

From: [Yen-Ju Chen](#)
To: [Williams, Christian D:\(Constellation Nuclear\)](#)
Cc: [Christian Jacobs](#); [John-Chau Nguyen](#)
Subject: Request for Additional Information for Dresden Exemption Request
Date: Friday, March 1, 2024 10:05:00 AM

Dear Mr. Williams:

Per our earlier conversation, the staff is requesting additional information to complete the review of Dresden's exemption request dated February 23, 2024 (ML24054A031). Please provide the following information by the end of business day today, March 1, 2024, in order to support your requested need date of April 18, 2024.

1. For future loading, provide the procedures for handling the dry cask storage system (i.e., loading, handling, and transit) that demonstrate that the system is either handled with a single failure proof device such that a drop is considered non-credible or administrative controls are in place to protect the lift height, which include an acceptable analysis that the MPC confinement boundary is maintained. GLs can refer to specific FSAR section and describe how it applies to site specific situations.

In the exemption request, under the technical justification for structural and confinement, Dresden stated that the structural assessment considered the handling operations for the dry cask storage system. Provide the handling procedures to support the justification in the exemption request.

2. Demonstrate that radiation release during a postulated accident is within the regulatory limits.

The analyses in Holtec's Final Safety Analysis Report (FSAR) for accident conditions demonstrate the consequences of accidents challenging the integrity of the confinement barrier and shielding design features should not exceed limits established in 10 CFR 72.106. The analyses in the FSAR also demonstrate that offsite doses during normal operations and anticipated occurrences should not exceed the limits of 10 CFR 72.104.

In the exemption request, under environmental consideration, Dresden states that the confinement boundary maintains its structural integrity during accident conditions. Demonstrate that the site-specific dose calculations for the postulated release would be within the regulatory limits, e.g., information/calculations from the 72.212 report.

3. Demonstrate that this exemption is otherwise in public interest. Provide site-specific information on why this exemption is needed right now and why it is in the public interest to grant this exemption.

Yen

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