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November 13th, 2024

Yen Chen, Project Manager  
Division of Spent Fuel Management  
Office of Nuclear Material Safety and Safeguards

U.S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, DC 20555-0001

Docket No. 72-1014, Certificate of Compliance (CoC) No. 1014  
CAC No. 001028, EPID No. L-2024-LLA-0111

Subject: HI-STORM 100 Amendment 19 Additional Responses to Requests for Additional Information

Reference: [1] "Amendment No. 19 to Certificate of Compliance No. 1014 for the HI-STORM 100 Multi-Purpose Canister Storage System – Request for Additional Information," letter from Y. Chen (NRC) to D. Elisio (Holtec) dated October 9, 2024. ADAMS Accession No. ML24274A300  
[2] "HI-STORM 100 Amendment 19 Responses to Requests for Additional Information," letter from D. Elisio (Holtec) to Y. Chen (NRC) dated November 4, 2024. ADAMS Accession No.

Dear Ms. Chen:

By letter dated October 9, 2024 [1], NRC staff documented Requests for Additional Information to support review of HI-STORM 100 amendment request 1014-19. Holtec provided responses to the majority of the RAIs in [2] on November 4, 2024. A clarification call between the NRC and Holtec was held on November 8, 2024 which identified additional actions for Holtec to complete before submitting the remainder of the RAI responses including some updates to the responses previously submitted. The updated RAI response file is provided in Attachment 1 with Attachment 2 being a non-proprietary copy. An updated submittal Summary of Proposed Changes for HI-STORM 100 Amendment 19 is provided in Attachment 3. Changes to these documents are marked



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with revision bars.

Changes to chapter 3 of the FSAR as a result of these RAIs are included in Attachment 4, with Attachment 5 being a non-proprietary copy. Changes related to the RAI responses are highlighted in yellow. Attachment 6 contains a proprietary document supporting the RAI responses.

Since several attachments to this letter contain proprietary information, an affidavit requesting this information be withheld in accordance with 10CFR2.390 is included as Attachment 7.

Please contact me at (856) 797-0900 Extension 3326 if there are any questions or require any additional information.

Sincerely,

Denise Elisio  
Licensing Engineer,  
Holtec International

cc: (via email)

Yaira Diaz-Sanabria, USNRC

Kimberly Manzione, Holtec

Attachments:

Attachment 1: HI-STORM 100 Amendment 19 RAI Responses (proprietary)

Attachment 2: HI-STORM 100 Amendment 19 RAI Responses (non-proprietary)

Attachment 3: HI-STORM 100 Amendment 19 Updated Summary of Proposed Changes (non-proprietary)

Attachment 4: HI-STORM 100 FSAR Proposed Revision 25a, Chapter 3 revised pages (proprietary)

Attachment 5: HI-STORM 100 FSAR Proposed Revision 25a, Chapter 3 revised pages (non-proprietary)

Attachment 6: HI-2240678R1, Analysis of the Non-Mechanistic Tipover Event of the Loaded HI-STORM 100 Storage Cask (proprietary)

Attachment 7: Affidavit in Accordance with 10 CFR 2.390