



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**
WASHINGTON, D.C. 20555-0001

July 23, 2024

MEMORANDUM TO: Cinthya Román, Deputy Director
Division of Fuel Management
Office of Nuclear Material Safety
and Safeguards

FROM: Bernard White, Senior Project Manager
Storage and Transportation Licensing Branch
Division of Fuel Management
Office of Nuclear Material Safety
and Safeguards

A handwritten signature in black ink, appearing to read "Bernard White", is placed over the printed name in the "FROM:" field.

Signed by White, Bernard
on 07/23/24

SUBJECT: SUMMARY OF JUNE 17, 2024, PRE-APPLICATION MEETING WITH
HOLTEC INTERNATIONAL ON PROPOSED AMENDMENT 19 TO
THE HI-STORM 100 STORAGE SYSTEM

Background

On January 30, 2024 (Agencywide Documents Access and Management System [ADAMS] Accession No. ML24016A190), the U.S. Nuclear Regulatory Commission (NRC) issued Notice of Violation (NOV) EA-23-044 (ML24016A190). The NOV issued a Severity Level IV violation to Holtec for failing to obtain a certificate amendment for the HI-STORM 100 storage system prior to implementing proposed design changes to multi-purpose canister (MPC) continuous basket shims (CBS). This failure resulted in a departure from the method of evaluation (MOE) in the HI-STORM 100 final safety analysis report (FSAR) as described in Title 10 of the *Code of Federal Regulations* Section 72.48, "Changes, tests, and experiments."

On June 17, 2024, the NRC held a closed meeting with Holtec International (Holtec) to discuss Holtec's proposed Amendment No. 19 to Certificate of Compliance No. 1014, for the Model No. HI-STORM 100 storage system as a follow-up to the meeting on April 24, 2024 (ML24157A048). The meeting was noticed on June 6, 2024 (ML24158A017). The list of meeting attendees is provided as Enclosure 1. There were no presentations used at the meeting.

Discussion

The NRC started the discussion by going over the five questions that are labeled a–e in the April 24, 2024, meeting summary for confirmation that Holtec's responses had not changed based on analyses it has performed since the meeting occurred. Holtec stated that their responses have not changed.

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In addition, Holtec stated that the list of runs shown in the closed portion of the April 24th meeting includes a mixture of CBS baskets and friction stir welded baskets. Holtec stated that it believes that there is a sufficient number of baskets and overpacks included in the runs to demonstrate safety, given that some combinations bound other, and noted that no CBS baskets are anticipated to be employed in the UVH overpack. Finally, Holtec stated that, during the current analysis effort, they modified several basket models to remove unnecessary conservatism, such as reducing temperatures and fuel weights.

The NRC inquired as to when it should expect an application for Amendment No. 19. Holtec stated that it would need a couple more weeks and would likely submit the application in closer to mid-July. NRC stated that sliding the schedule to the right a couple of weeks would push NRC's schedule for approval close to the week before Christmas and consequently moving the estimated completion of the rulemaking 2 weeks as well, potentially into June 2025.

NRC asked if Holtec was aware of any other users that might request an exemption to load the canisters with continuous basket shims prior to approval of either Amendment No. 19 or Amendment No. 7 to the HI-STORM FW storage system. Holtec stated that it mentioned the proposed effective dates for the two rulemakings at its last Holtec users group meeting. While Holtec said that none of the users expressed a need for further exemptions, it stated that the licensees need to manage their loading risk.

Docket No. 72-1014
EPID No. L-2024-LRM-0051

Enclosure: Meeting Attendees

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DOCUMENT DATE: July 23, 2024

DISTRIBUTION:

NRC Meeting Attendees

ADAMS Accession No.: ML24192A166

OFFICE	NMSS/DFM/STLB	NMSS/DFM/STLB	NMSS/DFM/SMB
NAME	BWhite	SFigueroa	JSmith
DATE	7/19/2024	7/19/2024	7/19/2024
OFFICE	NMSS/DFM/SMB	NMSS/DFM/STLB	NMSS/DFM/STLB
NAME	TBoyce	YDiaz-Sanabria	BWhite
DATE	7/19/2024	7/22/2024	7/23/2024

OFFICIAL RECORD COPY

MEETING ATTENDEES

Meeting Title: SUMMARY OF JUNE 17, 2024, PRE-APPLICATION MEETING WITH HOLTEC INTERNATIONAL ON PROPOSED AMENDMENT 19 TO THE HI-STORM 100 STORAGE SYSTEM

Participants: Holtec International and the U.S. Nuclear Regulatory Commission (NRC)

Date: June 17, 2024

NAME	AFFILIATION
Bernard White	NRC
Alexis Sotomayor-Rivera	NRC
Yaira Diaz-Sanabria	NRC
Christian Jacobs	NRC
Janine Smith	NRC
Loren Howe	NRC
Linda Howell	NRC
Shana Helton	NRC
Cinthya Roman	NRC
Yen-Ju Chen	NRC
Kimberly Manzione	Holtec International (Holtec)
Denise Elisio	Holtec
Charles Bullard	Holtec
Vishwas Mathur	Holtec
Jean Fleming	Holtec