved closer together are tabulated in Table P.3.8-10. Maximum relative displacements based on the updated model for the bounding orientation of 210° are shown in Table P.3.8-11. The summary table includes results for analyses with bolts and tie rods modeled and for analyses without bolts and tie rods modeled. Maximum relative displacements corresponding to the sensitivity analysis including the nominal gap at slots is also shown in Table P.3.8-11.

P.3.8.9 <u>Conclusions</u>

Finite element analyses and hand calculations for the 24PTH Type 3 basket assembly are performed for normal and off-normal conditions. Controlling stress intensities are reported in Table P.3.8-5. A comparison of stress intensities to the corresponding allowable values indicate that all load conditions and combinations show acceptable stress levels.

Finite element analyses and hand calculations for the 24PTH Type 3 basket assembly are performed for accident side and end drop conditions. Controlling equivalent plastic strains are reported in Table P.3.8-7. A comparison of strains to the corresponding allowable values indicates that all load conditions show acceptable results. Uncontrolled crack propagation in the grid plates is not an issue for the selected gird plate material.

NUH-003		
Revision 22	Page P.3.8-10	January 2024
	All changes on this page are Amd 18.	

Service Level	Stress Category ⁽²⁾	Notes
Level A (NG-3222)	$P_m \le 1.0 S_m$ $P_m + P_b \le 1.5 S_m$ $P_m + P_b + Q \le 3.0 S_m$ (Note 1)	Note 3
Level D Elastic Analysis (NG-3225, App. F)	$P_m \le min(max(1.2S_y, 1.5S_m), 0.7S_u)$ $P_m + P_b \le min(max(1.8S_y, 2.2S_m), S_u)$	
Level D Plastic Analysis (Austenitic) (NG-3225, App. F)	$P_m \le max(0.7S_u, S_y + 1/3(S_u - S_y))$ $P_m + P_b \le 0.9S_u$	Note 4
Level D Plastic Analysis (Ferritic) (NG-3225, App. F)	$P_m \leq 0.7 S_u$ $P_m + P_b \leq 0.9 S_u$	Note 5

Table P.3.8-124PTH Type 3 Basket Assembly Stress Criteria for Subsection NG Components

Notes:

(1) This limit may be exceeded provided the requirements of NG-3228.3 are satisfied, see NG-3222.2 and NG-3228.3.

(2) As appropriate, the special stress limits of NG-3227 should be applied.

(3) In accordance with NG-3222 and Note 9 of Figure NG-3221-1, the Limit Analysis provisions of NG-3228 may be used.

(4) Level D criteria for austenitic materials are also applicable to high-nickel alloy and copper nickel alloy materials.

(5) Alternatively, the criteria in the table may be exceeded for the steel basket plates if equivalent plastic strains are within 1% for membrane, 3% for membrane plus bending and 10% for peak equivalent plastic strains.

NUH-003			
Revision 22	Page P.3.8-11	January 2024	
All changes on this page are Amd 18.			

Table P.3.8-2 Threaded Fastener Stress Design Criteria (Normal/Off-Normal)

Stress Category	Allowable Stresses
Primary + Secondary Membrane $P_m + Q_m^{(2)}$	min(0.9Sy, 2/3Su)
Primary + Secondary Shear $P_m + Q_m^{(3)(6)}$	0.6Sy
Primary + Secondary Bearing $P_m + Q_m^{(4)}$	2.7Sy
Primary Membrane Pm ⁽²⁾	Sm
Primary Shear Pm ⁽³⁾	0.6Sm
Primary + Secondary Membrane + Bending $P_m + Q_m + P_b + Q_b^{(5)(6)}$	min(1.2S _y , 8/9S _u)

Notes:

(1) Classification and stress limits are as defined in ASME Code, Section III, Subsection NG [3.39].

(2) Averaged stress intensity on tensile stress area at threaded section.

(3) Averaged stress across shear area of threaded section.

(4) Averaged bearing stress under the fastener head.

(5) Stress intensity, excluding effects of stress concentrations.

(6) Not applicable to this evaluation; no significant thermal shear due to oversized/slotted holes, and no significant bending.

NUH-003			
Revision 22	Page P.3.8-12	January 2024	
All changes on this page are Amd 18.			

Component	Material	Temperature (°F)	Stress Category	Allowable Stress (ksi)
		700	P_m	24.96
Steel Grid Plates	AISI 4130		$P_m + P_b$	37.43
			$P_m + P_b + Q$	74.87
Rail Angle Plates	SA-516 Grade 70	550	P_m	20.00
			$P_m + P_b$	30.00
			$P_m + P_b + Q$	60.00
Transition Rails	Aluminum 6061	550	$P_m + P_b$	4.85
			$P_m + P_b + Q$	9.70
Bolts ⁽¹⁾	SA-564 Gr. 630 H1100	550	Tension, Pm	44.15
			Tension, $P_m + Q_m$	84.56
	SA-564 Gr. 630	550	Tension, Pm	44.15
THE ROOS	H1100		Tension, $P_m + Q_m$	84.56

 Table P.3.8-3

 Component Allowable Stresses (Normal / Off-Normal)

(1) For basket side loading, only tension loads are transferred through the bolts and tie rods due to oversized/slotted bolts holes that allow for thermal expansion.

NUH-003	
Revision 2	2

Strain Category	Allowable Strains ⁽¹⁾	
Primary Membrane	1 0%	
Em	1:078	
Primary Membrane + Bending	3.0%	
Em + Eb	5.078	
Primary + Peak	10 0%(2)	
$\mathcal{E}m + \mathcal{E}b + \mathcal{E}F$	10:076	
Compression or Buckling	Note ⁽³⁾	

Table P.3.8-4Basket Grid Plate Accident Drop Strain Design Criteria

(1) Equivalent plastic strain limits.

(2) Membrane + bending equivalent plastic strains determined from the analyses conservatively include peak equivalent plastic strain, such that the limit on primary + peak does not need to be evaluated.

(3) Determine the buckling load for each postulated drop orientation to demonstrate that the basket does not buckle within maximum drop load of 75g. Report the safety margin.

NUH-003	
Revision 22	

Load Combination	Component	Stress Category	Maximum Stress (ksi)	Allowable Stress (ksi)	Stress Ratio
		P_m	12.64	24.96	0.51
	Grid Plates	$P_m + P_b$	28.16	37.43	0.75
		$P_m + P_b + Q$	38.55	74.87	0.51
		P_m	4.10	20.00	0.20
Enveloping	Angle Plates	$P_m + P_b$	5.52	30.00	0.18
Results for		$P_m + P_b + Q$	15.72	60.00	0.26
Conditions in the TC	Transition Rails	$P_m + P_b$	2.09	4.85	0.43
		$P_m + P_b + Q$	7.97	9.70	0.82
	Bolts ⁽¹⁾	P_m	15.03	44.15	0.34
		$P_m + Q_m$	58.83	84.56	0.70
	Tio Pode ⁽¹⁾	P_m	22.16	44.15	0.50
	He Rods	$P_m + Q_m$	22.16	84.56	0.26

Table P.3.8-5 24PTH Type 3 Basket Stress Summary – Enveloped DW + Handling + Thermal

Bolt and tie rod stresses listed are increased for the reduced area at the threads. Grid plate stresses include hand calculated stresses for 0.5g axial, if controlled by DW + 0.5g Vertical + 0.5g Transverse + 0.5g Axial handling load combination. (1) (2)

NUH-003		
Revision 22	Page P.3.8-15	January 2024
	All changes on this page are Amd 18.	

24P1H Type 5 Daskei Gria Piale Sirain – Siae Drops with Dous and Tie Koas				
Side Drop Load Case	Fastener Status	Strain ⁽¹⁾ Category	Maximum Strain (in/in)	Allowable Strain (in/in)
ZEr O' Side Dren	with Bolts and Tie	Em	0.00000	0.01
75g, 0° Side Drop	Rods	Em + Eb	0.00175	0.03
75g, 180°Side Drop	with Bolts and Tie	Em	0.00000	0.01
	Rods	Em + Eb	0.00433	0.03
75g, 210° Side Drop	with Bolts and Tie	Em	0.00000	0.01
	Rods	Em + Eb	0.00777	0.03
75g, 225° Side Drop	with Bolts and Tie	Em	0.00000	0.01
	Rods	Em + Eb	0.00487	0.03
	with Bolts and Tie	Ет	0.00000	0.01

Ет

Em + Eb

0.00243

0.03

Table P.3.8-6

Notes:

(1) Equivalent plastic strain

75g, 270° Side Drop

with Bolts and Tie

Rods

Table P.3.8-7

24PTH Type 3 Basket Bounding Grid Plate Strain from the Updated Model – Side Drops with and without Bolts and Tie Rods

Side Drop Load Case	Fastener Status	Strain ⁽¹⁾ Category	Maximum Strain (in/in)	Allowable Strain (in/in)
	with Bolts and Tie	Em	0.00000	0.01
75g, 210° Side Drop	Rods	Em + Eb	0.00664	0.03
	without Bolts and Tie Rods ⁽²⁾	Em	0.00000	0.01
		Em + Eb	0.00673	0.03
75g, 210° Side	without Bolts and	Em	0.00000	0.01
Drop with Grid Tie Rods ⁽²⁾ Plate Slot Gaps	Em + Eb	0.01048	0.03	

Notes:

(1) Equivalent plastic strain

(2) Bolts and tie rods are removed from the model for this analysis, assuming that they fail.

Page P.3.8-16

Load condition	Last Converged Load (g) ⁽¹⁾	Actual Maximum Load(g)	Factor of Safety
75g 0° drop with bolts and tie rods	94.0	75.0	1.25
75g 180° drop with bolts and tie rods	94.0	75.0	1.25
75g 210° drop with bolts and tie rods	94.0	75.0	1.25
75g 225° drop with bolts and tie rods	94.0	75.0	1.25
75g 270° drop with bolts and tie rods	94.0	75.0	1.25

Table P.3.8-824PTH Type 3 Basket Buckling Analysis Results Summary

(1) A maximum load of 94g is applied. Therefore, the buckling load and factor of safety may be greater.

Table P.3.8-924PTH Type 3 Basket Bounding Buckling Analysis Results from the Updated Model

Load condition	Last Converged Load (g) ⁽¹⁾	Actual Maximum Load(g)	Factor of Safety
75g 210° drop with bolts and tie rods	94.0	75.0	1.25
75g 210° drop without bolts and tie rods	94.0	75.0	1.25
75g, 210° Side Drop without bolts and tie rods, with Grid Plate Slot Gaps	94.0	75.0	1.25

Notes:

(1) A maximum load of 94g is applied. Therefore, the buckling load and factor of safety may be greater.

Table P.3.8-10 24PTH Type 3 Basket Maximum Adjacent Fuel Compartment Relative Displacements

	Dreen	Maximum Absolute Relative Displacement (in)		
Load Condition	Drop Orientation	With bolts and tie rods		
		∆ux	∆uz	
	0°	0.035810	0.096722	
	180°	0.043568	0.095689	
75g Accident Side Drop	210°	0.069562	0.11426	
	225°	0.093409	0.095402	
	270°	0.091852	0.034103	

Table P.3.8-11

24PTH Type 3 Basket Bounding Maximum Adjacent Fuel Compartment Relative Displacements from the Updated Model

Load Condition	0	Maximum Absolute Relative Displacement (in)			
	Drop Orientation	With bolts and tie rods		Without bolts and tie rods ⁽¹⁾	
		Δ_{ux}	∆uz	∆ux	∆uz
75g Accident Side Drop	210°	0.066351	0.11468	0.067193	0.11634
75g, 210° Side Drop with Grid Plate Slot Gaps	210°	N/A ⁽²⁾	N/A ⁽²⁾	0.077034	0.13108

Notes:

Bolts and tie rods are removed from the model for this analysis, assuming that they fail.

(1) (2) The sensitivity analysis only considers the bounding case without bolts and tie rods.

NUH-003		
Revision 22	Page P.3.8-18	January 2024
	All changes on this page are Amd 18.	



Figure P.3.8-1 24PTH Type 3 Basket Assembly ANSYS Model – Isometric View

Page P.3.8-19

January 2024

All changes on this page are Amd 18.

Proprietary Information on Pages P.3.8-20 through P.3.8-27 Withheld Pursuant to 10 CFR 2.390

	All changes on this page are Amd 18.	
Revision 22	Page P.3.8-20	January 2024
NUH-003		

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NUH-003		
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NUH-003		
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NUH-003		
Revision 22		

Page P.3.9-4 All changes on this page are Amd 18.

Section P.4.10 discusses the thermal analysis of the 24PTH Type 1 DSC with HLZC #6 as shown in Appendix P.2, Figure P.2-9. As shown in Section P.4.10, the thermal analysis of HLZC #6 is bounded by the thermal analysis of HLZC #1 presented in Section P.4.6.

Section P.4.12 discusses the thermal analysis of the 24PTH Type 3 DSC during storage and transfer conditions.

The thermal analysis is carried out for the three NUHOMS[®]-24PTH DSC configurations (24PTH-S, 24PTH-L, and 24PTH-S-LC DSC types in combination with *three* basket types (*Types 1, 2 or 3*) of the NUHOMS[®]-24PTH system described in Section P.2.1). A summary of the three system configurations analyzed in this chapter are summarized below:

System Configuration	DSC Type	Basket Type	Fuel Type	Total Heat Load per DSC, kW	Transfer Cask ⁽²⁾	Storage Module ⁽²⁾
1	24PTH-S or	Tupo 1 or 2		40.8	OS197FC/ OS200FC	HSM-H/ HSM-HS
I	24PTH-L	Type Tors	All Fuels	31.2	OS197/ OS197H/OS200	HSM-H/ HSM-HS
2	24PTH-S or 24PTH-L	Type 2 or 3	All Fuels	31.2	OS197FC/ OS200FC	HSM-H/ HSM-HS
3	24PTH-S-LC ⁽¹⁾	Type 2 or 3	B&W 15x15	24	Standardized TC/ OS197/OS197H	HSM-H/HSM-HS or HSM Model 102 or 202

(1) The maximum heat load allowed in the 24PTH-S-LC DSC is 24 kW. The HSM Model 102 is designed for a maximum heat load of 24 kW from a NUHOMS[®] 24P DSC as described in Section 8.1.3. Therefore no additional analysis of HSM Model 102 is required with 24PTH-S-LC DSC. Thermal evaluation of 24PTH-S-LC DSC in OS197 TC is presented in Section P.4.11.

(2) Transfer operations in OS200FC/OS200 and Storage operations in HSM-HS are not applicable for Type 3 basket.

The thermal evaluations presented herein include steady state and transient analyses of the thermal response of the NUHOMS[®]-24PTH system components to a defined set of thermal loading conditions. These loading conditions envelop the thermal conditions expected during all normal, offnormal, and postulated accident loading, transfer and dry storage operations for the design basis thermal conditions as defined in Section P.2. The applicable allowable temperatures are presented and comparisons are made with calculated temperatures as the basis for acceptance.

The analyses conservatively apply a uniform maximum peaking factor of 1.11 [4.1] along the active fuel length to bound the effect of the decay heat flux varying axially along the active fuel length.

A description of the detailed analyses performed for the storage of NUHOMS[®]-24PTH DSC under normal, off-normal, and accident conditions is provided in Sections P.4.4 and for transfer is provided in Section P.4.5. Section P.4.6 describes the 24PTH DSC basket and fuel cladding analysis for storage and transfer conditions. Section P.4.6.8 describes thermal analysis of the OS200 TC with the 24PTH DSC and Section P.4.6.9 describes evaluation of the 24PTH DSC with damaged/failed fuel assemblies (FAs). The DSC cavity internal pressures are also calculated in Section P.4.6 for all conditions of storage and transfer. Section P.4.7 describes the evaluation performed for loading/unloading conditions. The thermal evaluation concludes that each of the three NUHOMS[®]-24PTH systems configurations listed above meets all the design criteria.

The effective thermal conductivity of the fuel assemblies used in the 24PTH DSC thermal analysis is based on the conservative assumption of radiation and conduction heat transfer only, where any convection heat transfer is neglected. In addition, the lowest effective thermal conductivity among the fuel assemblies to be stored using 24PTH-S DSC, -L DSC, and -S-LC DSC is selected as the basis for the thermal analysis. Section P.4.8 presents the calculations that determined the fuel assembly effective thermal conductivity in a helium or vacuum environment. The thermal analysis model conservatively neglects convection heat transfer in the basket regions.

The DSC basket and fuel cladding temperature calculation methodology has been benchmarked [4.20] against experimental data [4.21] obtained for the TN-24 cask.

NUH-003		
Revision 22	Page P.4-2	January 2024
	All changes on this page are Amd 18.	

P.4.2 <u>Summary of Thermal Properties of Materials</u>

The analyses performed herein use interpolated values where appropriate for intermediate temperatures. The interpolation assumes a linear relationship between the reported values. The use of linear interpolation between temperature values in the tables for determining intermediate value of property is justified by the near-linear behavior as a function of temperature for the range of interest.

The emissivity of stainless steel is 0.587 [4.5]. For additional conservatism an emissivity of 0.46 for stainless steel is used for the basket steel plates in the analysis. The emissivity assumed for oxidized Zircaloy cladding surfaces, including Babcock & Wilcox (B&W) M5 cladding material, is 0.8 [4.11]. The emissivity assumed for anodized and non-anodized aluminum portion of side heat shields are 0.8 and 0.1, respectively [4.26] [4.30] [4.47].

The emissivities of the different materials used in the analyses for the 24PTH Type 3 DSC in Section P.4.12 are provided in the following table.

Material	Emissivity (ɛ)	References
Zircaloy based Fuel Cladding	0.8	[4.11]
	0.46 ⁽¹⁾	Appendix U, Section U.4.2
Stainless steel	0.587 ⁽²⁾	[4.5]
	0.6 ⁽³⁾	Appendix U, Section U.4.2
Carbon steel	0.55	Appendix U, Section U.4.2
Concrete	0.9	[4.30]

Notes:

1. For machined or flat stainless steel surfaces

2. For rolled surfaces of the DSC cylindrical shell

3. For the inner surface of the structural shell of the OS197 TC to account for the expected surface oxidation that will occur during the lead pour process.

The tables below provide the thermal properties of materials used in the analysis of the NUHOMS[®]-24PTH DSC.

Additional thermal properties of materials used in the 24PTH Type 3 DSC basket are discussed in Section P.4.12.1.2.

The effective thermal properties are the lowest calculated values among the various PWR fuel assembly types that may be stored in 24PTH DSC. Since 24PTH-S-LC DSC is designed for storage of B&W 15x15 fuel, an additional subset of bounding effective thermal properties are reported.

Temperature, °F	k, Btu/min-in-°F	ρ, Ib _m /in³	T, ⁰F	C _p ,Btu/lb _m -°F
Bounding Fuel in Helium,	Transverse (Used in 24PT)	H-S and 24PTH-L D	SC Analys	sis) [See Section
	P.4.8]			
178	2.798E-04		80	0.05924
267	3.257E-04		260	0.06538
357	3.829E-04		692	0.07255
448	4.547E-04	0 1 1 1 /	1502	0.07779
541	5.389E-04	0.1114		
635	6.326E-04			
730	7.398E-04			
826	8.558E-04			

1. PWR Fuel with Helium Backfill

Bounding B&W 15x [See Section P.4.8]	15 Fuel in Helium, Transv	e rse (Used in 24PTH	H-S-LC DS	C Analysis)
162	3.560E-04		80	0.05931
254	4.064E-04		260	0.06544
346	4.780E-04		692	0.07261
439	5.639E-04	0 1265	1502	0.07790
533	6.620E-04	0.1205		
629	7.733E-04			
725	8.957E-04			
822	1.031E-03			

NUH-003	
Revision 22	

Page P.4-4a

P.4.3 Specifications for Components

The 24PTH DSC design allows for the use of various poison materials. The tables below show the required minimum thermal conductivity for poison materials in the 24PTH DSCs. Boral[®] has the lowest thermal conductivity compared to the other poison materials. The thermal analysis is carried out with the lowest thermal conductivity values for the poison material to bound the various poison materials used. The neutron poison plates must have the following minimum thermal conductivity.

Boral

Temperature (°F)	K (Btu/min-in-°F)	
100	0.0761	
500	0.0699	
774	0.0699(*)	

Enriched Borated Aluminum

Temperature (°F)	K (Btu/min-in-°F)
68	0.136
212	0.141
392	0.149
774	0.149*

Natural Borated Aluminum**

Temperature (°F)	K (Btu/min-in-°F)
68	0.120
212	0.144
482	0.148
571	0.148
774	0.148*

Notes:

* Assumed values.

** A full thickness (0.875 inch) piece of natural borated aluminum shall have a minimum thermal conductivity of 0.136 Btu/min-in-F. Conductivity values provided are based on a 0.125 inch piece of natural borated aluminum.

The 24PTH Type 3 DSC neutron absorber plate must have a minimum conductivity of 130 W/m-K. The thermal models described in Section P.4.12 refer to the neutron absorber plate as poison plate, in general, or, specifically, as MMC plate.

NUH-003	D D (12	
Revision 22	Page P.4-13	January 2024
	All changes on this page are Amd 18.	

P.4.4.7 <u>HSM-H Thermal Model Results</u>

P.4.4.7.1 Normal and Off-normal Operating Condition Results

Temperature distributions for the normal and off-normal cases are shown in Figure P.4-6 through Figure P.4-13. The maximum component temperatures for the normal and off-normal cases are listed in Table P.4-2, Table P.4-3, and Table P.4-4. Temperature distributions for the single HSM-H which provides maximum temperature gradients in concrete walls, are shown in Figure P.4-16. Note that Figure P.4-16 shows the analysis temperature distribution before any adjustments made based on the results for bounding Case 1 documented in Table P.4-2. As seen from Table P.4-2 and Table P.4-3, the HSM-H concrete and DSC shell temperatures without the fins on the side heat shield for 31.2 kW are bounded by the case with the fins for 40.8 kW decay heat load. Therefore, fins are not required on the side heat shields in the HSM-H, if the total heat load is 31.2 kW or less. This is summarized in Table P.4-43.

P.4.4.7.2 Accident Condition Results

Temperature distributions for the blocked vent accident case with 40.8 kW decay heat load at 38.5 hours after blockage of the vents are shown in Figure P.4-14. The maximum component temperatures for the blocked vent accident case are listed in Table P.4-5.

Figure P.4-15 shows the time-temperature history of HSM-H components for this transient.

The maximum component temperatures for these cases are listed in Table P.4-6. Figure P.4-17 provides maximum temperature gradients in concrete walls during accident conditions. Table P.4-5 and Table P.4-6 incorporate the adjustments made to the analytical results as described in P.4.4.8 based on the thermal tests of the HSM-H [4.48]. Note that Figure P.4-14, Figure P.4-15 and Figure P.4-17 show the analysis temperature distributions, before any adjustments made based on the results for bounding Case 1 documented in Table P.4-2.

P.4.4.8 Evaluation of HSM-H Performance

The thermal performance of the HSM-H is evaluated under normal, off-normal, and accident conditions of operation as described above and is shown to satisfy all the temperature limits and criteria. The DSC shell temperatures calculated here, are used in the DSC basket and fuel cladding models as a boundary condition in Section P.4.6. The results show that all the basket and fuel cladding material temperature limits are satisfied. The results of the HSM-H temperatures are used in Section P.3 to show that thermal stresses in the HSM-H are also within these allowables.

The results of the 117°F ambient blocked vent condition show that the maximum concrete temperature at the end of 38.5 hours (with finned side heat shields, louvered top heat shield, and with slots on plate on top of support rail) and 30.0 hours (with flat stainless steel heat shields and without slots on plate on top of support rail) in the blocked vent accident are 431 °F and 415 °F, respectively. These are above the 350 °F limit given in NUREG 1536 [4.42] for accident conditions. To account for the effect of higher concrete temperature on the concrete compressive strengths, the structural analysis of HSM-H concrete components in Section P.3 is based on 10% reduction in concrete material properties. *Elevated temperature testing of the concrete mix (cement type, additives, water-cement ratio, aggregates, proportions) is performed to ensure that the required strength is maintained. Portland cements meeting the requirements of ASTM C 150 or ASTM C595 (blended Portland cement) are acceptable for use. The use of any Portland cement concretes will require testing to be performed when the concrete accident temperature exceeds 350 °F. Testing will be performed to demonstrate that the level of strength reduction is less than the 10% reduction that was employed in the calculations, and to ensure that there is no deterioration of the concrete due to higher temperatures.*

NUH-003		
Revision 22	Page P.4-25	January 2024
	All changes on this page are Amd 18.	

P.4.11 Thermal Evaluation of 24PTH-S-LC DSC in OS197 TC

Thermal performance of the 24PTH-S-LC DSC during transfer operations in Standardized TC is based on a two-step approach. In Step 1, the DSC shell temperatures are evaluated as noted in Section P.4.5.1. In Step 2, the DSC temperatures evaluated in Step 1 are utilized as boundary conditions to determine the maximum fuel cladding and basket component temperatures as noted in Section P.4.6.5.2. The temperatures resulting from Step 1 are listed in Table P.4-39.

A similar evaluation to that described in Step 1 was performed to evaluate the thermal performance of a 32PT DSC during transfer operation in the OS197 TC as noted in Appendix M, Section M.4.4.1.6.1. This evaluation considers a two-dimensional (2D) cross section of the 32PT DSC in OS197 TC. Since a 2D cross-section model is employed the results of this evaluation are applicable to any configuration wherein the diameter of the DSC shell, the material of the shell and the heat load are the same. Since the outer diameter, material, and the maximum heat load (i.e. 24 kW) of the 24PTH-S-LC DSC and the 32PT DSC are identical, the DSC shell temperatures presented in Section M.4.4.1.6.1 can be applied to the 24PTH-S-LC DSC. The following table presents a comparison of the DSC shell temperatures determined for the 24PTH-S-LC DSC in the Standardized TC to the temperatures determined for 32PT DSC in the OS197 TC:

Operating Condition	Standardized TC @ 24 kW	OS197 @ 24 kW
Normal, 100 °F Ambient	448 [Table P.4-39]	445 [Table M.4-3]
Off-Normal, 117 °F	470 [Table P.4-39]	433 [Table M.4-9]
Ambient		
Accident, 117 °F Ambient	487 [Table P.4-39]	600 [Table M.4-14]

Comparison of DSC Shell Maximum Temperatures

A comparison of the DSC shell maximum temperatures shows that for normal and off-normal conditions, the maximum temperatures determined in the Standardized TC bound that of the OS197 TC. Therefore, no further evaluation is required for normal and off-normal conditions.

For accident conditions, the DSC shell maximum temperature of the OS197 TC is 600 °F and is significantly higher than 487 °F determined in the Standardized TC. This is because, the liquid neutron shield, which improves the thermal performance of the OS197 TC compared to Standardized TC during normal and off-normal conditions, is considered lost during the accident evaluation.

However, this temperature of 600 °F is bounded by the blocked vent accident condition of the 24PTH-S-LC DSC in HSM Model 102, which was analyzed based on a shell temperature of 613 °F as shown in Table P.4-28. As shown in Table P.4-25 and P.4-28 for HLZC # 5, the maximum fuel cladding temperature for blocked vent accident conditions when analyzed based on a bounding 613 °F shell temperature is 821 °F with significant margin to the temperature limit of 1058 °F. Therefore, even under accident conditions in the OS197 TC, the 24PTH-S-LC DSC will maintain the fuel cladding temperature significantly below the temperature limit of 1058 °F.

To estimate the impact on the internal pressure of 24PTH-S-LC DSC during accident conditions due to this temperature increase, the average helium temperature determined for blocked vent accident condition, i.e., 618 °F (See Section P.4.6.7.5) is also assumed for the transfer accident case. The maximum internal pressure for 24PTH-S-LC during a postulated transfer accident is then calculated as: NUH-003

Revision 22	Page P.4-69	January 2024
	All changes on this page are Amd 18.	

P.4.12 Thermal Evaluation of NUHOMS 24PTH Type 3 DSC

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This section evaluates the thermal performance of the 24PTH Type 3 DSC based on HLZC #1 through #6 during storage and transfer conditions with intact, damaged and failed FAs.

A new basket assembly designated as Type 3 is proposed for the 24PTH-S, 24PTH-L and the 24PTH-S-LC DSCs based on the EOS-37PTH DSC design. The EOS style basket design includes various features to improve the thermal performance such as

The Type 3 basket replaces the Type 1 (with aluminum inserts) or Type 2 baskets (without aluminum inserts) within the 24PTH-S or the 24PTH-L DSCs and the Type 2 basket within the 24PTH-S-LC DSC. The 24PTH system configurations applicable to the analyses presented in this section for Type 3 DSC are shown in the table from Section P.4.1. The evaluations for Type 1 and Type 2 baskets during storage and transfer conditions are presented in Sections P.4.4 through P.4.6 for HLZCs #1 through #5. Section P.4.10 presents the thermal evaluation of 24PTH Type 1 DSC with HLZC #6.

This section presents the thermal evaluation for Type 3 basket for all HLZCs. The objective of these evaluations is to demonstrate that the thermal performance of the Type 3 Basket exceeds the thermal performance of the Type 1 Basket (with aluminum inserts). Since the Type 1 Basket (with aluminum inserts) is better than Type 2 (without aluminum inserts), this will also ensure that the Type 3 basket is better than the Type 2 basket without additional evaluations. In addition, the 24PTH-S-LC DSC is limited to 24 kW. Therefore, the sensitivity analyses are based on the 40.8 kW considered for 24PTH-S or 24PTH-L DSCs during storage operations, and 40.8 kW during transfer operations with time limits and 31.2 kW heat load without time limits. The Type 3 basket is only permitted for use with the OS197 cask variants and cannot be used with the OS200 cask unlike the Type 1 or 2 baskets and no discussion is presented for this configuration. The Type 3 basket design has the same length as the Type 1 and Type 2 baskets.

P.4.12.1 Storage Analysis of 24PTH Type 3 DSC in HSM-H

For the storage evaluation, a computational fluid dynamics model of the 24PTH Type 3 DSC in HSM-H is utilized to determine the bounding temperatures. This model is based on the approach presented in Section U.4.11.1 of the UFSAR for the 32PTH1 DSC in HSM-H and also the approach presented in Section 4.4.2 of the NUHOMS[®] EOS UFSAR [4.53]. It includes the 24PTH Type 3 DSC basket, HSM-H and the external air domain surrounding the HSM-H.

P.4.12.1.1 Bounding Storage Condition

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A review of the maximum fuel cladding temperatures in Table P.4-14 and Section P.4.10 demonstrates that the load case with HLZC #1 results in bounding maximum fuel cladding temperature among HLZCs #1 and #4 through #6. As mentioned in Section P.4.6, HLZC #1 bounds HLZCs #2 and #3. Therefore, HLZC #1 is bounding among HLZCs #1 through #6.

NUH-003		
Revision 22	<i>Page P.4-70</i> a	January 2024
	All changes on this page are Amd 18.	

Based on a review of the maximum fuel cladding temperatures in Table P.4-14 for normal conditions, Table P.4-20 for off-normal conditions, and Table P.4-25 for accident conditions, along with Section P.4.10, the normal hot storage with 100 °F ambient temperature is the bounding normal storage load case.

] Table P.4-44 lists the limiting design load cases to evaluate the thermal performance of the 24PTH Type 3 DSC during storage conditions in HSM-H.

P.4.12.1.2 <u>Material Properties</u>

Material properties for the 24PTH Type 3 DSC and HSM-H components are listed in Table P.4-45. Figure P.4-56 shows the schematic view of basket assembly grid along with location of the center basket plates, off-center basket plates and steel outer plates. Figure P.4-56 also shows that, center and off-center basket plates are [

The bounding effective thermal properties of PWR FAs loaded in 24PTH Type 3 DSC are discussed in Section P.4.12.1.2.2.

Page P.4-70b All changes on this page are Amd 18. Proprietary Information on This Page Withheld Pursuant to 10 CFR 2.390

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P.4.12.1.2.2 Bounding Effective Thermal Properties of PWR FAs Loaded in 24PTH DSC

The calculation of the effective thermal properties for the homogenized FAs within the 24PTH Type 3 DSC follows the same methodology as that discussed in Section P.4.8. Based on the discussion in Section P.4.8, the thermal properties for the bounding WE14x14 are updated to account for the increased compartment size and the high emissivity steel plates within the 24PTH DSC Type 3 basket assembly. The bounding transverse and axial thermal conductivities as well as specific heat and density are listed in Table P.4-50.

P.4.12.1.3 Computer-Aided Design and Meshing

In addition to modeling the convection within the HSM-H cavity, the model also includes the thermal conduction within the basket and the HSM-H; radiation heat transfer among the DSC shell, heat shields, and HSM-H; and heat dissipation from the HSM-H and the vent outlet via convection and radiation to the ambient.

Section P.4.12.1.3.1 presents the computer-aided design (CAD) model for the 24PTH Type 3 DSC basket in ANSYS ICEM CFD [4.55]. Section P.4.12.1.3.2 presents the CAD model for the HSM-H with the 24PTH Type 3 DSC shell and end plates in ANSYS ICEM CFD [4.55]. The meshes are imported into ANSYS FLUENT [4.54] to develop a CFD model for thermal evaluation.

P.4.12.1.3.1 CAD of 24PTH Type 3 DSC Basket Assembly

Based on the dimensions in Table P.1-1, the following table summarizes the basket, cavity, and DSC lengths for the 24PTH DSC system.

NUH-003		
Revision 22	<i>Page P.4-70</i> d	January 2024
	All changes on this page are Amd 18.	

Proprietary Information on Pages P.4-70e through P.4-70i Withheld Pursuant to 10 CFR 2.390

P.4.12.1.3.2 CAD of HSM-H with 24PTH Type 3 DSC Shell

The CAD model of the HSM-H with the 24PTH DSC shell and end plates is generated in ANSYS ICEM CFD [4.55].

Some simplifications and assumptions are discussed as follows:

Page P.4-70j All changes on this page are Amd 18.]

- Maintain the expansion ratio between two consecutive cells below 1.3 in the regions where high gradients of temperature and velocity are expected or material changes. In solid regions, the expansion ratio is allowed to be 2 or higher.
- Avoid highly skewed elements with angles less than 45 degrees or larger than 135 degrees, especially in critical regions. In this mesh, around 99% of the elements have an angle between 45 and 135 degrees, and around 79% of the total elements have an angle between 81 and 99 degrees.
- Keep the aspect ratio of most elements less than 20 except for those in the near wall regions. In this mesh, 85% elements maintain the aspect ratio below 20, and 54% elements have the aspect ratio smaller than 5.
- Use finer and high-quality mesh in critical regions with high temperature and velocity gradients or with significant changes in geometry, such as regions near the DSC outer surfaces.

	All changes on this page are Amd 18	5unuary 2021
Revision 22	Page P 4-70k	January 2024
NUH-003		

• Ensure sufficient resolution in the near-wall regions adjacent to the wall to capture the large variations in the flow.

] The dimensionless wall distance y^+ is defined as:

$$y^{+} = \frac{\rho y U_{\tau}}{\mu}$$

Where ρ is the fluid density μ is the fluid viscosity y is the element size $U_{\tau} = \sqrt{\tau_w / \rho}$ is the friction velocity τ_w is the wall shear stress.

P.4.12.1.4 CFD Modeling

The CFD modeling follows the same setup as the EOS-37PTH DSC in the EOS-HSM with the wind effect as described in Section 4.4.2.3 and Section 4.9.4.2.3 in NUHOMS[®] *EOS SAR [4.53].*

The following sections present a detailed overview of the methodology used in the CFD model of the HSM-H with 24PTH Type 3 DSC.

Page P.4-701 All changes on this page are Amd 18. Proprietary Information on Pages P.4-70m through P.4-70q Withheld Pursuant to 10 CFR 2.390

NUH-003		
Revision 22	<i>Page P.4-70</i> m	January 2024
	All changes on this page are Amd 18.	

P.4.12.1.5 <u>Results</u>

P.4.12.1.5.1 <u>Maximum Component Temperatures</u>

Table P.4-54 compares the maximum fuel cladding and DSC component temperatures for the 24PTH Type 3 DSC in the HSM-H with HLZC #1 to the design basis values presented in Table P.4-14 and Table P.4-15 for normal hot storage condition with 100 °F ambient. The design basis values presented for the 24PTH Type 3 DSC are based on the bounding temperatures determined for HLZC #1 with a maximum heat load of 40.8 kW for the normal hot storage condition with 100 °F ambient.

As shown in Table P.4-54, the maximum temperatures of the components for the 24PTH Type 3 DSC and the HSM-H with HLZC #1 under the normal storage condition are bounded by design basis values listed in Table P.4-14 and Table P.4-15. Therefore, the design basis values in Table P.4-20 and Table P.4-21 for off-normal storage condition and Table P.4-25 and Table P.4-26 for accident blocked vent condition also remain bounding for the 24PTH Type 3 DSC.

Figure P.4-68 shows the temperature profiles for the fuel cladding and key components of the 24PTH Type 3 DSC shell and HSM-H. Figure P.4-69 shows the velocity contours on the symmetry middle plane of the HSM-H loaded with the 24PTH Type 3 DSC. The streamlines for the airflow inside the HSM-H loaded with the 24PTH Type 3 DSC under normal hot storage condition is shown in Figure P.4-70.

Proprietary Information on This Page Withheld Pursuant to 10 CFR 2.390

NUH-003		
Revision 22	<i>Page P.4-70</i> s	January 2024
All changes on this page are Amd 18.		
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P.4.12.1.5.4 Maximum Internal Pressures

As shown in Section P.4.12.1.5.1, the maximum temperatures of all components for the 24PTH Type 3 DSC are bounded by design basis values for the bounding normal condition with HLZC #1. Therefore, the average helium temperatures determined for the 24PTH Type 3 DSC are also bounded by the design basis values discussed in Section P.4.6.5.4 for determining the maximum internal pressures. The maximum internal pressures in Table P.4-19, Table P.4-24, and Table P.4-29 remain bounding for the 24PTH Type 3 DSC under normal, off-normal, and accident storage conditions, respectively.

Since both the temperatures and internal pressure for the 24PTH Type 3 DSC are lower compared to the design basis evaluation with 24PTH Type 1 DSC, the Type 3 basket offers enhanced thermal performance. Also, since the Type 1 (with aluminum insert) basket already exceeds the thermal performance for Type 2 (without aluminum insert) basket, no additional evaluation is required to replace the Type 2 basket with the Type 3 basket during storage operations.

P.4.12.2 Transfer Analysis of 24PTH Type 3 DSC in OS197

P.4.12.2.1 **Bounding Transfer Condition**

As discussed in Section P.4.1, there are six HLZCs allowed for 24PTH DSCs. HLZC #1 with 40.8 kW results in higher fuel cladding and basket temperatures compared to HLZCs #2 or #3. HLZC #1 also bounds HLZC #6 with 35.2 kW as discussed in Section P.4.10. In addition, based on a review of the maximum fuel cladding temperatures in Table P.4-14 for normal conditions, Table P.4-20 for off-normal conditions and Table P.4-25 for accident conditions along with Section P.4.10, the maximum fuel cladding temperatures with HLZC #1 and HLZC #4 bound those for HLZC #5. Therefore, HLZC #1 with time limits and HLZC #4 under steady-state normal conditions represent the bounding load cases for 24PTH Type 1 basket (with inserts). These bounding scenarios are re-evaluated for the 24PTH Type 3 DSC to demonstrate that the thermal performance exceeds the thermal performance of Type 1 or Type 2 basket assemblies.

The bounding transfer operations for the 24PTH Type 3 DSC in OS197FC TC are the horizontal transfer with HLZC #1 with time limits and HLZC #4 under steady-state conditions. Table P.4-61 lists the limiting design load cases to evaluate the thermal performance of the 24PTH Type 3 DSC during transfer conditions.

P.4.12.2.2 Material Properties

Various components of the 24PTH Type 3 DSC basket assembly and their materials are discussed in Section P.4.12.1.2 and listed in Table P.4-45. NUH-003 Revision 2.

2	<i>Page P.4-70</i> t	January 2024
	All changes on this page are Amd 18.	

The material properties for the design basis evaluation of the OS197FC using SINDA/FLUINT thermal model from Section P.4.5.2 are utilized in this evaluation.

P.4.12.2.3 <u>Computer-Aided Design and Meshing</u>

The half symmetric CAD model of the OS197FC TC is based on the model for the OS197FC-B TC with the 61BTH Type 2 DSC shell from Section B.4.5.6.2.1 of Appendix B.4 of EOS SAR [4.53]. Since the same transfer cask is used for transferring the 24PTH DSC, and also because both the 24PTH and 61BTH DSCs have the same outer diameter, the same model is modified using ANSYS ICEM CFD [4.55] to accommodate the 24PTH DSC shell and the top, bottom end plates using the dimensions from Drawing NUH24PTH-1002-SAR in Section P.1.5. In addition, since the 24PTH-S DSC is smaller, a spacer disc is introduced at the bottom of the cask between the DSC and the inner surface of the TC. No convection is considered within the empty regions of the spacer disc. Figure P.4-71 presents the 3D model of the TC model.

NUH-003	
Revision 22	

*Page P.4-70*u

Proprietary Information on Pages P.4-70v and P.4-70w Withheld Pursuant to 10 CFR 2.390

NUH-003		
Revision 22	<i>Page P.4-70</i> v	January 2024
	All changes on this page are Amd 18.	

P.4.12.2.5 <u>Results</u>

P.4.12.2.5.1 <u>Temperature Calculations</u>

The maximum temperatures of fuel cladding and key components of the OS197FC TC for the various load cases described in Table P.4-61 are reported in Table P.4-64. Table P.4-64 shows that the maximum fuel cladding temperature after 11.5 hours of transfer operation without forced air circulation is considerably lower than the 752 °F temperature limit described in Section P.4.1.

Also, for scenario when transfer operation cannot be completed within defined time limit, and air circulation is turned on to cool down the 24PTH DSC, maximum fuel cladding temperature is 707 °F and is also considerably lower than 752 °F temperature limit.

Table P.4-64 shows that in various conditions of transfer operation, for load cases with 40.2 kW the maximum temperature of ASTM B29 lead used in gamma shield is considerably lower than the 620 °F limit defined in [4.47]. Similarly, the highest neutron shield average temperature, which occurs in LC #T-3, is lower than the limit of 287 °F defined in Table P.4-9. Bulk average temperatures for NS-3 solid neutron shielding material in LC #T-1 and LC #T-4 are lower than the temperature limit of 250 °F defined for long term operation in Table P.4-9.

Figure P.4-72 shows the temperature history of the fuel cladding during the transient transfer operations for LCs T-1, T-2 and T-3. As seen from Figure P.4-72, during LC T-2 the air circulation slows down the heat up rate of the TC loaded with the DSC. Temperatures reported in Table P.4-64 show that the temperatures of all key components remain below allowable limits at the end of forced cooling. Based on LC T-2 analysis, the air circulation must be operated for at least 8 hours to cool down the TC/DSC system once initiated.

Based on LC T-3, a maximum of 4 hours is allowed to complete the transfer of the 24PTH Type 3 DSC to the storage module or to re-establish the air circulation. Table P.4-64 shows that the temperatures for all LCs remain below the maximum allowable temperature limits discussed in Section P.4.1.

Figure P.4-73 through Figure P.4-76 show the temperature contours for LCs T-1 through T-4.

Table P.4-64 also shows that maximum fuel cladding temperature in steady state transfer operation with HLZC #4 (31.2 kW) is considerably lower than the 752 °F temperature limit. It also shows that the maximum temperature of ASTM B29 lead used in gamma shield is considerably lower than the 620 °F limit. Similarly, the highest neutron shield average temperature is lower than the limit of 287 °F.

As shown in Table P.4-66, the maximum fuel cladding temperatures determined for LC # T-1 with 40.8 kW and LC #T-4 with 31.2 kW for 24PTH Type 3 DSC are lower compared to those determined for 24PTH DSC Type 1 DSC.

	All changes on this page are Amd 18.	· · · · ·
Revision 22	Page P.4-70x	January 2024
NUH-003		

For LC #T-1, the DSC shell temperature for the evaluation performed with the 24PTH Type 3 DSC is higher compared to the previous evaluation performed for the 24PTH Type 1 basket, while for LC #T-4, it remains below that for 24PTH Type 1 DSC shell with a similar margin as seen for the basket plates. This is primarily due to the difference in the thermal mass of the system, which only impacts the transient evaluations. Based on Table P.1-1, the dry weight of the 24PTH Type 3 basket is 86.1 kips compared to 92.4 kips for the 24PTH Type 1 basket. This reduction in the weight increases the heat up rate of the system resulting in higher temperature for the DSC Shell during transient operations. However, as seen from Table P.4-64, the maximum temperatures for all components remain within the design limits.

Based on the above discussion, the Type 3 basket can be used to replace the Type 1 basket. Also, since the Type 1 (with aluminum insert) basket already exceeds the thermal performance for Type 2 (without aluminum insert) basket, no additional evaluation is required to replace the Type 2 basket with the Type 3 basket during transfer operations.

P.4.12.2.5.2 GCI Calculation

P.4.12.2.5.3 Discussion of Applicable Time Limits

Based on the results for LC #T-4 summarized in Table P.4-64, steady state operations are permitted for OS197FC TC loaded with 24PTH Type 3 DSC with heat load of \leq 31.2 kW for HLZC 4.

For the 24PTH Type 3 DSC with HLZC #1 in OS197FC TC, based on the results of LC #T-1 for horizontal transfer operation without air circulation, the maximum fuel cladding temperature increases with time and may exceed the maximum allowable temperature limit of 752 °F. Therefore, steady-state transfer operations without air circulation are not permitted for HLZC #1 and a time limit is required to complete horizontal transfer operations. Similarly, steady state transfer operations are also not permitted for HLZC # 2, 3, and 6. The maximum time limits determined for HLZC # 1 remain applicable for HLZC # 2, 3, and 6 based on the discussion presented in Section P.4.12.1.1.

NUH-003		
Revision 22	Page P.4-70y	January 2024
	All changes on this page are Amd 18.	

As shown in Figure P.4-72, at the end of the 11.5 hours transient transfer operation, the maximum fuel cladding temperature has sufficient margin to the fuel cladding temperature limit of 752 °F. However, a time limit of 9.5 hours is chosen to provide an additional margin to the temperature limit for both the vertical transfer operations within the fuel building and horizontal transfer operations that occur outside the building consistent with the time limits for 24PTH *Type 1 DSC. During the vertical transfer operations performed within the building, the OS197* TC is not exposed to the sun (i.e., no solar load), whereas, for horizontal transfer operation performed outside the building it is exposed to the solar load, which makes the horizontal transfer operations the bounding case compared to vertical operations. The maximum fuel cladding temperature at 9.5 hours after the start of operations is for LC #T-1. Further, this reduction in the time limit will ensure that sufficient time is provided to initiate the recovery actions. If the maximum heat load of a DSC is less than 40.8 kW, a new time limit can be determined and recalculated based on the maximum heat load for that DSC using the methodology/models presented in Sections P.4.12.2.2 through P.4.12.2.4 to provide more realistic time limit for transfer operations.

If transfer operations cannot be completed within the time limit of 9.5 hours and the TC/DSC is in a horizontal orientation, one of the recovery actions is to initiate air circulation within 2 hours.

If air circulation is initiated as a recovery option, it must be operated for a minimum duration of 8 hours to allow sufficient time for the TC/DSC components to cool down before it is turned off. After 8 hours has elapsed with the blower in operation, it can be turned off to complete the DSC transfer. The maximum fuel cladding temperature 4 hours after the air circulation is turned off has sufficient margin to the temperature limit of 752 °F. As shown in Figure P.4-72, these time limits are conservatively calculated based on the initial temperatures at the end of the 11.5 hours transfer transfer operation before the blowers in operation.

Even for this worst-case condition, the maximum fuel cladding temperature remains below the allowable limit of 752 °F. In addition to the fuel cladding temperature, a review of the maximum temperatures presented in Table P.4-64 shows large margins for other TC components.

The minimum duration of 8 hours to run the blower and the time limit of 4 hours after the blower is turned off for completion of the transfer operations are determined based on the 24PTH Type 3 DSC in the OS197FC TC with the maximum allowable heat load of 40.8 kW.

P.4.12.3 Impact of Top and Bottom Forging modifications on 24PTH-S-LC DSCs

The 24PTH-S-LC DSC includes lead shield plugs encased within the inner top forging and the bottom forging for the Type 1 and Type 2 baskets. For these baskets, the lead was poured into the forging. The lead disc is a pre-cast insert, and for the top forging, may be provided as a single-piece or a two-piece configuration, where the two-piece option consists of two layers stacked together with a combined thickness equivalent to that of the single-piece configuration. For the Type 3 basket, a lead disc is considered in lieu of pouring the lead into the forgings as shown in Drawing NUH24PTH-1001-SAR for the top forging and Drawing NUH24PTH-1002-SAR for the bottom forging. In addition, the thickness of the steel plates was increased within the bottom forging while reducing the thickness of the lead.

NUH-003 Revision 22 Secret]

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72.48 and Amd 18 Heat dissipation from the top and bottom ends of the DSC is primarily along the axial direction, with very limited heat transfer in the radial direction due to the small thickness of the end plates. To determine the impact of these modifications on the thermal performance, a heat balance was performed on LC # S-1 in Table 4-44. Based on this heat balance, about 95% of the heat dissipated from the basket assembly is rejected through the DSC shell with only 2% rejected through the top end of the DSC and 3% towards the bottom. This shows that the top and bottom ends of the DSC only have a marginal impact on the thermal performance. In addition, since the Type 3 basket assembly has better thermal performance compared to Type 2 basket and also because the heat load is limited to 24 kW for the 24PTH-S-LC DSCs, these changes will not have an adverse impact on the thermal performance.

P.4.12.4 <u>Acceptance Criteria for Basket Plate Coating Damage</u>

During fabrication, the coating on the 24PTH Type 3 DSC steel basket plates can be physically damaged. The impact of coating damage on the effective thermal properties of PWR spent fuel assemblies is evaluated using the same methodology as described in Section P.4.8. Based on section P.4.8 of the UFSAR, the emissivity of the basket plates surrounding the fuel assembly impact only the transverse effective thermal conductivity and does not impact the axial effective thermal conductivity nor the effective specific heat or density of the bounding fuel assembly.

To evaluate the impact of the damaged coating, the effective transverse conductivity values for the PWR spent fuel assemblies are evaluated using the same methodology in Section P.4.8.1.4. Two sensitivity studies were performed. The first evaluation considers an overall reduction in the emissivity when 5% of the coating is damaged and the second evaluation considers the damage to be concentrated in a 1.5" wide strip on the basket plate.

The results of these evaluations show that the reduction in the transverse effective conductivity is less than 0.5% and that there is no measurable change in the fuel cladding temperature. As an example, when the basket plate temperature was fixed at 500 °F, the maximum fuel cladding temperature predicted with and without the damaged coating is 561 °F. Therefore, coating damage to the basket plates that satisfies the acceptance criteria listed below will not impact the thermal performance of the basket assembly or the fuel cladding temperature.

<u>Acceptance Criteria</u>

Based on the damaged coating evaluation discussed above, the acceptance criteria for the coated EOS-37PTH basket plates are summarized below:

- 1) Up to 5 % of the surface area between the interlocking slots of the coated plate exposed to the fuel assembly can be damaged, and
- 2) The width of the single damaged area for the coating within each individual plate cannot exceed 1.5".
- 3) The length or depth of the damaged coating area (i.e., scratch) is found to be insignificant on thermal performance. Therefore, no limitations are placed on these parameters if both Criteria 1 and 2 are met.

72.48

P.4.13 References

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NUH-003

Revision 22	Page P.4-71	January 2024
	All changes on this page are Amd 18.	

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 Table P.4-44

 Design Load Cases for 24PTH Type 3 DSC during Storage Conditions

Load Case #	Description	HLZC #	Ambient Temperature	Solar Insolation	Note
S-1	Normal storage condition, steady- state	1 (40.8 kW)	106 °F	No	(1)
S-1f	Normal storage condition, steady- state, fine mesh	1 (40.8 kW)	106 °F	No	(1), (2)

Notes:

NUH-003		
Revision 22	<i>Page P.4-116</i> a	January 2024
	All changes on this page are Amd 18.	

Proprietary Information on Pages P.4-116b through P.4-116i Withheld Pursuant to 10 CFR 2.390

NUH-003		
Revision 22	<i>Page P.4-116</i> b	January 2024
	All changes on this page are Amd 18.	

% of Core Height [4.58]	Length	Peaking Factor [4.58]
0.00	0.00	0
2.78	4.00	0.652
8.33	12.00	0.967
13.89	20.00	1.074
19.44	27.99	1.103
25.00	36.00	1.108
30.56	44.01	1.106
36.11	52.00	1.102
41.69	60.03	1.097
47.22	68.00	1.094
52.78	76.00	1.094
58.33	84.00	1.095
63.89	92.00	1.096
69.44	99.99	1.095
75.00	108.00	1.086
80.56	116.01	1.059
86.11	124.00	0.971
91.67	132.00	0.738
97.22	140.00	0.462
100.00	144.00	0

 Table P.4-52

 Applied Peaking Factors for PWR Fuel Assemblies in 24PTH Type 3 DSC

Page P.4-116j

Region	CFD Model Z-Coord. ⁽¹⁾ (in) % of Active Fuel Length		Fuel Length ⁽²⁾	Average Height	Peaking	Area Under	
#	From	То	From	То	from Bottom (in)	Factor	Curve (in)
1	0	2.140	0	0.0149	1.070	0.174	0.3731
2	2.140	8.129	0.0149	0.0564	5.134	0.661	3.9570
3	8.129	16.193	0.0564	0.1125	12.161	0.945	7.6213
4	16.193	23.753	0.1125	0.1649	19.973	1.065	8.0478
5	23.753	31.269	0.1649	0.2171	27.511	1.099	8.2611
6	31.269	40.193	0.2171	0.2791	35.731	1.107	9.8786
7	40.193	48.122	0.2791	0.3342	44.158	1.106	8.7676
8	48.122	56.129	0.3342	0.3898	52.125	1.102	8.8213
9	56.129	64.243	0.3898	0.4461	60.186	1.097	8.9028
10	64.243	71.753	0.4461	0.4983	67.998	1.094	8.2184
11	71.753	80.129	0.4983	0.5564	75.941	1.094	9.1643
12	80.129	88.193	0.5564	0.6125	84.161	1.095	8.8306
13	88.193	95.753	0.6125	0.6649	91.973	1.096	8.2838
14	95.753	104.129	0.6649	0.7231	99.941	1.094	9.1631
15	104.129	112.158	0.7231	0.7789	108.143	1.083	8.6988
16	112.158	119.753	0.7789	0.8316	115.955	1.052	7.9909
17	119.753	128.129	0.8316	0.8898	123.941	0.953	7.9840
18	128.129	136.193	0.8898	0.9458	132.161	0.728	5.8674
19	136.193	142.495	0.9458	0.9895	139.344	0.444	2.8012
20	142.495	144.000	0.9895	1.0000	143.248	0.087	0.1307
Sum					141.76		
Normalized			0.984				
Corr. Factor 1.					1.016		

Table P.4-53Peaking Factors for Fuel Assemblies in the 24PTH Type 3 DSC Model with Coarse Mesh

Notes:

⁽¹⁾ Assuming Z=0 is the bottom of the fuel, Z=144 " is the top of the fuel

⁽²⁾ The percentage is calculated as the Z-coordinate divided by the active fuel length of 144"

NUH-003		
Revision 22	<i>Page P.4-116</i> k	January 2024
	All changes on this page are Amd 18.	

Table P.4-54Maximum Component Temperatures for 24PTH Type 3 DSC in HSM-H for Normal Storagewith 106 °F Ambient Temperature

Components	Design Basis, Tables P.4-14 and P.4-15	LC S-1 ⁽¹⁾ (with HLZC #1)	$\Delta m{T}$ (THLZC #1 — TDesign Basis)
Fuel Cladding	734	705 ⁽²⁾	-29
Basket Plate	668	623 ⁽²⁾	-27
DSC Shell	461	410 ⁽²⁾	-51

Note:

(1) See Table P.4-44 for the description of the load cases.

(2) According to the discussion in Section P.4.12.1.5.3, a bounding value of 3 °F should be added to the maximum component temperatures to accommodate the effects from the calculated hot gap between the DSC and basket.

NUH-003				
Revision 22	<i>Page P.4-116</i> 1	January 2024		
All changes on this page are Amd 18.				

Proprietary Information on Pages P.4-116m and P.4-116n Withheld Pursuant to 10 CFR 2.390

NUH-003				
Revision 22	<i>Page P.4-116</i> m	January 2024		
All changes on this page are Amd 18.				

Table P.4-58Maximum Temperatures of Key Components in HSM-H loaded with 24PTH Type 3 DSC for
Bounding Storage Condition

Maximum Temperature (°F)						
Diametric Gap between DSC and basket	0.331"	0.3" (LC #S-1 ⁽¹⁾)	ΔΤ			
Fuel Cladding	707.81	705.46	2.35			
Concrete	246.84	247.76	-0.92			
Basket Plate	625.41	622.61	2.80			
Transition Rails	509.56	506.59	2.97			
DSC Shell	408.74	410.45	-1.71			
Side Heat Shield	245.43	246.50	-1.07			
Top Heat Shield	247.88	248.51	-0.63			
Support Structure	336.28	338.82	-2.54			

Notes:

(1) See Table P.4-44 for the description of the load cases.

Table P.4-59 Average Temperatures of Key Components in HSM-H Loaded with 24PTH Type 3 DSC for Bounding Storage Condition

Table P.4-60 Not Used

*Page P.4-116*0

Table P.4-61Design Load Cases for 24PTH Type 3 DSC during Transfer Conditions

Load Case #	Description	HLZC #	Ambient Temperature	Solar Insolation	Note
T-1A	Normal, hot, indoor horizontal transfer condition, no air circulation, initial condition	1 (40.8 kW)	120 °F	No	(2)
T-1	Normal, hot, outdoor horizontal transfer condition, no air circulation, @ 11.5 hours	1 (40.8 kW)	100 °F	Yes	(1), (3)
T-2	Normal, hot, outdoor horizontal transfer condition, air circulation, @ 8 hours after the end of LC #T-1	1 (40.8 kW)	100 °F	Yes	(1), (4)
Т-3	Normal, hot, outdoor horizontal transfer condition, no air circulation, @ 4 hours after the end of LC #T-2	1 (40.8 kW)	100 °F	Yes	(1), (5)
T-4	Normal, hot, outdoor horizontal transfer condition, no air circulation, steady-state	4 (31.2 kW)	100 °F	Yes	(1)
T-4f	Normal, hot, outdoor horizontal transfer condition, no air circulation, steady-state, fine mesh	4 (31.2 kW)	100 °F	Yes	(1), (6)

Notes:

(1) Insolation in accordance with 10 CFR Part 71.71(c)(1)

- (2) Assumes initial steady-state conditions with 223 °F water in the cask-DSC annulus and indoor ambient temperature of 120 °F. TC is in vertical orientation inside the fuel building during loading of DSC, but horizontal orientation is assumed as this case is performed to compute the initial condition for horizontal outdoor transfer operation (LC #T-1A).
- (3) Initial conditions taken from LC #T-1A for LC #T-1 Normal hot transient. At time = 0, the water is drained, the forced air circulation is off, and the system begins to heat up.
- (4) Initial conditions are taken from the end of 11.5 hours in LC #T-1 transient.
- (5) Initial conditions are taken from the end of 8 hours in LC #T-2 transient.
- (6) This is the fine mesh model for grid convergence index (GCI) study.

Table P.4-62 Not Used

Table P.4-63 Not Used

Table P.4-64Maximum Temperatures of Key Components of the OS197FC TC Loaded with 24PTHType 3 DSC

	LC # T-1A	LC # T-1 @11.5 hours	LC #T-2 @ 8 hours	LC #T-3 @ 4 hours	LC #T-4	Max. Allowable Temp.
		Maximum Co	mponent Temp	oeratures (°F)		(° <i>F</i>)
Fuel Cladding	615	690	707	711	708	752
Basket Plates	513	609	622	632	644	
Max. DSC Shell	288	458	441	467	501	800
Inner Liner	227	313	340	347	366	800
Gamma Shield	225	306	333	340	359	620
Structural Shell	207	254	281	289	310	
Neutron Shield, Max /Avg	203/193	249/210	276/214	284/218	304/254	- / 290
Closure Lid	182	180	256	218	213	
Top Forging	203	207	256	237	250	
Bottom Forging	215	187	165	171	215	
Neutron Shield Outer Skin	195	235	260	267	286	
Bulk Average NS-3, Bottom	195	169	122	134	190	250 (Table U.4-8)
Transition Rail	399	523	514	530	566	

Note:

(1) See Table P.4-61 for the description of the load case.

NUH-003		
Revision 22	<i>Page P.4-116</i> q	January 2024
	All changes on this page are Amd 18.	

Proprietary Information on This Page Withheld Pursuant to 10 CFR 2.390

NUH-003		
Revision 22	<i>Page P.4-116</i> r	January 2024
	All changes on this page are Amd 18.	

Table P.4-66Comparison of Maximum Temperatures between 24PTH Type 3 DSC and 24PTH Type 1 DSCduring Transfer Operations

Load Case ⁽¹⁾	LC # T-1	Design Basis, Tables P.4-14 and P.4-15 (DSC in TC, 100°F Ambient)	LC # T-4	Design Basis, Tables P.4-14 and P.4-16 (DSC in TC, 100°F Ambient)
Heat Load	HLZC #1	(40.8 kW)	HLZC #4	(31.2 kW)
Time limit (Hours)	11.5	11.5	Steady	Steady
	Maximum Component Temperatures (°F)			
Fuel Cladding	690	711	708	733
Basket Plates	609	643	644	680
Max. DSC Shell	458	445	501	548

NUH-003		
Revision 22	<i>Page P.4-116</i> s	January 2024
	All changes on this page are Amd 18.	

Proprietary Information on Pages P.4-171 through P.4-180 Withheld Pursuant to 10 CFR 2.390

NUH-003		
Revision 22	<i>Page</i> P.4-171	January 2024
	All changes on this page are Amd 18.	



Figure P.4-66 Peaking Factor Curve for PWR Fuel Assemblies in 24PTH Type 3 DSC

NUH-003		
Revision 22		

Page P.4-181

January 2024

All changes on this page are Amd 18.

Proprietary Information on Pages P.4-182 through P.4-186 Withheld Pursuant to 10 CFR 2.390

NUH-003		
Revision 22	<i>Page</i> P.4-182	January 2024
	All changes on this page are Amd 18.	



Figure P.4-71 Isometric View of CAD Model of OS197 with 24PTH Type 3 DSC

NUH-003	1
Revision 2	22

Page P.4-187

January 2024

All changes on this page are Amd 18.

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Figure P.4-72 Time History of Fuel Cladding for Transient LCs T-1, T-2 and T-3 during Transfer Operations

NUH-003		
Revision 22	Page P.4-188	January 2024
	All changes on this page are Amd 18.	

Proprietary Information on Pages P.4-189 through P.4-196 Withheld Pursuant to 10 CFR 2.390

NUH-003		
Revision 22	Page P.4-189	January 2024
	All changes on this page are Amd 18.	

P.5 <u>Shielding Evaluation</u>

The radiation shielding evaluation for the Standardized NUHOMS[®] System (during loading, transfer and storage) for the other NUHOMS[®] canisters is discussed in other sections and appendices of the FSAR. The following radiation shielding evaluation specifically addresses the shielding evaluation of the NUHOMS[®] 24PTH system with design-basis PWR fuel and control components (CCs) loaded in a NUHOMS[®]-24PTH DSC.

The shielding analysis is carried out for the three DSC configurations (24PTH-L, 24PTH-S, and 24PTH-S-LC) of the NUHOMS[®]-24PTH system described in Section P.1.

There are also three different basket types, as defined in Section P.1:

- Type 1 basket has square compartment tubes and aluminum inserts in the rails
 - *Type 2 basket has square compartment tubes and does not have aluminum inserts in the rails*
 - Type 3 basket is an alternate interlocking design with aluminum rails

Each basket type is available with the 24PTH-S and -L DSCs, while only basket Types 2 and 3 are available for the 24PTH-S-LC DSC. When referring to specific DSC/basket combinations, basket type is listed after the DSC configuration, e.g., "24PTH-L Type 1 DSC" refers to the 24PTH-L DSC with the Type 1 basket. When referring to the basket explicitly, "DSC" is replaced with "basket," e.g., "24PTH-L Type 1 basket."

The 24PTH-L and 24PTH-S DSCs are transferred either in the OS197/OS197H Transfer Cask (TC) or the OS197FC TC depending upon the heat load and stored in the HSM-H. The 24PTH-S-LC DSC is transferred in the Standardized TC *or OS197/OS197H TC* and stored in either the HSM-H or HSM-Model 102/202. The possible loading combinations are listed below:

- (1) 24PTH-L DSC \rightarrow OS197FC TC (bounds OS197/OS197H TCs)
- (2) 24PTH-L DSC \rightarrow HSM-H
- (3) 24PTH-S DSC \rightarrow OS197FC TC (bounded by #1)
- (4) 24PTH-S DSC \rightarrow HSM-H (bounded by #2)
- (5) 24PTH-S-LC DSC \rightarrow Standardized TC
- (6) 24PTH-S-LC DSC \rightarrow HSM-H or HSM Model 202 (bounded by #7)
- (7) 24PTH-S-LC DSC \rightarrow HSM-Model 102
- (8) 24PTH-S-LC DSC \rightarrow OS197/OS197H TC

The design of HSM-H is similar to HSM Model 102 except the HSM-H has improved shielding performance due to the following design features:

- Elimination of 6" uniform gap between adjacent modules,
- Innovative shielded inlet and outlet ventilation openings,
- Increased concrete thickness in roof, front and backwalls and shield walls, and
- Increased shielding in the HSM door.

NUH-003
Revision 22Page P.5-1January 2024All changes on this page are Amd 18.

Proprietary Information on This Page Withheld Pursuant to 10 CFR 2.390

NUH-003		
Revision 22	Page P.5-1a	January 2024
	All changes on this page are Amd 18.	

These design features results in the occupational and site dose rates ALARA.

The NUHOMS[®] 24PTH DSC can also be stored within an upgraded HSM model, designated as HSM-HS as described in Appendix U. From a shielding standpoint, the HSM-HS module is identical to the HSM-H module. Therefore, all calculations performed with the HSM-H are applicable to the HSM-HS.

The NUHOMS[®] 24PTH-L/S Type 1 or 2 DSC may also be transferred in a modified version of the OS200 TC as described in Appendix U. The OS200 TC is fitted with an aluminum sleeve to accommodate the smaller diameter 24PTH DSC.

The basket layout for the three DSC configurations is identical except for the length of the DSC components and the shield plug design. The 24PTH-S DSC and 24PTH-L DSC differ in DSC and cavity length, while the 24PTH-S-LC DSC and 24PTH-S DSC differ in cavity length due to a different shield plug design. The 24PTH-L/S has carbon steel shield plugs, while the 24PTH-S-LC has thinner lead shield plugs to increase cavity length to allow for greater fuel lengths in a shorter canister.

Each DSC configuration is designed to store up to 24 intact (and up to 12 damaged, with remaining intact) PWR fuel assemblies. The 24PTH-L and 24PTH-S-LC DSCs are also designed to store up to 24 intact standard PWR fuel assemblies with or without CC; such as burnable poison rod assemblies (BPRAs), Control Rod Assemblies (CRAs), Thimble Plug Assemblies (TPAs), Rod Cluster Control Assemblies (RCCAs), Axial Power Shaping Rod Assemblies (APSRAs), Orifice Rod Assemblies (ORAs), Vibration Suppression Inserts (VSIs), Neutron Source Assemblies (NSAs) and neutron sources. For shielding purposes, the 24PTH-L and the 24PTH-S DSC are identical. Therefore, the shielding evaluation presented herein is not performed for the 24PTH-S DSC.

The 24PTH DSCs are also authorized to store Westinghouse 15x15 class Partial Length Shield Assemblies (PLSAs). The PLSAs are similar to regular fuel assemblies except that a portion (axial section) of the active fuel is replaced by stainless steel rods. In essence, a PLSA rod would therefore consist of a fuel section and a steel section. Fuel qualification of these PLSAs, therefore, requires that the combined source term from the irradiated active fuel and steel regions be bounded by the design basis source terms.

The NUHOMS[®] 24PTH DSC is also designed to store up to 8 failed fuel assemblies in the peripheral locations of the basket. Each failed fuel assembly is housed inside a failed fuel canister prior to loading in these designated positions within the basket.

Revision 22	Page P.5-2	January 2024
	All changes on this page are Amd 18	bunnuny 2021

For the 24PTH-L DSC, Heat Load Zoning Configuration 2 (Figure P.2-2) is the configuration that produces the highest dose rates on the surfaces of the HSM-H and OS197FC TC as compared to configurations 1, 3, 4, and 6 because the highest source fuel assemblies are on the outer periphery of the basket region where self-shielding due to adjacent assemblies is limited. This configuration 2 consists of 20 2.0 kW fuel assemblies located in the outer regions of the DSC. For the 24PTH-S-LC, which has only one heat load zoning configuration (Configuration 5, Figure P.2-5). To bound the shielding analysis for heat load zoning configuration 5, fuel assemblies with a decay heat of 1.5 kW at all 24 location is used. This results in a shielding analysis corresponding to a total of 36 kW decay heat per DSC which is very conservative because the total decay heat in 24PTH-S-LC DSC is limited to 24kW. These bounding gamma and neutron source terms are then used in the radiation shielding models to conservatively calculate dose rates on and around the NUHOMS[®]-24PTH system.

The bounding burnup, minimum initial enrichment and cooling time combinations for the fuel assemblies used in the shielding analyses of the 24PTH-L DSC in the HSM-H and the OS197FC TC are as follows:

- Dose rates with 24PTH-L DSC in HSM-H: 41 GWd/MTU, 3.3 wt. % U-235, 3.0-year cooled fuel
- Dose rates with 24PTH-L DSC in OS197FC TC: 62 GWd/MTU, 3.4 wt. % U-235, 5.6-year cooled fuel

The bounding burnup, minimum initial enrichment and cooling time combinations for the fuel assemblies used in the shielding analysis of the 24PTH-S-LC DSC are as follows:

- Dose rates with 24PTH-S-LC DSC in Standardized TC: 32 GWd/MTU, 2.6 wt. % U-235, 3.0-year cooled fuel (the same source term is assumed to be bounding for OS197/OS197H analysis)
- Dose rates with 24PTH-S-LC DSC in HSM-Model 102: 32 GWd/MTU, 2.6 wt. % U-235, 3.0-year cooled fuel (same as for Standardized TC)

Note that for the 24PTH-L DSC, the source terms are different for calculating dose rate when in HSM-H and OS197FC TC. However, for the 24PTH-S-LC DSC, the source terms are the same for calculating the dose rates when in HSM-Model 102 and Standardized TC. The method of selecting the bounding source terms is explained in detail in Section P.5.2.

The design basis CC source term that envelops all CCs allowed in the 24PTH DSCs is taken from Appendix J for BPRAs with burnups up to 36 GWd/MTU. While Appendix J was developed to specifically address the additional source from a BPRA, this source term is selected as the bounding source term for all CCs. The TPAs and ORAs do not extend into the active fuel region of a fuel assembly. Therefore, they are limited to the source term equivalent to the top

NUH-003		
Revision 22	Page P.5-3	January 2024
	All changes on this page are Amd 18.	

P.5.1 Discussion and Results

All 24PTH-L DSC MCNP calculations are performed for heat-load zoning configuration 2 which includes 20 design-basis PWR fuel assemblies (with CC) using 2.0 kW fuel. All 24PTH-S-LC DSC MCNP calculations are performed for 24 design-basis PWR fuel assemblies (with CC) using 1.5 kW fuel.

Table P.5-1 summarizes the maximum and average dose rates for the NUHOMS[®]-24PTH-L DSC loaded into the NUHOMS[®] HSM-H.

Table P.5-2 summarizes the maximum and average dose rates for the NUHOMS[®]-24PTH-S-LC DSC loaded into the NUHOMS[®] HSM-Model 102. Note that the HSM-H is more heavily shielded than the HSM-Model 102 (thicker roof, shield walls, front and back wall including HSM door); therefore, HSM-Model 102 is conservatively modeled to bound HSM-H.

Table P.5-3 provides a summary of the dose rates on and around the OS197FC TC for transfer of the 24PTH-L *Type 2* DSC under normal, off-normal and accident conditions. *Table P.5-3a provides similar dose rate results for the 24PTH-L Type 3 DSC*.

Table P.5-4 provides a summary of the dose rates on and around the OS197FC TC for decontamination and welding operations for the 24PTH-L *Type 2* DSC. *Table P.5-4a provides similar dose rate results for the 24PTH-L Type 3 DSC.*

Table P.5-5 provides a summary of the dose rates on and around the Standardized TC for transfer of the 24PTH-S-LC *Type 2* DSC under normal, off-normal and accident conditions. *Table P.5-5a provides similar dose rate results for the 24PTH-S-LC Type 3 DSC*.

The dose rates reported in Tables P.5-1 through *P.5-5a* are scaled by footnotes to account for dose rate increases due to the unified FQTs and corresponding source terms. The unified FQTs are documented in Section M.5.2.6, and the corresponding source terms are documented in Section P.5.2.6. The scaling factors are developed in Section P.5.4.11.

A discussion of the method used to determine the design-basis fuel source terms is included in Section P.5.2. The design basis CC source term which is from Appendix J is shown in Table P.5-12. The shielding material densities are given in Section P.5.3. The method used to determine the dose rates due to design-basis fuel assemblies with CC in the various NUHOMS[®] 24PT DSC design configurations is provided in Section P.5.4. The shielding evaluation is performed with the MCNP4C2 [5.2] or MCNP5 [5.19] code with the ENDF/B-VI cross section library. Sample input files used for calculating neutron and gamma source terms and dose rates are included in Section P.5.5.

NUH-003		
Revision 22	Page P.5-5	January 2024
	All changes on this page are Amd 18.	

The NUHOMS[®]-24PTH DSC is also authorized to store fuel assemblies containing Blended Low Enriched Uranium (BLEU) fuel material.

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The design basis CC source terms are developed based upon an examination of the following three BPRA types (1) B&W 15 X 15 (2 cycles, 5 year cooled), (2) WE 17 X 17 Pyrex Burnable Absorber (2 cycles, 10 year cooled), and (3) WE 17 X 17 WABA Burnable Absorber (2 cycles, 10 year cooled). All BPRA types are irradiated to a burnup of 36 GWd/MTU using ORIGEN2. The final design basis CC source term is a hybrid of the worst-case results for the top, plenum, and core regions for these three BPRA types. The core region is taken from the WE 17 X 17 Pyrex BPRA, while the top and plenum regions are taken from the B&W 15 X 15 BPRA.

High burnup BPRAs may have a burnup up to 45 GWd/MTU. As the design basis CC source term assumes only 36 GWd/MTU, additional cooling time is required for high-burnup CCs so that the CC source remains bounded by the design basis. Calculations show that high-burnup B&W 15 X 15 BPRAs are acceptable for storage after 8 years of decay time. Both WE 17 X 17 Pyrex Burnable Absorber and WE 17 X 17 WABA Burnable Absorber high-burnup BPRAs are acceptable for storage after 13 years of decay time.

CCs that exceed the design basis CC source terms per assembly as addressed in Table P.5-12 may be loaded if they will not result in exceeding the dose rates in Tables P.5-1 through P.5-5*a*, so long as the per DSC Technical Specification limit of Table 1-1n is met and the decay heat of the CC plus the fuel assembly does not exceed the limits of the applicable heat zone loading (HZL) configuration.

P.5.2.1.3 <u>Uncertainty in Gamma Source Terms</u>

Almost 100% of the gamma spectrum from light elements is in the range of 1.0 to 1.33 MeV which corresponds exactly to two the most prominent lines of ⁶⁰Co. As for fission products, the main contributors after six years with a fraction greater than 5% in the range of 0.01 to 0.90 MeV are: ⁹⁰Sr, ⁹⁰Y, ¹⁰⁶Rh, ¹³⁷Cs, ¹⁴⁴Pr, ¹⁵⁴Eu, and ¹⁵⁵Eu. Contributions from ⁹⁰Y, ¹⁰⁶Rh, ¹³⁷Cs, ¹⁴⁴Pr, and ¹⁵⁴Eu are dominant in the range of 0.90 to 1.50 MeV. ¹⁰⁶Rh, ¹⁴⁷Sm, and ¹⁴²Ce are the strongest emitters at energies greater than 2.0 MeV. The accuracy of gamma spectrum is dependent upon the energy. Photon rates computed for fission products tend to be more accurate then those for actinides because the calculation of their inventory has less uncertainty [5.1].

Shortly after discharge the emission at higher energies is dominated by actinides. This is true for energies >4 MeV at all cooling times and energy above 3.5 MeV for cooling times after 10 years [5.1]. The major part of this emission comes from ²⁴⁴Cm. Thus the uncertainty for energy groups of order 3.0 MeV and greater is bounded with the precision with which the inventory of ²⁴⁴Cm is calculated. Per SCALE 4.4 [5.1], reported experimental ²⁴⁴Cm densities are accurate within \pm 20%. The gamma emission intensity from Cm, which is proportional to the quantity of Cm in the actinide inventory, is bounded by this value. Uncertainty in the source strength in the gamma energy range 0.5 to 2.5 MeV is in the vicinity of 10 to 15 % [5.1].

P.5.2.2 <u>Neutron Source Term for MCNP</u>

One SAS2H/ORIGEN-S run is required for each burnup/initial enrichment/cooling time combination to determine the total neutron source term for the active fuel regions. At discharge the neutron source is almost equally produced from ²⁴²Cm and ²⁴⁴Cm. The other strong contributor is ²⁵²Cf, which is approximately 1/10 of the Cm intensity, but its share vanishes after 6 years of cooling time because the half-life of ²⁵²Cf is 2.65 years. The half-lives of ²⁴²Cm and

NUH-003		
Revision 22	Page P.5-10	January 2024
	All changes on this page are Amd 18.	

P.5.4 <u>Shielding Evaluation</u>

Dose rate contributions from the bottom, in core, plenum and top regions, as appropriate, from 20 or 24 0.490 MTU fuel assemblies with control components (CCs) are calculated with the MCNP4C2 Code [5.2] *or MCNP5 code [5.21]* at various locations on and around the NUHOMS[®] -24PTH DSCs, HSM, and TC.

The following shielding evaluation discussion specifically addresses the NUHOMS[®]-24PTH-L in an HSM-H or OS197FC TC, and the 24PTH-S-LC DSC in an HSM-Model 102, Standardized TC, *or OS197/OS197H TC* using the 0.490 MTU design-basis source terms determined in Section P.5.2.

Dose rate contributions from the bottom, in-core, plenum and top regions, as appropriate, from 24 0.380 MTU fuel assemblies with CCs are also calculated with the MCNP5 Code [5.21] at various locations on and around the NUHOMS[®] 24PTH DSCs within the HSM and TC.

The shielding evaluation that determines the effect of loading 0.380 MTU per assembly on the dose rates is described in Section P.5.4.11.

P.5.4.1 <u>Computer Program</u>

MCNP4C2 [5.2] is a general-purpose Monte Carlo N-Particle code that can be used for neutron, photon, electron, or coupled neutron/photon/electron transport. The code treats an arbitrary three-dimensional configuration of materials in geometric cells bounded by first- and second-degree surfaces and some special fourth-degree surfaces. Pointwise (continuous energy) cross-section data are used. For neutrons, all reactions given in a particular cross-section evaluation are accounted for in the cross section set. For photons, the code takes account of incoherent and coherent scattering, the possibility of fluorescent emission after photoelectric absorption, absorption in pair production with local emission of annihilation radiation, and bremsstrahlung. Important standard features that make MCNP4C2 very versatile and easy to use include a powerful general source; an extensive collection of cross-section data; and an extensive collection of variance reduction techniques that can be employed to track particles through very complex deep penetration problems.

An updated version of the MCNP code, MCNP5 [5.21] with the continuous energy ENDFB-VI cross section library is used to determine the dose rates for the shielding analysis described in Section P.5.4.11 *and for Type 3 basket analysis*. MCNP5 has been used to perform the shielding analysis of the 24PTH System (Appendix P5), the 32PT System (Appendix M5), the 32PTH1 System (Appendix U.5), and the 37PTH System (Appendix Z.5).

P.5.4.2 Spatial Source Distribution

The source components are:

- The neutron sources due to the active fuel region,
- The gamma source due to the active fuel region,

NUH-003		
Revision 22	Page P.5-17	January 2024
	All changes on this page are Amd 18.	

P.5.4.6.1 Source Term Assumptions

- The primary neutron source in LWR spent fuel is the spontaneous fission of ²⁴⁴Cm. For the ranges of exposures, enrichments, and cooling times in the fuel qualification tables, ²⁴⁴Cm represents more than 85% of the total neutron source. The neutron spectrum is, therefore, relatively constant for the fuel parameters addressed herein and is assumed to follow the ²⁴⁴Cm fission spectrum provided in Section P.5.2.2.
- Surface gamma dose rates are calculated for the HSM and cask surfaces using the actual photon spectrum applicable for each case.
- The design basis radiological sources are determined with SAS2H\ORIGEN-S depletion models corresponding to 0.490 MTU/FA heavy metal weight.

P.5.4.6.2 HSM-H Dose Rate Analysis Assumptions

- The 24PTH-L DSC and fuel assemblies are positioned as close to the HSM-H front door as possible to maximize the HSM-H front wall dose rates.
- Planes of reflection are used to simulate adjacent HSM-Hs.
- Embedments and rebar in the HSM-H concrete are conservatively neglected.
- The borated neutron absorber sheets in the 24PTH-L DSC are modeled as aluminum.
- Axial source distribution assumed as shown in Table P.5-13.
- Fuel is homogenized within the fuel compartment, although the 24PTH-L DSC basket is modeled explicitly.
- Basket steel plates are modeled as stainless steel. High-strength low-alloy steel (HSLA) is used in the Type 3 basket. The HSLA steel density is 7.83 g/cm³ (or 0.283 lb/in³ see Table P.3.3-10), which is approximately 1% below that of stainless steel. The effect on dose rates is not expected to be notable.

P.5.4.6.3 HSM-Model 102 Dose Rate Analysis Assumptions

- The HSM-Model 102 is not modeled in MCNP. Dose rates from the HSM-Model 102 analysis from Appendix N.5 are scaled appropriately to account for both the increase in source and decrease in DSC shield plug thicknesses as described in Section P.5.4.7.2.
- The relative change in the dose rate due to the decreased shield plug thicknesses can be estimated by treating the shield plugs as infinite planes and taking the ratio of attenuation.
- As it is estimated that the side and roof dose rates presented in Appendix N.5 are highly conservative because the fuel and basket are homogenized, additional scaling factors of 0.67 and 0.8 are introduced for gamma and neutron dose rates, respectively, at the side and roof of the HSM-Model 102 as described in Section P.5.4.7.2.

NUH-003		
Revision 22	Page P.5-19	January 2024
	All changes on this page are Amd 18.	

P.5.4.6.4 OS197FC TC and Standardized TC Dose Rate Analysis Assumptions

- The 24PTH-L *Type 2 and 3 DSCs are* modeled within the OS197FC TC. The 24PTH-S-LC *Type 2 and 3 DSCs are* modeled because it is bounded by the 24PTH-L DSC. The 24PTH-S-LC DSC is modeled within the Standardized TC. *The Type 2 basket bounds the Type 1 basket because the Type 2 basket does not have aluminum inserts in the transition rails. In this chapter, all Type 2 basket results also bound the Type 1 basket. The Type 2 and 3 baskets are explicitly modeled because the basket designs are different. Basket steel plates are modeled as stainless steel.*
- Only the OS197FC is modeled for the welding operation. Three inches of supplemental neutron shielding and one inch of steel are assumed to be placed on top of the 24PTH-L DSC cover plates during welding.
- During the accident case, the cask neutron shield (either water or NS-3) and the neutron shield jacket (outer steel skin) is assumed to be lost.
- The borated neutron absorber sheets in the 24PTH-L DSC and 24PTH-S-LC DSC are modeled as aluminum.
- Axial source distribution assumed as shown in Table P.5-13.
- Fuel is homogenized within the fuel compartments, although the 24PTH-L DSC and 24PTH-S-LC DSC baskets are modeled explicitly.
- In the OS197FC TC model, the gap in the cask lid is assumed to extend around the entire circumference of the lid.

P.5.4.7 Normal Condition Models

Three classes of *MCNP* models are developed: (1) 24PTH-L *Type 2* DSC in HSM-H, (2) 24PTH-L *Type 2 or 3* DSC in OS197FC TC, and (3) 24PTH-S-LC *Type 2 or 3* DSC in Standardized TC. A fourth scenario, 24PTH-S-LC DSC in HSM-Model 102, is analyzed by scaling the results from a similar analysis in Appendix N.5. These models are described in subsequent sections.

P.5.4.7.1 <u>24PTH-L DSC in HSM-H</u>

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Two three-dimensional MCNP4C2 models are developed for the 24PTH-L *Type 2* DSC within a HSM-H, one model for neutrons and the other for gammas. These models are presented in Figure P.5-3 through Figure P.5-7. The HSM-H length is designated as the x axis, the width as the y axis, and the height as the z axis. The HSM-H door is designated as the south side and the -x direction, with the east wall as the -y direction. The roof is the +z direction. The east wall is designated as a reflective boundary and an end shield wall (3 ft thick) is attached to the west wall.

	All changes on this page are Amd 18.	ý
Revision 22	Page P.5-20	January 2024
NUH-003		
The bottom (bottom of bottom fitting) of the fuel assembly is assigned to an x plane at -213.84 cm. The center of the HSM-H is at y=0 and z=0. The 24PTH-L DSC lid is located 5" from the HSM-H rear wall (x=254.84 cm) which places the bottom of the DSC at x=-232.69 cm, about 9.5 in from the door interior. The 24PTH-L DSC support rails are not included in the model. The heat shields are modeled as flat plates without fins or louvers, and horizontal vent "liner" plates (2 cm thick) are modeled in the top side vents.

Dose rates are calculated on thin cells surrounding the HSM-H and are segmented into 30 cm increments to capture the peak dose rates. Dose rates are also calculated at the inlet and outlet vents. Dose rates for this scenario are provided in Table P.5-1. Dose rates for the front, roof, and side shield wall surface at DSC centerline of the HSM-H are also plotted as a function of distance in Figure P.5-16 through Figure P.5-18 respectively.

A sample MCNP4C2 model input file of HSM-H with 24PTH-L *Type 2* DSC is included in Section P.5.5.2.

Explicit models of the 24PTH-L Type 3 DSC inside the HSM-H are not developed because the explicit MCNP analysis of the 24PTH-L Type 3 DSC inside the OS197 TC (see Section P.5.4.7.3) indicates that side dose rates decrease due to the aluminum transition rails in the Type 3 basket. Because dose rates at inlet and outlet vents are primarily due to radiation that exits the side of the DSC, vent dose rates will decrease for the Type 3 basket compared to the Type 2 basket. However, based on the OS197FC TC analysis, the dose rates at the bottom of the cask (i.e., at the bottom of the DSC) increase for the Type 3 basket.

Because the bottom of the DSC is positioned near the HSM-H door, a door centerline dose rate for the Type 3 basket is added to Table P.5-1 and is obtained by scaling the door centerline dose rate computed with the Type 2 basket. Because the door centerline dose rate is gammadominated, the scaling factor is developed as the ratio of the maximum bottom gamma dose rates from Table P.5-3 and Table P.5-3a, or 2440/1660 = 1.47. The scaled door centerline dose rate is then (1.3 mrem/hr)(1.47) = 1.9 mrem/hr.

P.5.4.7.2 <u>24PTH-S-LC DSC in HSM-Model 102</u>

MCNP4C2 was not used for the shielding analysis of the HSM-Model 102. Rather, dose rates on the surface of the HSM-Model 102 were estimated by appropriately scaling the HSM-Model 102 results from Appendix N.5 to properly account for the differences in source and DSC designs.

First, the scaling factors due to the higher source are determined. These scaling factors are generated by comparing the sources from Appendix N.5 to the design basis sources for the HSM-Model 102 from Table P.5-11. The design basis gamma source from Appendix N.5 is for a decay heat of 1.3 kW/assembly, 46.1 GWd/MTU burnup, 3.2 wt.% U-235, and 5.5 years cooled, as shown in Appendix N.5, Table N.5-10. The design basis neutron source is 9.65E+08 n/s, from Table N.5-13 of Appendix N.5.

	All changes on this page are Amd 18.	
Revision 22	Page P.5-21	January 2024
NUH-003		

The neutron source scaling factor would simply be the ratio of the total source strengths, or 0.22, because both neutron sources follow the Cm-244 spectrum. As can be seen, the neutron source from Appendix N.5 is stronger than the 24PTH neutron source by this factor. For the gammas, it is necessary to compare the sources on a group by group basis because the spectra are different.

Using the HSM-H response function from Table P.5-18, it may be demonstrated that the gamma dose rate on the HSM surface is dominated by gammas in groups 29, 31, and 32 (i.e, 1-1.33 MeV, 1.33-1.66 MeV, and 2-2.5 MeV), so further analysis is limited to these three groups. The gamma scaling factor is then generated by weighting the dose rate fraction of each of these three energy groups for the Appendix N.5 gamma source by the ratio of gammas in each energy group and summing the results. Using this methodology, the gamma source scaling factor is approximately 1.6.

Note that the gamma source scaling factor of 1.6 is valid only when the source is dominated by the fuel, such as the HSM-Model 102 roof, side, front vent, and roof vent. At the front and back of the HSM-Model 102, where dose rates are assumed to have roughly equal contributions from the nozzles and fuel, the scaling factor must be reexamined. The dose rate from the nozzles is primarily from Co-60, which is in energy groups 31 and 32. The gamma ratio for these energy groups is approximately 1.04, so that the gamma energy scaling factors at the front and back are approximately 0.5*1.04+0.5*1.6*24/20~1.6. The factor 24/20 is introduced at the ends because the 24PTH-S-LC DSC contains 24 assemblies, while Appendix N.5 utilized only 20 design basis assemblies. The scaling factor at the HSM-Model 102 side do not need this 24/20 factor because the center four assemblies are self-shielded.

NUH-003		
Revision 22	Page P.5-21a	January 2024
	All changes on this page are Amd 18.	

Explicit MCNP analysis of the 24PTH-S-LC Type 3 DSC inside the Standardized TC (see Section P.5.4.7.4) indicates that side dose rates decrease due to the aluminum transition rails in the Type 3 basket. Because dose rates at inlet and outlet vents are primarily due to radiation that exits the side of the DSC, vent dose rates will decrease for the Type 3 basket compared to the Type 2 basket. However, based on the Standardized TC analysis, the dose rates at the bottom of the cask (i.e., at the bottom of the DSC) increase for the Type 3 design.

Because the bottom of the DSC is positioned near the HSM Model 102 door, a door centerline dose rate for the Type 3 basket is added to Table P.5-2 and is obtained by scaling the door centerline dose rate computed with the Type 2 basket. Because the door centerline dose rate is gamma-dominated, the scaling factor is developed as the ratio of the maximum bottom gamma dose rates from Table P.5-5 and Table P.5-5a, or 6360/4420 = 1.44. The scaled door centerline dose rate is then (62.2 mrem/hr)(1.44) = 90 mrem/hr.

P.5.4.7.3 <u>24PTH-L DSC in OS197FC TC</u>

Two three-dimensional MCNP4C2 models are employed for shielding analyses of the 24PTH-L Type 2 DSC within an OS197FC TC, one model for neutrons and the other for gammas. These models are presented in Figure P.5-8 through Figure P.5-11. The z-axis in the MCNP models coincides with the axis of rotation of the cask and the 24PTH-L DSC. Select features within the cask and on its surface are neglected because they produce only localized effects and have minimal impact on operational dose rates. Examples of neglected features include the 24 neutron shield panel support angles, the 4 trunnions, relief valves, clevises, and eyebolts. With the exception of the 24 neutron shield support angles and the trunnions, the balance of these items are local features that increase the shielding in a small area without replacing any of the shielding material which is included in the model. The additional shielding material that these features provide is not smeared into the bulk shielding, nor is any credit taken for it in the occupational exposure calculation. The 24 neutron shield support angles provide support for the neutron shield skin, which contains the water for the neutron shield. The steel that forms these angles is not smeared with the water in the neutron shield; rather it is modeled as water. This is conservative for gamma radiation because water is less than one seventh the density of steel. The density of the neutron shield water used in the cask MCNP models is 0.96 g/cm³. The resultant reduction in the hydrogen density as compared to full density water results in the water attenuating the neutron dose rate at about the same rate as that for full density steel. Therefore, replacing the steel with the lower density water results in little to no effect on the neutron dose rate outside the cask.

The trunnions penetrate the neutron shield, which locally changes the shielding configuration of the neutron shield. The trunnions are thick steel structures filled with NS-3 neutron shielding material. These structures protrude well past the neutron shield and are made of materials which provide more gamma shielding and comparable neutron shielding as compared to the 0.96 g/cm³ water that these replace. In addition, with the exception of the neutron shield support angles, none of these features is located near the axial center of the cask where the surface dose rate is the largest due to the axial peaking of the fuel.

Design features relevant to the shielding analysis of the OS197FC TC and 24PTH-L DSC are modeled in MCNP4C2. The overall length of the OS197FC TC is 202.97". The outer diameter of the OS197FC TC is 85.50" (neutron shield included). The outer diameter excluding the neutron shield is 79.12". The bottom of the OS197FC TC is designed to mate with a 24PTH-L DSC. The overall length of the 24PTH-L DSC is 192.55" (excluding the grapple) and its outer diameter is 67.19". The bottom end of the 24PTH-L DSC is in contact with the structural shell assembly of the transfer cask.

The OS197FC TC has a ventilated top lid to facilitate air circulation using fan as described in Section P.4.7. In MCNP4C2, the ventilation cutouts in the top cover assembly are modeled as complete annular gaps. The supporting steel around the bolts is not included for modeling convenience and conservatism in the results. Likewise, the neutron shielding in the top lid is also reduced to the inner radial dimension to conservatively account for the bolt cutouts. Use of cone adapters and cask spacers during air circulation will offset shielding lost by the removal of ram access cover.

	All changes on this page are Amd 18.	
Revision 22	Page P.5-23	January 2024
NUH-003		

NILLIT 002

Dose rates for *the 24PTH-L Type 2 DSC in the OS197FC TC* are provided in Table P.5-3. Dose rates at the sides, top, and bottom of this cask are presented graphically in Figure P.5-19 through Figure P.5-21.

A sample MCNP4C2 model input file for OS197FC TC with 24PTH-L *Type 2* DSC is included in Section P.5.5.3.

Because the 24PTH-L Type 3 basket design is significantly different than the 24PTH-L Type 2 basket design, an explicit MCNP5 model is developed for the 24PTH-L Type 3 basket based upon the drawings provided in Section P.1. The OS197FC TC cask model, dose rate tallies, and source terms are identical to the 24PTH-L Type 2 DSC MCNP model. Separate MCNP models are developed for gamma, neutron, and secondary gamma radiation to facilitate the use of weight windows generated by ADVANTG [5.22]. A cross-sectional view of the Type 3 basket is provided in Figure P.5-25. Dose rates for the 24PTH-L Type 3 DSC in the OS197FC TC are provided in Table P.5-3a.

Comparing the dose rates in Table P.5-3 and Table P.5-3a, side dose rates decrease for the Type 3 basket compared to the Type 2 basket due to the different transition rail design. However, because the basket members are generally lighter in the Type 3 basket, the end dose rates increase for the Type 3 basket compared to the Type 2 basket.

P.5.4.7.4 <u>24PTH-S-LC in Standardized TC</u>

Two three-dimensional MCNP4C2 models are employed for shielding analyses of the 24PTH-S-LC *Type 2* DSC within a Standardized TC, one model for neutrons and the other for gammas. These models are presented in Figure P.5-12 through Figure P.5-15. The z-axis in the MCNP models coincides with the axis of rotation of the cask and the 24PTH-DSC. Select features within the cask and on its surface are neglected because they produce only localized effects and have minimal impact on operational dose rates. Examples of neglected features include the 24 neutron shield panel support angles, the 4 trunnions, relief valves, clevises, and eyebolts as justified in Section P.5.4.7.3. Design features relevant to the shielding analysis of the cask and DSC are modeled in MCNP.

The overall length of the standardized transfer cask is 192.97". The outer diameter of the cask is 85.50" (neutron shield included). The outer diameter excluding the neutron shield is 79.12". The bottom of the transfer cask is designed to mate with a DSC. The overall length of the 24PTH-S-LC is 186.55", and its outer diameter is 67.19". The bottom end of the 24PTH-DSC is in contact with the structural shell assembly of the transfer cask.

Dose rates *the 24PTH-S-LC Type 2 DSC in the Standardized TC* are provided in Table P.5-5. Dose rates at the sides, top, and bottom of this cask are presented graphically in Figure P.5-22 through Figure P.5-24.

NUH-003		
Revision 22	Page P.5-24	January 2024
	All changes on this page are Amd 18.	

Because the 24PTH-S-LC Type 3 basket design is significantly different than the 24PTH-S-LC Type 2 basket design, an explicit MCNP5 model is developed for the 24PTH-S-LC Type 3 basket based upon the drawings provided in Section P.1.

The 24PTH-S-LC DSC has lead in the top and bottom shield plugs. There are two primary fabrication options for the lead shield plugs. Option A is a poured-lead design and is featured in the original Type 2 basket MCNP models. Option B is a machined-lead design and is featured in the Type 3 basket MCNP models. For option B, 1/8 inch radial gaps are modeled between all lead shield plugs and steel interfaces, and the lead density is reduced from 11.34 g/cm³ to 11.0 g/cm³ (3% reduction in density to account for potential voids in the lead). The shield plug lead thickness is also reduced for option B compared to option A, as indicated in the drawings provided in Section P.1. Therefore, option B results in higher cask end dose rates than option A.

The Standardized TC model, dose rate tallies, and source terms are identical to the Type 2 basket MCNP model. Option B is a pre-cast insert, and for the top shield plug, may be provided as a single-piece or a two-piece configuration, where the two-piece option consists of two layers stacked together with a combined thickness equivalent to that of the single-piece configuration. Separate MCNP models are developed for gamma, neutron, and secondary gamma radiation to facilitate the use of weight windows generated by ADVANTG [5.22]. A cross-sectional view of the Type 3 basket is provided in Figure P.5-25. Dose rates for the 24PTH-S-LC Type 3 DSC in the Standardized TC are provided in Table P.5-5a.

Comparing the dose rates in Table P.5-5 and Table P.5-5a, side dose rates decrease for the Type 3 basket compared to the Type 2 basket due to the different transition rail design. However, because the basket members are generally lighter in the Type 3 basket, the end dose rates increase for the Type 3 basket compared to the Type 2 basket. In addition, end dose rates also increase due to modeling the machined-lead shield plug option.

P.5.4.7.5 <u>24PTH-S-LC DSC in the OS197/OS197H TC</u>

The 24PTH-S-LC DSC may also be transferred in the OS197/OS197H TC. No explicit MCNP models are developed for this configuration because it is bounded by previously analyzed configurations.

Recall the 24PTH-L DSC/OS197 TC analysis is performed for source terms consistent with heat load zone configuration (HLZC) 2. These source terms are much stronger than the HLZC 5 source terms developed for the 24PTH-S-LC DSC. The basket cross-section is also the same for the 24PTH-L and 24PTH-S-LC DSCs. Therefore, the 24PTH-L DSC/OS197 TC side dose rates presented in Tables P.5-3 and P.5-3a bound the side dose rates for the 24PTH-S-LC DSC within the OS197 TC.

The OS197 TC and Standardized TC have the same shielding dimensions and materials on the bottom and top (i.e., lid), although the OS197 TC is longer than the Standardized TC. Therefore, when the 24PTH-S-LC DSC is transferred in the OS197 TC, the Standardized TC bottom and top dose rates from Tables P.5-5 and P.5-5a remain bounding.

P.5.4.8 Accident Models

No accident models were developed for the HSM-H because no accident scenario in Chapter P.11 has been identified that would alter the dose rates provided in Table P.5-1. For the HSM-Model 102 in an array, in an accident condition HSM-Model 102 is assumed to slide next to an adjacent HSM and therefore double the gap on one side as described in Chapter P.11. It is further conservatively assumed the dose rates from the array double as a result of this accident. The HSM-Model 102 accident analysis and results are provided in Chapter P.11.

For both the OS197FC TC and Standardized TC, accident cases are performed assuming the neutron shield and steel neutron shield jacket (outer skin) of each have been torn off. *The accident analysis for damaged fuels assumed as rubble is performed in Section U.5.4.8; the same conclusion is applicable for the 24PTH system. Therefore, the accident analysis performed with intact fuels is applicable to all fuel conditions.* Accident dose rates at 1m, 100m, and 500m from the side of the cask are presented in Table P.5-3 and Table P.5-5 for the OS197FC TC and Standardized TC, respectively. *Because accident dose rates are dominated by radiation exiting the side of the cask, accident dose rates computed for the Type 2 basket bound the Type 3 basket, as side dose rates decrease for the Type 3 basket.*

P.5.4.9 OS197FC TC Models During Fuel Loading Operations

MCNP models are developed for the cask decontamination and welding operations during fuel loading using the 24PTH-L *Type 2 and 3 DSCs*. As the *side and top* dose rates from this cask with 24PTH-L DSC bounds the 24PTH-S-LC DSC due to the higher source term used in 24PTH-L DSC, calculations are not performed for the loading operations with Standardized TC with 24PTH-S-LC DSC.

Cask Decontamination. The 24PTH-L DSC and the OS197FC TC are assumed to be completely filled with water, including the region between 24PTH-DSC and cask, which is referred to as the "cask/24PTH-DSC annulus." The 24PTH-DSC inner cover plate is assumed to be in place and the temporary shielding has not yet been installed. Results for this case are provided in Table P.5-4 and Table P.5-4a for the Type 2 and 3 baskets, respectively.

Welding and 24PTH-L DSC Draining. Before the start of welding operation, approximately 60% of the water in the DSC cavity is removed due to hydrogen generation. A dry DSC cavity is assumed in all welding models to be conservative. Temporary shielding consisting of three inches of NS3 and one inch of steel is assumed to cover the 24PTH-L DSC top shield plug. In addition, the DSC outer top cover plate is not present. The cask/24PTH-DSC annulus is assumed to remain completely filled with water. Results for this case are provided in Table P.5-4 and Table P.5-4a for the Type 2 and 3 baskets, respectively.

NUH-003		
Revision 22	<i>Page P.5-24</i> b	January 2024
	All changes on this page are Amd 18.	

P.5.4.10 Impact on Dose Rates due to Reduced Density Concrete and Gaps between HSMs

A bounding analysis is performed by employing a minimum concrete density of 140 pounds per cubic foot (pcf) in the HSM-H MCNP model combined with a maximum gap of 1.5 inches between adjacent HSM-H modules and shield walls to determine the effect on maximum and average dose rates due to a fully loaded 32PTH1 DSC. These calculations are documented in Appendix U.5, Section U.5.4.10. The ratios shown in Appendix U.5, Table U.5-18 and Table U.5-19 can be used as scaling factors to increase the maximum and surface-average dose rates of the 24PTH in the HSM-H to account for low density concrete and 1.5-inch gaps during HSM fabrication and installation. Note that the HSM-H concrete contains high density rebar which is not credited in the MCNP models. Further, the modules are installed adjacent to each other such that there will not be a "uniform" gap of 1.5 inches. Ignoring the effect due to increased vent dose rates, the increase in the average dose rates caused by both the maximum postulated uniform gaps and the minimum postulated concrete density is expected to be less than 20% at the front and roof surfaces of the HSM-H module. Dose reduction hardware may be installed to further reduce these dose rates.

P.5.4.11 Shielding Analysis with a Loading of 0.380 MTU per Fuel Assembly

As discussed in Section P.5.4, additional shielding analysis is performed with a reduced Uranium loading of 0.380 MTU per fuel assembly. The objective of this analysis is to determine the impact that reduced uranium loading has on system dose rates. The results of this analysis are employed to scale the dose rate results for the 24PTH System (all DSCs). For this purpose, the MCNP4C2 models used for the 0.490 MTU analyses are rerun using MCNP5 with updated source terms as described in P.5.2.6, and with updated material specifications to reflect the reduction in MTU. MCNP5 calculations are performed for the 24PTH-L *Type 2* DSC inside the HSM-H in the normal storage configuration, and dose rate scaling factors are derived using the same methodology as that described in Appendix U, Section U.5.4.12. MCNP5 calculations are also performed for the 24PTH-L *Type 2* DSC inside the OS197 TC in the decontamination and welding configurations, and in the normal and accident transfer configurations, and dose rate and occupational exposure scaling factors are derived using the same methodology as that described in Appendix U section U.5.4.12. These results are also applicable to the 24PTH-S and 24PTH-S-LC DSCs. Based on the updated results, six scaling factors are determined and are summarized as follows:

NUH-003		
Revision 22	Page P.5-25	January 2024
	All changes on this page are Amd 18.	

- The dose rates for the HSM-H front and roof are to be scaled by 1.13.
- The dose rates for the HSM-H side and rear are to be scaled by 1.30.
- The site dose for the HSM is to be scaled by 1.13.
- The dose rates for the TC for normal, welding and decontamination are to be scaled as follows:
 - No scaling is required for the side,
 - by 1.18 for the top,
 - by 1.19 for the bottom.
- The dose rates for the TC for accidents are to be scaled by 1.13.
- The occupational exposure for the TC loading and storage operations is to be scaled by 1.10.

These scaling factors are included as footnotes in the dose rate results summarized in Table P.5-1 through Table P.5-5*a*, Table P.5-21, Table P.5-22, Table P.5-24, and Table P.5-26.

These scaling factors are also used to scale the occupational exposure and generic site dose (2X10 back-to-back and front-to-front arrays) results calculated for the 24PTH System in Appendix P.10, and to scale the dose rate consequences of accidents for the 24PTH System in Appendix P.11.

For the 24PTH-S or -L DSC, HLZC 2 is bounding, with 2.0 kW/FA in the peripheral region. Comparing HLZC 1 through 4 and HLZC 6, the highest heat load is 2.5 kW/FA and occurs in the inner region of HLZC 6. Based on the methodology provided in Section B 10 TS 2, the 2.5 kW/FA FQT is included in the Technical Specifications [1.TS] and is applicable to all fuel to be loaded in the 24PTH-S or -L DSC. The 2.0 kW/FA FQT is also provided in the Technical Specifications and is applicable only to the peripheral region of HLZC 2 and 3. The complete set of FQTs is provided in Appendix M.2.

The 24PTH-S-LC DSC uses only HLZC 5. For this DSC, the 1.5 kW/FA FQT is included in the Technical Specifications [1.TS] and is applicable to all fuel to be loaded in the 24PTH-S-LC DSC.

NUH-003	D D 6 06	
Revision 22	Page P.5-25a	January 2024
	All changes on this page are Amd 18.	

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Revision 22	Page P.5-64	January 2024
Revision 22	Page P.5-64	January 2024

Table P.5-1Summary of NUHOMS®-24PTH-L DSC in HSM-H, Maximum and Average Dose Rates,
Configuration 2 (2) (6)

Dose Rate Location	Maximum Gamma (mrem/hr)	Gamma MCNP 1σ Error	Maximum Neutron (mrem/hr)	Neutron MCNP 1σ Error	Maximum Total ^(1, 5) (mrem/hr)	Total MCNP 1σ Error
HSM Roof (centerline) ⁽³⁾	20.1	0.038	0.5	0.018	20.6	0.037
HSM Roof Birdscreen ⁽³⁾	205.8	0.019	4.1	0.012	209.9	0.018
HSM End (Side) Shield Wall Surface ⁽⁴⁾	3.4	0.081	0.1	0.016	3.5	0.079
HSM Door Exterior Surface (centerline) ^{(3) (7)}	1.3	0.143	0.1	0.524	1.3	0.139
HSM Front Birdscreen ⁽³⁾	1232.0	0.068	5.5	0.076	1237.0	0.068

Dose Rate Location	Average (mrem/hr)	Gamma MCNP 1 o Error	Average Neutron (mrem/hr)	Neutron MCNP 1 o Error	Average Total (mrem/hr) ⁽⁵⁾	Total MCNP 1σ Error
HSM Roof ⁽³⁾	20.3	0.011	0.5	0.006	20.8	0.011
HSM End (Side) Shield Wall Surface ⁽⁴⁾	1.0	0.016	0.1	0.033	1.1	0.015
HSM Front ⁽³⁾	32.2	0.047	0.1	0.066	32.3	0.047
HSM Back Shield Wall ⁽⁴⁾	0.6	0.074	0.1	0.025	0.6	0.074

Notes:

(1) Gamma and Neutron dose rate peaks do not always occur at same location; therefore, the total dose rate is not always the sum of the gamma plus neutron dose rate.

(2) Dose rates calculated using Configuration 2 in 24PTH-L DSC bounds configurations 1, 3, 4, and 6. Dose rates can be higher by 6% to account for the use of grout during HSM fabrication and installation.

(3) These dose rates increase by 13% when loading 0.380 MTU FAs.

(4) These dose rates increase by 30% when loading 0.380 MTU FAs.

(5) Use the ratios shown in Appendix U.5, Table U.5-18 and Table U.5-19 to increase the maximum and surface-average dose rates, respectively to account for reduced density concrete and gaps of up to 1.5" as described in Appendix U.5, Section U.5.4.10.

(6) Dose rates are applicable to the Type 1, 2, and 3 baskets.

(7) The door centerline dose rate provided in the table is for the Type 2 basket. Total dose rate increases to 1.9 mrem/hr for the Type 3 basket (2.2 mrem/hr including note (3)).

NUH-003		
Revision 22	Page P.5-65	January 2024
	All changes on this page are Amd 18.	

Table P.5-2 Summary of NUHOMS®-24PTH-S-LC DSC in HSM-Model 102, Maximum and Average Dose Rates, Configuration 5^{(1) (4)}

Dose Rate Location	Maximum Gamma (mrem/hr)	Maximum Neutron (mrem/hr)	Maximum Total (mrem/hr)
HSM Roof (centerline) ⁽²⁾	59.3	0.2	59.5
HSM Roof Birdscreen ⁽²⁾	976.5	3.2	979.7
HSM End (Side) Shield Wall Surface ⁽³⁾	266.9	0.3	267.2
HSM Door Exterior Surface ^{(2) (5)} (centerline)	60.6	1.6	62.2
HSM Front Birdscreen ⁽²⁾	489.6	2.5	492.1
HSM Back Shield Wall ⁽³⁾	2.5	0.02	2.5

Dose Rate Location	Average Gamma (mrem/hr)	Average Neutron (mrem/hr)	Average Total (mrem/hr)
HSM Roof ⁽²⁾	47.3	0.2	47.5
HSM End (Side) Shield Wall Surface ⁽³⁾	31.7	0.1	31.8
HSM Front ⁽²⁾	45.6	0.9	46.5
HSM Back Shield Wall ⁽³⁾	0.8	0.01	0.8

Notes:

- (1) Dose rates can be higher by 6% to account for the use of grout during HSM fabrication and installation.
- (2) These dose rates increase by 13% when loading 0.380 MTU FAs.
- (3) These dose rates increase by 30% when loading 0.380 MTU FAs.
- (4) Dose rates are applicable to the Type 2 and 3 baskets.
- (5) The door centerline dose rate provided in the table is for the Type 2 basket. Total dose rate increases to 90 mrem/hr for the Type 3 basket (101 mrem/hr including note (2)).

NUH-003		
Revision 22	Page P.5-66	January 2024
	All changes on this page are Amd 18.	

Table P.5-3 Summary of NUHOMS®-24PTH-L Type 2 DSC, OS197FC TC Maximum Dose Rates During Transfer Operations, Configuration 2

Dose Rate Location	Maximum Gamma	Gamma MCNP	Maximum Neutron	Neutron MCNP	Maximum Total ⁽¹⁾	Total MCNP
	(mrem/hr)	1 σ Error	(mrem/hr)	1 σ Error	(mrem/hr)	1 σ Error
Cask Side Surface (Radial) ⁽³⁾	7.45E+02	0.0180	7.56E+02	0.0120	1.50E+03	0.0108
Cask Top Axial Surface ⁽⁴⁾	2.37E+02	0.0566	4.48E+01	0.0499	2.61E+02	0.0523
Cask Bottom Axial Surface ⁽⁵⁾	1.66E+03 ⁽²⁾	0.0353	2.57E+03 ⁽²⁾	0.0246	4.23E+03 ⁽²⁾	0.0204
1 ft from Cask Side (Radial) ⁽³⁾	4.76E+02	0.0179	4.82E+02	0.0107	9.58E+02	0.0104
1 ft from Cask Top Axial Surface ⁽⁴⁾	7.86E+01	0.0741	3.11E+01	0.0455	9.58E+01	0.0636
1 ft from Cask Bottom Axial Surface ⁽⁵⁾	9.80E+02	0.0355	9.44E+02	0.0340	1.92E+03	0.0246
3 ft from Cask Side (Radial) ⁽³⁾	2.85E+02	0.0163	2.78E+02	0.0096	5.63E+02	0.0095
3 ft from Cask Top Axial Surface ⁽⁴⁾	3.95E+01	0.1189	1.47E+01	0.0550	5.05E+01	0.0972
3 ft from Cask Bottom Axial Surface ⁽⁵⁾	3.44E+02	0.0341	2.79E+02	0.0600	6.23E+02	0.0328
Cask 1 m (Radial) Accident Condition ⁽⁶⁾	3.10E+02	0.0677	3.19E+03	0.0124	3.51E+03	0.0128
Cask 100 m (Radial) Accident Condition ⁽⁶⁾	1.50E-01	0.0297	5.10E-01	0.0134	6.61E-01	0.0124
Cask 500 m (Radial) Accident Condition ⁽⁶⁾	4.95E-04	0.0250	4.10E-04	0.0305	9.05E-04	0.0194

Notes:

(1) Gamma and Neutron dose rate peaks do not always occur at same location; therefore, the total dose rate is not always the sum of the gamma plus neutron dose rate.

(2) The peak bottom surface dose rate is directly below the grapple ring cut out in the bottom of the cask. The bottom average dose rates, including the grapple area, are 340 mrem/hr gamma, 419 mrem/hr neutron for a total average dose rate of 758 mrem/hr.

(3) The Side dose rates do not need to be scaled when loading 0.380 MTU FAs.

(4) The Top dose rates increase by 18% when loading 0.380 MTU FAs.

(5) The Bottom dose rates increase by 19% when loading 0.380 MTU FAs.

(6) The Accident dose rates increase by 13% when loading 0.380 MTU FAs.

NUH-003		
Revision 22	Page P.5-67	January 2024
	All changes on this page are Amd 18.	

Table P.5-3aSummary of NUHOMS®-24PTH-L Type 3 DSC, OS197 FC Maximum Dose Rates DuringTransfer Operations, Configuration 2

Dose Rate Location	Maximum Gamma (mrem/hr)	Gamma MCNP 1 a Error	Maximum Neutron (mrem/hr)	Neutron MCNP 1 a Error	Maximum Total ⁽¹⁾ (mrem/hr)	Total MCNP 1 σ Error
Cask Side Surface (Radial) $^{(3)}$	6.14E+02	0.0010	6.40E+02	0.0018	1.25E+03	0.0010
Cask Top Axial Surface ⁽⁴⁾	2.48E+02	0.0378	6.07E+01	0.0060	2.73E+02	0.0344
Cask Bottom Axial Surface ⁽⁵⁾	2.44E+03 ⁽²⁾	0.0063	3.11E+03 ⁽²⁾	0.0028	5.55E+03 ⁽²⁾	0.0032
1 ft from Cask Side (Radial) ⁽³⁾	3.87E+02	0.0009	4.09E+02	0.0017	7.95E+02	0.0010
1 ft from Cask Top Axial Surface ⁽⁴⁾	7.73E+01	0.0480	3.99E+01	0.0051	9.43E+01	0.0394
1 ft from Cask Bottom Axial Surface ⁽⁵⁾	1.38E+03	0.0072	1.12E+03	0.0031	2.49E+03	0.0042
3 ft from Cask Side (Radial) ⁽³⁾	2.28E+02	0.0009	2.38E+02	0.0015	4.66E+02	0.0009
3 ft from Cask Top Axial Surface ⁽⁴⁾	3.67E+01	0.0583	1.92E+01	0.0099	4.84E+01	0.0444
3 ft from Cask Bottom Axial Surface ⁽⁵⁾	4.80E+02	0.0100	<i>3.09E</i> + <i>02</i>	0.0042	7.88E+02	0.0063
Accident		Accident do	se rates in Tabl	le P.5-3 rema	in applicable	

Notes:

(1) Gamma and Neutron dose rate peaks do not always occur at the same location; therefore, the total dose rate is not always the sum of the gamma plus neutron dose rate.

(2) The peak bottom surface dose rate is directly below the grapple ring cut out in the bottom of the cask. The bottom average dose rates, including the grapple area, are 424 mrem/hr gamma, 484 mrem/hr neutron, for a total average dose rate of 908 mrem/hr.

(3) The Side dose rates do not need to be scaled when loading 0.380 MTU FAs.

(4) The Top dose rates increase by 18% when loading 0.380 MTU FAs.

(5) The Bottom dose rates increase by 19% when loading 0.380 MTU FAs.

Revision 22	Page P.S-0/a	January 2024
NUH-003 Devision 22	$D_{resc} D \leq 67_{0}$	Ian. am. 2024

Table P.5-4

Summary of NUHOMS[®]-24PTH-L *Type 2* DSC, OS197FC TC Maximum Dose Rates During Decontamination and Welding Operations, Configuration 2

Dose Rate Location	Maximum Gamma (mrem/hr)	Gamma MCNP 1 o Error	Maximum Neutron (mrem/hr)	Neutron MCNP 1σ Error	Maximum Total ⁽¹⁾ (mrem/hr)	Total MCNP 1σ Error
		Decontamin	ation			
Cask Side Surface (Radial) ⁽⁴⁾	4.34E+02	0.0210	8.23E+02	0.0069	1.26E+03	0.0085
Top Axial Surface ⁽⁵⁾	7.83E+02	0.0272	3.14E-01	0.2858	7.83E+02	0.0272
Cask Bottom Axial Surface ⁽⁶⁾	1.15E+03 ⁽²⁾	0.0478	5.83E+01 ⁽²⁾	0.0126	1.21E+03 ⁽²⁾	0.0455
1 ft from Cask Side (Radial) ⁽⁴⁾	2.82E+02	0.0206	5.32E+02	0.0060	8.14E+02	0.0082
1 ft from Top Axial Surface ⁽⁵⁾	5.93E+02	0.0262	1.05E+01	0.0304	5.93E+02	0.0262
1 ft from Cask Bottom Axial Surface ⁽⁶⁾	7.07E+02	0.0486	2.73E+01	0.0215	7.29E+02	0.0471
3 ft from Cask Side (Radial) ⁽⁴⁾	1.68E+02	0.0187	3.14E+02	0.0054	4.83E+02	0.0074
3 ft from Top Axial Surface ⁽⁵⁾	4.02E+02	0.0305	9.40E+00	0.0099	4.03E+02	0.0305
3 ft from Cask Bottom Axial Surface ⁽⁶⁾	2.54E+02	0.0494	1.86E+01	0.0085	2.62E+02	0.0480
		Welding	3			
Cask Side Surface (Radial) ⁽⁴⁾	6.22E+02	0.0224	5.46E+02	0.0123	1.17E+03	0.0132
Top Axial Surface ⁽⁵⁾	8.56E+02	0.0264	3.37E+01	0.0658	8.84E+02	0.0256
Cask Bottom Axial Surface ⁽⁶⁾	1.64E+03 ⁽³⁾	0.0397	2.69E+03 ⁽³⁾	0.0297	4.34E+03 ⁽³⁾	0.0238
1 ft from Cask Side (Radial) ⁽⁴⁾	4.06E+02	0.0217	3.51E+02	0.0108	7.58E+02	0.0127
1 ft from Top Axial Surface ⁽⁵⁾	6.48E+02	0.0371	2.42E+01	0.0814	6.69E+02	0.0360
1 ft from Cask Bottom Axial Surface ⁽⁶⁾	9.78E+02	0.0401	9.23E+02	0.0395	1.90E+03	0.0282
3 ft from Cask Side (Radial) ⁽⁴⁾	2.47E+02	0.0191	2.05E+02	0.0097	4.52E+02	0.0113
3 ft from Top Axial Surface ⁽⁵⁾	4.44E+02	0.3175	1.33E+01	0.0815	4.51E+02	0.3124
3 ft from Cask Bottom Axial Surface ⁽⁶⁾	3.41E+02	0.0386	2.51E+02	0.0663	5.92E+02	0.0358

Notes:

- (4) The Side dose rates do not need to be scaled when loading 0.380 MTU FAs.
- (5) The Top dose rates increase by 18% when loading 0.380 MTU FAs.
- (6) The Bottom dose rates increase by 19% when loading 0.380 MTU FAs.

NUH-003		
Revision 22	Page P.5-68	January 2024
	All changes on this page are Amd 18.	

⁽¹⁾ Gamma and Neutron dose rate peaks do not always occur at same location; therefore, the total dose rate is not always the sum of the gamma plus neutron dose rate.

⁽²⁾ The peak bottom surface dose rate is directly below the grapple ring cut out in the bottom of the cask. The bottom average dose rates, including the grapple area, are 238 mrem/hr gamma, 13 mrem/hr neutron for a total average dose rate of 251 mrem/hr.

⁽³⁾ The peak bottom surface dose rate is directly below the grapple ring cut out in the bottom of the cask. The bottom average dose rates, including the grapple area, are 331 mrem/hr gamma, 417 mrem/hr neutron for a total average dose rate of 748 mrem/hr. Note that this bottom axial dose rate has no impact on the occupational exposure because no operations are performed near bottom axial location.

Table P.5-4a

Summary of NUHOMS[®]-24PTH-L Type 3 DSC, OS197 FC Maximum Dose Rates During Decontamination and Welding Operations, Configuration 2

Dose Rate Location	Maximum Gamma (mrem/hr)	Gamma MCNP 1σError	Maximum Neutron (mrem/hr)	Neutron MCNP 1σError	Maximum Total ⁽¹⁾ (mrem/hr)	Total MCNP 1σ Error		
Decontamination								
Cask Side Surface (Radial) ⁽⁴⁾	<i>3.34E+02</i>	0.0014	6.43E+02	0.0007	<i>9.77E+02</i>	0.0007		
Cask Top Axial Surface ⁽⁵⁾	9.90E+02	0.0033	1.80E+01	0.0012	<i>9.91E+02</i>	0.0033		
Cask Bottom Axial Surface ⁽⁶⁾	$1.55E + 03^{(2)}$	0.0085	6.17E+01 ⁽²⁾	0.0022	1.61E+03 ⁽²⁾	0.0082		
1 ft from Cask Side (Radial) ⁽⁴⁾	2.17E+02	0.0013	4.15E+02	0.0006	6.33E+02	0.0006		
<i>1 ft from Cask Top Axial</i> <i>Surface</i> ⁽⁵⁾	7.79E+02	0.0038	7.95E+00	0.0063	7.79E+02	0.0038		
<i>1 ft from Cask Bottom Axial</i> Surface ⁽⁶⁾	<i>9.02E+02</i>	0.0093	2.38E+01	0.0026	9.25E+02	0.0091		
3 ft from Cask Side (Radial) ⁽⁴⁾	1.30E+02	0.0013	2.44E+02	0.0006	<i>3.74E+02</i>	0.0006		
3 ft from Cask Top Axial Surface ⁽⁵⁾	4.89E+02	0.0041	7.19E+00	0.0018	<i>4.90E</i> +02	0.0041		
3 ft from Cask Bottom Axial Surface ⁽⁶⁾	<i>3.13E</i> +02	0.0125	1.46E+01	0.0014	<i>3.21E+02</i>	0.0122		
		Welding	7					
Cask Side Surface (Radial) ⁽⁴⁾	<i>4.99E+02</i>	0.0010	<i>4.66E+02</i>	0.0023	9.65E+02	0.0012		
Cask Top Axial Surface ⁽⁵⁾	1.06E+03	0.0028	4.15E+01	0.0036	1.10E+03	0.0027		
Cask Bottom Axial Surface ⁽⁶⁾	$2.43E + 03^{(3)}$	0.0063	$3.04E + 03^{(3)}$	0.0027	$5.47E + 03^{(3)}$	0.0032		
1 ft from Cask Side (Radial) ⁽⁴⁾	3.24E+02	0.0010	2.98E+02	0.0021	6.22E+02	0.0011		
1 ft from Cask Top Axial Surface ⁽⁵⁾	8.23E+02	0.0033	2.80E+01	0.0037	8.51E+02	0.0032		
1 ft from Cask Bottom Axial Surface ⁽⁶⁾	1.37E+03	0.0072	1.09E+03	0.0029	2.46E+03	0.0042		
3 ft from Cask Side (Radial) ⁽⁴⁾	1.95E+02	0.0010	1.74E+02	0.0019	<i>3.69E+02</i>	0.0010		
3 ft from Cask Top Axial Surface ⁽⁵⁾	5.17E+02	0.0036	1.40E+01	0.0043	5.31E+02	0.0035		
3 ft from Cask Bottom Axial Surface ⁽⁶⁾	<i>4.73E</i> +02	0.0100	2.99E+02	0.0038	7.73E+02	0.0063		

Notes:

- (1) Gamma and Neutron dose rate peaks do not always occur at the same location; therefore, the total dose rate is not always the sum of the gamma plus neutron dose rate.
- (2) The peak bottom surface dose rate is directly below the grapple ring cut out in the bottom of the cask. The bottom average dose rates, including the grapple area, are 281 mrem/hr gamma, 13.4 mrem/hr neutron, for a total average dose rate of 295 mrem/hr.
- (3) The peak bottom surface dose rate is directly below the grapple ring cut out in the bottom of the cask. The bottom average dose rates, including the grapple area, are 416 mrem/hr gamma, 465 mrem/hr neutron, for a total average dose rate of 882 mrem/hr.
- (4) The Side dose rates do not need to be scaled when loading 0.380 MTU FAs.
- (5) The Top dose rates increase by 18% when loading 0.380 MTU FAs.
- (6) The Bottom dose rates increase by 19% when loading 0.380 MTU FAs.

Table P.5-5

Summary of NUHOMS[®]-24PTH-S-LC *Type 2* DSC, Standardized TC Maximum Dose Rates During Transfer Operations, Configuration 5

Dose Rate Location	Maximum Gamma (mrem/hr)	Gamma MCNP 1σ Error	Maximum Neutron (mrem/hr)	Neutron MCNP 1σ Error	Maximum Total ⁽¹⁾ (mrem/hr)	Total MCNP 1σ Error
Cask Side Surface (Radial) ⁽³⁾	4.19E+02	0.0600	1.81E+02	0.0178	5.77E+02	0.0273
Cask Top Axial Surface ⁽⁴⁾	3.01E+01	0.0894	8.03E+00	0.0778	3.25E+01	0.0829
Cask Bottom Axial Surface ⁽⁵⁾	4.42E+03 ⁽²⁾	0.1154	3.30E+02 ⁽²⁾	0.0276	4.75E+03 ⁽²⁾	0.1074
1 ft from Cask Side (Radial) ⁽³⁾	2.95E+02	0.0536	1.14E+02	0.0176	3.78E+02	0.0242
1 ft from Cask Top Axial Surface ⁽⁴⁾	2.06E+01	0.0251	5.44E+00	0.0576	2.43E+01	0.0224
1 ft from Cask Bottom Axial Surface ⁽⁵⁾	2.31E+03	0.1261	1.17E+02	0.0308	2.43E+03	0.1200
3 ft from Cask Side (Radial) ⁽³⁾	1.89E+02	0.0449	9.20E+01	0.0158	2.31E+02	0.0368
3 ft from Cask Top Axial Surface ⁽⁴⁾	1.06E+01	0.0201	2.73E+00	0.0567	1.31E+01	0.0165
3 ft from Cask Bottom Axial Surface ⁽⁵⁾	8.82E+02	0.1398	3.33E+01	0.0403	9.15E+02	0.1347
Cask 1 m (Radial) Accident Condition ⁽⁶⁾	3.44E+02	0.0505	4.18E+02	0.0219	7.62E+02	0.0258
Cask 100 m (Radial) Accident Condition ⁽⁶⁾	1.67E-01	0.0422	6.76E-02	0.0232	2.35E-01	0.0308
Cask 500 m (Radial) Accident Condition ⁽⁶⁾	6.20E-04	0.0302	5.34E-05	0.0341	6.74E-04	0.0279

Notes:

(1) Gamma and Neutron dose rate peaks do not always occur at same location therefore the total dose rate is not always the sum of the gamma plus neutron dose rate.

(2) The peak bottom surface dose rate is directly below the grapple ring cut out in the bottom of the cask. The bottom average dose rates, including the grapple area, are 730 mrem/hr gamma, 61 mrem/hr neutron for a total average dose rate of 791 mrem/hr.

(3) The Side dose rates do not need to be scaled when loading $0.380\ \text{MTU}\ \text{FAs}.$

(4) The Top dose rates increase by 18% when loading 0.380 MTU FAs.

(5) The Bottom dose rates increase by 19% when loading 0.380 MTU FAs.

(6) The Accident dose rates increase by 13% when loading 0.380 MTU FAs.

NUH-003		
Revision 22	Page P.5-69	January 2024
	All changes on this page are Amd 18.	

Table P.5-5aSummary of NUHOMS®-24PTH-S-LC Type 3 DSC, Standardized TC Maximum Dose RatesDuring Transfer Operations, Configuration 5

Dose Rate Location	Maximum Gamma (mrem/hr)	Gamma MCNP 1σError	Maximum Neutron (mrem/hr)	Neutron MCNP 1σError	Maximum Total ⁽¹⁾ (mrem/hr)	Total MCNP 1σError
Cask Side Surface (Radial) ⁽³⁾	<i>3.12E+02</i>	0.0026	9.74E+01	0.0027	<i>4.10E+02</i>	0.0021
Cask Top Axial Surface ⁽⁴⁾	2.92E+01	0.0280	8.35E+00	0.0081	3.23E+01	0.0254
Cask Bottom Axial Surface ⁽⁵⁾	6.36E+03 ⁽²⁾	0.0104	<i>3.40E</i> +02 ⁽²⁾	0.0061	6.70E+03 ⁽²⁾	0.0099
1 ft from Cask Side (Radial) ⁽³⁾	2.19E+02	0.0024	6.08E+01	0.0024	2.80E+02	0.0020
1 ft from Cask Top Axial Surface ⁽⁴⁾	2.09E+01	0.0048	5.82E+00	0.0078	2.43E+01	0.0043
1 ft from Cask Bottom Axial Surface ⁽⁵⁾	3.05E+03	0.0110	1.21E+02	0.0062	<i>3.17E+03</i>	0.0106
3 ft from Cask Side (Radial) ⁽³⁾	1.39E+02	0.0021	3.48E+01	0.0022	1.73E+02	0.0018
3 ft from Cask Top Axial Surface ⁽⁴⁾	<i>9.92E+00</i>	0.0026	2.89E+00	0.0111	1.21E+01	0.0022
3 ft from Cask Bottom Axial Surface ⁽⁵⁾	1.08E+03	0.0131	<i>3.46E+01</i>	0.0073	1.12E+03	0.0127
Accident		Accident dos	se rates in Tabl	e P.5-5 rema	in applicable	

Notes:

(1) Gamma and Neutron dose rate peaks do not always occur at the same location; therefore, the total dose rate is not always the sum of the gamma plus neutron dose rate.

(2) The peak bottom surface dose rate is directly below the grapple ring cut out in the bottom of the cask. The bottom average dose rates, including the grapple area, are 1020 mrem/hr gamma, 63.0 mrem/hr neutron, for a total average dose rate of 1090 mrem/hr.

(3) The Side dose rates do not need to be scaled when loading 0.380 MTU FAs.

(4) The Top dose rates increase by 18% when loading 0.380 MTU FAs.

(5) The Bottom dose rates increase by 19% when loading 0.380 MTU FAs.

NUH-003 Ravision 22	$P_{aga} P 5.60a$	January 2024
Revision 22	All changes on this nage are Amd 18.	Junuary 2024

Table P.5-14Shielding Material Densities

Assembly Region Material Densities

	Atomio	N	umber Densit	ty (atom/b-cm	ı)
Element	Number	Bottom End Fitting	Fuel	Plenum	Top End Fitting
0	8	-	1.35E-02	-	-
Al	13	1.31E-05	3.61E-06	6.39E-05	2.98E-05
Ti	22	9.88E-06	2.72E-06	4.80E-05	2.24E-05
Cr	24	1.88E-03	6.62E-05	1.06E-03	2.99E-03
Mn	25	1.65E-04	-	-	2.49E-04
Fe	26	5.96E-03	8.45E-05	1.29E-03	9.17E-03
Ni	28	1.21E-03	1.44E-04	2.54E-03	2.22E-03
Zr	40	6.23E-03	3.79E-03	3.89E-03	-
Mo	42	1.85E-05	5.08E-06	8.99E-05	4.19E-05
Sn	50	7.81E-05	4.75E-05	4.88E-05	-
U-235	92	-	3.39E-04	-	-
U-238	92	-	6.37E-03	-	-
]	Fotal	1.56E-02	2.43E-02	9.03E-03	1.47E-02

Other Shielding Materials

		Number Density (atom/b-cm)							
Element	Number	NS-3	Concrete	Water	Air	Lead	Carbon Steel	Stainless Steel	Aluminum/B ORAL
Н	1	4.498E-02	7.767E-03	6.393E-02					
B-10	5	3.054E-04							
С	6	9.595E-03							
Ν	7				3.587E-05				
0	8	3.704E-02	4.317E-02	3.203E-02	9.534E-06				
Na	11		1.022E-03						
Al	13	6.887E-03	2.343E-03						6.071E-02
Si	14	1.243E-03	1.559E-02						
K	19		6.776E-04						
Ca	20	1.454E-03	2.855E-03						
Cr	24							1.743E-02	
Fe	26	1.042E-04	3.019E-04				8.465E-02	6.128E-02	
Ni	28							7.511E-03	
Pb	82					3.296E-02			
То	otal	1.016E-01	7.373E-02	9.596E-02	4.540E-05	3.296E-02	8.465E-02	8.622E-02	6.071E-02

Note:

(1) This correspond to a lead density of 11.34 g/cm³. Note that for the 24PTH-S-LC the Type 3 analysis, lead density employed in the shield plugs model is 11.00 g/cm³ (or 3.197E-2 atom/b-cm).

NUH-003		
Revision 22	Page P.5-78	January 2024
	All changes on this page are Amd 18.	

 Table P.5-21

 Surface Average Dose Rates on HSM-Model 102 with 24PTH-S-LC Type 2 DSC

Surfaces	Dose Components	Dose Rate from Table N.5-4 of Appendix N (mrem/hr)	Scaling factors	Dose Rate (mrem/hr)
Deals(3)	Gamma	1.3	0.6	0.8
Back ^(e)	Neutron	0.1	0.1	0.01
Front (excluding	Gamma	4.9	6.8	33.5
bird screen) ⁽¹⁾⁽²⁾	Neutron	2.0	0.4	0.9
Roof (excluding bird	Gamma	25.4	1.1	27.1
screen) (1) (2)	Neutron	0.5	0.2	0.1
Side ⁽³⁾	Gamma	29.6	1.1	31.7
Side	Neutron	0.5	0.2	0.1
Eront Dind Sanoon(2)	Gamma	261.3	1.1	279.6
Front Bird Screen	Neutron	6.2	0.2	1.1
Doof Dird Samoon(2)	Gamma	408.9	1.1	437.5
Root Bird Screen	Neutron	9.0	0.2	1.5

Notes:

- (1) If the front average dose rate includes the contribution from the front birdscreen, the dose rates are 45.6 mrem/hr for gammas and 0.9 mrem/hr for neutron radiation. Likewise, if the roof average dose rate includes the contribution from the roof birdscreen, the dose rate is 47.3 mrem/hr for gammas and 0.2 mrem/hr for neutron radiation.
- (2) These dose rates increase by 13% when loading 0.380 MTU FAs.
- (3) These dose rates increase by 30% when loading 0.380 MTU FAs.

Revision 22	Page P.5-85	January 2024
Revision 22	Page P 5-85	January 2024
NUH-003		

 Table P.5-22

 Maximum Dose Rates on HSM-Model 102 with 24PTH-S-LC Type 2 DSC

Surfaces	Dose Components	Dose Rate from Table N.5-4 of Appendix N (mrem/hr)	Scaling factors	Dose Rate (mrem/hr)
D = -1-(3)	Gamma	4	0.6	2.5
Dack	Neutron	0.1	0.1	0.02
Energe (2)	Gamma	9	6.8	60.6
Front	Neutron	4	0.4	1.6
$\mathbf{D} = \mathbf{f}^{(2)}$	Gamma	55	1.1	59.3
K001(2)	Neutron	1.0	0.2	0.2
C: 1-(3)	Gamma	250	1.1	266.9
Side	Neutron	2.0	0.2	0.3
Enort Dind Sources(2)	Gamma	458	1.1	489.6
Front Bird Screen ⁽²⁾	Neutron	14 ⁽¹⁾	0.2	2.5
Deef Dind Senson ⁽²⁾	Gamma	913	1.1	976.5
Kool biru Screen	Neutron	18	0.2	3.2

Notes:

- (1) Not calculated in appendix N.5. Estimated here as approximately twice the average dose rate.
- (2) These dose rates increase by 13% when loading 0.380 MTU FAs.
- (3) These dose rates increase by 30% when loading 0.380 MTU FAs.

NUH-003		
Revision 22	Page P.5-86	January 2024
	All changes on this page are Amd 18.	



Figure P.5-3 24PTH-L *Type 2* DSC Within HSM-H, Side View at Centerline of DSC

[xxx] = surface numbers, all dimensions without units are in cm

	All changes on this page are Amd 18.	<i>cultury</i> 2021
Revision 22	Page P.5-93	January 2024
NUH-003		



Figure P.5-4 24PTH-L *Type 2* DSC Within HSM-H, Head-on View at X=0

[xxx] = surface numbers, all dimensions without units are in cm

NUH-003 Revision 22	Page P 5-94	January 2024
	All changes on this page are Amd 18.	5unuury 2024



Figure P.5-5 24PTH-L *Type 2* DSC Within HSM-H, Head-on View Showing Top Vents

NUH-003		
Revision 22	Page P.5-95	January 2024
	All changes on this page are Amd 18.	· · · · · · · · · · · · · · · · · · ·



Figure P.5-6 24PTH-L *Type 2* DSC Within HSM-H, Head-on View at Lid End of DSC (X=225 cm)

NUH-003		
Revision 22	Page P.5-96	January 2024
	All changes on this page are Amd 18.	



Figure P.5-7 24PTH-L *Type 2* DSC Within HSM-H, Head-on View at Bottom End of DSC (X=-225 cm)

Revision 22	Page P.5-97	January 2024
	All changes on this page are Amd 18.	



Figure P.5-8 24PTH-L *Type 2* DSC Within OS197FC TC, Axial View of Transfer Model





Note: All dimensions are in inches.

Figure P.5-9 24PTH-L *Type 2* DSC Within OS197FC TC, Top View of Transfer Model Showing Cask Lid with Gap, Top Nozzle, and Plenum

NUH-003		
Revision 22	Page P.5-99	January 2024
	All changes on this page are Amd 18.	



Note: All dimensions are in inches.

Figure P.5-10 24PTH-L *Type 2* DSC Within OS197FC TC, Bottom View of Transfer Model Showing Cask Bottom and Bottom Nozzle

Revision 22 Page P 5-100 Janua	
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All changes on this page are Amd 18.	



Figure P.5-11 24PTH-L *Type 2* DSC Within OS197FC TC, Radial Cut View of Transfer Models Showing Fuel Locations

	All changes on this page are Amd 18.	•••••••••••••••••••••••••••••••••••••••
Revision 22	Page P.5-101	January 2024
NUH-003		



Note: All dimensions are in inches.

Figure P.5-12 24PTH-S-LC *Type 2* DSC Within Standardized TC, Axial View of Transfer Model

NUH-003		
Revision 22	Page P.5-102	January 2024
	All changes on this page are Amd 18.	



Note: All dimensions are in inches.

Figure P.5-13 24PTH-S-LC *Type 2* DSC Within Standardized TC, Top View of Transfer Model Showing Cask Lid with Gap, Top Nozzle, and Plenum

NUH-003		
Revision 22	Page P.5-103	January 2024
	All changes on this page are Amd 18.	



Note: All dimensions are in inches.

Figure P.5-14 24PTH-S-LC *Type 2* DSC Within Standardized TC, Bottom View of Transfer Model Showing Cask Bottom and Bottom Nozzle

NUH-003		
Revision 22	Page P.5-104	January 2024
	All changes on this page are Amd 18.	



Figure P.5-15 24PTH-S-LC *Type 2* DSC Within Standardized TC, Radial Cut Views of Transfer Model Showing Fuel Locations

Revision 22	Page P.5-105	January 2024
NUH-003	D D C 10C	1 202



Figure P.5-16 HSM-H with 24PTH-L *Type 2* DSC, Front Door Centerline Dose Rate

Page P.5-106 All changes on this page are Amd 18.





Page P.5-107


Figure P.5-18 HSM-H with 24PTH-L *Type 2* DSC, Side Shield Wall Surface at DSC Centerline Dose Rate

NUH-003			
Revision 22			

Page P.5-108 All changes on this page are Amd 18.



Figure P.5-19 OS197FC TC with 24PTH-L *Type 2* DSC, Side Surface Dose Rate



Figure P.5-20 OS197FC TC with 24PTH-L *Type 2* DSC, Top Surface Dose Rate



Figure P.5-21 OS197FC TC with 24PTH-L *Type 2* DSC, Bottom Surface Dose Rate

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Figure P.5-22 Standardized Transfer Cask with 24PTH-S-LC *Type 2* DSC, Side Surface Dose Rate

Page P.5-112 All changes on this page are Amd 18.



Figure P.5-23 Standardized Cask with 24PTH-S-LC *Type 2* DSC, Top Surface Dose Rate



Figure P.5-24 Standardized Cask with 24PTH-S-LC *Type 2* DSC, Bottom Surface Dose Rate

January 2024



Note: The 24PTH-L Type 3 DSC is depicted in this figure with 20 fuel assemblies. The 24PTH-S-LC Type 3 DSC cross-sectional view is the same but with 24 fuel assemblies.

Figure P.5-25 24PTH-L Type 3 DSC Cross-Section

Page P.5-115 All changes on this page are Amd 18.

P.6 <u>Criticality Evaluation</u>

The design criteria for the NUHOMS[®]-24PTH DSC requires that the fuel loaded in the DSC remain subcritical under normal, and accident conditions as defined in 10CFR Part 72.

The NUHOMS[®]-24PTH system's criticality safety is ensured by fixed neutron absorbers in the basket, soluble boron in the pool and favorable basket geometry. Burnup credit is not taken in this criticality evaluation. The DSC basket uses a Borated-Aluminum alloy, Aluminum/B4C metal matrix composite or Boral[®] as its fixed neutron poison material. These materials are ideal for long-term use in the radiation and thermal environments of a DSC. Section P.9 provides the justification for the use of 90% credit for borated aluminum. Similarly, Metal Matrix Composites have been qualified for use as a neutron absorber with 90% credit as justified in Section P.9. Therefore, the collective term *B-Al* refers to all those fixed poison materials where 90% credit is justified. A credit of 75% is taken for the presence of neutron poison for Boral[®] plates.

There are three different basket types:

- The Type 1 basket features aluminum inserts in the R45 transition rails.
- The Type 2 basket does not include aluminum inserts in the R45 transition rails.
- The Type 3 basket features an alternate design compared to the Type 1 or 2 baskets.

The available poison loadings for each basket type are provided in Table P.6-1. Poison loadings *A*, *B*, and *C* are available only for the Type 1 and 2 baskets, while poison loading *D* is available only for the Type 3 basket.

In addition to utilizing three different fixed poison loadings, the soluble boron concentration in the pool credited in the analysis is also varied from 2100 ppm to 3000 ppm.

Kevision 22		January 2024
Revision 22	Page P 6-1	Ianuary 2024
NUH-003		

P.6.1 Discussion and Results

The criticality analysis presented in the main body of this chapter is based on the Type 1 and 2 basket designs. It is demonstrated in a sensitivity study that all enrichment limits developed for the Type 1C/2C baskets may be conservatively applied to the Type 3D basket. This sensitivity study is provided in Section P.6.6.4.

Figure P.6-1 shows the cross section of the NUHOMS[®]-24PTH DSC. The NUHOMS[®]-24PTH DSC stainless steel basket consists of an "egg-crate" plate design. The fuel assemblies are housed in 24 stainless steel fuel compartment tubes with up to 12 damaged fuel assemblies occupying peripheral locations, as shown in Figure P.2-6. In addition, the 24PTH DSC is also designed to store up to 8 failed fuel assemblies in the peripheral locations of the basket (designated as "A" locations in Figure P.2-6). Each failed fuel assembly is housed inside a failed fuel canister prior to loading in these designated positions within the basket. The basket structure, including the fuel compartment tubes, is held together with stainless steel insert plates and the poison and aluminum plates that form the "egg-crate" structure. The basket compartment structure is connected to perimeter rail assemblies, portions of it comprising of aluminum interface. The fuel compartment tube structure is connected to perimeter transition rail assemblies as shown on the drawings in Section P.1.5. The poison/aluminum plates are located between the fuel compartment tubes, as shown in Figure P.6-1.

The analysis presented herein is performed for a NUHOMS[®]-24PTH DSC in the NUHOMS[®]-OS197, OS197H, or OS197FC and Standardized Transfer casks (TCs) during normal, off-normal and accident loading conditions. The 24PTH DSC is also transferred in a modified version of the OS200 TC as described in Appendix U. The OS200 TC is fitted with an aluminum sleeve to accommodate the smaller diameter 24PTH DSC. This analysis also bounds all conditions of storage in the HSM (either HSM-H, HSM-HS or HSM Model 102). The NUHOMS[®] TCs are identical for criticality purposes. The OS197FC design is identical to OS197 or OS197H TC with a modified lid design to allow for air circulation for enhanced heat removal. The NUHOMS[®] Transfer casks consist of an inner stainless steel shell, lead gamma shield, a stainless steel structural shell and a hydrogenous (liquid or solid) neutron shield. This analysis is applicable to any licensed cask of similar construction. The NUHOMS[®]-24PTH DSC/Cask configuration is shown to be subcritical under normal, off-normal and accident conditions of loading, transfer and storage.

The criticality analysis determines the most reactive configuration for the basket and fuel assembly position. Then criticality calculations evaluate a variety of fuel assembly types, initial enrichments and poison loadings (fixed and soluble poison). Table P.6-2 lists the fuel assemblies considered as authorized contents of the NUHOMS[®]-24PTH System. Finally, the maximum allowed initial enrichment for each fuel assembly type as a function of basket type (fixed poison loading and aluminum inserts) and soluble boron concentration is determined and is listed in Table P.6-3. Table P.6-10 shows the results of the analysis performed to determine the bounding configuration for Type 1 or Type 2 baskets (with or without aluminum inserts in R45 transition rails). The calculations determine k_{eff} with the CSAS25 control module of SCALE-4.4 [6.1] for each assembly type and initial enrichment, including all uncertainties to assure criticality safety under all credible conditions.

NUH-003		
Revision 22	Page P.6-2	January 2024
	All changes on this page are Amd 18.	

The Control Components (CCs) are also authorized for storage in the 24PTH DSCs. The authorized CCs are Burnable Poison Rod Assemblies (BPRAs), Control Rod Assemblies (CRAs), Rod Cluster Control Assemblies (RCCAs), Thimble Plug Assemblies (TPAs), Axial Power Shaping Rod Assemblies (APSRAs), Orifice Rod Assemblies (ORAs), Vibration Suppression Inserts (VSIs), Neutron Source Assemblies (NSAs), and Neutron Sources. The

administrative margin is from Reference [6.3]. Results from the USL evaluation are presented in Table P.6-47.

The criticality evaluation used the same cross section set, fuel materials and similar material/geometry options that were used in the 121 benchmark calculations as shown in Table P.6-46. The modeling techniques and the applicable parameters listed in Table P.6-48 for the actual criticality evaluations fall within the range of those addressed by the benchmarks in Table P.6-46.

P.6.5.2 <u>Results of the Benchmark Calculations</u>

The results from the comparisons of physical parameters of each of the fuel assembly types to the applicable USL value are presented in Table P.6-48. The minimum value of the USL is determined to be 0.9411 based on comparisons to the limiting assembly parameters as shown in Table P.6-48.

P.6.5.3 Benchmarking of SCALE 6.0

The benchmarking of SCALE 6.0 is presented in Appendix M, Section M.6.5.3. The benchmarking uses the ENDF/B-V cross-section library and NITAWL. The USL value of 0.9404 was determined which incorporates the code bias and bias uncertainties including an administrative safety margin of 0.05.

NUH-003		
Revision 22	<i>Page</i> P.6-27	January 2024
	All changes on this page are Amd 18.	

P.6.6.4 <u>Type 3 Basket Sensitivity Analysis</u>

The Type 3 basket features an alternate design compared to the Type 1 or 2 baskets. The Type 3 basket has a larger minimum compartment width and a higher poison loading than the Type 1 or 2 baskets. It is demonstrated in Table P.6-13 for the Type 1 or 2 baskets that reactivity decreases as the compartment width increases. Therefore, k_{eff} will decrease for the Type 3D basket when compared with the Type 1C/2C basket. All enrichment limits developed for the Type 1C/2C basket may be conservatively applied to the Type 3D basket, and this conclusion is verified with the following sensitivity analysis.

<u>Methodology</u>

Sensitivity cases are developed for intact, damaged, and failed fuel to explicitly demonstrate that reactivity decreases for the Type 3D basket compared to the Type 1C/2C basket. Because the Type 1C/2C basket analysis was performed with SCALE 4.4, which is no longer installed, SCALE 6.0 [6.4] is used in this sensitivity study. To allow a direct comparison between the Type 1C/2C basket and Type 3D basket results without computer code biases, all Type 1C/2C basket cases are first rerun using SCALE 6.0, and the Type 1C/2C basket SCALE 6.0 results are compared to the Type 3D basket SCALE 6.0 results.

All SCALE 6.0 reruns use the same resonance shielding and neutron cross section library used in the SCALE 4.4 inputs, which are NITAWL and 44-group ENDF/B-V library, respectively. The benchmarking performed for SCALE 6.0 is provided in Section P.6.5.3.

The CSAS5 (KENO V.a) control module of the SCALE 6.0 program is used to calculate the effective multiplication factor (k_{eff}) of the system. The CSAS5 control module allows simplified data input to the functional modules BONAMI, NITAWL, and KENO V.a. These modules process the required cross sections and calculate the k_{eff} of the system. BONAMI performs resonance self-shielding calculations for nuclides that have Bondarenko data associated with their cross sections. NITAWL applies a Nordheim resonance self-shielding correction to nuclides having resonance parameters.

Description of the KENO Model for the Type 3 basket

This section describes the details of the KENO input used in the analysis. The KENO model of the Type 3 basket is developed based on the design provided in the drawings in Section P.1.5. The material description, KENO V.a parameter data, and unit cells for fuel rods, instrument tubes, and guide tubes are taken from the base cases (described under Section P.6.4.2, K).

NUH-003		
Revision 22	<i>Page P.6-87</i> a	January 2024
	All changes on this page are Amd 18.	

The poison plates that form the egg crate structure are modeled in such a way that the plates fit together tightly. In reality, the plates have slots to fix the vertical and horizontal plates that are slightly wider than the total plate thickness. These small gaps at the slots are conservatively not considered in the KENO model developed for Type 3 basket since these gaps would be filled with borated water, which would decrease the reactivity. The egg crate is formed by a set of horizontal and vertical plates crossing each other, which forms the wall of the compartment. In this discussion, "horizontal" is parallel to the x-axis, while "vertical" is parallel to the y-axis. The following paragraphs provide the description of the KENO model for the compartment nominal width of 8.9 inches. The minimum width of the compartment is 8.8 inches and the sensitivity analysis is performed for both minimum and nominal compartment widths.

The horizontal plates are modeled as one single length plate whose length is calculated manually. For example, the length of the plates (Al+MMC+SS) that spans 4 compartments, 4 thin (vertical) plates and 1 thick (vertical) plate each is calculated as (4x8.9" + 4x0.945" + 1x1.195") = 40.575 inches (see Figure P.6-27). The full length of the plate that spans all the 6 compartments, with only Al on the peripheral assemblies, is calculated as 59.001 inches. The lengths of the horizontal plates in the model are slightly shorter than the actual plates since the gaps are not considered.

The vertical plates are modeled as short segments with their length the same as the compartment width. These segments are then included in between two fuel compartments to form an array. These arrays are then placed as holes in the global unit. The overall length of the vertical plate at the center without considering the thickness of the horizontal plate that runs in between the vertical plates is calculated as (6x8.9" + 2x2.8345") = 59.069 inches. If the thicknesses of the horizontal plates are considered, the total vertical length in the model would be 64.67 inches.

The overall lengths of the plates in the KENO model are shorter than the actual plates and hence the total area of the poison plates modeled is reduced compared to the actual plates. This is conservative since the overall poison in the model is reduced compared to the actual basket.

While MMC is the only neutron material option for the Type 3D basket, the sensitivity cases model the fixed poison as B-Al for consistency with the Type 1C/2C basket evaluation. The thickness of the poison plate is 0.164 inches in the Type 3 basket. The poison content is 35 mg B- $10/cm^2$ (poison loading D). 90% credit is taken and hence in the KENO model 31.5 mg B- $10/cm^2$ is modeled. The boron and aluminum ratio in the poison plate is calculated based on this thickness and poison content values.

The transition rail is modeled using stainless steel material. This is based on the results of the transition rail region material study using the Type 1 basket, which demonstrated that the use of steel for transition rail material is most reactive. The Type 1 basket transition rail geometry is conservatively applied to the Type 3 basket KENO model. The other materials used for describing the canister and the cask are the same as in the base cases. Water fills the gap between the canister and cask.

The axial height modeled is 11.94 inches in the KENO model, with periodic boundary conditions applied to the top and bottom of the model. This boundary condition ensures the model is infinitely long in the axial direction. For failed fuel analysis, the length in the axial direction is changed to match the length used in the failed fuel analysis using the Type 1 basket.

NUH-003		
Revision 22	<i>Page P.6-87</i> b	January 2024
	All changes on this page are Amd 18.	

In the damaged and failed fuel analysis, it is assumed that the maximum pitch is the optimum pitch value that leads to highest k_{eff} . The maximum pitch is calculated using the compartment width (W), the fuel rod's cladding radius (r) value and the number of fuel rods in a row (n). The compartment width value is 8.9 inches; however, for the optimum pitch calculation, 8.85 inches is considered to give a small gap between the peripheral row of fuel rods and the poison plates forming the walls of the compartment to avoid KENO overlap errors. The formula used to compute the maximum pitch value is (W-2r)/(n-1). Similar analysis is performed for the minimum compartment width of 8.8 inches.

The material inputs are the same in the Type 3D basket models compared to the Type 1C/2C basket models with the exception of poison loading D, which is provided in Table P.6-8.

Sensitivity Evaluation

The following assumptions are relevant to the criticality analysis performed with Type 3 basket:

- 1. A conservative assumption of 90% credit is taken for the poison in the KENO model.
- 2. An egg-crate section height of 11.94 inches is modeled. The top and bottom shield plugs are not modeled, and a periodic boundary condition is conservatively applied on the top and bottom.
- 3. The plates forming the egg-crate are assumed to fit together tightly without any gaps. This is a conservative assumption since the presence of gaps would create space for borated water.
- 4. Type 3 basket is a staggered basket. However, the KENO model developed is non-staggered for simplicity because a staggered and non-staggered representation is neutronically equivalent.
- 5. Damaged fuel analysis with the Type 1 basket shows the most reactive damaged case is using optimum (maximum) pitch and guide/instrument tube locations filled with fuel rods. Hence the same configuration is used for the damaged fuel cases in the Type 3 basket analysis.
- 6. Failed fuel analysis with the Type 1 basket illustrates the most reactive failed fuel configuration has fully expanded pitch and the rods shifted 6 inches at the top where they are not covered with poison plates. The same configuration is used in this analysis for failed fuel.
- 7. There are 3 versions of the basket based on their length: 24PTH-S, 24PTH-L, and 24PTH-S-LC. It is assumed that k_{eff} values obtained for the different cases apply to the 24PTH-S, 24PTH-L, 24PTH-S-LC versions of the Type 3 basket since periodic boundary conditions are applied in the Z-direction, making the model infinitely long.

For the Type 3 basket analysis, the fuel parameters enrichment, soluble boron, internal moderator density values are the same as in the base cases. The poison concentration in the model is $31.5 \text{ mg B-}10/\text{cm}^2$. The base cases are described below. For intact fuel analysis, the rod pitch is same as the base case. In the damaged and failed fuel analyses, a larger rod pitch is utilized than the original model because the compartment size is larger.

NUH-003		
Revision 22	<i>Page P.6-87</i> c	January 2024
	All changes on this page are Amd 18.	

Table P.6-15 tabulates k_{eff} values for various PWR assemblies with varying enrichment, soluble boron, and poison concentration values. It is demonstrated that the most reactive fuel for a given enrichment is B&W 15X15. Hence, the base cases used in the intact fuel analysis are from the intact fuel analysis with the Type 1C/2C basket loaded with B&W 15X15 fuel. Seven most reactive cases are identified under each soluble concentration value:

- 1. B&W 15x15 case with soluble boron at 2100 ppm, enrichment at 4.3 wt.% U-235 and internal moderator density value at 90%.
- 2. B&W 15x15 case with soluble boron at 2200 ppm, enrichment at 4.5 wt.% U-235 and internal moderator density value at 90%.
- 3. B&W 15x15 case with soluble boron at 2300 ppm, enrichment at 4.6 wt.% U-235 and internal moderator density value at 90%.
- 4. B&W 15x15 case with soluble boron at 2400 ppm, enrichment at 4.7 wt.% U-235 and internal moderator density value at 90%.
- 5. *B&W* 15x15 case with soluble boron at 2500 ppm, enrichment at 4.8 wt.% U-235 and internal moderator density value at 90%.
- 6. B&W 15x15 case with soluble boron at 2600 ppm, enrichment at 4.9 wt.% U-235 and internal moderator density value at 90%.
- 7. B&W 15x15 case with soluble boron at 2700 ppm, enrichment at 5.0 wt.% U-235 and internal moderator density value at 90%.

For damaged fuel analysis, the base cases are taken from the Type 1C/2C basket analysis. The damaged analysis is carried out with 12 damaged fuel assemblies loaded in the peripheral locations. Two cases are selected from Table P.6-36. These cases feature fuel rods in the guide/instrument tube locations and fully expanded pitch:

- 1. B&W 15x15 assembly with 4.5 wt.% U-235 enrichment, 2300 ppm of soluble boron concentration, and 90% internal moderator density;
- 2. WE 17x17 assembly with 5.0 wt. % U-235, 2600 ppm soluble boron concentration, and 90% internal moderator density.

For failed fuel analysis, the base cases are taken from the Type 1C/2C basket analysis. The failed fuel analysis is performed with 8 failed assemblies loaded at the designated locations along the periphery. These cases feature fully expanded pitch and the rods shifted axially with 6 inch of the fuel rod not covered by the poison plates. The rods are either intact (cladded) or fully/partially de-cladded. The two cases selected here are from Table P.6-40:

1. *B&W* 15x15 case with both intact and failed fuel at 5.0 wt.% U-235 enrichment, 2700 ppm soluble boron concentration, and 80% internal moderator density;

NUH-003		
Revision 22	<i>Page P.6-87</i> d	January 2024
	All changes on this page are Amd 18.	

2. WE 15x15 case with intact fuel at 4.6 wt.% U-235, failed fuel at 4.5 wt.% U-235, soluble boron concentration at 2100 ppm and internal moderator density at 90%.

These base case inputs are converted from SCALE 4.4 to SCALE 6.0 format. SCALE 4.4 uses NITAWL for cross-section processing, so PARM=NITAWL is included in the input before running these cases using SCALE 6.0. For damaged and failed fuel cases, the MOREDATA card in SCALE 4.4 is replaced with explicit LATTICECELL card in SCALE 6.0. The results of the intact, damaged and failed fuel analysis for the nominal compartment width are presented in Table P.6-49, Table P.6-50, and Table P.6-51. The results of the intact, damaged and failed fuel analysis for the nominal compartment width are presented in Table P.6-51. The results of the intact, damaged and failed fuel analysis for the nominal compartment width are presented in Table P.6-51.

The criticality results obtained with the Type 3D basket are compared to the corresponding base case results. The difference between the two is calculated as:

 $Difference = k_{eff-T1/2} - k_{eff-T3}$

A positive value of the difference indicates that the Type 1C/2C basket results bound the Type 3D basket results. All difference values presented in Table P.6-49, Table P.6-49a, Table P.6-50, Table P.6-50a, Table P.6-51, and Table P.6-51a indicate that reactivity decreases for the Type 3D basket. Therefore, all Type 1C/2C enrichment limits are bounding and may be conservatively applied to the Type 3D basket. Reactivity decreases for the Type 3D basket due to the larger poison loading and larger minimum compartment size compared to the Type 3D basket. All the k_{eff} values shown in Table P.6-49, Table P.6-50 and Table P.6-51 for the Type 3D basket are below the SCALE 6.0 USL of 0.9404. Therefore, it is concluded that the NUHOMS[®]-24PTH DSC with the Type 3 basket is compliant with the criticality related portions of 10 CFR Part 72.

NUH-003		
Revision 22	Page P.6-87e	January 2024
	All changes on this page are Amd 18.	

	Minimum B10 Content	Minimum B10 Content	B10 Content Used in
Basket Type	for Boral [®]	for B-Al ⁽¹⁾	Criticality Evaluation
	(mg/cm^2)	(mg/cm^2)	(mg/cm^2)
1A or 2A	9.00	7.00	6.3
1B or 2B	19.0	15.0	13.5
1C or 2C	40.0	32.0	28.8
3D	N/A	35.0	31.5

Table P.6-1Minimum B10 Content in the Neutron Poison Plates

Notes:

1

(1) B-Al = Metal Matrix Composites and Borated Aluminum Alloys. *Type 3D basket only uses Metal Matrix Composites poison material.*

NUH-003		
Revision 22	Page P.6-88	January 2024
	All changes on this page are Amd 18.	

Material	ID	Density g/cm ³	Element	Weight %	Atom Density (atoms/b-cm)
			U-235	4.407	1.20673E-03
UO_2	1	10.686	U-238	83.743	2.26382E-02
(Enrichment - 3.0 wt%)			0	11.850	4.76898E-02
			Zr	98.23	4.2541E-02
			Sn	1.45	4.8254E-04
Zircaloy-4	2	6.56	Fe	0.21	1.4856E-04
			Cr	0.10	7.5978E-05
			Hf	0.01	2.2133E-06
Water (Pellet Clad	r	0.000	Н	11.1	6.6769E-02
Gap)	3	0.998	0	88.9	3.3385E-02
			С	0.080	3.1877E-04
			Si	1.000	1.7025E-03
			Р	0.045	6.9468E-05
Stainless Steel (SS304)	4	7.94	Cr	19.000	1.7473E-02
			Mn	2.000	1.7407E-03
			Fe	68.375	5.8545E-02
			Ni	9.500	7.7402E-03
	5		Н	11.159	6.67692E-02
Borated Water		1.000	0	88.541	3.33846E-02
(3000 ppm Boron)			B10	5.522E-02	3.32551E-05
			B11	2.444E-01	1.33856E-04
Aluminum	8	2.70	Al	100.0	6.0307E-02
Aluminum - Boron Poison			B10	1.224	1.98248E-03
Plate for Type 1A or 2A	9	2.693	B11	0.136	2.00339E-04
Basket (6.30 mg B-10/cm ²)			Al	98.640	5.92883E-02
Water	10	0.008	Н	11.1	6.6769E-02
water	10	0.998	0	88.9	3.3385E-02
Lead	11	11.34	Pb	100.0	3.2969E-02
$^{11}\mathbf{P}$ C in CC	10	2 5 5 5	B11	78.56	1.0988E-01
B ₄ C III CC	12	2.335	С	21.44	2.7470E-02
Aluminum - Boron Poison			B10	1.6443	2.66323E-03
Plate for Type 1B or 2B	9	2.693	B11	0.1827	2.69132E-04
Basket (13.5 mg B-10/cm ²)			Al	98.173	5.90076E-02
Aluminum - Boron Poison			B10	3.5082	5.68213E-03
Plate for Type 1C or 2C	9	2.693	B11	0.3898	5.74208E-04
Basket (28.8 mg B-10/cm ²)			Al	96.102	5.77628E-02
Aluminum – Boron Poison			B-10	2.80	4.54761E-03
Plate for Type 3D Basket	asket 9	2.693	B-11	0.31	4.59558E-04
$(31.5 mg B-10/cm^2)$			Al	96.89	5.82307E-02

Table P.6-8 Material Property Data

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Table P.6-49 Comparison of the Intact Fuel Results for Type 3D Basket to Type 1C/2C Basket – Nominal Compartment Width

		Туре 3			<i>Type 1/2⁽²⁾</i>		Difference
	<i>kkeno</i>	1σ	k eff	<i>kkeno</i>	1σ	k eff	Difference
24PTH_T3_BW15B21_P35E43_090 bw15b21_p32e43_090	0.9144	0.0008	0.9160	0.9321	0.0008	0.9337	0.0177
24PTH_T3_BW15B22_P35E45_090 bw15b22_p32e45_090	0.9180	0.0010	0.9200	0.9340	0.0009	0.9358	0.0158
24PTH_T3_BW15B23_P35E46_090 bw15b23_p32e46_090	0.9176	0.0009	0.9194	0.9348	0.0010	0.9368	0.0174
24PTH_T3_BW15B24_P35E47_090 bw15b24_p32e47_090	0.9159	0.0009	0.9177	0.9345	0.0010	0.9365	0.0188
24PTH_T3_BW15B25_P35E48_090 bw15b25_p32e48_090	0.9165	0.0010	0.9185	0.9331	0.0009	0.9349	0.0164
24PTH_T3_BW15B26_P35E49_090 bw15b26_p32e49_090	0.9166	0.0009	0.9184	0.9338	0.0009	0.9356	0.0172
24PTH_T3_BW15B27_P35E50_090 bw15b27_p32e50_090	0.9155	0.0010	0.9175	0.9329	0.0010	0.9349	0.0174

1. Case ID for Type 3 basket starts with "24PTH_T3", while the other filename beginning with "bw15" is the corresponding base case from intact fuel analysis with the Type 1 or Type 2 basket.
2. The results given in the "Type 1/2" column are the results from re-running base intact cases with SCALE 6.0.

NUH-003		
Revision 22	<i>Page P.6-183</i> a	January 2024
	All changes on this page are Amd 18.	

Table P.6-49a Comparison of the Intact Fuel Results for Type 3D Basket to Type 1C/2C Basket – Minimum Compartment Width

Creat ID(1)		Туре 3			<i>Type 1/2⁽²⁾</i>		Difference
	k KENO	1σ	k eff	k KENO	1σ	k eff	Difference
24PTH_T3_BW15B21_P35E43_090_CW2 bw15b21_p32e43_090	0.9198	0.0009	0.9216	0.9321	0.0008	0.9337	0.0121
24PTH_T3_BW15B22_P35E45_090_CW2 bw15b22_p32e45_090	0.9228	0.0009	0.9246	0.9340	0.0009	0.9358	0.0112
24PTH_T3_BW15B23_P35E46_090_CW2 bw15b23_p32e46_090	0.9242	0.0008	0.9258	0.9348	0.0010	0.9368	0.0110
24PTH_T3_BW15B24_P35E47_090_CW2 bw15b24_p32e47_090	0.9243	0.0009	0.9261	0.9345	0.0010	0.9365	0.0104
24PTH_T3_BW15B25_P35E48_090_CW2 bw15b25_p32e48_090	0.9207	0.0009	0.9225	0.9331	0.0009	0.9349	0.0124
24PTH_T3_BW15B26_P35E49_090_CW2 bw15b26_p32e49_090	0.9227	0.0008	0.9243	0.9338	0.0009	0.9356	0.0113
24PTH_T3_BW15B27_P35E50_090_CW2 bw15b27_p32e50_090	0.9195	0.0009	0.9213	0.9329	0.0010	0.9349	0.0136

1. Case ID for Type 3 basket starts with "24PTH_T3", while the other filename beginning with "bw15" is the corresponding base case from intact fuel analysis with the Type 1 or Type 2 basket.
2. The results given in the "Type 1/2" column are the results from re-running base intact cases with SCALE 6.0.

NUH-003		
Revision 22	<i>Page P.6-183</i> b	January 2024
	All changes on this page are Amd 18.	

 Table P.6-50

 Comparison of the Damaged Fuel Results for Type 3D Basket to Type 1C/2C Basket – Nominal Compartment Width

	Туре 3			<i>Type 1/2⁽²⁾</i>			D:Conserves
	<i>kkeno</i>	1σ	k eff	k KENO	1σ	k eff	Dijjerence
24PTH_T3_12D_BW15B23_P35E45_090 bw15_d12e45_090	0.9185	0.0009	0.9203	0.9351	0.0009	0.9369	0.0166
24PTH_T3_12D_WE17B26_P35E50_090 we17_d12e50_090	0.9239	0.0010	0.9259	0.9358	0.0008	0.9374	0.0115

1. Case ID for Type 3 basket starts with "24PTH_T3", while the other filename is the corresponding base case from damaged fuel analysis with Type 1 or Type 2 basket.

2. The results given in the "Type 1/2" column are the results from re-running base damaged fuel cases with SCALE 6.0.

 Table P.6-50a

 Comparison of the Damaged Fuel Results for Type 3D Basket to Type 1C/2C Basket – Minimum Compartment Width

C_{res} $ID^{(l)}$		Type 3			<i>Type 1/2⁽²⁾</i>		
Case ID ⁽⁴⁾	k _{KENO}	1σ	k eff	k _{KENO}	1σ	k eff	Difference
24PTH_T3_12D_BW15B23_P35E45_090_CW2 bw15_d12e45_090	0.9242	0.0010	0.9262	0.9351	0.0009	0.9369	0.0107
24PTH_T3_12D_WE17B26_P35E50_090_CW2 we17 d12e50 090	0.9265	0.0008	0.9281	0.9358	0.0008	0.9374	0.0093

1. Case ID for Type 3 basket starts with "24PTH_T3", while the other filename is the corresponding base case from damaged fuel analysis with Type 1 or Type 2 basket.

2. The results given in the "Type 1/2" column are the results from re-running base damaged fuel cases with SCALE 6.0.

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NO11-005	27 M	Page P 6-183c	January 2024

 Table P.6-51

 Comparison of the Failed Fuel Results for Type 3D Basket to Type 1C/2C Basket – Nominal Compartment Width

C_{res} $ID^{(l)}$	Туре 3			<i>Type 1/2⁽²⁾</i>			
	<i>kkENO</i>	1σ	k eff	k KENO	1σ	k eff	Difference
24PTH_T3_08F_BW15B27_P35E50F50_080 bw15b27p32e50f50_080	0.9158	0.0010	0.9178	0.9322	0.0009	0.9340	0.0162
24PTH_T3_08F_WE15B21_P35E46F45_090 we15b21p32e46f45_090	0.9178	0.0009	0.9196	0.9370	0.0010	0.9390	0.0194

1. Case ID for Type 3 basket starts with "24PTH_T3", while the other filename is the corresponding base case from failed fuel analysis with Type 1 or Type 2 basket.

2. The results given in the "Type 1/2" column are the results from re-running base failed fuel cases with SCALE 6.0.

 Table P.6-51a

 Comparison of the Failed Fuel Results for Type 3D Basket to Type 1C/2C Basket - Minimum Compartment Width

Case ID ⁽¹⁾		Туре 3			<i>Type 1/2⁽²⁾</i>		Difference
	<i>kkeno</i>	1σ	k eff	k keno	1σ	k eff	Dijjerence
24PTH_T3_08F_BW15B27_P35E50F50_080_CW2 bw15b27p32e50f50_080	0.9199	0.0010	0.9219	0.9322	0.0009	0.9340	0.0126
24PTH_T3_08F_WE15B21_P35E46F45_090_CW2 we15b21p32e46f45_090	0.9291	0.0009	0.9309	0.9370	0.0010	0.9390	0.0081

1. Case ID for Type 3 basket starts with "24PTH_T3", while the other filename is the corresponding base case from failed fuel analysis with Type 1 or Type 2 basket.

2. The results given in the "Type 1/2" column are the results from re-running base failed fuel cases with SCALE 6.0.

Revision 22 Page P.6-183d	Januarv 2024
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Figure P.6-27 Poison plate lengths used in the Type 3 KENO model

Page P.6-210 All changes on this page are Amd 18.

- 5. If a leak is found, remove the outer cover plate root pass, the vent and siphon port plugs and repair the inner cover plate welds. Repeat procedure steps from P.8.1.3 Step 18.
- 6. Perform dye penetrant examination of the root pass weld. Weld out the outer top cover plate to the DSC shell and perform dye penetrant examination on the weld surface in accordance with the CoC Appendix A Inspections, Tests, and Evaluations Item 4.3 requirements.
- 7. Seal weld the prefabricated plug over the outer cover plate test port and perform dye penetrant weld examinations.
- 8. Remove the automatic welding machine from the DSC.
- 8a. In accordance with Technical Specification 4.3.2, verify that the NS is filled before the draining operation in Step 9 is initiated and continually monitored during the first five minutes of the draining evolution to ensure the NS remains filled.
- 9. Open the cask drain port valve and drain the water from the cask/DSC annulus.
- 10. Rig the cask top cover plate and lower the cover plate onto the TC.
- 11. Bolt the cask cover plate into place, tightening the bolts to the required torque in a star pattern.

CAUTION: Monitor the applicable time limits of Technical Specification 3.1.3 until the completion of DSC transfer Step 6 of Section P.8.1.6.

- 12. Verify that the TC radial dose rates measured at the surface of the Transfer Cask are compliant with limits specified in CoC Appendix A Inspections, Tests, and Evaluations Item 3.2. The configuration for determining the TC radial surface dose rates shall be in accordance with CoC Appendix A Inspections, Tests, and Evaluations Item 3.2.
- P.8.1.5 TC Downending and Transfer to ISFSI

NOTE: Ensure the administrative controls detailed in Section 5.1.1.5 are being implemented.

1. If loading with OS197/OS197H/OS197FC TC, drain the TC neutron shield to an acceptable location as required to meet the plant lifting crane capacity limit.

CAUTION: The radiation dose rates around the surface of the transfer cask without water in the neutron shield (through step P.8.1.5.10) are expected to be high. Use proper ALARA practices (e.g., use of temporary shielding, appropriate positioning of personnel, etc.) to minimize personnel exposure.

- 2. Re-attach the TC lifting yoke to the crane hook, as necessary. Ready the transfer trailer and cask support skid for service.
- 3. Move the scaffolding away from the cask as necessary. Engage the lifting yoke and lift the cask over the cask support skid on the transfer trailer.
- 4. The transfer trailer should be positioned so that cask support skid is accessible to the crane with the trailer supported on the vertical jacks.

P.8.2 Procedures for Unloading the Cask

P.8.2.1 DSC Retrieval from the HSM

Note: Ensure the administrative controls detailed in Section 5.1.1.5 are being implemented.

- 1. Ready the TC, transfer trailer, and support skid for service and tow the trailer to the HSM. If using the OS200/OS200FC TC to unload, verify that it has been fitted with an internal aluminum sleeve and cask spacer of appropriate height (refer to Drawings NUH-08-8004-SAR and NUH-08-8005-SAR provided in Appendix U.1, Section U.1.5). If using OS197, OS197H or OS197FC TC to unload, verify that it has the appropriate height spacer (see Figure P.4-18).
- 2. Back the trailer as close to the HSM as compatible with HSM door removal and remove the cask top cover plate.
- 3. Cut any welds from the door and remove the HSM door using a porta-crane. Remove the DSC drop-in retainer.
- 4. Using the skid positioning system align the cask with the HSM and position the skid until the cask is docked with the HSM access opening.
- 5. Using optical survey equipment, verify alignment of the cask with respect to the HSM. The TC shall be aligned with respect to the HSM such that the longitudinal centerline of the DSC in the TC is within $\pm \frac{1}{8}$ inch of its true position when the TC is docked with the HSM front access opening.

If the alignment tolerance is exceeded, the following actions should be taken:

- a. Confirm that the transfer system is properly configured,
- b. Check and repair the alignment equipment, or
- c. Confirm the locations of the alignment targets on the TC and HSM.
- 5a. Install the cask restraints.
- 6. Install and align the hydraulic ram with the cask.
- 7. Extend the ram through the cask into the HSM until it is inserted in the DSC grapple ring.
- 8. Activate the arms on the ram grapple mechanism with the DSC grapple ring.
- 8a. From this point, until fuel has been removed from the DSC or the DSC has been removed from the TC, the DSC will be inspected for damage after any TC drop of fifteen inches or greater.
- 9. Retract ram and pull the DSC into the cask.
- 10. Retract the ram grapple arms.
- 11. Disengage the ram from the cask.
- 12. Remove the cask restraints.
- 13. Using the skid positioning system, disengage the cask from the HSM.

72.48

Note: If using the OS200/OS200FC TC to unload, place a sleeve ring spacer at the top of the aluminum sleeve (refer to Drawing NUH-08-8004-SAR provided in Appendix U.1, Section U.1.5).

14. Install the cask top cover plate and ready the trailer for transfer.

15. Replace the door on the HSM.

P.8.2.2 <u>Removal of Fuel from the DSC</u>

When the DSC has been removed from the HSM, there are several potential options for off-site shipment of the fuel. It is preferred to ship the DSC intact to a reprocessing facility, monitored retrievable storage facility or permanent geologic repository in a compatible shipping cask licensed under 10 CFR *Part* 71. *Note that ISG-2, Revision 2 [8.6] also defines ready retrieval or retrievability of spent fuel as the ability to remove a canister (DSC) loaded with spent fuel assemblies from a storage cask/overpack (Option B). DSCs approved for use and loaded from Amendment 18 forward demonstrate fuel retrievability based on Option B.*

If it becomes necessary to remove fuel from the DSC prior to off-site shipment, there are two basic options available at the ISFSI or reactor site. The fuel assemblies could be removed and reloaded into a shipping cask using dry transfer techniques, or if the applicant so desires, the initial fuel loading sequence could be reversed and the plant's spent fuel pool utilized. Procedures for unloading the DSC in a fuel pool are presented here. However, wet or dry unloading procedures are

NUH-003		
Revision 22	<i>Page P.8-15</i> a	January 2024
	All changes on this page are Amd 18.	

P.8.9 <u>References</u>

- 8.1 U.S. Nuclear Regulatory Commission, "Standard Format and Content for a Topical Safety Analysis Report for a Spent Fuel Dry Storage Container," Regulatory Guide 3.61 (February 1989).
- 8.2 U.S. Nuclear Regulatory Commission, Office of the Nuclear Material Safety and Safeguards, "Safety Evaluation of VECTRA Technologies' Response to Nuclear Regulatory Commission Bulletin 96-04 For the NUHOMS[®]-24P and NUHOMS[®]-7P.
- 8.3 U.S. Nuclear Regulatory Commission Bulletin 96-04, "Chemical, Galvanic or Other Reactions in Spent Fuel Storage and Transportation Casks," July 5, 1996.
- 8.4 SNT-TC-1A, "American Society for Nondestructive Testing, Personnel Qualification and Certification in Nondestructive Testing," 1992.
- 8.5 U.S. Nuclear Regulatory Commission, Interim Staff Guidance (ISG-22), "Potential Rod Splitting due to Exposure to an Oxidizing Atmosphere during Short-term Cask Loading Operations in LWR or Other Uranium Oxide Based Fuel."
- 8.6 Division of Spent Fuel Management Interim Staff Guidance 2, Revision 2 (ISG-2) "Fuel Retrievability in Spent Fuel Storage Applications," April 26, 2016.

NUH-003		
Revision 22	Page P.8-25	January 2024
	All changes on this page are Amd 18.	

P.9 Acceptance Tests and Maintenance Program

P.9.1 Acceptance Tests

The pre-operational testing requirements for the NUHOMS[®]-24PTH system are given in Section 9.0. The NUHOMS[®]-24PTH DSC has been enhanced to provide leaktight confinement and the basket includes an updated poison plate design. The requirements for the poison plate material acceptance tests and the NUHOMS[®]-24PTH DSC welds for the 24PTH system are described.

P.9.1.1 Visual Inspection

Visual examinations are performed at the fabricator's facility to ensure that the NUHOMS[®]-24PTH system components conform to the fabrication specifications and drawings.

P.9.1.2 <u>Structural Tests</u>

The NUHOMS[®]-24PTH DSC confinement welds are designed, fabricated, tested and inspected in accordance with ASME B&PV Code Section III, Subsection NB [9.1] with exceptions as listed in Section P.3.1. The following requirements are unique to the NUHOMS[®]-24PTH DSC:

- The inner bottom cover weld is inspected in accordance with Article NB-5231 when the weld joint design is per Figure NB-4243-1,
- The outer bottom cover weld is penetrant tested, and
- The outer top cover plate weld root and cover are penetrant tested.

The NUHOMS[®]-24PTH DSC *Type 1 and 2 baskets are* designed, fabricated, and inspected in accordance with ASME B&PV Code Section III, Subsection NG [9.1] with exceptions as listed in Section P.3.1.

P.9.1.3 Leak Tests

The NUHOMS[®]-24PTH DSC confinement boundary is leak tested to verify that it is leaktight in accordance with the criteria of ANSI N14.5 [9.2]. The personnel performing the leak test are qualified in accordance with SNT-TC-1A [9.8].

The leak tests are typically performed using the helium mass spectrometer method. Alternative methods are acceptable, provided that the required sensitivity is achieved.

P.9.1.4 <u>Component Tests</u>

The NUHOMS[®] system does not include any components such as valves, rupture discs, pumps, or blowers. No other components of the NUHOMS[®] system require testing, except as discussed in this chapter.

NUH-003		
Revision 22	Page P.9-1	January 2024
	All changes on this page are Amd 18.	

P.9.1.5 Shielding Integrity Tests

The transfer cask poured lead shielding integrity will be confirmed via gamma scanning prior to first use. The detector and examination grid will be matched to provide coverage of the entire lead-shielded surface area. The acceptance criterion is attenuation greater than or equal to that of a test block matching the cask through-wall configuration with lead and steel thicknesses equal to the design minima less 5%.

The radial neutron shielding is provided by filling the neutron shield shell with water during operations. No testing is necessary. The neutron shield material in the lid and bottom end is a cementitious grout, NS-3. The shielding performance of this material will be assured by written procedures.

The gamma and neutron shielding materials of the storage system itself are limited to concrete HSM components and steel shield plugs in the DSC, *except for the 24PTH-S-LC DSC*. The integrity of these shielding materials is ensured by the control of their fabrication in accordance with the appropriate ASME, ASTM or ACI criteria. No additional acceptance testing is required.

The 24PTH-S-LC DSC incorporates lead in the top and bottom shield plugs, either installed by a pour or a precast insert. A volumetric inspection of the lead, either by a gamma inspection or an ultrasonic inspection, shall be performed to check for the existence and extent of any voids. The results of this inspection shall verify that the effective thickness of the lead through any section conforms to the thickness specified on the drawings.

P.9.1.6 <u>Thermal Acceptance Tests</u>

No thermal acceptance testing is required to verify the performance of each storage unit other than that specified in the Technical Specifications for initial loading.

The heat transfer analysis for the basket includes credit for the thermal conductivity of neutronabsorbing materials. *Requirements for Type 1 and 2 baskets are specified in Section P.4.3. For Type 3 baskets, the minimum acceptable thermal conductivity is*

] Because these materials do not have publicly documented values for thermal conductivity, testing of such materials will be performed in accordance with Section P.9.1.7.6.

P.9.1.7 Poison Acceptance

The neutron absorber used for criticality control in the DSC basket may consist any of the following types of material:

- a) Borated aluminum (Basket Types 1 and 2 only)
- b) Boron carbide/aluminum metal matrix composite (MMC) (All basket types)
- c) BORAL[®] (Basket Types 1 and 2 only)

NUH-003				
Revision 22	Page P.9-2	January 2024		
All changes on this page are Amd 18.				

P.9.1.7.6 <u>Thermal Conductivity Testing of Poison Plates</u>

Acceptance testing shall conform to ASTM E1225¹, ASTM E1461², or equivalent method, performed at room temperature on coupons taken from the rolled or extruded production material. Initial sampling shall be one test per lot, and may be reduced if the first five tests meet the specified minimum thermal conductivity. For cast products, the lot shall be defined by the heat or ingot. For other products, the lot shall be defined as material produced in a single production campaign using the same heat or lots of aluminum and boron carbide feed materials.

If a thermal conductivity test result is below the specified minimum, at least four additional tests shall be performed on the material from that lot. If the mean value of those tests, including the original test, falls below the specified minimum, the associated lot shall be rejected.

After twenty five tests of a single type of material, with the same aluminum alloy matrix, the same boron content, and the same primary boron phase, e.g., B₄C, TiB₂, or AlB₂, if the mean value of all the test results less two standard deviations meets the specified thermal conductivity, no further testing of that material is required. This exemption may also be applied to the same type of material if the matrix of the material changes to a more thermally conductive alloy (e.g., from 6000 to 1000 series aluminum), or if the boron content is reduced without changing the boron phase.

The measured thermal conductivity values shall satisfy the minimum required conductivities as specified in Section P.4.3 *for Type 1 and 2 baskets. For Type 3 baskets, the minimum acceptable thermal conductivity is as described in Section P.9.1.6.*

The thermal conductivity test requirement does not apply to aluminum that is paired with the neutron absorber.

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NUH-005				
Revision 22	Page P.9-5	January 2024		
All changes on this page are Amd 18.				

¹ ASTM E1225, "Thermal Conductivity of Solids by Means of the Guarded-Comparative-Longitudinal Heat Flow Technique"

² ASTM E1461, "Thermal Diffusivity of Solids by the Flash Method"

P.9.1.8 <u>High-Strength Low-Alloy Steel for Basket Type 3</u>

The basket structural material is the same as is qualified and tested for the EOS-37PTH under CoC 1042 [9.11]. The structural steel grid plate shall be a High-Strength Low-Alloy (HSLA) steel meeting one of the following requirements A, B, or C:

- A. ASTM A829 Gr 4130 [9-13] or AMS 6345 SAE 4130, quenched and tempered at not less than 1050 °F, 103.6 ksi minimum yield strength, and 123.1 ksi minimum ultimate strength. This material is qualified as described in [9.12].
- B. ASME Code edition 2010 with 2011 addenda, SA-517 Gr A, B, E, F, or P. This material is qualified by the material properties at elevated temperature in ASME Section II, Part D [9.14], which exceed the values of yield and ultimate strength in UFSAR Table P.3.3-10.
- *C. Other HSLA steel, with the specified heat treatment, meeting these qualification and acceptance criteria:*
 - *i.* If quenched and tempered, the tempering temperature shall be at no less than 1000 °F,
 - ii. Qualified prior to first use by testing at least two lots and demonstrating that the fracture toughness value $K_{JIc} \ge 150$ ksi \sqrt{in} at -40 °F with 95% confidence based on the methodology in Reference [9.12] for HSLA steel.
 - iii. Qualified prior to first use by testing at least two lots and demonstrating that the 95% lower tolerance limit of yield and ultimate strengths \geq the values in UFSAR Table P.3.3-10 based on the methodology in Reference [9.12] for HSLA steel.
 - *iv.* Meet production acceptance criteria based on the 95% lower tolerance limit of yield strength and ultimate strength at room temperature as determined by qualification testing described in Section 9.1.8.iii.

As discussed in the Response to RSI 8-6 of [9.19], the 103.6 ksi yield and 123.1 ksi ultimate strength requirements only apply to the A829 Gr 4130 material and are not necessary for SA-517 because the mechanical properties from ASME Section II Part D exceed the design requirements of Table P.3.3-10 at all temperatures. The rationale for applying these acceptance criteria to A829 Gr 4130 is explained in the Response to RSI 8-5 of [9.19]. The impact testing acceptance criteria provide an alternate means of demonstrating sufficiently ductile behavior at the minimum service temperature as explained in RSI 8-6 of [9.19].

The basket HSLA material shall also meet the following production acceptance criteria:

• Weld repair shall not be permitted.

.....

- Impact testing shall be performed at -40 $^{\circ}F$
 - Charpy testing per ASTM A370 [9.15], minimum absorbed energy 25 ft-lb average, 20 ft-lb lowest of three (modify these acceptance criteria for sub-size specimens per A370-17 Table 9), or
 - Dynamic tear testing per ASTM E604 [9.16] with acceptance criterion of a minimum 80% shear fracture appearance.
- Test specimen location, orientation, and sampling rate per ASTM A6 [9.17] or ASTM A20 [9.18] for production acceptance testing.

All changes on this page are Amd 18.			
Revision 22	<i>Page P.9-12</i> a	January 2024	
NUH-003			

Proprietary Information on This Page Withheld Pursuant to 10 CFR 2.390

NUH-003			
Revision 22	<i>Page P.9-12</i> b	January 2024	
All changes on this page are Amd 18.			

P.9.3 <u>References</u>

- 9.1 ASME Boiler and Pressure Vessel Code, Section III, 1998 Edition including 2000 addenda.
- 9.2 ANSI N14.5-1997, "American National Standard for Leakage Tests on Packages for Shipment of Radioactive Materials," February 1998.
- 9.3 Deleted.
- 9.4 Deleted.
- 9.5 "Aluminum Standards and Data, 2003" The Aluminum Association.
- 9.6 Natrella, "Experimental Statistics," Dover, 2005.
- 9.7 Deleted.
- 9.8 SNT-TC-1A, "American Society for Nondestructive Testing, Personnel Qualification and Certification in Nondestructive Testing," 1992.
- 9.9 Deleted.
- 9.10 Deleted.
- 9.11 CoC 1042, "Updated Final Safety Analysis Report (UFSAR) for the NUHOMS[®] EOS System, Revision 3," June 2020.
- 9.12

]

- 9.13 ASTM A829, "Standard Specification for Alloy Structural Steel Plates," ASTM International, West Conshohocken, PA, 2014.
- 9.14 ASME Boiler and Pressure Vessel Code, Section II, Materials Specifications, Part D, 2010 Edition with 2011 Addenda.
- 9.15 ASTM A370, "Standard Test Methods and Definitions for Mechanical Testing of Steel Products," ASTM International, West Conshohocken, PA, 2021.
- 9.16 ASTM E604, "Standard Test Method for Dynamic Tear Testing of Metallic Materials," ASTM International, West Conshohocken, PA, 2018.
- 9.17 ASTM A6, "Standard Specification for General Requirements for Rolled Structural Steel Bars, Plates, Shapes, and Sheet Piling" ASTM International, West Conshohocken, PA, 2016.
- 9.18 ASTM A20, Standard Specification for General Requirements for Steel Plates for Pressure Vessels, ASTM International, West Conshohocken, PA, 2020.
- 9.19 Acceptance Review of TN Americas LLC Application for Certificate of Compliance No. 1042, Amendment No. 1, to the NUHOMS[®] EOS System, Revision 1 – Response to Request for Supplemental Information (Docket No. 72-1042, CAC No. 001028, EPID: L-2018-LLA-0043), ML18178A029.

All changes on this page are Amd 18.				
Revision 22	Page P.9-14	January 2024		
NUH-003				

Poison Type	24PTH Basket Type	Minimum Poison Loading (B10 mg/cm ²)	% Credit Used in Criticality Analysis
Borated Aluminum ⁽¹⁾ /MMC	1A or 2A	7	
	1B or 2B	15	00
	1C or 2C	32	90
	3D	35	
BORAL®	1A or 2A	9	
	1B or 2B	19	75
	1C or 2C	40	

 Table P.9-1

 B10 Specification for the NUHOMS[®]-24PTH Poison Plates

Notes:

(1) Borated Aluminum is not an option for the Type 3 basket

NUH-003		
Revision 22	Page P.9-15	January 2024
	All changes on this page are Amd 18.	

P.10.1 Occupational Exposure

The occupational exposure results shown herein do not account for loading of 0.380 MTU fuel, which is described in Section P.5.4.11. Loading 0.380 MTU fuel results in an increase in occupational exposure of 10%.

The expected occupational dose for placing a canister of spent fuel into dry storage is based on the operational steps outlined in Table 7.4-1. The total exposure for the occupational dose due to placing a single NUHOMS[®]-24PTH-L DSC into storage is conservatively estimated to be 4.5 person-rem. This value bounds the exposure for loading either a 24PTH-S or 24PTH-S-LC DSC into storage. This is a very conservative estimate because the dose rates on and around the 24PTH DSC's used in these calculations are based on very conservative assumptions for the design-basis source terms and analyses models (Configuration 2 from Section P.2). The calculated exposures are due mainly to the expected gamma dose rate during preparation for welding.

The exposure calculation is based on the 24PTH-L Type 2 DSC, which bounds the 24PTH-L Type 1 DSC. As noted in Chapter P.5, the 24PTH-L Type 3 DSC has lower cask side dose rates and higher cask end dose rates than the 24PTH-L Type 2 DSC. The net effect on occupational exposure is an increase of 3% for the 24PTH-L Type 3 DSC, which is negligible and within the uncertainty of the methodology.

Measured occupational exposures are usually significantly less than calculated values and are provided for multiple past loading campaigns in Table P.10-1a. The average measured occupational exposures range from 0.17 person-rem to 0.36 person-rem and are significantly lower than the computed value of 4.5 person-rem. This result implies large conservatism in the computed exposure.

The NUHOMS[®]-24PTH System loading operations, the number of workers required for each operation, and the amount of time required for each operation are presented in Table P.10-1. This information is used as the basis for estimating the total occupational exposure associated with one fuel load. This evaluation is performed for the storage of one design-basis NUHOMS[®]-24PTH-L DSC in an HSM-H. The loading operations are identical for the 24PTH-S and 24PTH-S-LC DSC. The dose rates applicable for each operation are based on the results presented in Section P.5.4 for loading operations. Engineering judgment and operational experience are used to estimate dose rates that were not explicitly evaluated. This evaluation assumes that a transfer trailer/skid with an integral ram is used for the DSC transfer operations. Licensees may elect to use different equipment and/or different procedures. Each Licensee must evaluate any such changes in accordance with its ALARA program.

Unique steps are sometimes necessary at the individual site to load the canister, complete closure operations and place the canister in the HSM. Specifically, the licensee may choose to modify the sequence of operations in order to achieve reduced dose rates for a larger number of steps, with the end result of reduced total exposure. The only requirement is that the licensee practice ALARA with respect to the total exposure received for a loading campaign. These estimated durations, manloading and dose rates are not limits.

NUH-003		
Revision 22	Page P.10-2	January 2024
	All changes on this page are Amd 18.	
The amount of time required to complete some operations as identified in Table P.10-1 may be greater than the actual amount of time spent in a radiation field. The process of vacuum drying the DSC includes setting up the vacuum drying system (VDS), verifying that the VDS is operating correctly, evacuating the DSC cavity, monitoring the DSC pressure, and disconnecting the VDS from the DSC. Of these tasks, only setup and removal of the VDS require a worker to spend time near the DSC. The most time consuming task, evacuating the DSC, does not require anyone to be present near DSC at all. The total exposure calculated for each task is therefore not necessarily equal to the number of workers multiplied by the total time required, multiplied by a dose rate. The exposure estimation for each task correctly accounts for cases such as vacuum drying assumes that good ALARA practices are followed.

The results of the evaluations of the 24PTH-L are presented in Table P.10-1.

NUH-003		
Revision 22	Page <i>P.10-2</i> a	January 2024
	All changes on this page are Amd 18.	

Loading Campaign	HSM	DSC	Average DSC Heat Load (kW)	Average Occupational Exposure (person-rem)
1	HSM Model 102	24PTH-S-LC	22.3	0.34
2	HSM Model 102	24PTH-S-LC	22.4	0.31
3	HSM Model 102	24PTH-S-LC	22.8	0.36
4	HSM-H	24PTH-L	25.8	0.23
5	HSM-H	24PTH-L	26.6	0.34
6	HSM-H	24PTH-L	29.0	0.24
7	HSM-H	24PTH-L	28.0	0.17
8	HSM-H	24PTH-L	29.3	0.17

Table P.10-1aMeasured Occupational Exposures

NUH-003		
Revision 22	Page <i>P.10-9</i> a	January 2024
	All changes on this page are Amd 18.	

P.11.1.2 Extreme Temperatures

No change. The off-normal maximum ambient temperature of 125°F is used in Section 8.1.2.2. For the NUHOMS[®]-24PTH system, a maximum ambient temperature of 117°F is used. Therefore, the analyses in Section 8.1.2.2 bound TCs and HSM Model 102 used in the NUHOMS[®]-24PTH system.

P.11.1.2.1 Postulated Cause of Event

No change. See Section 8.1.2.2.

P.11.1.2.2 Detection of Event

No change to Section 8.1.2.2.

P.11.1.2.3 <u>Analysis of Effects and Consequences</u>

The thermal evaluation of the NUHOMS[®]-24PTH system for off-normal conditions is presented in Section P.4. The 100°F normal condition with insolation bounds the 117°F case without insolation for the DSC in the TC. Therefore the normal condition maximum temperatures are bounding. The 117°F case with the DSC in the HSM-H is not bounded by the normal conditions and therefore evaluated in Section P.4.

The NUHOMS[®] standardized TC and HSM Model 102 were evaluated for a maximum heat load of 24 kW and maximum off-normal ambient temperature of 125°F. The maximum heat load of the 24PTH-S-LC DSC in standardized TC or HSM Model 102 is limited to 24 kW. Therefore the evaluation presented in Section 8.1.2.2 is bounding for these components.

The structural evaluation of the 24PTH DSC for off-normal temperature conditions is presented in Section P.3.6.2.2. The structural evaluation of the basket due to off-normal thermal conditions is presented in Section P.3.6.1.3 *for the Types 1 and 2 basket. The Type 3 basket is evaluated considering the bounding normal and off-normal thermal conditions in Section P.3.8.* The structural evaluation of HSM-H and OS197FC Transfer Cask for off-normal conditions with 24PTH DSC are presented in Section P.3.6.

As indicated in Section P.3.6, the structural evaluation of the HSM-HS and OS200/OS200FC Transfer Cask, as presented in Chapter U.3, Section U.3.6.2.3 and Chapter U.3, Section U.3.6.2.4, respectively, are not affected when loaded with the 24PTH DSC.

P.11.1.2.4 Corrective Actions

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Restrictions for onsite handling of the TC with a loaded DSC under extreme temperature conditions are presented in Technical Specifications 4.4.1.A and 4.4.1.B. There is no change to this requirement as a result of addition of the NUHOMS[®]-24PTH DSC.

	All changes on this page are Amd 18.	
Revision 22	Page P.11-3	January 2024
NUH-003		

remain sealed in the DSC and, therefore, will not contaminate the encroaching flood water. See also Section 8.2.4.3.

P.11.2.4.4 <u>Corrective Actions</u>

No change to Section 8.2.4.4.

P.11.2.5 Accidental TC Drop

P.11.2.5.1 Cause of Accident

See Section P.3.7.4.

P.11.2.5.2 Accident Analysis

The evaluation of the NUHOMS[®]-24PTH DSC shell and basket assemblies due to an accidental drop is presented in Section P.3.7.4 *for the Types 1 and 2 basket and in Section P.3.8 for the Type 3 basket*. As documented in Chapter P.3.7, the TCs have been evaluated for a payload that bounds the 24PTH DSC payload, and therefore is not affected by the 24PTH DSC. As shown in Section P.3.7.4, the DSC shell and *Types 1 and 2* basket stress intensities are within the appropriate ASME Code Service Level D allowable limits and maintains their structural integrity. *The Type 3 basket grid plate plastic strains meet the strain criteria for high-strength low-alloy steel as shown in Section P.3.8.7.3*.

For the standardized TC with solid neutron shield, complete loss of neutron shield during cask drop events is not credible. For the case of a liquid neutron shield, a complete loss of neutron shield was evaluated at the 100°F ambient condition with full solar load in Section P.4. It is conservatively assumed that the neutron shield jacket is still present but all the liquid is lost. The maximum DSC shell temperature is 685°F. The maximum OS197/OS197H/OS197FC cask inner liner, OS197/OS197H/OS197FC cask outer shell, and OS197/OS197H/OS197FC cask neutron shield jacket temperatures are 530°F, 488°F and 325°F respectively for 24PTH DSC with 40.8 kW decay heat load as shown in Table P.4-12. The fuel cladding temperatures are below their limit as shown in Table P.4-25. Accident thermal conditions, such as loss of the liquid neutron shield, need not be considered in the load combination evaluation. Rather the peak stresses resulting from the accident thermal conditions must be less than the allowable fatigue stress limit for 10 cycles from the appropriate fatigue design curves in Appendix I of the ASME Code. Similar analyses of other NUHOMS[®] TCs have shown that fatigue is not a concern. Therefore, these thermal stresses in a TC with a liquid neutron shield need not be evaluated for the accident condition.

As documented in Section U.3.3.7.4, the OS200 transfer cask has been evaluated for the 32PTH1 DSC payload, which bounds that for the 24PTH DSC.

For the OS200 transfer cask, the assessment of a complete loss of neutron shield, presented in Section U.11.2.5.2, is not changed.

NUH-003		
Revision 22	Page P.11-14	January 2024
	All changes on this page are Amd 18.	

Table R.1-1Comparison of Key Parameters of NUHOMS® HSM Model 152 VersusHSM Model 80 and Model 102

Characteristic	HSM Model 80	HSM Model 102	HSM Model 152
Overall Length (without Shield Walls)	19'-10″	19'-10″	19'-7"
Overall Width (without Shield Walls)	9'-8"	9'-8"	8'-5"
Overall Height	15'-0"	15'-0"	17'-10″
Roof Thickness	3'-0"	3'-0"	5'-8"
End Shield Wall Thickness	2'-0"	2'-0"	3'-0"
Rear Shield Wall Thickness	2'-0"	2'-0"	3'-0"
Side Wall Thickness	1'-6"	1′-6″	1'-0"
Back Wall Thickness	1'-0"	1'-0"	1'-0"
Front Wall Thickness	2'-6"	2'-6"	2'-6"
Floor Thickness	1'-0"	1'-0"	N/A
Door Construction	~ 8" thick consisting of concrete core (~ 6") encased by stainless steel (2")	24" thick consisting of reinforced concrete	24" thick consisting of reinforced concrete
Inlet Vent Configuration	4 along lower side walls	4 along lower side walls	1 along bottom front wall
Inlet Vent Area	1200 in ²	1200 in ²	792 in ²
Outlet Vent Configuration	4 along upper side walls	4 along upper side walls	1 along interface of roof and rear wall
Outlet Vent Area	1680 in ²	1680 in ²	608 in ²
Gap Between Adjacent Modules Placed Side-By-Side	6″	6″	0"
Bird Screen Type	Wire Cloth 3/4" mesh x 0.120" wire	Wire Cloth 3/4" mesh x 0.120" wire	Wire Cloth 3/4" mesh x 0.080" wire
Weight – Base Unit (including HSM support steel)	164,403 ⁽¹⁾	170,900 ⁽¹⁾	175,678
Weight – Roof	80,970 (1)	89,050 ⁽¹⁾	134,043
Weight Door	6,556	12,620	12,599
DSC Support Steel Configuration	Structural steel frame with rails installed to permit sliding of DSC	Structural steel frame with rails installed to permit sliding of DSC	Guide rails bolted to concrete to permit sliding of DSC
Heat Shield Thickness	12 Gauge (0.1054″) Galvanized Steel	12 Gauge (0.1054″) Galvanized Steel	12 Gauge (0.1054″) Stainless Steel

Note: (1) Based on BWR dimensions and weights which envelop the PWR dimensions and weights.

The canister stop plates are loaded by the normal and off-normal handling loads and seismic loads. The normal handling load during the insertion of the DSC is 60 kips on both of the rails. The maximum off-normal handling load is 80 kips on one rail. The seismic load considering a conservative factor of 1.5 is 95.625 kips acting on each plate. Stresses in the canister stop plates, rail-to-canister stop end plate weld, and canister stop end plate-to-stiffener plate welds are all determined to be less than the specified allowables.

R.3.7.8.8 Thermal Cycling of the HSM Model 152

No change to Section 8.2.10.5.

R.3.7.8.9 Evaluation of HSM Model 152 Concrete Components with Temperature Exceeding Code Limits

The maximum concrete temperature under normal and off-normal condition for the HSM Model 152 are 221 °F and 231/234 °F (for 117 °F and 125 °F ambient conditions), respectively. These temperatures exceed 200 °F in normal condition and 225 °F in off-normal condition, but do not exceed 300 °F. Therefore, as specified in CoC 1004 SER [3.9], no tests or reduction in concrete strength are required to demonstrate the capability of the concrete to adequately handle the elevated temperatures provided Type II cement is used and special aggregates are selected which are acceptable for concrete in this temperature range. *In lieu of Type II cement, blended Portland cement meeting the requirements of ASTM C595 is acceptable for use*. This approach is consistent with standardized HSM design, for which special aggregates for the roof concrete mix are provided.

The maximum concrete temperature for a 40-hour blocked vent condition is 394/397 °F (for 117°F and 125 °F ambient conditions), which exceeds the 350°F limit specified in CoC 1004 SER [3.9]. As noted in the CoC 1004 SER [3.9], use of any Portland cement concrete where accident temperature exceeds 350 °F will require testing be performed on the exact concrete mix. *Portland cements meeting the requirements of ASTM C150 or ASTM C595 (blended Portland) are acceptable for use*. Elevated temperature testing of the exact concrete mix (cement type, additives, water-cement ratio, aggregates, proportions) is to be performed for the HSM Model 152. The use of high temperature concrete testing is explicitly accepted by the NRC, as documented in the NRC's SER, Section 3.0, Page 3-5. The testing shall demonstrate the level of strength reduction is less than that which was applied (10% in the calculation), and show that the increased temperatures do not cause deterioration of the concrete.

NUH-003		
Revision 22	Page R.3-20	January 2024
	All changes on this page are Amd 18.	

• For off-normal and accident operating conditions, the maximum DSC shell temperatures for a 24P DSC stored in a standardized HSM Model 80/102 generally bound those computed for all DSC models stored in HSM Model 152. For the cases when the 32PT and 24PHB DSCs are stored within HSM Model 152, the maximum DSC shell temperatures are slightly higher (12°F) than those when the 32PT and 24PHB DSCs are in HSM Model 80/102.

The increase in DSC shell temperature is conservatively $\sim 2\%$ of absolute temperature. Thus based on gas laws the maximum increase in DSC internal pressure would be less than 2%. From the FSAR the bounding pressures for the DSC are for the Transfer Cask conditions (off-normal and accident), which are unchanged, and even in these cases there is more that 2% margin available.

R.4.4.2 Evaluation of HSM Model 152 Concrete Temperatures

The maximum concrete temperatures for a 24 kW DSC stored in an HSM Model 152 are tabulated in Table R.4-2 and are compared against the allowable concrete temperatures. It should be noted that the methodology used for calculating the HSM Model 152 concrete temperature is the same as that used in [4.1] (HEATING7).

From a review of the results summarized in Table R.4-2 below, the following observations can be made:

- The maximum concrete temperatures for the normal and off-normal thermal conditions exceed 200 °F but do not exceed 300 °F, therefore no tests or reduction of concrete strength are required so long as Type II cement is used and special concrete aggregates are selected in accordance with the criteria recommended by the U.S. NRC in [4.3]. *In lieu of Type II cement, blended Portland cement meeting the requirements of ASTM C595 is acceptable for use.*
- The maximum concrete temperature for the accident condition exceeds 350°F, therefore testing is required on the exact concrete mix (cement type, additives, water-cement ratio, aggregates, proportions, etc.) to acceptably demonstrate the level of strength reduction which needs to be applied, and to show that the increased temperatures do not cause deterioration of the concrete. The use of high temperature concrete testing is acceptable, as documented in the SER [4.3], Section 3.0, Page 3-5. The testing shall demonstrate the level of strength reduction is less than that which was applied (10% in the calculation), and show that the increased temperatures do not cause deterioration of the concrete.

R.4.4.3 Evaluation of HSM Model 152 Maximum Fuel Cladding Temperatures

A summary of the maximum fuel cladding temperatures evaluated for the various DSC models stored in HSM Model 152 is shown in Table R.4-3. In all cases, calculated cladding temperatures are less than allowables.

R.4.4.4 Evaluation of HSM Model 152 Maximum Air Exit Temperature

Table R.4-4 documents the results of an evaluation that shows the equilibrium air temperature difference between the ambient temperature and the vent outlet temperature (Δ T) with a 24 kW NUH-003 Registron 22

Revision 22	Page R.4-3	January 2024
	All changes on this page are Amd 18.	

Thermal Loading Condition	Maximum Ambient Temperature (°F)	24kW DSC in HSM 152 Concrete Temperature (°F)	HSM 152 Allowable Concrete Temperature (°F)
Normal	100	221	300 (1)
Off-Normal	117 125	231 234	300 (1)
Accident 40 Hour Blocked Vent	117 125	394 397	425 (2)

Table R.4-2	Table R.4-2	
Maximum Concrete Temperatures for the HSM Model 152	Concrete Temperatures for the HSM Model 152	2

Notes:

- Use of Type II cement in combination with special aggregates are selected which are acceptable for concrete in this temperature range as specified in the "Discussion of Concrete Constituents and Temperature Suitability" in the Safety Evaluation Report of Safety Analysis Report for the Standardized NUHOMS[®] Horizontal Modular Storage System for Irradiated Nuclear Fuel (Pages 3-4 and 3-5), U.S. Nuclear Regulatory Commission, December 1994 [4.3]. In lieu of Type II cement, blended Portland cement meeting the requirements of ASTM C595 is acceptable for use.
- 2. Use of any Portland cement concrete where "accident" temperatures exceed 350°F requires performance of tests on the exact concrete mix used as specified in the Safety Evaluation Report of Safety Analysis Report for the Standardized NUHOMS[®] Horizontal Modular Storage System for Irradiated Nuclear Fuel (Page 3-5), U.S. Nuclear Regulatory Commission, December 1994 [4.3]. Portland cements meeting the requirements of ASTM C150 or ASTM C595 (blended Portland) are acceptable for use.

NUH-003		
Revision 22		

Parameter	61BTH Type 1 DSC	61BTH Type 2 DSC
DSC Length (in)	196.04 (Maximum)	196.04 (Maximum)
DSC Outside Diameter (in)	67.25	67.25
DSC Cavity Length (in)	178.41 (Minimum)	178.41 (Minimum)
DSC Shell Thickness (in)	0.5	0.5
DSC Loaded Weight, Dry (kips)	88.7(2)	93.1
DSC Loaded Weight, Wet (kips) ⁽³⁾	100.6	102.5
HSM-H/HSM Model 202 Single Module Weight, Empty (kips)	334.4	334.4
HSM-H/HSM Model 202 Single Module Weight, Loaded (kips)	423.1	427.5
HSM Model 80 Weight, Empty (kips)	252.0	N/A
HSM Model 80 Weight, Loaded (kips)	340.4	N/A
HSM Model 102 Weight, Empty (kips)	283.2	N/A
HSM Model 102 Weight, Loaded (kips)	371.9	N/A
HSM Model 152 Weight, Empty (kips)	318.3	N/A
HSM Model 152 Weight, Loaded (kips)	407.0	N/A

Table T.1-1 Key Design Parameters of the NUHOMS[®]-61BTH System⁽¹⁾

HSM-H ⁽⁴⁾	
Overall Length (without shield walls), in	248
Overall Width (without shield walls), in	116
Overall Height, in	222

(1) Unless stated otherwise, nominal values are provided.

(2) With optional top grid assembly (bounding)

(3) Without top cover plates(4) Bounds other HSM types

T.2.2 Design Criteria for Environmental Conditions and Natural Phenomena

The NUHOMS[®]-61BTH DSC is handled and stored in the same manner as the existing NUHOMS[®]-61BT System. The environmental conditions and natural phenomena are the same as those described in Appendix K. Updated criteria are given in the applicable section. Table T.2-14 summarizes the design criteria for the 61BTH DSC. This table also summarizes the applicable codes and standards utilized for design. Design criteria for the Standardized HSM Model 80, 102, 152 and 202 remain the same as shown in Chapter 3, Section 3.2.5. Design criteria for the HSM-H are the same as described in Appendix P. The OS197FC TC described in Chapter 1, provided with a modified top lid, is designated as the OS197FC-B TC. A two-piece lid option is also available for the OS197FC-B when used with the 61BTH Type 2 DSC. The design criteria for the OS197FC-B TC remain the same as shown in Chapter 3, Section 3.2.5 of the UFSAR.

Modifications have been made to the HSM-HS and the OS200/OS200FC TC design configuration described in Appendix U, Section U.1.2 to accommodate the smaller diameter of the NUHOMS[®]-61BTH DSC.

Notes:

- The design criteria listed in this section for the HSM-H module are also applicable to HSM-HS except for the high seismic loads as discussed below in Section T.2.2.3.
- The design criteria for the OS200/OS200 FC TC are as described in Appendix U, Section U.2.2 except for the seismic loads as discussed below in Section T.2.2.3.

T.2.2.1 <u>Tornado Wind and Tornado Missiles</u>

No change to Section P.2.2.1 for HSM-H or to Chapter 3, Section 3.2.5 for the standardized HSM.

The evaluation of tornado-generated missile loads on the transfer cask summarized in Chapter 8, Section 8.2 of the UFSAR remains unchanged.

T.2.2.2 <u>Water Level (Flood) Design</u>

No change to Chapter 3, Section 3.2.2.

T.2.2.3 <u>Seismic Design</u>

The seismic design criteria for the HSM-H, the 61BTH DSC and the OS197FC-B TC are consistent with the criteria set forth in Chapter 3, Section 3.2.3, with the exception that the NRC Regulatory Guide 1.60 (R.G. 1.60) [2.6] response spectra is anchored to a maximum ground acceleration of 0.30g (instead of 0.25g) for the horizontal components and 0.20g (instead of 0.17g) for the vertical component. The results of the frequency analysis of the HSM-H structure (which includes a simplified model of the DSC) yield a lowest frequency of 22.1 Hz in the transverse direction and 28.4 Hz in the longitudinal direction. The lowest vertical frequency exceeds 33 Hz. Thus, based on the R.G. 1.60 response spectra amplifications, the corresponding seismic accelerations used for the design of the HSM-H are 0.387g and 0.331g in the transverse and

longitudinal directions, respectively, and 0.20g in the vertical direction. The corresponding accelerations applicable to the DSC are 0.427g and 0.344g in the transverse and longitudinal directions, respectively, and 0.20g in the vertical direction. The seismic analysis of the HSM-H and 61BTH DSC are further discussed in Section T.3.7.

The seismic criteria for the high seismic HSM-HS is an "enhanced" NRC Regulatory Guide 1.60 response spectra anchored at 1.0g maximum horizontal acceleration and 1.0g maximum vertical acceleration as shown in Appendix U, Figure U.2-4.

The seismic design criteria for the HSM Model 80, 102, 152 or 202 do not change from that documented in Section 8.2 of the UFSAR for Models 80/102 or the applicable appendix for Models 152/202. Similarly, the seismic design criteria for OS197 TC or OS197H or OS200/OS200FC TC remain unchanged from that documented in Chapter 8, Section 8.2, except for seismic which is the same as HSM-H.

Table T.3.1-3

The detailed information associated with this table, ASME Code Alternatives for the NUHOMS-61BTH DSC Basket, can be found in CoC 1004 Appendix C [1.CoC-APPC].*

* Note: While this is true for CoC 1004 Amendment 18, for Amendment 13, Revision 1, as Corrected, and 14, 15, 16 and 17, see Reference [3.54] for the NRC approval of an alternative to American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel (B&PV) Code, Section III, Division I, Subsection NG, Subparagraph NG-4230.1 for tack welds for R45 Transition Rails of the Standardized NUHOMS[®] 61 BTH Type 2 dry shielded canister (DSC).

Component Description	Calculated Weight (kips)
Type 1 DSC Shell Assembly	13.43
Type 1 DSC Top Shield Plug and Top Cover Plates	8.90
Type 1 DSC Internal Basket Assembly	23.37
Type 1 DSC Total Empty Weight	45.70
Type 2 DSC Shell Assembly	13.43
Type 2 DSC Top Cover Plates and Shield Plug	8.90
Type 2 DSC Internal Basket Assembly	27.79
Type 2 DSC Total Empty Weight	50.12
61 BWR Spent Fuel Assemblies	<u>≤ 43.0</u>
Total Loaded Type 1 DSC Weight (Dry)	88.70
Total Loaded Type 2 DSC Weight (Dry) ⁽⁵⁾	93.12
Water in Loaded Type 1 DSC	13.91
Water in Loaded Type 2 DSC	12.08
Total Loaded Type 1 DSC Weight (Wet) ⁽¹⁾	93.71
Total Loaded Type 2 DSC Weight (Wet) ⁽⁵⁾	96.30
Transfer Cask Empty Weight (with Neutron Shield/Top Lid)	111.25
Total Type 1 Loaded Transfer Cask Weight (Dry/Wet)	199.95/204.96
Total Type 2 Loaded Transfer Cask Weight (Dry/Wet) ⁽⁶⁾	204.37/207.55
HSM Single Module Weight, Model 80/102 (Empty)	283.2
HSM Single Module Weight, Model 152 (Empty)	318.3
HSM-H/202 Single Module Weight (Empty)	334.4
HSM Single Module Weight, Model 80/102 (Loaded)	<i>371.9⁽²⁾/376.3⁽³⁾</i>
HSM Single Module Weight, Model 152 (Loaded)	407.0 ⁽²⁾ /411.4 ⁽³⁾
HSM-H/202 Single Module Weight (Loaded)	<i>423</i> .1 ⁽²⁾ / <i>427</i> .5 ⁽³⁾

Table T.3.2-1Summary of the NUHOMS®-61BTH System Component Weights⁽⁴⁾(with HSM (Models 80/102/152/202/HSM-H) and OS197/OS197H TC)

Notes:

- (1) Without top shield plug and top cover plates
- (2) Loaded with bounding weight of Type 1 61BTH DSC
- (3) Loaded with Type 2 61BTH DSC
- (4) Weights are based on nominal dimensions.
- (5) This weight does not include the weight of the top and bottom end caps used when loading damaged fuel.
- (6) Type 2 61BTH DSC may use a two-piece lid (interior and exterior) design option in order to reduce the weight for critical lift.

B. Operation/Storage Loads

The basket loads in the Horizontal Storage Module (HSM or HSM-H) are summarized in the table below. As seen in the table, smaller loads are also conservatively lumped with bigger loads to minimize the analysis effort.

Loading	Basket Orientation	Service Level	Load	Enveloped Load for Analysis
Dead Weight	Horizontal	A/B	1g Down	1g Down
Standard Seismic Loads (HSM) ⁽²⁾	Horizontal	С	0.37g Axial + 0.37g Trans. + 0.17g Vertical	2g Axial + 2g Trans. + 2g Vertical
Standard Seismic Loads (HSM-H) ⁽²⁾	Horizontal	С	0.344g Axial + 0.427g Trans. + 0.20g Vertical	2g Axial + 2g Trans. + 2g Vertical
Thermal ⁽¹⁾	Horizontal	A/B	Bounding Thermal Stress	Bounding Thermal Stress

The thermal stresses of the basket are addressed in Section T.3.4. The envelope of all storage thermal conditions and transfer thermal conditions (excluding vacuum drying) is used for all load combinations (as applicable).
 High Seismic Criteria Loads are addressed in Section T.3.7.

(2) High Seismic Criteria Loads are addressed in Section T.3.7.

T.3.6.1.3.3 Basket Stress Analysis due to Handling /Transfer Loads

A. <u>Vertical Dead Weight (Basket in Vertical Orientation)</u>

During 1g downloading, the fuel assemblies and fuel compartment are forced against the bottom of the cask. It is important to note that, for any longitudinal or near longitudinal loading, the fuel assemblies react directly against the end of the canister/cask and not through the basket structure as in lateral loading. It is only the weight of the basket and holddown ring (or top grid) that causes axial compressive stress during longitudinal loading. Axial compressive stresses are computed as if only the compartment tubes and outer box will withstand all the weight. A Type 1 basket weight of 23.5 kips (actual weight is 23.44 kips) and 28.0 kips (actual weight is 27.79 kips) for the Type 2 basket weight is used in the stress calculations.

Compressive Stress at Fuel Compartment Tubes and Outer Wrappers

Type 1: Total weight = 23.5 kips

Weight excluding top grid, poison plates, aluminum plates, and rails, 23.5 - 1.55 - 3.17 - 0.88 - 3.68 - 1.98 = 12.24 kips Section area = 12,240 /(164 x 0.284) = 262.80 in² Stress due to 1g = -23.5 / 262.80 = - 0.089 ksi

Type 2: Total weight = 28.0 kips

Weight excluding top grid, poison plates, aluminum plates, and rails, 28.0 - 1.55 - 3.17 - 6.29 - 3.68 - 0.92 = 12.39 kips

Section area = $12,390 / (164 \times 0.284) = 266.02 \text{ in}^2$ Stress due to 1g = -28.0 / 266.02 = -0.105 ksi

- 5. If a leak is found, remove the outer cover plate root pass (if not using test head), the vent and siphon port plugs and repair the inner cover plate welds. Then install the strongback (if used) and repeat procedure steps from T.8.1.3 step 21.
- 6. Perform dye penetrant examination of the root pass weld. Weld out the outer top cover plate to the DSC shell and perform dye penetrant examination on the weld surface in accordance with the CoC Appendix A Inspections, Tests, and Evaluations Item 4.3 requirements.
- 7. Install and seal weld the prefabricated plug, if applicable, over the outer cover plate test port and perform dye penetrant weld examinations in accordance with CoC Appendix A Inspections, Tests, and Evaluations Item 4.3 requirements.
- 8. Remove the automatic welding machine from the DSC.
- 8a. In accordance with Technical Specification 4.3.2, verify that the NS is filled before the draining operation in Step 9 is initiated and continually monitored during the first five minutes of the draining evolution to ensure the NS remains filled.
- 9. Open the cask drain port valve and drain the water from the cask/DSC annulus.
- 10. Rig the cask top cover plate and lower the cover plate onto the transfer cask. If using the two-piece lid option on the OS197FC-B TC to load the 61BTH Type 2 DSC, rig the interior lid only.
- 11. If using the OS200/OS200FC TC to load, place a sleeve ring spacer at the top of the aluminum sleeve (refer to Drawing NUH-08-8004-SAR provided in Appendix U.1, Section U.1.5).
- 12. Bolt the cask cover plate into place, tightening the bolts to the required torque in a star pattern.

CAUTION: Monitor the applicable time limits of Technical Specification 3.1.3 until the completion of DSC transfer step 6 of Section T.8.1.6, if loading Type 2 61BTH DSC.

13. Verify that the TC radial dose rates measured at the surface of the Transfer Cask are compliant with limits specified in CoC Appendix A Inspections, Tests, and Evaluations Item 3.2. The configuration for determining the TC radial surface dose rates shall be in accordance with CoC Appendix A Inspections, Tests, and Evaluations Item 3.2.

T.8.1.5 Transfer Cask Downending and Transfer to ISFSI

NOTE:

Ensure the administrative controls detailed in Section 5.1.1.5 are being implemented.

NOTE:

Alternate Procedure for Downending of Transfer Cask: Some plants have limited floor hatch openings above the cask/trailer/skid, which limit crane travel (within the hatch opening) that would be needed in order to downend the TC with the trailer/skid in a stationary position. For these situations, alternate procedures are to be developed on a plant-specific basis, with detailed steps for downending.

1. Re-attach the transfer cask lifting yoke to the crane hook, as necessary. Ready the transfer trailer and cask support skid for service.

- 20. Replace the transfer cask top cover plate. Secure the skid to the trailer, retract the vertical jacks and disconnect the skid positioning system.
- 21. If this is the final loading, fully drain the liquid neutron shield.
- 22. Tow the trailer and cask to the designated equipment storage area. Return the remaining transfer equipment to the storage area.
- 23. Close and lock the ISFSI access gate and activate the ISFSI security measures.
- 24. Not Used.

T.8.1.7 <u>Monitoring Operations</u>

- 1. Perform routine security surveillance in accordance with the licensee's ISFSI security plan.
- 2. Perform one of the two alternate daily surveillance activities listed below:
 - a. A daily visual surveillance of the HSM air inlets and outlets to insure that no debris is obstructing the HSM vents in accordance with Technical Specification 4.3.6.a requirements.
 - b. A temperature measurement of the thermal performance, for each HSM, on a daily basis in accordance with Technical Specification 4.3.6.b requirements.

NUH-003		
Revision 22	Page T.8-13	January 2024
	All changes on this page are Amd 18.	

T.8.2.1 DSC Retrieval from the HSM

Note: Ensure the administrative controls detailed in Section 5.1.1.5 are being implemented.

- 1. Ready the transfer cask, transfer trailer, and support skid for service and tow the trailer to the HSM. If using the OS200/OS200FC TC to unload, verify that it has been fitted with an internal aluminum sleeve and a cask spacer of appropriate height (refer to Drawings NUH-08-8004-SAR and NUH-08-8005-SAR provided in Appendix U.1, Section U.1.5).
- 2. Back the trailer to within a few feet of the HSM and remove the cask top cover plate.
- 2a. If using the two-piece lid option, remove the combined interior and exterior top lid assembly.

CAUTION: High dose rates are expected in the HSM cavity after removal of HSM door. Proper ALARA practices should be followed.

- 3. Remove the HSM door using a porta-crane. Remove the DSC axial retainer.
- 4. Continue to back the transfer trailer within a few inches of the HSM. Using the skid positioning system, align the cask with the HSM and position the skid until the cask is docked with the HSM access opening.
- 5. Using optical survey equipment, verify alignment of the cask with respect to the HSM. The TC shall be aligned with respect to the HSM such that the longitudinal centerline of the DSC in the TC is within $\pm \frac{1}{8}$ inch of its true position when the TC is docked with the HSM front access opening.

If the alignment tolerance is exceeded, the following actions should be taken:

- a. Confirm that the transfer system is properly configured,
- b. Check and repair the alignment equipment, or
- c. Confirm the locations of the alignment targets on the TC and HSM.
- 5a. Install the cask restraints.
- 6. Install (if required) and align the hydraulic ram with the cask.
- 7. Extend the ram through the cask into the HSM until it is inserted in the DSC grapple ring.
- 8. Activate the arms on the ram grapple mechanism with the DSC grapple ring.
- 8a. From this point, until fuel has been removed from the DSC or the DSC has been removed from the TC, the DSC will be inspected for damage after any TC drop of 15 inches or greater.
- 9. Retract ram and pull the DSC into the cask.
- 10. Retract the ram grapple arms.
- 11. Disengage the ram from the cask. Install the ram access penetration cover plate.

If it becomes necessary to remove fuel from the DSC prior to off-site shipment, there are two basic options available at the ISFSI or reactor site. The fuel assemblies could be removed and reloaded into a shipping cask using dry transfer techniques, or if the applicant so desires, the initial fuel loading sequence could be reversed and the plant's spent fuel pool utilized. Procedures for unloading the DSC in a fuel pool are presented here. However, wet or dry unloading procedures are essentially identical to those of DSC loading through the DSC weld removal (beginning of preparation for placement of the cask in the fuel pool). Prior to opening the DSC, the following operations are to be performed.

- 1. The cask may now be transferred to the cask handling area inside the plant's fuel/reactor building.
- 2. Position and ready the trailer for access by the crane.
- 2a. If using the two-piece lid option, remove the exterior top lid.
- 3. Attach the lifting yoke to the crane hook.
- 4. Engage the lifting yoke with the trunnions of the cask.
- 5. Visually inspect the yoke lifting hooks to insure that they are properly aligned and engaged onto the cask trunnions.
- 6. Lift the cask approximately one inch off the trunnion supports.
- 7. Move the crane backward in a horizontal motion while simultaneously raising the crane hook vertically and lift the cask off the trailer. Move the cask to the cask decon area.
- 8. Lower the cask into the cask decon area in the vertical position.
- 9. Wash the cask to remove any dirt which may have accumulated on the cask during the DSC loading and transfer operations.
- 10. Place scaffolding around the cask so that any point on the surface of the cask is easily accessible to personnel.
- 11. Unbolt the cask top cover plate.
- 12. Connect the rigging cables to the cask top cover plate and lift the cover plate from the cask. Set the cask cover plate aside and disconnect the lid lifting cables.
- 12a. If using the two-piece lid option, remove the interior top lid.
- 13. Install temporary shielding to reduce personnel exposure as required. Fill the TC/DSC annulus with clean demineralized water and place a protective cover over the annulus.

The process of DSC unloading is similar to that used for DSC loading. DSC opening operations described below are to be carefully controlled in accordance with plant procedures. This operation is to be performed under the site's standard health physics guidelines for welding, grinding, and handling of potentially highly contaminated equipment. These are to include the use of prudent housekeeping measures and monitoring of airborne particulates. Procedures may require personnel to perform the work using respirators or supplied air.

NUH-003		
Revision 22	Page T.8-18	January 2024
	All changes on this page are Amd 18.	

U.8.1.5 <u>TC Downending and Transfer to ISFSI</u>

Note: Ensure the administrative controls detailed in Section 5.1.1.5 are being implemented.

Note: <u>Alternate Procedure for Downending of Transfer Cask</u>: Some plants have limited floor hatch openings above the cask/trailer/skid, which limit crane travel (within the hatch opening) that would be needed in order to downend the TC with the trailer/skid in a stationary position. For these situations, alternate procedures are to be developed on a plant-specific basis, with detailed steps for downending.

- 1. Re-attach the TC lifting yoke to the crane hook, as necessary. Ready the transfer trailer and cask support skid for service.
- 2. Move the scaffolding away from the cask as necessary. Engage the lifting yoke and lift the cask over the cask support skid on the transfer trailer.
- 3. The transfer trailer should be positioned so that cask support skid is accessible to the crane with the trailer supported on the vertical jacks.
- 4. Position the cask lower trunnions onto the transfer trailer support skid pillow blocks.
- 5. Move the crane forward while simultaneously lowering the cask until the cask upper trunnions are just above the support skid upper trunnion pillow blocks.
- 6. Inspect the positioning of the cask to insure that the cask and trunnion pillow blocks are properly aligned.
- 7. Lower the cask onto the skid until the weight of the cask is distributed to the trunnion pillow blocks.
- 8. Inspect the trunnions to ensure that they are properly seated onto the skid and install the trunnion tower closure plates, if required.
- 9. Remove the bottom ram access cover plate from the cask if integral rem/trailer is not used. Install the two-piece temporary neutron/gamma shield plug to cover the bottom ram access. Install the ram trunnion support frame on the bottom of the TC. (The temporary shield plug and ram trunnion support frame are not required with integral ram/trailer.)

U.8.1.6 DSC Transfer to the HSM

1. Prior to transferring the cask to the ISFSI or prior to positioning the transfer cask at the HSM designated for storage, remove the HSM door using a porta-crane, inspect the cavity of the HSM, removing any debris and ready the HSM to receive a DSC. The doors on adjacent HSMs should remain in place.

CAUTION: The insides of empty modules have the potential for high dose rates due to adjacent loaded modules. Proper ALARA practices should be followed for operations inside these modules and in the areas outside these modules whenever the door from the empty HSM has been removed.

14. Recheck all alignment marks and ready all systems for DSC transfer. The TC shall be aligned with respect to the HSM such that the longitudinal centerline of the DSC in the TC is within $\pm \frac{1}{8}$ inch of its true position when the TC is docked with the HSM front access opening.

If the alignment tolerance is exceeded, the following actions should be taken:

- a. Confirm that the transfer system is properly configured,
- b. Check and repair the alignment equipment, or
- c. Confirm the locations of the alignment targets on the TC and HSM.
- 15. Activate the hydraulic ram to initiate insertion of the DSC into the HSM. Stop the ram when the DSC reaches the support rail stops at the back of the module.
- 16. Not used.
- 17. Retract and disengage the hydraulic ram system from the cask and move it clear of the cask. Remove the cask restraints from the HSM.
- 18. Using the skid positioning system, disengage the cask from the HSM access opening.
- 19. Install the DSC axial in retainer through the HSM door opening.
- 20. Install the HSM door using a portable crane and secure it in place. Door may be welded for security. Verify that the HSM dose rates are compliant with the limits specified in CoC Appendix A Inspections, Tests, and Evaluations Items 3.3.1 and 3.3.2.
- 21. Replace the TC top cover plate. Secure the skid to the trailer, retract the vertical jacks and disconnect the skid positioning system.
- 22. If this is the final loading, fully drain the liquid neutron shield.
- 23. Tow the trailer and cask to the designated equipment storage area. Return the remaining transfer equipment to the storage area.
- 24. Close and lock the ISFSI access gate and activate the ISFSI security measures.
- 25. Not used.

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U.8.1.7 <u>Monitoring Operations</u>

- 1. Perform routine security surveillance in accordance with the licensee's ISFSI security plan.
- 2. Perform **one** of the two alternate daily surveillance activities listed below:
 - a. A daily visual surveillance of the HSM air inlets and outlets to insure that no debris is obstructing the HSM vents in accordance with Technical Specification 4.3.6.a requirements.

NUH-003		
Revision 22	Page U.8-12	January 2024
	All changes on this page are Amd 18.	

U.8.2 Procedures for Unloading the Cask

U.8.2.1 DSC Retrieval from the HSM

Note: Ensure the administrative controls detailed in Section 5.1.1.5 are being implemented.

- 1. Ready the TC, transfer trailer, and support skid for service and tow the trailer to the HSM.
- 2. Back the trailer to within a few feet of the HSM and remove the cask top cover plate.

CAUTION: High dose rates are expected in the HSM cavity after removal of HSM door. Proper ALARA practices should be followed.

- 3. Remove the HSM door using a crane. Remove the DSC axial retainer.
- 4. Continue to back the transfer trailer within a few inches of the HSM. Using the skid positioning system align the cask with the HSM and position the skid until the cask is docked with the HSM access opening.
- 5. Using optical survey equipment, verify alignment of the cask with respect to the HSM. The TC shall be aligned with respect to the HSM such that the longitudinal centerline of the DSC in the TC is within $\pm \frac{1}{8}$ inch of its true position when the TC is docked with the HSM front access opening.

If the alignment tolerance is exceeded, the following actions should be taken:

- a. Confirm that the transfer system is properly configured,
- b. Check and repair the alignment equipment, or
- c. Confirm the locations of the alignment targets on the TC and HSM.
- 5a. Install the cask restraints.
- 6. Install (if required) and align the hydraulic ram with the cask.
- 7. Extend the ram through the cask into the HSM until it is inserted in the DSC grapple ring.
- 8. Activate the arms on the ram grapple mechanism with the DSC grapple ring.
- 8a. From this point, until fuel has been removed from the DSC or the DSC has been removed from the TC, the DSC will be inspected for damage after any TC drop of 15 inches or greater.
- 9. Retract ram and pull the DSC into the cask.
- 10. Retract the ram grapple arms.
- 11. Disengage the ram from the cask. Install the ram access penetration cover plate.
- 12. Remove the cask restraints.
- 13. Using the skid positioning system, disengage the cask from the HSM.
- 14. Install the cask top cover plate and ready the trailer for transfer.
- 15. Replace the door on the HSM.

Table V.1-1Comparison of Key Parameters of NUHOMS® HSM Model 202 versusHSM Model 80 and Model 102

Characteristic	HSM Model 80	HSM Model 102	HSM Model 202
Overall Length (without Shield Walls)	19'-10" (BWR)	19'-10" (BWR)	20'-8"
Overall Width (without Shield Walls)	9'-8"	9'-8"	9'-8"
Overall Height	15'-0"	15'-0"	18'-6" (without vent cover)
Roof Thickness	3'-0"	3'-0"	3'-8"
End Shield Wall Thickness	2'-0"	2'-0"	3'-0"
Rear Shield Wall Thickness	2'-0"	2'-0"	3'-0"
Side Wall Thickness	1′-6″	1'-6″	1'-0"
Back Wall Thickness	1'-0"	1'-0″	1'-0"
Front Wall Thickness	2'-6"	2'-6"	3'-6"
Floor Thickness	1'-0"	1'-0"	N/A
Door Construction	~ 8" thick consisting of concrete core (~ 6") encased by stainless steel (2")	24" thick consisting of reinforced concrete	Min. of 18-1/2" thick reinforced concrete attached to a 7-7/8" thick steel plate Optional Door: Min. of 25 3/8" thick reinforced concrete attached to a 3" thick steel plate
Inlet Vent Configuration	4 along lower side walls	4 along lower side walls	2 along bottom of side walls
Inlet Vent Area	1200 in ²	1200 in ²	2368 in ²
Outlet Vent Configuration	4 along upper side walls	4 along upper side walls	2 along upper side walls
Outlet Vent Area	1680 in ²	1680 in ²	2368 in ²
Gap Between Adjacent Modules Placed Side-By-Side	6"	6″	0″
Bird Screen Type	Wire Cloth 3/4" mesh x 0.120" wire	Wire Cloth 3/4" mesh x 0.120" wire	Wire Cloth 3/4" mesh x 0.120" wire
Weight – Base Unit (including HSM support steel)	164,403 lb	170,900 lb	178,424 lb
Weight – Roof	80,970 lb	89,050 lb	107,261 lb
Weight Door	6,556 lb	12,620 lb	21,510 lb
DSC Support Steel Configuration	Structural steel frame with rails installed to permit sliding of DSC	Structural steel frame with rails installed to permit sliding of DSC	Guide rails bolted to concrete to permit sliding of DSC
Heat Shield Thickness	12 Gauge (0.1054″) Galvanized Steel	12 Gauge (0.1054″) Galvanized Steel	2" x 1/8" thick Aluminum Plates to form a Louvered Roof Heat Shield and 1/4" thick Anodized Aluminum Side Heat Shields <u>Alternate Heat Shield</u> <u>Configuration:</u> 12 Gauge (0.1054") flat stainless steel top and side Heat Shields

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V.3.7.8.4 Evaluation of HSM Model 202 Support Steel

The evaluation of the HSM Model 202 support steel is described in Section P.3.7.11.6.4 since the HSM Model 202 is based on the HSM-H.

V.3.7.8.5 Evaluation of HSM Model 202 Shield Door

The evaluation of the HSM Model 202 shield door is described in Section P.3.7.11.6.5 since the HSM Model 202 is based on the HSM-H.

V.3.7.8.6 Evaluation of HSM Model 202 Heat Shields

The evaluation of HSM Model 202 heat shields is described in Section P.3.7.11.6.6 since the HSM Model 202 is based on the HSM-H.

V.3.7.8.7 Evaluation of HSM Model 202 Seismic Retainers

The evaluation of HSM Model 202 seismic retainers is described in Section P.3.7.11.6.7 since the HSM Model 202 is based on the HSM-H.

V.3.7.8.8 Thermal Cycling of the HSM Model 202

No change to Section 8.2.10.5.

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V.3.7.8.9 Evaluation of HSM Model 202 Concrete Components with Temperature Exceeding Code Limits

The maximum concrete temperature under off-normal condition for the HSM Model 202 are 238/243°F (for 117°F and 125°F ambient conditions). The normal condition is bounded by the off-normal condition. Although the maximum concrete temperatures exceed 225°F in the off-normal condition, they do not exceed 300°F. Therefore, as specified in [3.4], no tests or reduction in concrete strength are required to demonstrate the capability of the concrete to adequately handle the elevated temperatures provided Type II cement is used and special aggregates are selected which are acceptable for concrete in this temperature range. This approach is consistent with standardized HSM design, for which special aggregates for the roof concrete mix are provided. *In lieu of Type II cement, blended Portland cement meeting the requirements of ASTM C595 is acceptable for use*.

The maximum concrete temperature for a 40-hour blocked vent condition is 376/381°F (for 117°F and 125°F ambient conditions), which exceeds the 350°F limit specified in [3.4]. As noted in [3.4], use of any Portland cement concrete where accident temperature exceeds 350°F will require testing be performed on the exact concrete mix. Elevated temperature testing of the exact concrete mix (cement type, additives, water-cement ratio, aggregates, proportions) is to be performed for the HSM Model 202. The use of high temperature concrete testing is explicitly accepted by the NRC, as documented in the NRC's SER [3.4], Section 3.0, Page 3-5. The testing shall demonstrate the level of strength reduction is less than that which was applied, and show that the increased temperatures do not cause deterioration of the concrete. *Portland cements meeting the requirements of ASTM C150 or ASTM C595 (blended Portland) are acceptable for use*.

	All changes on this page are Amd 18.	<u>ب</u>
Revision 22	Page V.3-12	January 2024
NUH-003		

Table V.4-2
Maximum Concrete Temperatures for the HSM Model 202

Thermal Loading Condition	Maximum Ambient Temperature (°F)	24kW DSC in HSM 202 Concrete Temperature (°F)	HSM 202 Allowable Concrete Temperature (°F)
Normal	100	N/A (Bounded by Off-Normal)	300 ⁽¹⁾
Off-Normal	117 125	238 243	300 ⁽¹⁾
Accident 40 Hour Blocked Vent	117 125	376 381	425 ⁽²⁾

Notes:

- (1) Use of Type II cement in combination with special aggregates are selected which are acceptable for concrete in this temperature range as specified in the "Discussion of Concrete Constituents and Temperature Suitability" in the Safety Evaluation Report of Safety Analysis Report for the Standardized NUHOMS[®] Horizontal Modular Storage System for Irradiated Nuclear Fuel (Pages 3-4 and 3-5), U.S. Nuclear Regulatory Commission, December 1994 [4.3]. In lieu of Type II cement, blended Portland cement meeting the requirements of ASTM C595 are acceptable for use.
- (2) Use of any Portland cement concrete where "accident" temperatures exceed 350°F requires performance of tests on the exact concrete mix used as specified in the Safety Evaluation Report of Safety Analysis Report for the Standardized NUHOMS[®] Horizontal Modular Storage System for Irradiated Nuclear Fuel (Page 3-5), U.S. Nuclear Regulatory Commission, December 1994 [4.3]. Portland cements meeting the requirements of ASTM C150 or ASTM C595 (blended Portland) are acceptable for use.

NUH-003				
Revision 22				

- 21. Install the HSM door using a portable crane or other suitable lifting device and secure it in place. Door may be welded for security. Verify that the HSM dose rates are compliant with the limits specified in CoC Appendix A Inspections, Tests, and Evaluations Items 3.3.1 and 3.3.2.
- 22. Replace the TC top cover plate. Secure the skid to the trailer, retract the vertical jacks and disconnect the skid positioning system.
- 23. If this is the final loading, fully drain the liquid neutron shield.
- 24. Tow the trailer and cask to the designated equipment storage area. Return the remaining transfer equipment to the storage area.
- 25. Close and lock the ISFSI access gate and activate the ISFSI security measures.
- 26. Not Used.

W.8.1.7 Monitoring Operations

- 1. Perform routine security surveillance in accordance with the licensee's ISFSI security plan.
- 2. Perform <u>one</u> of the two alternate daily surveillance activities listed below:
 - a. A daily visual surveillance of the HSM air inlets and outlets to insure that no debris is obstructing the HSM vents in accordance with Technical Specification 4.3.6.a requirements.
 - b. A temperature measurement of the thermal performance, for each HSM, on a daily basis in accordance with Technical Specification 4.3.6.b requirements.

W.8.2 Procedures for Unloading the Cask

The operational differences specified above for loading operations when using OS197L TC (relative to the use of OS197 TC described in Chapter 5) will also apply for unloading operations.

W.8.3 Identification of Subjects for Safety Analysis

There is no change relative to Section 5.1.3 regarding criticality control, chemical safety, operational shutdown modes and maintenance techniques.

In addition to the typical instrumentation listed in Table 5.1-1 of Section 5.1.3, the use of OS197L TC shall require optical targets and instruments to implement specific remote crane operations described in Section W.8.1 above.

All changes on this page are Amd 18.		
Revision 22	Page W.8-25	January 2024
NUH-003		

- 8. Remove the automated welding machine from the DSC.
- 9. Open the cask drain port valve and drain the water from the cask/DSC annulus.

CAUTION: If the DSC decay heat load is greater than 24.0 kW, monitor the applicable time limits of Technical Specification 3.1.3 until the completion of DSC transfer step 15 of Section Y.8.1.6.

If the TC is in a horizontal orientation on the transfer skid, and the required time limit for completion of a DSC transfer specified in Technical Specification 3.1.3 are not met, initiate air circulation in the TC/DSC annulus by starting one of the blowers provided on the transfer skid and continue blower operation for a minimum duration of 36 hours.

When transfer operations are ready to continue secure air circulation and either complete the DSC insertion OR return the TC/DSC to an upright configuration and fill with clean demineralized water within the applicable time limits of Technical Specification 3.1.3.

- 10. Rig the cask top cover plate and lower the cover plate onto the transfer cask.
- 11. Bolt the cask cover plate into place, tightening the bolts to the required torque in a star pattern.
- 12. Verify that the TC dose rates are compliant with limits specified in CoC Appendix A Inspections, Tests, and Evaluations Item 3.2.
- Y.8.1.5 Transfer Cask Downending and Transfer to ISFSI

NOTE: Ensure the administrative controls detailed in Section 5.1.1.5 are being implemented.

NOTE: Alternate procedure for downending of transfer cask: Some plants have limited floor hatch openings above the cask/trailer/skid, or other conditions which limit crane travel in the direction that would be needed in order to downend the TC with the trailer/skid in a stationary position. For these situations, alternate procedures are to be developed on a plant-specific basis, with detailed steps for downending.

- 1. Re-attach the transfer cask lifting yoke to the crane hook, as necessary. Ready the transfer trailer and cask support skid for service.
- 2. Move the scaffolding away from the cask, as necessary. Engage the lifting yoke and lift the cask over the cask support skid on the transfer trailer.
- 3. The transfer trailer should be positioned so that the cask support skid is accessible to the crane with the trailer supported on the vertical jacks.
- 4. Position the cask lower trunnions onto the transfer trailer support skid pillow blocks.
- 5. Move the crane forward while simultaneously lowering the cask until the cask upper trunnions are just above the support skid upper trunnion pillow blocks.
- 6. Inspect the positioning of the cask to ensure that the cask and trunnion pillow blocks are properly aligned.
- 7. Lower the cask onto the skid until the weight of the cask is distributed to the trunnion pillow blocks.
- 8. Inspect the trunnions to ensure that they are properly seated onto the skid and install the trunnion tower closure plates, if required.
- 9. Remove the bottom ram access cover plate from the cask if integral ram/trailer is not used. Install the two-piece temporary neutron/gamma shield plug to cover the bottom ram access. Install the ram trunnion support frame on the bottom of the transfer cask.

- 22. Tow the trailer and cask to the designated equipment storage area. Return the remaining transfer equipment to the storage area.
- 23. Close and lock the ISFSI access gate and activate the ISFSI security measures.
- 24. Not used.
- Y.8.1.7 Monitoring Operations
- 1. Perform routine security surveillance in accordance with the licensees ISFSI security plan.
- 2. Perform one of the two alternate daily surveillance activities listed below:
 - a. A daily visual surveillance of the HSM air inlets and outlets to ensure that no debris is obstructing the HSM vents in accordance with Technical Specification 4.3.6.a requirements.
 - b. A temperature measurement of the thermal performance, for each HSM, on a daily basis in accordance with Technical Specification 4.3.6.b requirements.

Y.8.2 Procedures for Unloading the Cask

Y.8.2.1 DSC Retrieval from the HSM

Note: Ensure the administrative controls detailed in Section 5.1.1.5 are being implemented.

- 1. Ready the transfer cask, transfer trailer, and support skid for service and tow the trailer to the HSM.
- 2. Back the trailer to within a few feet of the HSM and remove the cask top cover plate.

CAUTION: High dose rates are expected in the HSM cavity after removal of HSM door. Proper ALARA practices should be followed.

- 3. Remove the HSM door using a porta-crane. Remove the DSC axial retainer.
- 4. Continue to back the trailer within a few inches of the HSM. Using the skid positioning system, align the cask with the HSM and position the skid until the cask is docked with the HSM access opening.
- 5. Using optical survey equipment, verify alignment of the cask with respect to the HSM. The TC shall be aligned with respect to the HSM such that the longitudinal centerline of the DSC in the TC is within $\pm \frac{1}{8}$ inch of its true position when the TC is docked with the HSM front access opening.

If the alignment tolerance is exceeded, the following actions should be taken:

- a. Confirm that the transfer system is properly configured,
- b. Check and repair the alignment equipment, or
- c. Confirm the locations of the alignment targets on the TC and HSM.
- 5a. Install the cask restraints.
- 6. Install (if required) and align the hydraulic ram with the cask.
- 7. Extend the ram through the cask into the HSM until it is inserted in the DSC grapple ring.
- 8. Activate the arms on the ram grapple mechanism with the DSC grapple ring.
- 8a. From this point, until fuel has been removed from the DSC or the DSC has been removed from the TC, the DSC will be inspected for damage after any TC drop of fifteen inches or greater.
- 9. Retract ram and pull the DSC into the cask.
- 10. Retract the ram grapple arms.
- 11. Disengage the ram from the cask. Install the ram access penetration cover plate.
- 12. Remove the cask restraints.
- 13. Using the skid positioning system, disengage the cask from the HSM.

air circulation in the TC/DSC annulus by starting one of the blowers provided on the transfer skid and continue blower operation for a minimum duration of 36 hours.

When transfer operations are ready to continue secure air circulation and either complete the DSC insertion OR return the TC/DSC to an upright configuration and fill with clean demineralized water within the applicable time limits of Technical Specification 3.1.3.

- 10. Rig the cask top cover plate and lower the cover plate onto the TC.
- 11. Bolt the cask cover plate into place, tightening the bolts to the required torque in a star pattern.
- 12. Verify that the transfer cask dose rates are compliant with limits specified in CoC Appendix A Inspections, Tests, and Evaluations Item 3.2.

Z.8.1.5 TC Downending and Transfer to ISFSI

NOTE: Ensure the administrative controls detailed in Section 5.1.1.5 are being implemented.

NOTE: Alternate Procedure for Downending of Transfer Cask: Some plants have limited floor hatch openings above the cask/trailer/skid, or other conditions which limit crane travel in the direction that would be needed in order to downend the TC with the trailer/skid in a stationary position. For these situations, alternate procedures are to be developed on a plant-specific basis, with detailed steps for downending.

- 1. Re-attach the TC lifting yoke to the crane hook, as necessary. Ready the transfer trailer and cask support skid for service.
- 2. Move the scaffolding away from the cask, as necessary. Engage the lifting yoke and lift the cask over the cask support skid on the transfer trailer.
- 3. The transfer trailer should be positioned so that cask support skid is accessible to the crane with the trailer supported on the vertical jacks.
- 4. Position the cask lower trunnions onto the transfer trailer support skid pillow blocks.
- 5. Move the crane forward while simultaneously lowering the cask until the cask upper trunnions are just above the support skid upper trunnion pillow blocks.
- 6. Inspect the positioning of the cask to ensure that the cask and trunnion pillow blocks are properly aligned.
- 7. Lower the cask onto the skid until the weight of the cask is distributed to the trunnion pillow blocks.
- 8. Inspect the trunnions to ensure that they are properly seated onto the skid and install the trunnion tower closure plates, if required.
- 9. Remove the bottom ram access cover plate from the cask if integral ram/trailer is not used. Install the two-piece temporary neutron/gamma shield plug to cover the bottom ram access. Install the ram trunnion support frame on the bottom of the transfer cask. (The temporary shield plug and ram trunnion support frame are not required with the integral ram/trailer.)

- 24. Close and lock the ISFSI access gate and activate the ISFSI security measures.
- 25. Not used.
- Z.8.1.7 Monitoring Operations
- 1. Perform routine security surveillance in accordance with the licensee's ISFSI security plan.
- 2. Perform one of the two alternate daily surveillance activities listed below:
 - a. A daily visual surveillance of the HSM air inlets and outlets to ensure that no debris is obstructing the HSM vents in accordance with Technical Specification 4.3.6.a requirements.
 - b. A temperature measurement of the thermal performance, for each HSM, on a daily basis in accordance with Technical Specification 4.3.6.b requirements.

Z.8.2 Procedures for Unloading the Cask

Z.8.2.1 DSC Retrieval from the HSM

NOTE: Ensure the administrative controls detailed in Section 5.1.1.5 are being implemented.

1. Ready the TC, transfer trailer, and support skid for service and tow the trailer to the HSM.

NOTE: Verify that a cask spacer of appropriate height (refer to Drawing NUH-08-8005-SAR provided in Appendix U, Section U.1.5) is placed at the location of the TC.

2. Back the trailer to within a few feet of the HSM and remove the cask top cover plate.

CAUTION: High dose rates are expected in the HSM cavity after removal of the HSM door. Proper ALARA practices should be followed.

- 3. Remove the HSM door using a crane. Remove the DSC axial retainer.
- 4. Continue to back the trailer within a few inches of the HSM. Using the skid positioning system align the cask with the HSM and position the skid until the cask is docked with the HSM access opening.
- 5. Using optical survey equipment, verify alignment of the cask with respect to the HSM. The TC shall be aligned with respect to the HSM such that the longitudinal centerline of the DSC in the TC is within $\pm \frac{1}{8}$ inch of its true position when the TC is docked with the HSM front access opening.

If the alignment tolerance is exceeded, the following actions should be taken:

- a. Confirm that the transfer system is properly configured,
- b. Check and repair the alignment equipment, or
- c. Confirm the locations of the alignment targets on the TC and HSM.
- 5a. Install the cask restraints.
- 6. Install (if required) and align the hydraulic ram with the cask.
- 7. Extend the ram through the cask into the HSM until it is inserted in the DSC grapple ring.
- 8. Activate the arms on the ram grapple mechanism with the DSC grapple ring.
- 8a. From this point, until fuel has been removed from the DSC or the DSC has been removed from the TC, the DSC will be inspected for damage after any TC drop of 15 inches or greater.
- 9. Retract ram and pull the DSC into the cask.
- 10. Retract the ram grapple arms.
- 11. Disengage the ram from the cask. Install the ram access penetration cover plate.

Biennial Report of 10 CFR 72.48 Evaluations Performed for CoC 1004 for the Period 07/28/2022 to 01/24/2024

LR No. 721004-	Description of Change, Test, or Experiment	Summary of Evaluation
1610 Rev. 3	The licensing review evaluates the "use-as-is" disposition for a supplier nonconformance (NCR) by full evaluation based on changes implemented following the 2022 NRC triennial inspection. Specifically, the NCR accepts nonconforming damage to the poison and aluminum plates due to misplaced spot welds in the dry shielded canister (DSC) basket.	The impact to the poison plates was fully evaluated to ensure that criticality control is not affected by the NCR. The mock-up and subsequent testing performed by the supplier show that the incorrectly located welds do cause some distortion of both the aluminum and poison plates. However, the conclusion from the mock-up is that the boron carbide in the plate was neither lost nor displaced, and therefore, the areal density continued to meet the minimum required by the UFSAR and Technical Specifications. A criticality calculation was performed to evaluate the condition of the poison plates assuming there was no boron carbide present in the damaged sections. The calculation concludes that the results are within the associated sensitivity. Therefore, the assumed damage does not have an adverse impact on the criticality design function. All eight 72.48 evaluation criteria were met.
1702 Rev. 2	A summary of Revision 1 of this LR was provided in a previous biennial summary report, dated July 27, 2020, and pertained to a horizontal storage module (HSM) installation specification and general arrangement drawing that required that the HSMs on the expansion end of the array be empty during removal of end walls as the compensatory measures for shielding and missile protection. The proposed activity implemented alternate procedural actions, which were added to the configuration drawing by a design change request (DCR) to expand the HSM array with loaded DSCs. The alternate action was the temporary use of a steel plate in lieu of the end wall. Revision 2 of this licensing review incorporates a DCR and the corrective actions specified for associated Corrective Action Reports (CARs). Revision 2 is performed after the completion of the HSM array expansion activities at the independent spent fuel storage installation (ISFSI) site, where the temporary configuration that is the subject of this LR no longer exists.	The thickness of the steel plates used to temporarily replace the end wall was increased from ³ / ₄ inch to 1 inch based on Revision 1 of the supporting structural calculation. Several evaluation responses were revised and the response to 10 CFR 72.48 criterion 8 was changed to 'YES'. The revised response indicates that the change may not be implemented without an amendment. It is noted for clarity and completeness that this LR revision was performed after completion of the HSM array expansion activities at the ISFSI, for the sole purpose of addressing the finding from NRC Inspection Reports 72-1004/2019-201 and 72-1004/2022-202. Since the method of evaluation used to justify the temporary configuration used during the ISFSI site array expansion fails this Evaluation criterion, and a licensing amendment requesting NRC review and approval of the method of evaluation will not be pursued, the temporary configuration that is the subject of this Evaluation is not authorized for any similar future activity. • No associated UFSAR changes were required.

LR No. 721004-	Description of Change, Test, or Experiment	Summary of Evaluation
1838 Rev. 2	A summary of Revision 1 of this LR was provided in a previous biennial summary report, dated July 27, 2022, and pertained to a reduction in the number of studs connecting the R45 and R90 transition rails in the 61BTH Type 2 basket, and also addressed a reduction in the thickness of the R45 transition rails in the 61BTH Type 2 basket.	 The responses and conclusions of the evaluation provided as Revision 1 remain valid and unchanged. All eight 72.48 evaluation criteria were met. No associated UFSAR changes were required.
	The purpose of Revision 2 to this LR is to update the documentation to new TIP 3.5 Screening and Evaluation forms that were issued following the 2022 NRC triennial inspection.	
1915 Rev. 1	A summary of Revision 0 of this LR was provided in a previous biennial summary report, dated July 27, 2022, and pertained to a nonconformance on the OS197FC-B Transfer Cask (TC) two-piece lid due to a reduced exterior lid thickness that was fabricated in support of a loading campaign. The purpose of Revision 1 to this LR is to update the documentation to new TIP 3.5 Screening and Evaluation forms that were issued following the 2022 NBC triennial inspection	 The responses and conclusions of the evaluation provided as Revision 0 remain valid and unchanged. All eight 72.48 evaluation criteria were met. No associated UFSAR changes were required.
1947 Rev. 0	The activity incorporates a design option for the top shield plug (TSP) component of the NUHOMS [®] 24PTH-S-LC DSC. An option for a single-piece pre-cast lead insert for the TSP was introduced in Amendment 18 as part of the 24PTH DSC Type 3 basket design. This change provides an additional option for the pre-cast lead insert to be fabricated in two pieces (i.e., layers) that are approximately half the thickness of the single-piece lead insert and then the two individual layers are stacked together. The two-piece lead insert option is intended to provide shielding effectiveness equivalent to that of the single-piece lead insert option and is an enhancement to support the fabrication and handling of the pre-cast lead insert.	The change incorporating the two-piece option for the pre-cast lead insert of the TSP introduces another axial gap between the two lead layers which effectively reduces the thermal conductivity of the top end of the DSC, impacting the thermal performance of the system. Therefore, the thermal calculation was revised to quantify the effects. That calculation determined that the effective thermal conductivity of the top end of the DSC in the axial direction is reduced approximately 1.9% due to the additional axial gap between the lead layers of the TSP. The thermal analysis of the 24PTH-S-LC DSC performed in the supporting calculation used the same approach as that described in UFSAR Section P.4.12.3. The analysis concluded that the change has no effect on the thermal performance of the 24PTH system, including the DSC shell and fuel cladding maximum temperatures determined for normal, off normal, and accident conditions. There is no change to the decay heat load of the DSC or the heat transfer capability of the basket. The average and maximum temperatures of the DSC components remain unchanged. All eight 72.48 evaluation criteria were met. • This change is incorporated into UFSAR Revision 22.

LR No. 721004-	Description of Change, Test, or Experiment	Summary of Evaluation
1952 Rev. 0	The proposed change is to determine the minimum duration required to operate the blowers during transfer operations of the 61BTH Type 2 DSC in an OS197 TC. Blowers may be used to provide additional cooling to the DSC as one of the recovery options, if the transfer operations could not be completed within the time limits specified in Limiting Condition for Operation (LCO) 3.1.3 of the Technical Specifications (TS). If the air circulation is activated as a recovery operation during transfer operations, the air circulation needs to be interrupted by turning off the blowers before transferring the DSC into the storage module. This condition represents a routine transfer operation. After the blowers are turned off, the actions of LCO 3.1.3 of the TS specify that the time limits for completion of DSC transfer are the same as those initially considered after the water is drained from the TC/DSC annulus until completion of DSC insertion into the HSM-H. The time limits determined for the completion of the transfer operations once the air circulation is interrupted considers that the system is under steady-state conditions before the interruption. Due to the large thermal mass of the DSC, the blowers must be on for a sufficient duration to ensure that the DSC cools down before turning them off. Therefore, a minimum time required to operate the blowers to achieve the steady-state condition with air circulation was determined.	Only the DSC thermal design function is impacted by this change. A calculation evaluated the thermal performance of the 61BTH Type 2 DSC for heat load zone configurations (HLZCs) that require transfer time limits per LCO 3.1.3 and provides the minimum duration required to run the blower to achieve steady- state conditions. Based on results presented in the calculation, the air circulation must be operated for a minimum duration to ensure the system cools down sufficiently. The minimum duration to operate the blower is 50 hours for HLZCs # 7, and 57 hours for HLZCs # 5, 6, and 8. After the blowers are turned off, the time limits for transfer are as indicated in LCO 3.1.3 table. The UFSAR evaluates the heat up of the DSC once the blowers are turned on and the DSC reaches steady-state conditions and further concludes that once the DSC is at steady state and the blowers are turned off, the maximum fuel cladding temperatures remain below allowable limits at the end of the allowable transfer duration. All eight 72.48 evaluation criteria were met. • No associated UFSAR changes were required.
1955 Rev. 0	The proposed change evaluated an increase of the off-normal insertion and extraction loads for the 32PT DSC in the HSM-152 storage module from 80,000 lbs as described in Table M.2-20 and Section M.3.6.2 of the UFSAR to 90,000 lb. The off-normal force of 90,000 lbs for insertion or extraction is only applicable for the 32PT DSC with a single bottom forging and a single forging grapple ring when loaded in an HSM-152 with rail bolts having mechanical properties equal to or greater than those for ASTM A325 material. The evaluation was conducted to support a loading campaign conducted in late 2022.	 The effects on insertion and extraction of the DSC were addressed individually. The structural analyses determined that the increased insertion and extraction loads evaluated did not affect the structural or confinement design functions of the 32PT DSC or the structural design function of the HSM-152. All eight 72.48 evaluation criteria were met. No associated UFSAR changes were required.

LR No. 721004-	Description of Change, Test, or Experiment	Summary of Evaluation
1957 Rev. 0	This licensing review addresses a "use-as-is" disposition for a nonconforming condition involving the thickness of the top shield plug (TSP) component for certain 61BTH Type 2 DSCs fabricated and loaded at an ISFSI. The thickness of the TSP is pertinent to the minimum stack-up dimension for the combined top closure plates of the DSC consisting of the TSP, inner top cover plate (ITCP) and outer top cover plate (OTCP). The DSC TSP provides shielding for the 61BTH Type 2 DSC so that the occupational dose at the top end is minimized during drying, sealing, handling, and transfer operations, and in storage.	As determined in the associated Screening, this Evaluation is limited to the effect of the nonconforming condition on the shielding design function only. As such, a shielding calculation was prepared to evaluate the effect of reduced minimum stack-up thickness of the TSP/ITCP/OTCP based on assumed minimum TSP thickness resulting from an investigation and dimensional inspections. The shielding calculation concluded that the nonconforming condition on maximum dose rates is approximately 4%, which is small. The effect on occupational exposure during the loading and transfer operations is approximately 1%. The dose rates and exposure provided for the loading and transfer operations are ALARA. The ITE limits provided in TS 3.2 continue to bound the calculated dose rates. The impacts on the 72.104 and 72.106 shielding functions range from negligible to very small, and the design remains well within 10 CFR 72.104 and 72.106 limits. All eight 72.48 evaluation criteria were met. • No associated UFSAR changes were required.
1972 Rev. 0	The proposed change assessed an increase in the fresh concrete density for the HSM-102 to 160 pounds per cubic foot (pcf). To evaluate the impact, the weights of the HSM-102 concrete components using the maximum fresh concrete density of 160 pcf were determined, and a structural evaluation was performed to reflect the increased weight.	Only the structural design function was addressed in the evaluation because there was no adverse effect on the credited thermal, or shielding design functions of the HSM-102. Structural analyses evaluated the impact of the increased HSM-102 weight on the design functions of the HSM. The analyses show that all the components have sufficient capacities to withstand the design basis load combinations after the changes. Therefore, the change does not impact the structural adequacy of the HSM-102 and the storage module meets its intended structural design function as described in the UFSAR. Since the structural design function is satisfied, there is no impact on the confinement design function of the stored DSC. All eight 72.48 evaluation criteria were met. • This change is incorporated into UFSAR Revision 22.

LR No. 721004-	Description of Change, Test, or Experiment	Summary of Evaluation
1974 Rev. 0	The proposed change an increase in the fresh concrete density for the HSM-H to 160 pounds per cubic foot (pcf). To evaluate the impact, the weights of the HSM-H concrete components using the maximum fresh concrete density of 160 pcf were determined, and a structural evaluation was performed to reflect the increased weight.	Only the structural design function was addressed in the evaluation because there was no adverse effect on the credited thermal, or shielding design functions of the HSM-H. Structural analyses evaluated the impact of the increased HSM-H weight on the design functions of the HSM. The analyses show that all the components have sufficient capacities to withstand the design basis load combinations after the changes. Therefore, the change does not impact structural adequacy of the HSM-H and the storage module meets its intended structural design function as described in the UFSAR. Since the structural design function is satisfied, there is no impact on the confinement design function of the stored DSC. All eight 72.48 evaluation criteria were met.
1977 Rev. 1	Revision 0 of the proposed change addressed the correction of a latent error identified in a structural calculation previously performed for the Standardized HSM Models 80 and 102. During the preparation of a new revision to the structural calculation associated with the Standardized HSM Models 80 and 102, it was identified that the Excel spreadsheets used to compute the forces/moments and/or interaction ratios for certain load combinations were incorrect due to erroneous results being reported for certain load combinations for seismic loads and for tornado wind and missile loads. The capacities for the HSM concrete components were properly calculated. However, due to the error, the demand-to-capacity ratios reported for the HSM concrete components were also incorrect for the two affected load combinations. The error is limited to the HSM concrete components only. Revision 1 documents a sensitivity study of the initial structural evaluation for oxidized heat shields but at higher temperatures.	The structural calculation for the Standardized HSM Models 80 and 102 was revised to correct the computation error. The effect of the correction on the structural design function is quantified in new Appendix N of the revised calculation where some of the corrected shear and moment demands are more limiting in comparison to the results reported in the previous revision of the calculation. The results of the revised structural calculation indicate that there is sufficient margin to the structural capacity of the affected HSM concrete components (i.e., the demand-to-capacity ratios remain within the 1.0 limit) and the enveloping load combination results table in the UFSAR was updated. All eight 72.48 evaluation criteria were met. • This change is incorporated into UFSAR Revision 22.