

Amendment No. 4 Proposed Technical Specifications

CoC No. 1042

APPENDIX A

NUHOMS® EOS SYSTEM GENERIC TECHNICAL SPECIFICATIONS

Amendment No. 4

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## 1.0 USE AND APPLICATION

### 1.1 Definitions

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-----NOTE-----

The defined terms of this section appear in capitalized type and are applicable throughout these Technical Specifications and Bases.

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<u>Term</u>	<u>Definition</u>
ACTIONS	ACTIONS shall be that part of a Specification that prescribes Required Actions to be taken under designated Conditions within specified Completion Times.
BLEU FUEL	Blended Low Enriched Uranium (BLEU) FUEL material is generated by down-blending high enriched uranium (HEU). Because the feedstock contains both unirradiated and irradiated HEU, fresh BLEU fuel has elevated concentrations of U-232, U-234, and U-236.
CONTROL COMPONENTS (CCs)	Authorized CCs include Burnable Poison Rod Assemblies (BPRAs), Thimble Plug Assemblies (TPAs), Control Rod Assemblies (CRAs), Control Element Assemblies (CEAs), Control Spiders, Rod Cluster Control Assemblies (RCCAs), Axial Power Shaping Rod Assemblies (APSRAs), Orifice Rod Assemblies (ORAs), Peripheral Power Suppression Assemblies (PPSAs), Vibration Suppression Inserts (VSIs), Flux Suppression Inserts (FSIs), Burnable Absorber Assemblies (BAAs), Neutron Source Assemblies (NSAs) and Neutron Sources. CCs not explicitly listed are also authorized as long as external materials are limited to zirconium alloys, nickel alloys, and stainless steels. Non-fuel hardware that are positioned within the fuel assembly after the fuel assembly is discharged from the core such as Guide Tubes 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 to be authorized CCs.

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(continued)

1.1 Definitions (continued)

DAMAGED FUEL	DAMAGED FUEL assemblies are fuel assemblies containing 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 so that a fuel assembly maintains its configuration for normal and off-normal conditions. The extent of cladding damage is also limited so that no release of pellet material is observed during inspection and handling operations in the pool prior to loading operations. DAMAGED FUEL assemblies shall also contain top and bottom end fittings. DAMAGED FUEL assemblies may also contain missing or partial fuel rods.
DRY SHIELDED CANISTER (DSC)	An EOS-37PTH DSC, EOS-89BTH DSC, and 61BTH Type 2 DSC are sealed containers that provide confinement of fuel in an inert atmosphere.
FAILED FUEL	FAILED FUEL is defined as ruptured fuel rods, severed fuel rods, loose fuel pellets, fuel fragments, or fuel assemblies that may not maintain configuration for normal or off-normal conditions. FAILED FUEL may contain breached rods, grossly breached rods, or other defects such as missing or partial rods, missing grid spacers, or damaged spacers to the extent that the assembly may not maintain configuration for normal or off-normal conditions. FAILED FUEL shall be stored in a failed fuel canister (FFC).
FUEL BUILDING	The FUEL BUILDING is the site-specific area or facility where the LOADING OPERATIONS take place.
FUEL CLASS	A FUEL CLASS includes fuel assemblies of the same array size for a particular type of fuel design. For example, WEV 17x17, WEO 17x17, and ANP Advanced MK BW 17x17 fuel assemblies are part of a WE 17x17 FUEL CLASS.

(continued)

1.1 Definitions (continued)

HORIZONTAL STORAGE MODULE (HSM)	<p>An HSM is either a reinforced concrete structure (RC) or a steel-plate composite (SC) for storage of a loaded DSC at a spent fuel storage installation. Where the term “HSM” is used without distinction, this term shall apply to both the EOS-HSM and HSM-MX.</p> <p>The term EOS-HSM refers to the base unit for storage of a single DSC as a single piece (EOS-HSM) or as a split base (EOS-HSMS). When used without distinction, the term EOS-HSM shall refer to both the reinforced concrete and the steel-plate composite variants of the HSM.</p> <p>The term MATRIX (HSM-MX) refers to the two-tiered staggered structure for storage of the DSCs.</p>
INDEPENDENT SPENT FUEL STORAGE INSTALLATION (ISFSI)	<p>The facility within a perimeter fence licensed for storage of spent fuel within HSMs.</p>
INTACT FUEL	<p>Fuel assembly with no known or suspected cladding defects in excess of pinhole leaks or hairline cracks, and with no missing rods.</p>
LOADING OPERATIONS	<p>LOADING OPERATIONS include all licensed activities on a DSC in a TC while it is being loaded with fuel assemblies. LOADING OPERATIONS begin when the first fuel assembly is placed in the DSC and end when the TC is ready for TRANSFER OPERATIONS (i.e., when the cask is in a horizontal position on the transfer trailer.) LOADING OPERATIONS do not include DSC transfer between the TC and the HSM.</p>
LOW-ENRICHED OUTLIER FUEL (LEOF)	<p>LOW-ENRICHED OUTLIER FUEL is PWR and BWR fuel with enrichments below the minimum enrichment specified in Table 7A and Table 18, respectively.</p>
RECONSTITUTED FUEL ASSEMBLY	<p>A RECONSTITUTED FUEL ASSEMBLY is a fuel assembly where one or more fuel rods are replaced by low enriched uranium or natural uranium fuel rods or non-fuel rods.</p>

(continued)

1.1 Definitions (continued)

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STORAGE OPERATIONS

STORAGE OPERATIONS include all licensed activities that are performed at the ISFSI, while a DSC containing fuel assemblies is located in an HSM on the storage pad within the ISFSI perimeter. STORAGE OPERATIONS do not include DSC transfer between the TC and the HSM.

TRANSFER CASK (TC)

A TRANSFER CASK (TC) (EOS-TC108, EOS-TC125, EOS-TC135, and OS197/OS197H/OS197FC-B/OS197HFC-B) consists of a licensed NUHOMS® System TC. When used without distinction, the term EOS-TC includes the EOS-TC108, EOS-TC125, and EOS-TC135. The term OS197 includes the OS197/OS197H/OS197FC-B/OS197HFC-B. The TC is placed on a transfer trailer for movement of a DSC to the HSM.

TRANSFER OPERATIONS

TRANSFER OPERATIONS include all licensed activities involving the movement of a TC loaded with a DSC containing fuel assemblies. TRANSFER OPERATIONS begin after the TC has been placed horizontal on the transfer trailer ready for TRANSFER OPERATIONS and end when the DSC is at its destination and/or no longer horizontal on the transfer trailer. TRANSFER OPERATIONS include DSC transfer between the TC and the HSM.

UNLOADING OPERATIONS

UNLOADING OPERATIONS include all licensed activities on a DSC to unload fuel assemblies. UNLOADING OPERATIONS begin when the DSC is no longer horizontal on the transfer trailer and end when the last fuel assembly has been removed from the DSC. UNLOADING OPERATIONS do not include DSC transfer between the HSM and the TC.

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## 1.0 USE AND APPLICATION

### 1.2 Logical Connectors

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**PURPOSE** The purpose of this section is to explain the meaning of logical connectors.

Logical connectors are used in Technical Specifications (TS) to discriminate between, and yet connect, discrete Conditions, Required Actions, Completion Times, Surveillances, and Frequencies. The only logical connectors that appear in TS are AND and OR. The physical arrangement of these connectors constitutes logical conventions with specific meanings.

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**BACKGROUND** Several levels of logic may be used to state Required Actions. These levels are identified by the placement (or nesting) of the logical connectors and by the number assigned to each Required Action. The first level of logic is identified by the first digit of the number assigned to a Required Action and the placement of the logical connector in the first level of nesting (i.e., left justified with the number of the Required Action). The successive levels of logic are identified by additional digits of the Required Action number and by successive indentions of the logical connectors.

When logical connectors are used to state a Condition, Completion Time, Surveillance, or Frequency, only the first level of logic is used, and the logical connector is left justified with the statement of the Condition, Completion Time, Surveillance, or Frequency.

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**EXAMPLES** The following examples illustrate the use of logical connectors:

EXAMPLE 1.2-1

ACTIONS:

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. LCO (Limiting Condition for Operation) not met.	A.1 Verify... <u>AND</u> A.2 Restore...	

---

In this example the logical connector AND is used to indicate that when in Condition A, both Required Actions A.1 and A.2 must be completed.

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(continued)

1.2 Logical Connectors (continued)

EXAMPLES  
(continued)

EXAMPLE 1.2-2

ACTIONS:

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. LCO not met.	A.1 Stop... <u>OR</u> A.2 A.2.1 Verify... <u>AND</u> A.2.2 A.2.2.1 Reduce... <u>OR</u> A.2.2.2 Perform... <u>OR</u> A.3 Remove...	

This example represents a more complicated use of logical connectors. Required Actions A.1, A.2, and A.3 are alternative choices, only one of which must be performed as indicated by the use of the logical connector OR and the left justified placement. Any one of these three Actions may be chosen. If A.2 is chosen, then both A.2.1 and A.2.2 must be performed as indicated by the logical connector AND. Required Action A.2.2 is met by performing A.2.2.1 or A.2.2.2. The indented position of the logical connector OR indicates that A.2.2.1 and A.2.2.2 are alternative choices, only one of which must be performed.

## 1.0 USE AND APPLICATION

### 1.3 Completion Times

PURPOSE	The purpose of this section is to establish the Completion Time convention and to provide guidance for its use.
BACKGROUND	Limiting Conditions for Operation (LCOs) specify the lowest functional capability or performance levels of equipment required for safe operation of the facility. The ACTIONS associated with an LCO state Conditions that typically describe the ways in which the requirements of the LCO are not met. Specified with each stated Condition are Required Action(s) and Completion Times(s).
DESCRIPTION	<p>The Completion Time is the amount of time allowed for completing a Required Action. It is referenced to the time of discovery of a situation (e.g., equipment or variable not within limits) that requires entering an ACTIONS Condition unless otherwise specified, providing the facility is in a specified condition stated in the Applicability of the LCO. Required Actions must be completed prior to the expiration of the specified Completion Time. An ACTIONS Condition remains in effect and the Required Actions apply until the Condition no longer exists or the facility is not within the LCO Applicability.</p> <p>Once a Condition has been entered, subsequent subsystems, components, or variables expressed in the Condition, discovered to be not within limits, will <u>not</u> result in separate entry into the Condition unless specifically stated. The Required Actions of the Condition continue to apply to each additional failure, with Completion Times based on initial entry into the Condition.</p>

EXAMPLES      The following examples illustrate the use of Completion Times with different types of Conditions and Changing Conditions.

#### EXAMPLE 1.3-1

##### ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
B. Required Action and associated Completion Time not met.	B.1 Perform Action B.1	12 hours
	<u>AND</u> B.2 Perform Action B.2	36 hours

(continued)

### 1.3 Completion Times (continued)

#### EXAMPLES (continued)

Condition B has two Required Actions. Each Required Action has its own separate Completion Time. Each Completion Time is referenced to the time that Condition B is entered.

The Required Actions of Condition B are to complete action B.1 within 12 hours AND complete action B.2 within 36 hours. A total of 12 hours is allowed for completing action B.1 and a total of 36 hours (not 48 hours) is allowed for completing action B.2 from the time that Condition B was entered. If action B.1 is completed within 6 hours, the time allowed for completing action B.2 is the next 30 hours because the total time allowed for completing action B.2 is 36 hours.

#### EXAMPLES

##### EXAMPLE 1.3-2

##### ACTIONS

CONDITION		REQUIRED ACTION	COMPLETION TIME
A.	One system not within limit.	A.1	Restore system to within limit.
			7 days
B.	Required Action and associated Completion Time not met.	B.1	Perform Action B.1.
		<u>AND</u>	
		B.2	Perform Action B.2.
			36 hours

When a system is determined to not meet the LCO, Condition A is entered. If the system is not restored within 7 days, Condition B is also entered and the Completion Time clocks for Required Actions B.1 and B.2 start. If the system is restored after Condition B is entered, Condition A and B are exited, and therefore, the Required Actions of Condition B may be terminated.

(continued)

1.3 Completion Times (continued)

EXAMPLES  
(continued)

EXAMPLE 1.3-3

ACTIONS

-----NOTE-----  
Separate Condition entry is allowed for each component.  
-----

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. LCO not met.	A.1 Restore compliance with LCO.	4 hours
B. Required Action and associated Completion Time not met.	B.1 Perform Action B.1.	6 hours
	<u>AND</u> B.2 Perform Action B.2.	12 hours

The Note above the ACTIONS Table is a method of modifying how the Completion Time is tracked. If this method of modifying how the Completion Time is tracked was applicable only to a specific Condition, the Note would appear in that Condition rather than at the top of the ACTIONS Table.

The Note allows Condition A to be entered separately for each component, and Completion Times tracked on a per component basis. When a component is determined to not meet the LCO, Condition A is entered and its Completion Time starts. If subsequent components are determined to not meet the LCO, Condition A is entered for each component and separate Completion Times start and are tracked for each component.

IMMEDIATE  
COMPLETION  
TIME

When “Immediately” is used as a Completion Time, the Required Action should be pursued without delay and in a controlled manner.

## 1.0 USE AND APPLICATION

### 1.4 Frequency

PURPOSE	The purpose of this section is to define the proper use and application of Frequency requirements
DESCRIPTION	<p>Each Surveillance Requirement (SR) has a specified Frequency in which the Surveillance must be met in order to meet the associated Limiting Condition for Operation (LCO). An understanding of the correct application of the specified Frequency is necessary for compliance with the SR.</p> <p>The "specified Frequency" is referred to throughout this section and each of the Specifications of Section 3.0, Limiting Condition for Operation (LCO) and Surveillance Requirement (SR) Applicability. The "specified Frequency" consists of the requirements of the Frequency column of each SR, as well as certain Notes in the Surveillance column that modify performance requirements.</p> <p>Situations where a Surveillance could be required (i.e., its Frequency could expire), but where it is not possible or not desired that it be performed until sometime after the associated LCO is within its Applicability, represent potential SR 3.0.4 conflicts. To avoid these conflicts, the SR (i.e., the Surveillance or the Frequency) is stated such that it is only "required" when it can be and should be performed. With a SR satisfied, SR 3.0.4 imposes no restriction.</p>

(continued)

1.4 Frequency (continued)

EXAMPLES

The following examples illustrate the various ways that Frequencies are specified:

EXAMPLE 1.4-1

SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
Verify pressure within limit.	12 hours

Example 1.4-1 contains the type of SR most often encountered in the Technical Specifications (TS). The Frequency specifies an interval (12 hours) during which the associated Surveillance must be performed at least one time. Performance of the Surveillance initiates the subsequent interval. Although the Frequency is stated as 12 hours, an extension of the time interval to 1.25 times the stated Frequency is allowed by SR 3.0.2 for operational flexibility. The measurement of this interval continues at all times, even when the SR is not required to be met per SR 3.0.1 (such as when the equipment is determined to not meet the LCO, a variable is outside specified limits, or the unit is outside the Applicability of the LCO). If the interval specified by SR 3.0.2 is exceeded while the facility is in a condition specified in the Applicability of the LCO, the LCO is not met in accordance with SR 3.0.1.

If the interval as specified by SR 3.0.2 is exceeded while the facility is not in a condition specified in the Applicability of the LCO for which performance of the SR is required, the Surveillance must be performed within the Frequency requirements of SR 3.0.2 prior to entry into the specified condition. Failure to do so would result in a violation of SR 3.0.4.

(continued)

1.4 Frequency (continued)

EXAMPLES  
(continued)

EXAMPLE 1.4-2

SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
Verify flow is within limits.	Once within 12 hours prior to starting activity <u>AND</u> 24 hours thereafter

Example 1.4-2 has two Frequencies. The first is a one-time performance Frequency, and the second is of the type shown in Example 1.4-1. The logical connector “AND” indicates that both Frequency requirements must be met. Each time the example activity is to be performed, the Surveillance must be performed prior to starting the activity.

The use of “once” indicates a single performance will satisfy the specified Frequency (assuming no other Frequencies are connected by “AND”). This type of Frequency does not qualify for the 25% extension allowed by SR 3.0.2.

“Thereafter” indicates future performances must be established per SR 3.0.2, but only after a specified condition is first met (i.e., the “once” performance in this example). If the specified activity is canceled or not performed, the measurement of both intervals stops. New intervals start upon preparing to restart the specified activity.

(continued)



1.4 Frequency (continued)

EXAMPLES  
(continued)

EXAMPLE 1.4-3

SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
<p>-----NOTE -----</p> <p>Not required to be met until 96 hours after verifying the helium leak rate is within limit.</p> <p>-----</p> <p>Verify EOS DSC vacuum drying pressure is within limit.</p>	<p>Once after verifying the helium leak rate is within limit.</p>

As the Note modifies the required performance of the Surveillance, it is construed to be part of the “specified Frequency.” Should the vacuum drying pressure not be met immediately following verification of the helium leak rate while in LOADING OPERATIONS, this Note allows 96 hours to perform the Surveillance. The Surveillance is still considered to be performed within the “specified Frequency.”

Once the helium leak rate has been verified to be acceptable, 96 hours, plus the extension allowed by SR 3.0.2, would be allowed for completing the Surveillance for the vacuum drying pressure. If the Surveillance was not performed within this 96 hour interval, there would then be a failure to perform the Surveillance within the specified Frequency, and the provisions of SR 3.0.3 would apply.

## 2.0 FUNCTIONAL AND OPERATING LIMITS

### 2.1 Fuel to be Stored in the EOS-37PTH DSC

<u>PHYSICAL PARAMETERS:</u>	
FUEL CLASS	Unconsolidated B&W 15x15, WE 14x14, WE 15x15, WE 17x17, CE 14x14, CE 15x15 and CE 16x16 FUEL CLASS PWR fuel assemblies (with or without CCs) that are enveloped by the fuel assembly design characteristics listed in Table 1.
Number of FUEL ASSEMBLIES with CCs	$\leq 37$
Maximum Fuel Assembly plus CC Weight	1900 lbs
<u>DAMAGED FUEL ASSEMBLIES:</u>	
Number and Location of DAMAGED FUEL Assemblies	Maximum of 8 DAMAGED FUEL Assemblies. Balance may be INTACT FUEL, empty cells, or dummy assemblies. Number and Location of DAMAGED FUEL assemblies are shown in Figures 1F, 1H, and 1K, and 13. The DSC basket cells which store DAMAGED FUEL assemblies are provided with top and bottom end caps.
<u>FAILED FUEL:</u>	
Number and Location of FAILED FUEL	Maximum of 4 FAILED FUEL locations. Balance may be INTACT FUEL assemblies, empty cells, or dummy assemblies. Number and Location of FAILED FUEL assemblies are shown in Figures 1F, 1H, and 1K, and 13. FAILED FUEL shall be stored in a failed fuel canister (FFC).
Maximum Uranium Loadings per FFC for FAILED FUEL	Per Table 2
<u>RECONSTITUTED FUEL ASSEMBLIES:</u>	
<ul style="list-style-type: none"> <li>Limits for transfer in the EOS-TC125/135 <u>AND</u> storage in the EOS-HSM</li> </ul>	Per Table 24
<ul style="list-style-type: none"> <li>Limits for transfer in the EOS-TC125/135 <u>AND</u> storage in the HSM-MX</li> </ul>	$\leq 37$ RECONSTITUTED FUEL ASSEMBLIES per DSC with a minimum cooling time of 2 years
<ul style="list-style-type: none"> <li>Limits for transfer in the EOS-TC108</li> </ul>	Per Table 25

(continued)

2.1 Fuel to be Stored in the EOS-37PTH DSC (continued)

<p><u>BLENDING LOW ENRICHED URANIUM (BLEU) FUEL Assemblies:</u></p> <ul style="list-style-type: none"> <li>Number of BLEU FUEL Assemblies per DSC</li> </ul>	<p>≤ 37</p>
<p><u>THERMAL PARAMETERS:</u></p> <p>Maximum Heat Load Configuration (MHLC) and Decay Heat Calculations</p>	<p>Per Figures 1B, 1C, 1D, 1E AND 1F for transfer in the EOS-TC108 and storage in EOS-HSM.</p> <p>Per Figures 1G, 1H AND 1I for transfer in the EOS-TC108 /TC125/TC135 and storage in HSM-MX.</p> <p>Per Figure 1K for transfer in the EOS-TC108 and storage in HSM-MX.</p> <p>Per Figure 12, which specifies maximum allowable heat loads in a six-zone configuration, for transfer in the EOS-TC125/TC135 and storage in the EOS-HSM.</p> <p>Heat load zoning configurations (HLZCs) enveloped by the MHLC in Figure 12 are allowed for transfer in the EOS-TC125/TC135 and storage in the EOS-HSM. Chapter 2, Section 2.4.3.2 of the UFSAR provides the specific HLZCs.</p> <p>The maximum allowable heat loads may be reduced based on the thermal analysis methodology in the UFSAR to accommodate site-specific conditions. However, the maximum decay heat for each FA shall not exceed the values specified in the aforementioned figures.</p> <p>The licensee is responsible for ensuring that uncertainties in fuel enrichment and burnup are correctly accounted for in the decay heat calculations.</p>

(continued)

2.1 Fuel to be Stored in the EOS-37PTH DSC (continued)

<p><u>THERMAL PARAMETERS</u> (continued)</p>	<p>For FAs with active fuel length shorter than 144 inches, reduce the maximum heat load per FA in each loading zone of the HLZCs using a scaling factor (SF) as shown below.</p> $q_{Short\ FA} = q_{Bounding\ FA} \cdot SF,$ $SF = \frac{L_{a,Short\ FA}}{L_{a,Bounding\ FA}} \cdot \frac{k_{eff,Short\ FA}}{k_{eff,Bounding\ FA}}.$ <p>Where,  <math>k_{eff}</math>= Effective conductivity for FA,  <math>q</math> = Decay heat load per assembly defined for each loading zone,  <math>L_a</math>= Active fuel length,  SF= Scaling factor (SF) for short FAs.</p> <p>The effective conductivity for the shorter FA should be determined using the same methodology documented in the UFSAR.</p> <p>For FAs with active fuel length greater than 144 inches, no scaling is required and the maximum heat loads listed for each HLZC are applicable.</p> <p>Decay Heat per DSC</p> <p>≤ 50.0 kW and as specified for the applicable heat load zone configuration</p>
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(continued)

2.1 Fuel to be Stored in the EOS-37PTH DSC (continued)

<u>RADIOLOGICAL PARAMETERS:</u>	
Maximum Assembly Average Burnup	62 GWd/MTU
Minimum Cooling Time	<p>For all fuel to be stored in the HSM-MX, minimum cooling time as a function of burnup and enrichment per Table 7B.</p> <p>For all fuel to be stored in the EOS-HSM, minimum cooling time as a function of burnup and enrichment per Table 7C.</p> <p>1 year for the EOS-TC125/135</p> <p>2 years for the EOS-TC108</p>
Minimum Assembly Average Initial Fuel Enrichment	As specified in Table 7A as a function of assembly average burnup.
Maximum Planar Average Initial Fuel Enrichment	As specified in Table 4 as a function of minimum soluble boron concentration
Minimum B-10 Concentration in Poison Plates	As specified in Table 5
Number and location of LOW-ENRICHED OUTLIER FUEL (LEOF)	≤ 4 LEOF in the peripheral locations. A minimum of three non-LEOFs shall circumferentially separate LEOFs within the peripheral locations. No limitation for LEOF in the inner locations. The peripheral and inner locations are defined in Figure 3.
<u>CONTROL COMPONENTS (CCs)</u>	
Maximum Co-60 equivalent activity for the CCs.	As specified in Table 3

## 2.0 FUNCTIONAL AND OPERATING LIMITS

### 2.2 Fuel to be Stored in the EOS-89BTH DSC

<u>PHYSICAL PARAMETERS:</u>  FUEL CLASS	INTACT unconsolidated 7x7, 8x8, 9x9, 10x10, and 11x11 FUEL CLASS BWR assemblies (with or without channels) that are enveloped by the fuel assembly design characteristics listed in Table 6.
<u>NUMBER OF INTACT FUEL ASSEMBLIES</u>  Channel Hardware  Maximum Uranium Loading Maximum Fuel Assembly Weight with a Channel	≤ 89  Channeled fuel may be stored with or without associated channel hardware.  198 kg/assembly 705 lb
<u>RECONSTITUTED FUEL ASSEMBLIES:</u>  <ul style="list-style-type: none"> <li>Limits for transfer in the EOS-TC125</li> <li>Limits for transfer in the EOS-TC108</li> </ul>	Per Table 22  Per Table 23
<u>BLENDED LOW ENRICHED URANIUM (BLEU) FUEL ASSEMBLIES:</u>  <ul style="list-style-type: none"> <li>Number of BLEU FUEL Assemblies per DSC</li> </ul>	≤ 89

(continued)

2.2 Fuel to be Stored in the EOS-89BTH DSC (continued)

<p><u>THERMAL PARAMETERS:</u> Maximum Heat Load Configuration (MHLC) and Decay Heat Calculations</p>	<p>Per Figure 2 for transfer in the EOS-TC108.</p> <p>Per Figure 11, which specifies maximum allowable heat loads in a six-zone configuration, for transfer in the EOS-TC125.</p> <p>Heat load zoning configurations (HLZCs) enveloped by the MHLC in Figure 11 are allowed for transfer in the EOS-TC125 and storage in the EOS-HSM or HSM-MX. Chapter 2, Section 2.4.3.2 of the UFSAR provides the specific HLZCs.</p> <p>The maximum allowable heat loads may be reduced based on the thermal analysis methodology in the UFSAR. However, the maximum decay heat for each FA shall not exceed the values specified in Figure 11.</p> <p>The licensee is responsible for ensuring that uncertainties in fuel enrichment and burnup are correctly accounted for in the decay heat calculations.</p> <p>For FAs with active fuel length shorter than 144 inches, reduce the maximum decay heat for each FA in each loading zone of the HLZCs using a scaling factor (SF) as shown below.</p> $q_{Short\ FA} = q_{Bounding\ FA} \cdot SF,$ $SF = \frac{L_{a,Short\ FA}}{L_{a,Bounding\ FA}} \cdot \frac{k_{eff,Short\ FA}}{k_{eff,Bounding\ FA}}.$ <p>Where,</p> <ul style="list-style-type: none"> <li><math>k_{eff}</math> = Effective conductivity for FA,</li> <li><math>q</math> = Decay heat load per assembly defined for each loading zone,</li> <li><math>L_a</math> = Active fuel length,</li> <li>SF = Scaling factor for short FAs.</li> </ul> <p>The effective conductivity for the shorter FA should be determined using the same methodology documented in the UFSAR.</p> <p>For FAs with active fuel length greater than 144 inches, no scaling is required and the maximum heat loads listed for each HLZC are applicable.</p>
<p>Decay Heat per DSC</p>	<p>≤ 48.2 kW for EOS-TC125 ≤ 41.6 kW for EOS-TC108</p>

(continued)

2.2 Fuel to be Stored in the EOS-89BTH DSC continued)

<p><u>RADIOLOGICAL PARAMETERS:</u></p> <p>Maximum Assembly Average Burnup</p> <p>Minimum Cooling Time</p> <p>Maximum Lattice Average Initial Fuel Enrichment</p> <p>Minimum B-10 Concentration in Poison Plates</p> <p>Minimum Assembly Average Initial Fuel Enrichment</p> <p>Number and location of LOW-ENRICHED OUTLIER FUEL (LEOF)</p>	<p>62 GWd/MTU</p> <p>As specified as a function of burnup and enrichment per Table 21.</p> <p>1.0 year for EOS-TC125</p> <p>3.0 years for EOS-TC108; See Figure 2 for additional cooling times for HLZC 2 and 3 transferred in the EOS-TC108.</p> <p>Per Table 8</p> <p>Per Table 8</p> <p>As specified in Table 18 as a function of assembly average burnup.</p> <p>≤ 4 LEOF in the peripheral locations. A minimum of six non-LEOFs shall circumferentially separate LEOFs within the peripheral locations. No limitation for LEOF in the inner locations. The peripheral and inner locations are defined in Figure 8.</p>
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## 2.0 FUNCTIONAL AND OPERATING LIMITS

### 2.3 Fuel to be stored in the 61BTH Type 2 DSC

<u>PHYSICAL PARAMETERS:</u>	
FUEL CLASS	INTACT or DAMAGED or FAILED 7x7, 8x8, 9x9, 10x10 or 11x11 BWR assemblies (with or without channels) that are enveloped by the fuel assembly design characteristics listed in Table 13
Number of INTACT FUEL ASSEMBLIES	≤ 61
Channel Hardware	Channeled fuel may be stored with or without associated channel hardware.
Maximum Uranium Loading	198 kg/ assembly
Maximum Fuel Assembly Weight with a Channel	705 lbs
<u>DAMAGED FUEL ASSEMBLIES:</u>	
Number and Location of DAMAGED FUEL Assemblies	Maximum of 61 DAMAGED FUEL assemblies as shown in Figure 5. Balance may be INTACT FUEL, empty cells, or dummy assemblies. The DSC basket cells which store DAMAGED FUEL assemblies are provided with top and bottom end caps.
<u>FAILED FUEL:</u>	
Number and Location of FAILED FUEL	Maximum of 4 FAILED FUEL locations as shown in Figure 5  Balance may be INTACT FUEL assemblies, empty cells, or dummy assemblies. FAILED FUEL shall be stored in a failed fuel canister (FFC)
Maximum Uranium Loadings per FFC for FAILED FUEL	Table 14
<u>RECONSTITUTED FUEL ASSEMBLIES:</u>	
<ul style="list-style-type: none"> <li>Number of RECONSTITUTED FUEL ASSEMBLIES per DSC</li> </ul>	≤ 61
<ul style="list-style-type: none"> <li>Maximum number of irradiated stainless steel rods per DSC</li> </ul>	120

(continued)

<ul style="list-style-type: none"> <li>Maximum number of irradiated stainless steel rods per RECONSTITUTED FUEL ASSEMBLY</li> <li>Loading restrictions for locations within the basket</li> </ul>	<p>10</p> <p>Inner and peripheral loading locations are defined in Figure 6.</p> <p>Inner Loading Locations:</p> <ul style="list-style-type: none"> <li>RECONSTITUTED FUEL ASSEMBLIES may be loaded in any compartment within the inner locations.</li> </ul> <p>Peripheral Loading Locations:</p> <ul style="list-style-type: none"> <li>RECONSTITUTED FUEL ASSEMBLIES with <math>\leq 5</math> irradiated stainless steel rods per fuel assembly may be loaded into all peripheral locations (i.e., not restricted).</li> <li>RECONSTITUTED FUEL ASSEMBLIES with <math>&gt; 5</math> and <math>\leq 10</math> irradiated stainless steel rods per fuel assembly shall have at least one fuel assembly that does not contain irradiated stainless steel rods on each peripherally adjacent location (see Figure 7).</li> </ul>
<p><u>BLENDING LOW ENRICHED URANIUM (BLEU) FUEL Assemblies:</u></p> <ul style="list-style-type: none"> <li>Number of BLEU FUEL Assemblies per DSC</li> </ul>	<p><math>\leq 61</math></p>
<p>THERMAL/RADIOLOGICAL PARAMETERS:</p> <p>Heat Load Zone Configuration and Fuel Qualification</p> <p>Maximum Assembly Average Burnup</p> <p>Minimum Cooling Time</p>	<p>Limitations on decay heats are presented in the respective HLZC tables in Figures 4A through 4J.</p> <p>62 GWd/MTU</p> <p>For all fuel, minimum cooling time as a function of burnup and enrichment per Table 19.</p> <p>For the peripheral fuel of HLZC 2, 4, 5, 6, 7, and 8 only, minimum cooling time as a function of burnup and enrichment per Table 20. The peripheral and inner locations are defined in Figure 6.</p>

(continued)

Minimum Assembly Average Initial Fuel Enrichment	As specified in Table 18 as a function of assembly average burnup.
Decay Heat per DSC	$\leq 31.2$ kW
Maximum Lattice Average Initial Enrichment	Per Table 9, Table 10, Table 11 or Table 12
Minimum B-10 Concentration in Poison Plates	Per Table 9, Table 10, Table 11 or Table 12
Number and location of LOW-ENRICHED OUTLIER FUEL (LEOF)	$\leq 4$ LEOF in the peripheral locations. A minimum of five non-LEOFs shall circumferentially separate LEOFs within the peripheral locations. No limitation for LEOF in the inner locations. The peripheral and inner locations are defined in Figure 6.

## 2.0 FUNCTIONAL OPERATING LIMITS

### 2.4 Functional and Operating Limits Violations

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If any Functional and Operating Limit of 2.1 or 2.2 or 2.3 is violated, the following ACTIONS shall be completed:

- 2.4.1 The affected fuel assemblies shall be placed in a safe condition.
  - 2.4.2 Within 24 hours, notify the NRC Operations Center.
  - 2.4.3 Within 60 days, submit a special report which describes the cause of the violation and the ACTIONS taken to restore compliance and prevent recurrence.
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### 3.0 LIMITING CONDITION FOR OPERATION (LCO) AND SURVEILLANCE REQUIREMENT (SR) APPLICABILITY

#### LIMITING CONDITION FOR OPERATION

LCO 3.0.1	LCOs shall be met during specified conditions in the Applicability, except as provided in LCO 3.0.2.
LCO 3.0.2	<p>Upon discovery of a failure to meet an LCO, the Required Actions of the associated Conditions shall be met, except as provided in LCO 3.0.5.</p> <p>If the LCO is met or is no longer applicable prior to expiration of the specified Completion Time(s), completion of the Required Action(s) is not required, unless otherwise stated.</p>
LCO 3.0.3	Not applicable to a spent fuel storage cask.
LCO 3.0.4	<p>When an LCO is not met, entry into a specified condition in the Applicability shall not be made except when the associated ACTIONS to be entered permit continued operation in the specified condition in the Applicability for an unlimited period of time. This Specification shall not prevent changes in specified conditions in the Applicability that are required to comply with ACTIONS, or that are related to the unloading of a DSC.</p> <p>Exceptions to this Specification are stated in the individual Specifications. These exceptions allow entry into specified conditions in the Applicability when the associated ACTIONS to be entered allow operation in the specified condition in the Applicability only for a limited period of time.</p>
LCO 3.0.5	Equipment removed from service or not in service in compliance with ACTIONS may be returned to service under administrative control solely to perform testing required to demonstrate it meets the LCO or that other equipment meets the LCO. This is an exception to LCO 3.0.2 for the system returned to service under administrative control to perform the testing required to demonstrate that the LCO is met.
LCO 3.0.6	Not applicable to a spent fuel storage cask.
LCO 3.0.7	Not applicable to a spent fuel storage cask.

(continued)

## SURVEILLANCE REQUIREMENTS

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SR 3.0.1	SRs shall be met during the specified conditions in the Applicability for individual LCOs, unless otherwise stated in the SR. Failure to meet a Surveillance, whether such failure is experienced during the performance of the Surveillance or between performances of the Surveillance, shall be failure to meet the LCO. Failure to perform a Surveillance within the specified Frequency shall be failure to meet the LCO except as provided in SR 3.0.3. Surveillances do not have to be performed on equipment or variables outside specified limits.
SR 3.0.2	<p>The specified Frequency for each SR is met if the Surveillance is performed within 1.25 times the interval specified in the Frequency, as measured from the previous performance or as measured from the time a specified condition of the Frequency is met.</p> <p>For Frequencies specified as “once,” the above interval extension does not apply. If a Completion Time requires periodic performance on a “once per . . .” basis, the above Frequency extension applies to each performance after the initial performance.</p> <p>Exceptions to this Specification are stated in the individual Specifications.</p>
SR 3.0.3	<p>If it is discovered that a Surveillance was not performed within its specified Frequency, then compliance with the requirement to declare the LCO not met may be delayed, from the time of discovery, up to 24 hours or up to the limit of the specified Frequency, whichever is less. This delay period is permitted to allow performance of the Surveillance.</p> <p>If the Surveillance is not performed within the delay period, the LCO must immediately be declared not met, and the applicable Condition(s) must be entered.</p> <p>When the Surveillance is performed within the delay period and the Surveillance is not met, the LCO must immediately be declared not met, and the applicable Condition(s) must be entered.</p>
SR 3.0.4	Entry into a specified condition in the Applicability of an LCO shall not be made unless the LCO's Surveillances have been met within their specified Frequency. This provision shall not prevent entry into specified conditions in the Applicability that are required to comply with ACTIONS or that are related to the unloading of a DSC.

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### 3.1 DSC Fuel Integrity

#### 3.1.1 Fuel Integrity during Drying

##### LCO 3.1.1

Medium:

Helium shall be used for cover gas during drainage of bulk water (blowdown or draindown) from the DSC.

Pressure:

The DSC vacuum drying pressure shall be sustained at or below 3 Torr (3 mm Hg) absolute for a period of at least 30 minutes following evacuation.

APPLICABILITY: During LOADING OPERATIONS but before TRANSFER OPERATIONS.

#### ACTIONS:

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. If the required vacuum drying pressure cannot be obtained.	A.1	30 days
	A.1.1 Confirm that the vacuum drying system is properly installed. Check and repair the vacuum drying system as necessary. <u>OR</u>	
	A.1.2 Establish helium pressure of at least 0.5 atm and no greater than 15 psig in the DSC. <u>OR</u>	30 days
	A.2 Flood the DSC with spent fuel pool water or water meeting the requirements of LCO 3.2.1, if applicable, submerging all fuel assemblies.	

(continued)

3.1 DSC Fuel Integrity (continued)

SURVEILLANCE REQUIREMENTS	
SURVEILLANCE	FREQUENCY
SR 3.1.1      Verify that the DSC vacuum drying pressure is less than or equal to 3 Torr (3 mm Hg) absolute for at least 30 minutes following evacuation.	Once per DSC, after an acceptable NDE of the inner top cover plate to DSC shell weld.

(continued)



### 3.1 DSC Fuel Integrity (continued)

#### 3.1.2 DSC Helium Backfill Pressure

LCO 3.1.2 DSC helium backfill pressure shall be  $2.5 \pm 1$  psig (stable for 30 minutes after filling) after completion of vacuum drying.

APPLICABILITY: During LOADING OPERATIONS but before TRANSFER OPERATIONS.

#### ACTIONS:

CONDITION	REQUIRED ACTION	COMPLETION TIME
<p>-----NOTE -----</p> <p>Not applicable until SR 3.1.2 is performed.</p> <p>-----</p> <p>A. The required backfill pressure cannot be obtained or stabilized.</p>	<p>A.1</p> <p>A.1.1 Maintain helium atmosphere in the DSC cavity.</p> <p><u>AND</u></p> <p>A.1.2 Confirm, check and repair or replace as necessary the vacuum drying system, helium source and pressure gauge.</p> <p><u>AND</u></p> <p>A.1.3 Check and repair, as necessary, the seal weld between the inner top cover plate and the DSC shell.</p> <p><u>OR</u></p> <p>A.2 Establish the DSC helium backfill pressure to within the limit. If pressure exceeds the criterion, release a sufficient quantity of helium to lower the DSC cavity pressure within the limit.</p> <p><u>OR</u></p>	<p>30 days</p> <p>30 days</p>

(continued)

3.1 DSC Fuel Integrity (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
	A.3 Flood the DSC with spent fuel pool water or water meeting the requirements of LCO 3.2.1, if applicable, submerging all fuel assemblies.	30 days

SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
SR 3.1.2 Verify that the DSC helium backfill pressure is $2.5 \pm 1$ psig stable for 30 minutes after filling.	Once per DSC, after the completion of SR 3.1.1 requirement.

(continued)

## 3.1 DSC Fuel Integrity (continued)

## 3.1.3 Time Limit for Completion of DSC Transfer

## LCO 3.1.3

The time to transfer the DSC to the HSM shall be within the limits.

Additionally, if the DSC and HLZC combination result in a time limit for completion of transfer from the table below, the air circulation system shall be assembled and be verified to be operable within 7 days before commencing the TRANSFER OPERATIONS of the loaded DSC.

DSC MODEL	APPLICABLE HLZC	TIME LIMITS (HOURS)
EOS-37PTH	HLZCs qualified per Figure 12	8 <sup>(1)</sup>
EOS-37PTH	HLZC 3	No Limit
EOS-37PTH	HLZC 1, 2, or 4-11	8 <sup>(1) (2)</sup>
EOS-89BTH	HLZCs qualified per Figure 11	8 <sup>(1)</sup>
EOS-89BTH	HLZC 2	10 <sup>(1)(3)</sup>
EOS-89BTH	HLZC 3	No Limit <sup>(3)</sup>
61BTH Type 2	HLZC 1, 2, 3, 4, or 9	No limit
61BTH Type 2	5, 6, or 8	23
61BTH Type 2	7 or 10	10

## -----NOTE-----

1. The time limit for completion of a DSC transfer is defined as the time elapsed in hours after the initiation of draining of TC/DSC annulus water until the completion of insertion of the DSC into the HSM. For transfer of an EOS-DSC, the time limit for transfer operations is determined based on the EOS-37PTH DSC in EOS-TC125 with the maximum allowable heat load of 50 kW or EOS-89BTH DSC in EOS-TC125 with the maximum allowable heat load of 48.2 kW. If the maximum heat load of a DSC is less than 50 kW for EOS-37PTH DSC or 48.2 kW for the EOS-89BTH DSC, a new time limit can be determined to provide additional time for transfer operations. The calculated time limit shall not be less than the time limit specified in LCO 3.1.3. The calculation should be performed using the same methodology documented in the UFSAR.
2. HLZC 2, 4-6 (shown in Figures 1B, 1D-1F) time limits apply for the EOS-37PTH DSC transferred in the EOS-TC108 only. HLZC 7-9 time limits apply for storage in the HSM-MX. If transferring the EOS-37PTH with HLZC 2, 4-6, or 11 in the EOS-TC125/135 and storing in the EOS-HSM, the limits for Figure 12 apply. Time limits also apply for HLZC 1, 2, and 4-11 when storing WE 14 x 14.
3. HLZC 2 and 3 (shown in Figure 2) time limits apply for the EOS-89BTH transferred in the EOS-TC108 only. If transferring the EOS-89BTH with HLZC 2 or 3 in the EOS-TC125, the limits for Figure 11 apply.

(continued)

**ACTIONS:**

1. For EOS-37PTH and EOS-89BTH DSCs: If Required Action A.2 is initiated, run the blower for a minimum of 8 hours. After the blower is turned off, the time limit for completion of DSC transfer is 4 hours. If Required Action A.2 fails to complete within one hour, follow Required Action A.3 for the time remaining in the original Required Action A.3 completion time of 5 hours. 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 EOS-37PTH DSC in EOS-TC125 with the maximum allowable heat load of 50 kW or EOS-89BTH DSC in EOS-TC125 with the maximum allowable heat load of 48.2 kW. If the maximum heat load of a DSC is less than 50 kW for EOS-37PTH DSC or 48.2 kW for the EOS-89BTH DSC, new time limits can be determined to provide additional time for these transfer operations. The calculated time limits shall not be less than 4 hours for completion of transfer operation after the blower is turned off. The calculation should be performed using the same methodology documented in the UFSAR.
2. For 61BTH Type 2 DSC: If Required Action A.2 is initiated, run the blower for a minimum of 8 hours. After the blower is turned off, the time limit for completion of DSC transfer is 4 hours. If Required Action A.2 fails to complete within one hour, follow Required Action A.3 for the time remaining in the original Required Action A.3 completion time of 5 hours. 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 61BTH Type 2 DSC in OS197FC-B TC with the maximum allowable heat load of 31.2 kW. If the maximum heat load of a DSC is less than 31.2 kW, new time limits can be determined to provide additional time for these transfer operations. The calculated time limits shall not be less than 4 hours for completion of transfer operation after the blower is turned off. The calculation should be performed using the same methodology documented in the UFSAR.

3-8

3.1 DSC Fuel Integrity (continued)

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SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.1.3	Verify that the time limit for completion of DSC transfer is met.	Once per DSC, after the initiation of draining of TC/DSC annulus water.

## 3.2 Cask Criticality Control

### 3.2.1 Soluble Boron Concentration

LCO 3.2.1 The boron concentration of the spent fuel pool water and the water added to the cavity of a loaded EOS-37PTH DSC shall be at least the boron concentration shown in Table 4 for the basket type and fuel enrichment selected.

APPLICABILITY: During LOADING and UNLOADING OPERATIONS with fuel and liquid water in the EOS-37PTH DSC cavity.

#### ACTIONS:

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. Soluble boron concentration limit not met.	A.1 Suspend loading of fuel assemblies into DSC.	Immediately
	<u>AND</u>	
	A.2	
	A.2.1 Add boron and re-sample, and test the concentration until the boron concentration is shown to be at least that required.	Immediately
	<u>OR</u>	
	A.2.2 Remove all fuel assemblies from DSC.	Immediately

## SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
<p>SR 3.2.1.1    Verify soluble boron concentration limit in spent fuel pool water and water to be added to the DSC cavity is met using two independent measurements (two samples analyzed by different individuals) for LOADING OPERATIONS.</p>	<p>Within 4 hours before insertion of the first fuel assembly into the DSC.</p> <p><u>AND</u></p> <p>Every 48 hours thereafter while the DSC is in the spent fuel pool or until the fuel has been removed from the DSC.</p>
<p>SR 3.2.1.2    Verify soluble boron concentration limit in spent fuel pool water and water to be added to the DSC cavity is met using two independent measurements (two samples analyzed by different individuals) for UNLOADING OPERATIONS.</p>	<p>Once within 4 hours prior to flooding DSC during UNLOADING OPERATIONS.</p> <p><u>AND</u></p> <p>Every 48 hours thereafter while the DSC is in the spent fuel pool or until the fuel has been removed from the DSC.</p>

### 3.3 Radiation Protection

#### 3.3.1 DSC and TRANSFER CASK (TC) Surface Contamination

LCO 3.3.1 Removable surface contamination on the outer top 1 foot surface of the DSC AND the exterior surfaces of the TC shall not exceed:

- a. 2,200 dpm/100 cm<sup>2</sup> from beta and gamma sources; and
- b. 220 dpm/100 cm<sup>2</sup> from alpha sources.

APPLICABILITY: During LOADING OPERATIONS

ACTIONS:

----- NOTE -----  
Separate condition entry is allowed for each DSC and TC.

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. Top 1 foot exterior surface of the DSC removable surface contamination limits not met.	A.1 Decontaminate the DSC to bring the removable contamination to within limits.	Prior to TRANSFER OPERATIONS
B. TC removable surface contamination limits not met.	B.1 Decontaminate the TC to bring the removable contamination to within limits	Prior to TRANSFER OPERATIONS



#### SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.3.1.1	Verify that the removable contamination on the top 1 foot exterior surface of the DSC is within limits.	Once, prior to TRANSFER OPERATIONS.
SR 3.3.1.2	Verify by either direct or indirect methods that the removable contamination on the exterior surfaces of the TC is within limits.	Once, prior to TRANSFER OPERATIONS.

## 4.0 DESIGN FEATURES

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The specifications in this section include the design characteristics of special importance to each of the physical barriers and to the maintenance of safety margins in the NUHOMS® EOS System design.

### 4.1 Site

#### 4.1.1 Site Location

Because this UFSAR is prepared for a general license, a discussion of a site-specific ISFSI location is not applicable.

### 4.2 Storage System Features

#### 4.2.1 Storage Capacity

The total storage capacity of the ISFSI is governed by the plant-specific license conditions.

#### 4.2.2 Storage Pad

For sites for which soil-structure interaction is considered important, the licensee is to perform site-specific analysis considering the effects of soil-structure interaction. Amplified seismic spectra at the location of the HSM center of gravity (CG) is to be developed based on the soil-structure interaction (SSI) responses. EOS-HSM seismic analysis for the reinforced concrete EOS-HSM (EOS-HSM-RC) information is provided in UFSAR Appendix 3.9.4, Section 3.9.4.9.2. The steel-plate composite EOS-HSM (EOS-HSM-SC) seismic analysis information is provided in UFSAR Appendix 3.9.8, Section 3.9.8.9. HSM-MX seismic analysis information is provided in UFSAR Appendix A.3.9.4, Section A.3.9.4.9.2.

The storage pad location shall have no potential for liquefaction at the site-specific safe shutdown earthquake (SSE) level.

Additional requirements for the pad configuration are provided in Technical Specification 4.5.2.

### 4.3 Canister Criticality Control

The NUHOMS® EOS-37PTH DSC is designed for the storage of PWR fuel assemblies with a maximum planar average initial enrichment of less than or equal to 5.0 wt. % U-235 taking credit for soluble boron during LOADING OPERATIONS and the boron content in the poison plates of the DSC basket. The EOS-37PTH DSC uses a boron carbide/aluminum metal matrix composite (MMC) poison plate material. The EOS-37PTH DSC has two different neutron poison loading options, A and B, based on the boron content in the poison plates as listed in Table 5. Table 4 also defines the requirements for boron concentration in the DSC cavity water as a function of the DSC basket type for the various FUEL CLASSES authorized for storage in the EOS-37PTH DSC.

The NUHOMS® EOS-89BTH DSC is designed for the storage of BWR fuel assemblies with a maximum lattice average initial enrichment of less than or equal to 5.00 wt. % U-235 taking credit for the boron content in the poison plates of the DSC basket. There are three neutron poison loading options specified for the EOS-89BTH DSC depending on the type of poison material and the B-10 areal density in the plates, as specified in Table 8.

(continued)

#### 4.0 Design Features (continued)

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The 61BTH Type 2 DSC is designed for the storage of BWR fuel assemblies with a maximum lattice average initial enrichment of less than or equal to 5.0 wt. % U-235 taking credit for the boron content in the poison plates of the DSC basket. The 61BTH Type 2 DSC has multiple basket configurations based on the absorber material type (borated aluminum alloy, metal matrix composite (MMC), or Boral®) and boron content in the absorber plates as listed in Table 9 through Table 12.

##### 4.3.1 Neutron Absorber Tests

The neutron absorber used for criticality control in the DSC baskets may be one of the following materials:

- Boron carbide/MMC
- BORAL® (EOS-89BTH or 61BTH Type 2 DSCs only)
- Borated aluminum (61BTH Type 2 DSC only)

##### Acceptance Testing (MMC, BORAL®, and borated aluminum)

B-10 areal density is verified by neutron attenuation testing or by chemical analysis of coupons taken adjacent to finished panels, and isotopic analysis of the boron carbide powder. The minimum B-10 areal density requirements are specified in Table 5 for EOS-37PTH, Table 8 for EOS-89BTH, and Table 9 through Table 12 for 61BTH Type 2 DSCs.

Finished panels are subject to visual and dimensional inspection.

##### Qualification Testing (MMC only)

MMCs are qualified for use in the NUHOMS® EOS System by verification of the following characteristics.

- The chemical composition is boron carbide particles in an aluminum alloy matrix.
- The form is with or without an aluminum skin.
- The median boron carbide particle size by volume is  $\leq 80$  microns with no more than 10% over 100 microns.
- The boron carbide content is  $\leq 50\%$  by volume.
- The porosity is  $\leq 3\%$ .

##### 4.3.2 High Strength Low Alloy Steel for Basket Structure for EOS-37PTH and EOS-89BTH DSCs.

The basket structural material shall be a high strength low alloy (HSLA) steel meeting one of the following requirements A, B, or C:

- A. ASTM A829 Gr 4130 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 at room temperature.
- B. ASME SA-517 Gr A, B, E, F, or P.

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(continued)

#### 4.0 Design Features (continued)

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- 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  $K_{JIC} \geq 150 \text{ ksi} \sqrt{\text{in}}$  at  $\leq -40 \text{ °F}$  with 95% confidence.
  - iii. Qualified prior to first use by testing at least two lots and demonstrating that the 95% lower tolerance limit of yield strength and ultimate strength  $\geq$  the values in UFSAR Table 8-10.
  - 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 4.3.2.C.iii.

The basket structural material shall also meet one of the following production acceptance criteria for impact testing at  $\leq -40 \text{ °F}$ :

- a. Charpy testing per ASTM A370, minimum absorbed energy 25 ft-lb average, 20 ft-lb lowest of three (for sub-size specimens, reduce these criteria per ASTM A370-17 Table 9), or
- b. Dynamic tear testing per ASTM E604 with acceptance criterion minimum 80% shear fracture appearance.

#### 4.4 Codes and Standards

##### 4.4.1 HORIZONTAL STORAGE MODULE (HSM)

The reinforced concrete HSM is designed in accordance with the provisions of ACI 349-06. The steel structure of the steel-plate composite HSM is designed and constructed in accordance with the provisions of ANSI/AISC N690-18. The concrete of the steel-plate composite HSM is designed in accordance with provisions of ACI 349-13 and constructed in accordance with ACI 318-08. Code alternatives are discussed in Technical Specification 4.4.4. Load combinations specified in ANSI 57.9-1984, Section 6.17.3.1 are used for combining normal operating, off-normal, and accident loads for the HSM.

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(continued)

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4.0 Design Features (continued)

## 4.4.2 DRY SHIELDED CANISTER (DSC) (EOS-37PTH, EOS-89BTH, and 61BTH Type 2)

The DSC confinement boundary is designed, fabricated and inspected to the maximum practical extent in accordance with ASME Boiler and Pressure Vessel Code Section III, Division 1, Subsection NB, NF, and NG, for Class 1 components. The ASME code edition years and any addenda for the various DSC types and relevant subsections are provided in the table below. Code alternatives are discussed in Technical Specification 4.4.4.

DSC Type	Applicable Code	Edition/Year
EOS-37PTH, EOS-89BTH	ASME B&PV Code, Section III, Division 1, Subsection NB	2010 Edition with Addenda through 2011
61BTH Type 2	ASME B&PV Code, Section III, Division 1, Subsections NB, NG and NF	1998 Edition with Addenda through 2000

## 4.4.3 TRANSFER CASK

The EOS-TC design stress analysis and OS197 design stress analysis and fabrication, exclusive of the trunnions and the neutron shield enclosures, is performed in accordance with applicable codes as provided in the table below. The stress allowables for the upper trunnions for the EOS-TCs and the upper and lower trunnions for the OS197 conform to ANSI N14.6-1993 for single-failure-proof lifting.

TC	Applicable Code	Edition/Year
EOS-TC	ASME B&PV Code, Section III, Division 1, Subsection NF for Class 1 supports	2010 Edition with Addenda through 2011
OS197	ASME B&PV Code, Section III, Division 1, Subsection NC for Class 2 vessels	1983 Edition with Winter 1985 Addenda

## 4.4.4 Alternatives to Codes and Standards

ASME Code alternatives for the EOS-37PTH, EOS-89BTH DSC, and 61BTH Type 2 DSC are listed below:

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(continued)

4.0 Design Features (continued)

**EOS-37PTH and EOS-89BTH DSC ASME Code Alternatives, Subsection NB**

REFERENCE ASME CODE SECTION/ARTICLE	CODE REQUIREMENT	JUSTIFICATION AND COMPENSATORY MEASURES
NCA	All	Not compliant with NCA
NB-1100	Requirements for Code Stamping of Components	The canister shell, the inner top cover, the inner bottom cover or bottom forging assembly, the outer top cover, and the drain port cover and vent port plug are designed and fabricated in accordance with the ASME Code, Section III, Subsection NB to the maximum extent practical. However, Code Stamping is not required. As Code Stamping is not required, the fabricator is not required to hold an ASME "N" or "NPT" stamp, or to be ASME Certified.
NB-2121	Permitted Material Specifications	Type 2205 and UNS S31803 are duplex stainless steels that provide enhance resistance to chloride-induced stress corrosion cracking. They are not included in Section II, Part D, Subpart 1, Tables 2A and 2B. UNS S31803 has been accepted for Class 1 components by ASME Code Case N-635-1, endorsed by NRC Regulatory Guide 1.84. Type 2205 falls within the chemical and mechanical requirements of UNS S31803. Normal and off-normal temperatures remain below the 600 °F operating limit. Accident conditions may exceed this limit, but only for durations too short to cause embrittlement.
NB-2130  NB-4121	Material must be supplied by ASME approved material suppliers  Material Certification by Certificate Holder	Material is certified to meet all ASME Code criteria but is not eligible for certification or Code Stamping if a non-ASME fabricator is used. As the fabricator is not required to be ASME certified, material certification to NB-2130 is not possible. Material traceability and certification are maintained in accordance with the NRC approved QA program associated with CoC 1042.
NB-2300	Fracture toughness requirements for material	Type 2205 and UNS S31803 duplex stainless steels are tested by Charpy V-notch only per NB-2300. Drop weight tests are not required. Impact testing is not required for the vent port plug.
NB-2531	Drain port cover; straight beam ultrasonic testing (UT) per SA-578 for all plates for vessel	SA-578 applies to 3/8" and thicker plate only; allow alternate UT techniques to achieve meaningful UT results.
NB- 2531 and NB-2541	Vent port plug UT and liquid penetrant testing (PT)	This plug may be made from plate or bar. Due to its small area, it has no structural function. It is leak tested along with the inner top cover plate after welding. Therefore, neither UT nor PT are required.

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4.0 Design Features (continued)

**EOS-37PTH and EOS-89BTH DSC ASME Code Alternatives, Subsection NB**

(continued)

REFERENCE ASME CODE SECTION/ARTICLE	CODE REQUIREMENT	JUSTIFICATION AND COMPENSATORY MEASURES
NB-4243 and NB-5230	Category C weld joints in vessels and similar weld joints in other components shall be full penetration joints. These welds shall be examined by UT or radiographic testing (RT) and either PT or magnetic particle testing (MT).	<p>The shell to the outer top cover plate (OTCP) weld, the shell to the inner top cover weld, and the drain port cover and vent port plug welds are all partial penetration welds. The cover-to-shell welds are designed to meet the guidance provided in NUREG-1536, Revision 1 for the stress reduction factor. Nondestructive examination (NDE) is done by qualified personnel, in accordance with Section V and the acceptance standards of Section III, Subsection NB-5000, except as noted for OTCP weld option 2 ultrasonic examination.</p> <p>As an alternative to the NDE requirements of NB-5230 for Category C welds, all of these closure welds will be multi-layer welds and receive a root and final PT examination, except for the shell to the OTCP weld.</p> <p><u>OTCP weld option 1</u></p> <p>The shell to OTCP weld will be a multi-layer weld and receive multi-level PT examination in accordance with the guidance provided in NUREG 1536 Revision 1 for NDE. The multi-level PT examination provides reasonable assurance that flaws of interest will be identified.</p> <p><u>OTCP weld option 2</u></p> <p>The shell to the outer top cover plate weld will be examined by UT.</p>
NB-5330	Ultrasonic Acceptance Standards	<p>The UT acceptance criteria for OTCP weld option 2 are:</p> <ol style="list-style-type: none"> <li>1. Rounded flaws are evaluated by the acceptance criteria of NB-5331(a).</li> <li>2. Planar flaws are allowable up to the limit <math>(W - \Sigma h_i) \geq D</math> at any location, where <math>\Sigma h_i</math> is the sum of the depth of aligned planar defects, W is the measured weld thickness, and D is the minimum weld depth required by NB-3000.</li> <li>3. Planar flaws that penetrate the surface of the weld are not allowable.</li> </ol>
NB-5520	NDE Personnel must be qualified to the 2006 edition of SNT-TC-1A	Permit use of the Recommended Practice SNT-TC-1A up to the edition as cited in Table NCA-7000-1 of the latest ASME Code edition listed in 10 CFR 50.55a at the time of construction.

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4.0 Design Features (continued)

**EOS-37PTH and EOS-89BTH DSC ASME Code Alternatives, Subsection NB**

(continued)

REFERENCE ASME CODE SECTION/ARTICLE	CODE REQUIREMENT	JUSTIFICATION AND COMPENSATORY MEASURES
NB-6000	All completed pressure retaining systems shall be pressure tested	<p>The DSC is not a complete or “installed” pressure vessel until the top closure is welded following placement of fuel assemblies within the DSC. Due to the inaccessibility of the shell and lower end closure welds following fuel loading and top closure welding, as an alternative, the pressure testing of the DSC is performed in two parts. The DSC shell, shell bottom, including all longitudinal and circumferential welds, is pneumatically tested and examined at the fabrication facility when using the three plate bottom assembly. If using a single piece bottom forging, the fabrication pressure test may be waived although the helium leak test requirement remains in place. The low test pressure test does not stress a single piece bottom and bottom-to-shell weld sufficiently to cause pre-existing defects to propagate into leaks. For the purpose of finding leaks, the helium leak test is far more sensitive than the pressure test.</p> <p>The shell to the inner top cover closure weld is pressure tested and examined for leakage in accordance with NB-6300 in the field.</p> <p>The drain port cover and vent port plug welds will not be pressure tested; these welds and the shell to the inner top cover closure weld are helium leak tested after the pressure test.</p> <p>Per NB-6324 the examination for leakage shall be done at a pressure equal to the greater of the design pressure or three-fourths of the test pressure. As an alternative, if the examination for leakage of these field welds, following the pressure test, is performed using helium leak detection techniques, the examination pressure may be reduced to 1.5 psig. This is acceptable given the significantly greater sensitivity of the helium leak detection method.</p>
NB-7000	Overpressure Protection	<p>No overpressure protection is provided for the EOS-37PTH or EOS-89BTH DSC. The function of the DSC is to contain radioactive materials under normal, off-normal, and hypothetical accident conditions postulated to occur during transportation. The DSC is designed to withstand the maximum internal pressure considering 100% fuel rod failure at maximum accident temperature.</p>

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4.0 Design Features (continued)

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**EOS-37PTH and EOS-89BTH DSC ASME Code Alternatives, Subsection NB**  
(continued)

NB-8000	Requirements for nameplates, stamping and reports per NCA-8000	The EOS-37PTH and EOS-89BTH DSC are stamped or engraved with the information required by 10 CFR Part 72. Code stamping is not required for these DSCs. QA Data packages are prepared in accordance with requirements of the NRC approved QA program associated with CoC 1042.
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4.0 Design Features (continued)

**61BTH Type 2 DSC ASME Code Alternatives for the Confinement Boundary**

REFERENCE ASME CODE SECTION/ ARTICLE	CODE REQUIREMENT	ALTERNATIVES, JUSTIFICATION & COMPENSATORY MEASURES
NCA	All	Not compliant with NCA. Quality Assurance is provided according to 10 CFR Part 72 Subpart G in lieu of NCA-4000.
NCA-1140	Use of Code editions and addenda	Code edition and addenda other than those specified in Section 4.4.2 may be used for construction, but in no case earlier than 3 years before that specified in the Section 4.4.2 table.  Materials produced and certified in accordance with ASME Section II material specification from Code Editions and Addenda other than those specified in Section 4.4.2 may be used, so long as the materials meet all the requirements of Article 2000 of the applicable Subsection of the Section III Edition and Addenda used for construction.
NB-1100	Requirements for Code Stamping of Components, Code reports and certificates, etc.	Code Stamping is not required. As Code Stamping is not required, the fabricator is not required to hold an ASME "N" or "NPT" stamp, or to be ASME Certified.
NB-1132	Attachments with a pressure retaining function, including stiffeners, shall be considered part of the component.	Bottom shield plug and outer bottom cover plate are outside code jurisdiction; these components together are much larger than required to provide stiffening for the inner bottom cover plate; the weld that retains the outer bottom cover plate and with it the bottom shield plug is subject to root and final PT examination.
NB-2130	Material must be supplied by ASME approved material suppliers.	Material is certified to meet all ASME Code criteria but is not eligible for certification or Code Stamping if a non-ASME fabricator is used. As the fabricator is not required to be ASME certified, material certification to NB-2130 is not possible. Material traceability and certification are maintained in accordance with TN's NRC approved QA program.
NB-4121	Material Certification by Certificate Holder	
NB-4243 and NB-5230	Category C weld joints in vessels and similar weld joints in other components shall be full penetration joints. These welds shall be examined by UT or RT and either PT or MT.	The shell to the outer top cover weld, the shell to the inner top cover weld, the siphon and vent cover plate welds, and the vent and siphon block welds to the shell are all partial penetration welds.  As an alternative to the NDE requirements of NB-5230 for Category C welds, all of these closure welds will be multi-layer welds and receive a root and final PT examination, except for the shell to the outer top cover weld. The shell to the outer top cover weld will be a multi-layer weld and receive multi-level PT examination in accordance with the guidance provided in NUREG-1536 Revision 1 for NDE. The multi-level PT Examination provides reasonable assurance that flaws of interest will be identified. The PT examination is done by qualified personnel, in accordance with Section V and the acceptance standards of Section III, Subsection NB-5000. All of these welds will be designed to meet the guidance provided in NUREG-1536 Revision 1 for stress reduction factor.

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4.0 Design Features (continued)

**61BTH Type 2 DSC ASME Code Alternatives for the Confinement Boundary**

REFERENCE ASME CODE SECTION/ ARTICLE	CODE REQUIREMENT	ALTERNATIVES, JUSTIFICATION & COMPENSATORY MEASURES
NB-6100 and 6200	All completed pressure retaining systems shall be pressure tested.	<p>The 61BTH Type 2 DSC is not a complete or "installed" pressure vessel until the top closure is welded following placement of Fuel Assemblies with the DSC. Due to the inaccessibility of the shell and lower end closure welds following fuel loading and top closure welding, as an alternative, the pressure testing of the DSC is performed in two parts. The DSC shell and shell bottom (including all longitudinal and circumferential welds) is pressure tested and examined at the fabrication facility.</p> <p>The shell to the inner top cover closure weld are pressure tested and examined for leakage in accordance with NB-6300 in the field.</p> <p>The siphon/vent cover welds are not pressure tested; these welds and the shell to the inner top cover closure weld are helium leak tested after the pressure test.</p> <p>Per NB-6324, the examination for leakage shall be done at a pressure equal to the greater of the design pressure or three-fourths of the test pressure. As an alternative, if the examination for leakage of these field welds, following the pressure test, is performed using helium leak detection techniques, the examination pressure may be reduced to <math>\geq 1.5</math> psig. This is acceptable given the significantly greater sensitivity of the helium leak detection method.</p>
NB-7000	Overpressure Protection	<p>No overpressure protection is provided for the NUHOMS® DSCs. The function of the DSC is to contain radioactive materials under normal, off-normal and hypothetical accident conditions postulated to occur during transportation and storage. The DSC is designed to withstand the maximum possible internal pressure considering 100% fuel rod failure at maximum accident temperature.</p>
NB-8000	Requirements for nameplates, stamping & reports per NCA-8000.	<p>The NUHOMS® DSC nameplate provides the information required by 10 CFR Part 71, 49 CFR Part 173 and 10 CFR Part 72 as appropriate. Code stamping is not required for the DSC. QA data packages are prepared in accordance with the requirements of TN's approved QA program.</p>
NB-5520	NDE personnel must be qualified to a specific edition of SNT-TC-1A.	<p>Permit use of the Recommended Practice SNT-TC-1A to include up to the most recent 2011 edition.</p>

(continued)

4.0 Design Features (continued)

**61BTH Type 2 DSC ASME Code Alternatives for the Basket**

REFERENCE ASME CODE SECTION/ ARTICLE	CODE REQUIREMENT	ALTERNATIVES, JUSTIFICATION & COMPENSATORY MEASURES
NCA	All	Not compliant with NCA. Quality Assurance is provided according to 10 CFR Part 72 Subpart G in lieu of NCA-4000.
NCA-1140	Use of Code editions and addenda	Code edition and addenda other than those specified in Section 4.4.2 may be used for construction, but in no case earlier than 3 years before that specified in the Section 4.4.2 table.  Materials produced and certified in accordance with ASME Section II material specification from Code Editions and Addenda other than those specified in Section 4.4.2 may be used, so long as the materials meet all the requirements of Article 2000 of the applicable Subsection of the Section III Edition and Addenda used for construction.
NG/NF-1100	Requirements for Code Stamping of Components, Code reports and certificates, etc.	Code Stamping is not required. As Code Stamping is not required, the fabricator is not required to hold an ASME "N" or "NPT" stamp, or to be ASME Certified.
NG/NF-2000	Use of ASME Material	Some baskets include neutron absorber and aluminum plates that are not ASME Code Class 1 material. They are used for criticality safety and heat transfer, and are only credited in the structural analysis with supporting their own weight and transmitting bearing loads through their thickness. Material properties in the ASME Code for Type 6061 aluminum are limited to 400 °F to preclude the potential for annealing out the hardening properties. Annealed properties (as published by the Aluminum Association and the American Society of Metals) are conservatively assumed for the aluminum transition rails for use above the Code temperature limits.
NG/NF-2130	Material must be supplied by ASME approved material suppliers.	Material is certified to meet all ASME Code criteria but is not eligible for certification or Code Stamping if a non-ASME fabricator is used. As the fabricator is not required to be ASME certified, material certification to NG/NF-2130 is not possible. Material traceability and certification are maintained in accordance with TN's NRC approved QA program.
NG/NF-4121	Material Certification by Certificate Holder	
NG-3352	Table NG-3352-1 lists the permissible welded joints and quality factors.	The fuel compartment tubes may be fabricated from sheet with full penetration seam weldments. Per Table NG-3352-1, a joint efficiency (quality) factor of 0.5 is to be used for full penetration weldments examined in accordance with ASME Section V visual examination (VT). A joint efficiency (quality) factor of 1.0 is utilized for the fuel compartment longitudinal seam welds (if present) with VT examination. This is justified because the compartment seam weld is thin and the weldment is made in one pass; and both surfaces of the weldment (inside and outside) receive 100% VT examination. The 0.5 quality factor, applicable to each surface of the weldment, results in a quality factor of 1.0 since both surfaces are 100% examined. In addition, the fuel compartments have no pressure retaining function and the stainless steel material that comprises the fuel compartment tubes is very ductile.
NG/NF-8000	Requirements for nameplates, stamping & reports per NCA-8000.	The NUHOMS® DSC nameplate provides the information required by 10 CFR Part 71, 49 CFR Part 173 and 10 CFR Part 72 as appropriate. Code stamping is not required for the DSC. QA data packages are prepared in accordance with the requirements of TN's approved QA program.
NG/NF-5520	NDE personnel must be qualified to a specific edition of SNT-TC-1A.	Permit use of the Recommended Practice SNT-TC-1A to include up to the most recent 2011 edition.

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#### 4.0 Design Features (continued)

Code alternatives for the HSM concrete specifications are listed below:

REFERENCE ACI349-06/-13, AS APPLICABLE SECTION/ARTICLE	CODE REQUIREMENT	ALTERNATIVES, JUSTIFICATION AND COMPENSATORY MEASURES
Appendix E, Section E.4- Concrete Temperatures, Paragraph E.4.3	Paragraph E.4.3 requires testing of concrete for temperatures higher than those given in Paragraph E.4.1.	<p>The concrete temperature limit criteria in NUREG-1536, Revision 1, Section 8.4.14.2 is used for normal and off-normal conditions.</p> <p>Alternatively, per ACI 349-13, Code Requirements for Nuclear Safety-Related Concrete Structures and Commentary, Section RE.4, the specified compressive strength, which may be tested up to 56 days, is increased to 7,000 psi for HSM fabrication so that any losses in properties (e.g., compressive strength) resulting from long-term thermal exposure will not affect the safety margins based on the specified 5,000 psi compressive strength used in the design calculations. Additionally, also as indicated in Section RE.4, short, randomly oriented steel fibers may be used to provide increased ductility, dynamic strength, toughness, tensile strength, and improved resistance to spalling.</p> <p>The safety margin on compressive strength is 40% for a concrete temperature limit of 300 °F normal and off-normal conditions.</p>
Appendix E, Section E.4- Concrete Temperatures, Paragraph E.4.1	Paragraph E.4.1 specifies that the concrete temperatures for normal operations shall not exceed 150 °F except for local areas such as around penetrations, which are allowed to have increased temperatures not to exceed 200 °F.	<p>The concrete temperature limit criteria in NUREG-1536, Section 8.4.14.2 are used for normal and off-normal conditions.</p> <p>Blended Cement per ASTM C595 may be used in lieu of Portland Cement Type II.</p> <ul style="list-style-type: none"> <li>The cement supplier, as of January 2023, will no longer provide cement in accordance with ASTM C150 because the industry is transitioning to a cement with a smaller carbon footprint that includes 10% limestone.</li> <li>ACI 349-06 identifies several ASTM specifications for cement that are acceptable per the code requirements. ASTM C150 and ASTM C595 are two of the acceptable cement specifications identified in Section 3.2 of ACI 349-06.</li> <li>Thermal compatibility tests conducted on concrete mixes using the two cement types show comparable strength results with no signs of degradation due to exposure to elevated temperatures.</li> </ul>

(continued)

#### 4.0 Design Features (continued)

Code alternatives for the steel-plate composite HSM specifications are listed below:

REFERENCE ANSI/AISC N690	CODE REQUIREMENT	JUSTIFICATION AND COMPENSATORY MEASURES
NB2	Required load combinations for normal, severe environmental, and extreme environmental and abnormal conditions.	The load combinations contained in AISC N690-18 are intended to cover a wide range of structural applications where additional load combinations are used to cover various uncertainties. For the design of dry-storage structures, NUREG 1536, R1 (and the more current NUREG 2215) endorse the load combinations specified in Section 6.17.3.1 of ANSI 57.9-1984 as the most applicable load combinations. Therefore, the use of ANSI 57.9-1984 load combinations in lieu of those specified in AISC-N690-18 is acceptable for this application.
N9.1.1.(a)	For exterior SC walls, the minimum value of the section thickness, $t_{sc}$ , shall be 18 inches (450 mm). For interior SC walls, the minimum $t_{sc}$ shall be 12 inches (300 mm).	As presented in Commentary for Section N9.1.1(a) of N690, the minimum section thickness for exterior SC walls is based on Table 1 of NUREG-0800, Revision 3, Section 3.5.3, Revision 3. It requires minimum 16.9-inch thick (430mm) 4-ksi (28 MPa) reinforced concrete (RC) walls to resist a tornado missile. Conservatively, the SC wall is treated as a RC wall for missile loading. The thinner sections of the door are supported by the front wall of the EOS-HSM-SC during missile impact. Therefore, the door meets the specified minimum thickness value of 18 inches for exterior walls. The minimum thickness for interior walls is based on the maximum reinforcement ratio and minimum faceplate thickness. The specified minimum thickness value of 12 inches is conservatively rounded up from the actual minimum of 10 inches as presented in Commentary for Section N9.1.1(a) of N690. Therefore, the sections of the door and OVC that do not meet the specified thickness value of 12 inches, still meet the 10 inch minimum thickness requirement.
N9.1.1(c)	The reinforcement ratio of SC sections shall have a minimum value of 0.015 and a maximum value of 0.050.	According to AISC Steel Design Guide 32, high reinforcement ratios can potentially result in higher concrete stresses and change the governing in-plane shear limit state from steel faceplate yielding to concrete compression strut failure, which can potentially reduce the strength and ductility of SC walls. The reinforcement ratio for the thin walls of the EOS-HSM-SC minimally (less than 5%) exceeds the ratio of 0.050 and this exceedance facilitates compliance with the faceplate slenderness requirement in Section N9.1.3 of N690-18. The reinforcement ratio for the top segment of the front wall is marginally less than the minimum reinforcement ratio of 0.015 when the effective thickness of the front wall faceplate is considered. Per Commentary Section N9.1.1(c) of N690, use of a very low reinforcement ratio poses concerns regarding handling strength and stiffness in addition to residual stresses due to fabrication operations and concrete casting. These concerns are not applicable because the actual thickness is twice as large as the effective thickness.

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## 4.0 Design Features (continued)

Code alternatives for the steel-plate composite HSM specifications are listed below (continued):

REFERENCE ANSI/AISC N690	CODE REQUIREMENT	JUSTIFICATION AND COMPENSATORY MEASURES
N9.1.1.(d)	The specified minimum yield stress of faceplates, $F_y$ , shall not be less than 50 ksi (350 MPa) nor more than 65 ksi (450 MPa).	The door and OVC steel plates are constructed from ASTM A36. As presented in the Commentary for Section N9.1.1(d) of N690, the minimum yield strength of faceplates is intended to prevent premature yielding due to residual stresses from concrete casting and thermally induced stresses. The door and OVC are free to grow when subjected to thermal loads and require a concrete volume of relatively low height resulting in insignificant pressure on the faceplates during casting as compared to a large EOS-HSM-SC wall. Therefore, stresses due to thermal growth and residual stress from concrete casting will not contribute to premature yielding of the faceplates in these components. Additionally, the margins for the door thickness to withstand local damage due to missile attack, ductile capacity for missile impact, and structural adequacy for punching shear are sufficiently large. The OVC has no structural safety function. Therefore, a material meeting the properties of ASTM A36 will have sufficient strength for this application.
N9.1.4b(a)	Steel anchors shall be spaced not to exceed the minimum spacing required to develop the yield strength of the faceplates over the development length.	This requirement ensures that sufficient composite action exists between the steel faceplate and concrete. However, the requirement does not consider the contribution of ties to available shear strength of the SC component, leading to inefficient designs for those components such as thin walls, for which the density of ties tends to be high. Studies based on finite element analysis demonstrate the contribution of ties to the composite action and show that composite action is adequate for the thin walls of the EOS-HSM-SC.
N9.1.4b(b)	Steel anchors shall be spaced not to exceed the minimum spacing required to prevent interfacial shear failure before out-of-plane shear failure of the SC section.	This requirement does not consider the required strength of the SC component but the available out-of-plane strength, leading to inefficient designs in those cases where the demand-to-capacity ratio for out-of-plane shear interaction is low. For the design of the EOS-HSM-SC, this criterion is modified such that the spacing of steel anchors required to prevent interfacial shear failure is deemed adequate if the demand-to-capacity ratio for out-of-plane shear interaction (presented in Section N9.3.6a of N690-18) is below 1.0 when required strength at least 1/3 greater than that determined by structural analysis is used. This approach is validated by laboratory test results.

(continued)

## 4.0 Design Features (continued)

Code alternatives for the steel-plate composite HSM specifications are listed below (continued):

N9.1.7a(b)	The flange fitted at the end of the sleeve for a fully developed edge at the opening perimeter shall extend a distance of at least the section thickness beyond the opening perimeter.	The front wall opening in the top segment of the EOS-HSM-SC only is considered as an opening because the majority of the front wall opening area is in the top segment and the bottom segment has only a slightly concave edge. The design of the front wall opening in the top segment of the EOS-HSM-SC follows the requirements on design and detailing around openings to the maximum practical extent possible to achieve a fully developed edge at the opening perimeter: a sufficiently fine finite element mesh is employed for the front wall and around its opening; a sleeve spanning across the opening from the front faceplate to the back faceplate is provided; and an equivalent flange is provided by thickening the front wall faceplate to provide additional strength in the stress concentration region. For the EOS-HSM-SC front wall, it is impractical to extend a distance of at least the section thickness beyond the opening perimeter because of the proximity of the front wall opening to the side walls.
N9.3.6a	The interaction of out-of-plane shear forces shall be limited by Equation A-N9-24 of N690-18.	The interaction of out-of-plane shear forces for thin walls of the EOS-HSM-SC is considered based on a modified approach described in the discussion on Section N9.1.4b(b) of N690-18.
NM2.4	User Note: Parameters documented and retrievable for each weld include, but are not limited to, the welder, weld wire lot/filler metal used, equipment used, date the weld was performed, date the weld was inspected, identification of weld inspector, and weld WPS used. The fabricator or constructor, as applicable for the work scope, should develop a method whereby each weld and its associated data can be identified.	Welding shall be documented as per the requirements of AISC 360-16. The EOS-HSM-SC is made up of Category B, C, and NITS items and not Safety Related as outlined in N690-18. The requirements of AISC 360-16 are consistent with Category B items as described in Chapter 14 of the UFSAR.
NM2.7.(d).(1)	At tie locations, the perpendicular distance between the opposite faceplates are within plus or minus $t_{sc}/200$ , rounded upward to the nearest 1/16 in. (2 mm), where $t_{sc}$ is the SC section thickness. This tolerance check shall be performed for the row of tie-bars located closest to the free edges of SC panels.	For walls less than 24", the wall thickness tolerance at tie locations shall be plus or minus 1/8", measured at the row of tie-bars located closest to the free edges of the SC panels. The EOS-HSM-SC does not have segmented walls to apply a tighter tolerance at the free edges. The EOS-HSM-SC design is its own free standing support structure that will not be affected by discontinuities at the wall connections. Any variance will be smoothly transitioned by nature of its construction. The formulas were developed for walls that are a minimum of 24". The formula when applied to much thinner walls leads to impractical designs. Therefore, the tolerances of this Section should be applied as stated above.

(continued)



#### 4.0 Design Features (continued)

Code alternatives for the steel-plate composite HSM specifications are listed below (continued):

NM2.7.(d).(3)	In between the tie locations, the perpendicular distance between the opposite faceplates are within plus or minus $t_{sc}/100$ , rounded upward to the nearest 1/16 in. (2 mm). This tolerance check shall be performed along the free edges of the SC wall panels.	For less than 24", the wall thickness tolerance in between tie locations shall be plus or minus 1/4", measured at the free edge of the SC panels. The EOS-HSM-SC does not have segmented walls to apply a tighter tolerance at the free edges. The EOS-HSM-SC design is its own free standing support structure that will not be affected by discontinuities at the wall connections. Any variance will be smoothly transitioned by nature of its construction. The formulas were developed for walls that are a minimum of 24". The formula when applied to much thinner walls leads to impractical designs. Therefore, the tolerances of this Section should be applied as stated above.
NM2.7.(2)	<p>Additionally, after concrete curing, the faceplate waviness, <math>f_w</math>, shall be limited to the following:</p> $f_w \leq \left( \frac{t_p}{2} \right) \left( \frac{s_{t,min}}{s} \right) \quad (NM2-1)$ <p>where,  <math>s</math> = spacing of the steel anchors, in. (mm)  <math>s_{t,min}</math> = minimum tie spacing, in. (mm)  <math>t_p</math> = thickness of faceplate, in. (mm)</p>	The inspection for the faceplate waviness will not be required for the EOS-HSM-SC. Units of HSMs are typically poured in groups, and therefore, the verification of this requirement cannot be performed at all locations. Due to the construction process of the EOS-HSM-SC, many walls are inaccessible after pouring. This exception is for the inspection and verification of these tolerances after curing, not the tolerance values themselves.
NM2.14	If not available from a qualified source, the material shall be dedicated for use as specified in Subpart 2.14 of ASME NQA-1.	Commercial grade dedication is not required for ITS Category B, C and NITS items per the TN QA program. HSMs are not considered basic components; therefore, per 10 CFR Part 21, they are not subject to commercial grade dedication.
NM2.15	The fabricator shall be able to demonstrate, by written procedure and by actual practice, a method of material identification meeting the requirements of the contract documents.	Material traceability is not required for ITS Category B or C items as outlined in Section 14.2 of the UFSAR and therefore, the EOS-HSM-SC components do not require material traceability as described in the code. However, all other aspects of NM2.15, including material identification, are required.
NM3.4	Except for stainless steels, machine-finished surfaces shall be protected against corrosion by a rust-inhibitive coating that is removable prior to erection or that has characteristics that make removal prior to erection unnecessary.	Rust inhibitor shall not be required for threads or cut edges of rolled shapes and plates. Dywidag rods and similar threaded items used in concrete construction are not normally provided with rust inhibitor.
NN	This chapter addresses minimum requirements for quality control, quality assurance and nondestructive evaluation for safety-related structural steel systems and steel elements of composite members for nuclear facilities.	Chapter NN quality control and quality assurance requirements do not apply to the EOS-HSM-SC. The EOS-HSM-SC is an ITS Category B item; therefore, AISC 360-16 shall be applied. The nondestructive examination of welded joints described in Section NN5.5 shall still apply.

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#### 4.0 Design Features (continued)

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Proposed alternatives to the above-specified ASME and ACI codes, other than the aforementioned alternatives, may be used when authorized by the Director of the Office of Nuclear Material Safety and Safeguards, or designee. The applicant should demonstrate that:

1. The proposed alternatives would provide an acceptable level of quality and safety, or
2. Compliance with the specified requirements of above-specified ASME and ACI codes would result in hardship or unusual difficulty without a compensating increase in the level of quality and safety.

The applicant should also submit information regarding the environmental impact of such a request to support the NRC's NEPA regulations in 10 CFR Part 51. Any proposed alternatives must be submitted and approved prior to implementation.

Requests for exceptions in accordance with this section should be submitted in accordance with 10 CFR 72.4.

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(continued)

## 4.0 Design Features (continued)

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### 4.5 Storage Location Design Features

The following storage location design features and parameters shall be verified by the system user to assure technical agreement with the UFSAR.

#### 4.5.1 Storage Configuration

EOS-HSMs and HSM-MXs are placed together in single rows or back to back arrays. A rear shield wall is placed on the rear of any single row loaded EOS-HSM.

#### 4.5.2 Concrete Storage Pad Properties to Limit DSC Gravitational Loadings Due to Postulated Drops

The EOS-37PTH DSC and EOS-89BTH DSC have been evaluated for drops of up to 65 inches onto a reinforced concrete storage pad. The 61BTH Type 2 DSC has been evaluated for drops of up to 80 inches onto a reinforced concrete storage pad.

#### 4.5.3 Site Specific Parameters and Analyses

The following parameters and analyses are applicable to all HSMs unless specifically noted and shall be verified by the system user for applicability at their specific site. Other natural phenomena events, such as lightning, tsunamis, hurricanes, and seiches, are site specific and their effects are generally bounded by other events, but they should be evaluated by the user.

1. Flood levels up to 50 ft and water velocity of 15 fps.
2. One-hundred year roof snow load of 110 psf.
3. Normal ambient temperature is based on the heat load of the DSC as follows:  
For the EOS-HSM:
  - a. For the EOS-37PTH DSCs with a heat load less than or equal to 41.8 kW or for the EOS-89BTH DSCs with a heat load less than or equal to 41.6 kW, the minimum temperature is -20 °F. The maximum calculated normal average ambient temperature corresponding to a 24-hour period is 90 °F.
  - b. For the EOS-37PTH DSCs with a heat load greater than 41.8 kW or for the EOS-89BTH DSCs with a heat load greater than 41.6 kW, the minimum temperature is -20 °F. The maximum calculated average yearly temperature is 70 °F.  
For the HSM-MX:
  - c. The minimum temperature is -20 °F. The maximum calculated normal average ambient temperature corresponding to a 24-hour period is 90 °F.
4. Off-normal ambient temperature range of -40 °F without solar insolation to 117 °F with full solar insolation. The 117 °F off-normal ambient temperature corresponds to a 24-hour calculated average temperature of 103 °F.

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(continued)

#### 4.0 Design Features (continued)

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5. The response spectra at the base of the HSMs shall be compared against the response spectra defined in UFSAR Section 2.3.4 for the EOS-HSM, and Section A.2.3.4 for the HSM-MX and shown to be enveloped by the UFSAR response spectra. If it is not enveloped, stability can be demonstrated by either static or dynamic analysis.
  6. The potential for fires and explosions shall be addressed, based on site-specific considerations.
  7. Supplemental Shielding: In cases where engineered features (i.e., berms, shield walls) are used to ensure that the requirements of 10 CFR 72.104(a) are met, such features are to be considered important to safety and must be evaluated to determine the applicable Quality Assurance Category.
  8. If an INDEPENDENT SPENT FUEL STORAGE INSTALLATION (ISFSI) site is located in a coastal salt water marine atmosphere, then any load-bearing carbon steel DSC support structure rail components for the EOS-HSM, or front and rear DSC supports for the HSM-MX shall be procured with a minimum 0.20% copper content or stainless steel shall be used for corrosion resistance. For weld filler material used with carbon steel, 1% or more nickel bearing weld material would also be acceptable in lieu of 0.20% copper content.
  9. If an ISFSI site is required to evaluate blockage of air vents for durations longer than evaluated in the UFSAR, a new duration can be determined based on site-specific parameters. The evaluation should be performed using the same methodology documented in the UFSAR.
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## 5.0 ADMINISTRATIVE CONTROLS

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### 5.1 Programs

Each user of the NUHOMS® EOS System will implement the following programs to ensure the safe operation and maintenance of the ISFSI:

- Radiological Environmental Monitoring Program (see 5.1.1 below)
- Radiation Protection Program (see 5.1.2 below)
- HSM Thermal Monitoring Program (see 5.1.3 below)

#### 5.1.1 Radiological Environmental Monitoring Program

- a. A radiological environmental monitoring program will be implemented to ensure that the annual dose equivalent to an individual located outside the ISFSI controlled area does not exceed the annual dose limits specified in 10 CFR 72.104(a).
- b. Operation of the ISFSI will not create any radioactive materials or result in any credible liquid or gaseous effluent release.

#### 5.1.2 Radiation Protection Program

The Radiation Protection Program will establish administrative controls to limit personnel exposure to As Low As Reasonably Achievable (ALARA) levels in accordance with 10 CFR Part 20 and Part 72.

- a. As part of its evaluation pursuant to 10 CFR 72.212, the licensee shall perform an analysis to confirm that the limits of 10 CFR Part 20 and 10 CFR 72.104 will be satisfied under the actual site conditions and configurations considering the planned number of DSCs to be used and the planned fuel loading conditions. This analysis is also used to qualify fuel considered for loading, as outlined below:
  1. For the DSCs considered for loading, select HLZC(s) appropriate to store the spent fuel.
  2. Compute the decay heat of the fuel assemblies considered for loading. Methods include, but are not limited to, NRC Regulatory Guide 3.54, or the methodology described in the UFSAR (i.e., ORIGEN-ARP).
  3. Compute the source term for the fuel assemblies considered for loading. The design basis source terms provided in the UFSAR may be used for site-specific shielding analysis if they are shown to bound the site-specific source terms.
  4. Demonstrate computationally that the EOS-HSM or HSM-MX to be loaded meets the dose rate requirements of TS 5.1.2(c). This evaluation may be used as the basis for the dose rate limits established in TS 5.1.2(b).
  5. Demonstrate computationally that direct radiation from the ISFSI meets the requirements of 72.104.

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## 5.0 ADMINISTRATIVE CONTROLS (continued)

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- b. On the basis of the analysis in TS 5.1.2(a), the licensee shall establish a set of HSM dose rate limits which are to be applied to DSCs used at the site. Limits shall establish dose rates for:
- i. HSM front face,
  - ii. HSM door centerline, and
  - iii. End shield wall exterior for the EOS-HSM or exterior side wall of the HSM-MX monolith.

- c. Notwithstanding the limits established in TS 5.1.2(b), the dose rate limits may not exceed the following values as calculated for a content of design basis fuel as follows:

For EOS-HSM:

- i. 65 mrem/hr average over the front face,
- ii. 15 mrem/hr at the door centerline, and
- iii. 5 mrem/hr average at the end shield wall exterior.

For HSM-MX:

- i. 165 mrem/hr average over the front face,
- ii. 15 mrem/hr at the door centerline, and
- iii. 5 mrem/hr average at the exterior side wall of the HSM-MX monolith.

If the measured dose rates do not meet the limits of TS 5.1.2(b) or TS 5.1.2(c), whichever are lower, the licensee shall take the following actions:

- Notify the U.S. Nuclear Regulatory Commission (Director of the Office of Nuclear Material Safety and Safeguards) within 30 days,
  - Administratively verify that the correct fuel was loaded,
  - Ensure proper installation of the HSM door,
  - Ensure that the DSC is properly positioned on the DSC supports, and
  - Perform an analysis to determine that placement of the as-loaded DSC at the ISFSI will not cause the ISFSI to exceed the radiation exposure limits of 10 CFR Part 20 and 10 CFR Part 72 and/or provide additional shielding to assure exposure limits are not exceeded.
- d. A monitoring program to ensure the annual dose equivalent to any real individual located outside the ISFSI controlled area does not exceed regulatory limits is incorporated as part of the environmental monitoring program in the Radiological Environmental Monitoring Program of TS 5.1.1.

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## 5.0 ADMINISTRATIVE CONTROLS (continued)

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- e. When using the EOS-TC108 with a liquid neutron shield (NS), the NS shall be verified to be filled when DSC cavity draining or TC/DSC annulus draining operations are initiated and continually monitored during the first five minutes of the draining evolution to ensure the NS remains filled. The NS shall also be verified to be filled prior to the movement of the loaded TC from the decontamination area. Observation of water level in the expansion tank or some other means can be used to verify compliance with this requirement.
- f. Following completion of the DSC shell assembly at the fabricator facility, the inner bottom cover plate, canister shell and all associated welds are leak-tested to demonstrate that these welds and components meet the “leak-tight” criterion ( $\leq 1.0 \times 10^{-7}$  reference  $\text{cm}^3/\text{sec}$ ) as defined in “American National Standard for Radioactive Materials – Leakage Tests on Packages for Shipment”, ANSI N14.5-1997. If the leakage rate exceeds  $1.0 \times 10^{-7}$  reference  $\text{cm}^3/\text{sec}$ , check and repair these welds or components.

Following completion of the welding of the DSC shell to the inner top cover and drain port cover and vent plug after fuel loading, these welds and components are leak-tested to demonstrate that they meet the “leak-tight” criterion ( $\leq 1.0 \times 10^{-7}$  reference  $\text{cm}^3/\text{sec}$ ) as defined in “American National Standard for Radioactive Materials - Leakage Tests on Packages for Shipment”, ANSI N14.5-1997. If the leakage rate exceeds  $1.0 \times 10^{-7}$  reference  $\text{cm}^3/\text{sec}$ , check and repair these welds or components.

### 5.1.3 HSM Thermal Monitoring Program

Two separate programs for the EOS-HSM and MATRIX HSM are described in Technical Specifications 5.1.3.1 and 5.1.3.2, respectively.

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## 5.0 ADMINISTRATIVE CONTROLS (continued)

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### 5.1.3.1 EOS-HSM Thermal Monitoring Program

This program provides guidance for temperature measurements that are used to monitor the thermal performance of each EOS-HSM. The intent of the program is to prevent conditions that could lead to exceeding the concrete and fuel clad temperature criteria. Each user must implement either TS 5.1.3.1(a) OR 5.1.3.1(b).

a. Daily Visual Inspection of EOS-HSM Inlets and Outlets (Front Wall and Roof Birdscreens) and Wind Deflectors

- i. The user shall develop and implement procedures to perform visual inspection of EOS-HSM inlets and outlets on a daily basis.

Perform a daily visual inspection of the air vents to ensure that EOS-HSM air vents are not blocked for more than 40 hours. If visual inspection indicates blockage, clear air vents and replace or repair birdscreens if damaged. If the air vents are blocked or could have been blocked for more than 40 hours, evaluate existing conditions in accordance with the site corrective action program to confirm that conditions adversely affecting the concrete or fuel cladding do not exist.

- ii. Daily Visual Inspection of Wind Deflectors

If wind deflectors are required per TS 5.5, the user shall develop and implement procedures to perform visual inspection of the wind deflectors on a daily basis.

There is a possibility that the wind deflectors could become damaged or lost by extreme winds, tornados, or other accidents. The condition caused by a damaged or lost wind deflector is bounded by the air vent blockage postulated and analyzed in the UFSAR accident analyses. The procedures shall ensure that the duration of a damaged or lost wind deflector will not exceed periods longer than 40 hours as assumed in the UFSAR analyses for vent blockage. If visual inspection indicates a damaged or lost wind deflector, replace or repair the wind deflector. If the wind deflectors are damaged or could have been damaged for more than 40 hours, evaluate existing conditions in accordance with the site corrective action program to confirm that conditions adversely affecting the concrete or fuel cladding do not exist.

b. Daily EOS-HSM Temperature Measurement Program

- i. The user shall develop a daily temperature measurement program to verify the thermal performance of each NUHOMS® EOS System. The user shall establish administrative temperature limits to (1) detect off-normal and accident blockage conditions before the EOS- HSM components and fuel cladding temperatures would exceed temperature design limits and (2) ensure the EOS-HSM air vents are not blocked for more than 40 hours. The daily temperature measurements shall include one of the following options:
1. direct measurement of the EOS-HSM concrete temperature
  2. direct measurement of inlet and outlet air temperatures

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(continued)



## 5.0 ADMINISTRATIVE CONTROLS (continued)

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If the direct measurement of the inlet and outlet air temperatures (option 2) is performed, the measured temperature differences of the inlet and outlet vents of each individual EOS-HSM must be compared to the predicted temperature differences for each individual EOS-HSM during normal operations. The measured temperature difference between the inlet and outlet vents shall not exceed 138 °F.

- ii. The user shall establish in the program, measurement locations in the EOS-HSM that are representative of the EOS-HSM thermal performance and directly correlated to the predicted fuel cladding temperatures, air mass flow rates, and NUHOMS® EOS System temperature distributions that would occur with the off-normal and accident blockage conditions, as analyzed in the UFSAR. The administrative temperature limits shall employ appropriate safety margins that ensure temperatures would not exceed design basis temperature limits in the UFSAR, and be based on the UFSAR methodologies used to predict thermal performance of the NUHOMS® EOS System. If the direct measurement of the inlet and outlet air temperatures (option 2) is performed, the user must develop procedures to measure air temperatures that are representative of inlet and outlet air temperatures, as analyzed in the UFSAR. The user must also consider site-specific environmental conditions, loaded decay heat patterns, and the proximity of adjacent EOS-HSM modules in the daily air temperature measurement program. The user must ensure that measured air temperatures reflect only the thermal performance of each individual module, and not the combined performance of adjacent modules.
- iii. The user shall establish in the program the appropriate actions to be taken if administrative temperature criteria are exceeded. If an administrative temperature limit is exceeded during a daily measurement, the user shall inspect the vents, wind deflectors if installed, and implement TS 5.1.3.1(a) for the affected system, until the cause of the excursion is determined and necessary corrective actions are completed under the site corrective action program.
- iv. If measurements or other evidence indicate that the EOS-HSM concrete temperatures have exceeded the concrete accident temperature limit of 500 °F for more than 40 hours, the user shall perform an analysis and/or tests of the concrete in accordance with TS 5.3. The user shall demonstrate that the structural strength of the EOS-HSM has an adequate margin of safety and take appropriate actions to return the EOS-HSM to normal operating conditions.
- v. If measurements or other evidence indicate that off-normal or accident temperature limits for fuel cladding have been exceeded, verify that canister confinement is maintained and assess analytically the condition of the fuel. Additionally, within 30 days, take appropriate actions to restore the spent fuel to a safe configuration.

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## 5.0 ADMINISTRATIVE CONTROLS (continued)

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### 5.1.3.2 HSM-MX Thermal Monitoring Program

This program provides guidance for temperature measurements that are used to monitor the thermal performance of each HSM-MX. There are no credible scenarios that could block both the inlet and outlet vents. Therefore, only blockage of inlet vent is considered in the UFSAR. The intent of the program is to prevent conditions that could lead to exceeding the concrete and fuel clad temperature criteria. Each user must implement either TS 5.1.3.2(a) OR 5.1.3.2(b).

a. Daily Visual Inspection of HSM-MX Inlets and Outlets (Front Wall and Roof Birdscreens)

The user shall develop and implement procedures to perform visual inspection of HSM-MX inlets and outlets on a daily basis.

Perform a daily visual inspection of the air vents to ensure that HSM-MX air vents are not blocked for more than 32 hours. If visual inspection indicates blockage, clear air vents and replace or repair birdscreens if damaged. If the air vents are blocked or could have been blocked for more than 32 hours, evaluate existing conditions in accordance with the site corrective action program to confirm that conditions adversely affecting the concrete or fuel cladding do not exist.

b. Daily HSM-MX Temperature Measurement Program

- i. The user shall develop a daily temperature measurement program to verify the thermal performance of each HSM-MX System through direct measure of the HSM-MX concrete temperature. The user shall establish administrative temperature limits to (1) detect off-normal and accident blockage conditions before the HSM-MX components and fuel cladding temperatures would exceed temperature design limits and (2) ensure the HSM-MX air vents are not blocked for more than 32 hours.
- ii. The user shall establish in the program measurement locations in the HSM-MX that are representative of the HSM-MX thermal performance and directly correlated to the predicted fuel cladding temperatures, air mass flow rates, and NUHOMS® MATRIX System temperature distributions that would occur with the off-normal and accident blockage conditions, as analyzed in the UFSAR. The administrative temperature limits shall employ appropriate safety margins that ensure temperatures would not exceed design basis temperature limits in the UFSAR, and be based on the UFSAR methodologies used to predict thermal performance of the NUHOMS® MATRIX System.
- iii. The user shall establish in the program the appropriate actions to be taken if administrative temperature criteria are exceeded. If an administrative temperature limit is exceeded during a daily measurement, the user shall inspect the vents and implement TS 5.1.3.2(a) for the affected system, until the cause of the excursion is determined and necessary corrective actions are completed under the site corrective action program.

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## 5.0 ADMINISTRATIVE CONTROLS (continued)

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- iv. If measurements or other evidence indicate that the HSM-MX concrete temperatures have exceeded the concrete accident temperature limit of 500 °F for more than 32 hours, the user shall perform an analysis and/or tests of the concrete in accordance with TS 5.3. The user shall demonstrate that the structural strength of the HSM-MX has an adequate margin of safety and take appropriate actions to return the HSM-MX to normal operating conditions.
- v. If measurements or other evidence indicate that off-normal or accident temperature limits for fuel cladding have been exceeded, verify that canister confinement is maintained and assess analytically the condition of the fuel. Additionally, within 30 days, take appropriate actions to restore the spent fuel to a safe configuration.

## 5.2 Lifting Controls

### 5.2.1 TC/DSC Lifting Height and Temperature Limits

The requirements of 10 CFR 72 apply to TC/DSC lifting/handling height limits outside the FUEL BUILDING. The requirements of 10 CFR Part 50 apply to TC/DSC lifting/handling height limits inside the FUEL BUILDING. Confirm the surface temperature of the TC before TRANSFER OPERATIONS of the loaded TC/DSC.

The lifting height of a loaded TC/ DSC is limited as a function of low temperature and the type of lifting/handling device, as follows:

- No lifts or handling of the TC/DSC at any height are permissible at TC surface temperatures below 0 °F
- The maximum lift height of the TC/DSC shall be 65 inches for the EOS-DSCs or 80 inches for the 61BTH Type 2 DSC if the surface temperature of the TC is above 0 °F and a non-single-failure-proof lifting/handling device is used.
- No lift height restriction is imposed on the TC/DSC if the TC surface temperature is higher than 0 °F, and a single-failure-proof lifting/handling system is used.

The requirements of 10 CFR Part 72 apply when the TC/DSC is in a horizontal orientation on the transfer trailer. The requirements of 10 CFR Part 50 apply when the TC/DSC is being lifted/handled using the cask handling crane/hoist. (This distinction is valid only with respect to lifting/handling height limits.)

### 5.2.2 Cask Drop

#### Inspection Requirement

The TC will be inspected for damage and the DSC will be evaluated after any TC with a loaded DSC side drop of 15 inches or greater.

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## 5.0 ADMINISTRATIVE CONTROLS (continued)

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### Background

TC/DSC handling and loading activities are controlled under the 10 CFR Part 50 license until a loaded TC/DSC is placed on the transporter, at which time fuel handling activities are controlled under the 10 CFR Part 72 license.

### Safety Analysis

The analysis of bounding drop scenarios shows that the TC will maintain the structural integrity of the DSC confinement boundary from an analyzed side drop height of 65 inches for the EOS-DSCs and 80 inches for the 61BTH Type 2 DSC. This 65-inch/80-inch drop height envelopes the maximum height from the bottom of the TC when secured to the transfer trailer while en route to the ISFSI.

Although analyses performed for cask drop accidents at various orientations indicate much greater resistance to damage, requiring the inspection of the DSC after a side drop of 15 inches or greater ensures that:

1. The DSC will continue to provide confinement.
2. The TC can continue to perform its design function regarding DSC transfer and shielding.

## 5.3 Concrete Testing

HSM concrete shall be tested during the fabrication process for elevated temperatures to verify that there are no significant signs of spalling or cracking and that the concrete compressive strength is greater than that assumed in the structural analysis. Tests shall be performed at or above the calculated peak accident temperature and for a period no less than the permissible duration as specified in Technical Specification 5.1.3.

HSM concrete temperature testing shall be performed whenever:

- There is a change in the supplier of the cement, or
- There is a change in the source of the aggregate, or
- The water-cement ratio changes by more than 0.04.

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## 5.0 ADMINISTRATIVE CONTROLS (continued)

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### 5.4 Hydrogen Gas Monitoring

For DSCs, while welding the inner top cover during LOADING OPERATIONS, and while cutting the inner top cover to DSC shell weld when the DSC cavity is wet during UNLOADING OPERATIONS, hydrogen monitoring of the space under the top shield plug in the DSC cavity is required, to ensure that the combustible mixture concentration remains below the flammability limit of 4%. If this limit is exceeded, all welding operations shall be stopped and the DSC cavity purged with helium to reduce hydrogen concentration safely below the limit before welding or cutting operations can be resumed.

### 5.5 EOS-HSM Wind Deflectors

If the heat load of an EOS-37PTH DSC during STORAGE OPERATIONS is greater than 41.8 kW, wind deflectors shall be installed on the EOS-HSM.

If the heat load of a fuel assembly loaded per HLZC 5 in the EOS-37PTH DSC during STORAGE OPERATIONS is greater than 1.625 kW, wind deflectors shall be installed on the EOS-HSM.

If the heat load of an EOS-89BTH DSC during STORAGE OPERATIONS is greater than 41.6 kW, wind deflectors shall be installed on the EOS-HSM.

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**Table 1**  
**Fuel Assembly Design Characteristics for the EOS-37PTH DSC**

PWR FUEL CLASS	B&W 15X15	WE 17X17	CE 15X15	WE 15X15	CE 14X14	WE 14X14	CE 16X16
Fissile Material	UO <sub>2</sub>	UO <sub>2</sub>	UO <sub>2</sub>	UO <sub>2</sub>	UO <sub>2</sub>	UO <sub>2</sub>	UO <sub>2</sub>
Maximum Number of Fuel Rods	208	264	216	204	176	179	236
Maximum Number of Guide/ Instrument Tubes	17	25	9	21	5	17	5

**Table 2**  
**Maximum Uranium Loading per FFC for Failed PWR Fuel**

Fuel Assembly Class	Maximum Uranium Loading (MTU)
WE 17x17	0.550
CE 16x16	0.456
BW 15x15	0.492
WE 15x15	0.480
CE 15x15	0.450
CE 14x14	0.400
WE 14x14	0.410

**Table 3**  
**Co-60 Equivalent Activity for CCs Stored in the EOS-37PTH DSC**

Fuel Region	Maximum Co-60 Equivalent Activity per DSC (Curies/DSC) <sup>(2)</sup>		
	<i>Transfer in the EOS-TC108 <u>AND</u> (storage in the EOS-HSM <u>OR</u> HSM-MX)</i>	<i>Transfer in the EOS-TC125/135 <u>AND</u> storage in the HSM-MX</i>	<i>Transfer in the EOS-TC125/135 <u>AND</u> storage in the EOS-HSM</i>
Active Fuel	32,656		37,259
Plenum/Top Region	6,671		7,607

Notes:

1. Not Used.
2. NSAs and Neutron Sources shall only be stored in the inner zone of the basket. Figure 3 defines the compartments categorized as the Inner and Peripheral Zones.

**Table 4**  
**Maximum Planar Average Initial Enrichment for EOS-37PTH**  
(2 Pages)

PWR Fuel Class	Maximum Planar Average Initial Enrichment (wt. % U-235) as a Function of Soluble Boron Concentration and Basket Type (Fixed Poison Loading) With and Without CCs								
	Minimum Soluble Boron (ppm)	Basket Type							
		A1/A2/A3/A4H/A4L/A5				B1/B2/B3/B4H/B4L/B5			
		w/o CCs		w/ CCs		w/o CCs		w/ CCs	
		INTACT FUEL	DAMAGED/ FAILED FUEL <sup>(2)</sup>	INTACT FUEL	DAMAGED/ FAILED FUEL <sup>(2)</sup>	INTACT FUEL	DAMAGED/ FAILED FUEL <sup>(3)</sup>	INTACT FUEL	DAMAGED/ FAILED FUEL <sup>(3)</sup>
WE 17x17 Class	2000	4.35	4.20	4.35	4.15	4.50	4.15	4.45	4.25
	2100	4.50	4.20	4.45	4.20	4.65	4.25	4.60	4.40
	2200	4.60	4.40	4.55	4.35	4.75	4.45	4.70	4.55
	2300	4.70	4.45	4.65	4.50	4.85	4.65	4.85	4.60
	2400	4.85	4.45	4.80	4.60	5.00	4.65	4.95	4.75
	2500	4.95	4.65	4.90	4.70	5.00	5.00	5.00	4.95
CE 16x16 Class	2000	5.00	4.75	5.00	4.70	5.00	5.00	5.00	5.00
	2100	5.00	5.00	5.00	5.00	-	-	-	-
	2200	-	-	-	-	-	-	-	-
	2300	-	-	-	-	-	-	-	-
	2400	-	-	-	-	-	-	-	-
	2500	-	-	-	-	-	-	-	-
BW 15x15 Class	2000	4.25	4.05	4.20	4.00	4.40	4.10	4.35	4.15
	2100	4.40	4.10	4.30	4.15	4.55	4.20	4.45	4.25
	2200	4.50	4.25	4.45	4.15	4.65	4.35	4.60	4.30
	2300	4.60	4.35	4.55	4.30	4.80	4.40	4.70	4.50
	2400	4.75	4.40	4.65	4.45	4.90	4.55	4.85	4.50
	2500	4.85	4.55	4.75	4.65	5.00	4.75	4.90	4.75
	2600	<sup>(1)</sup>	<sup>(1)</sup>	<sup>(1)</sup>	<sup>(1)</sup>	5.00	5.00	<sup>(1)</sup>	<sup>(1)</sup>
WE 15x15	2000	4.45	4.10	4.40	4.10	4.55	4.30	4.55	4.25
	2100	4.60	4.15	4.55	4.15	4.65	4.50	4.65	4.35
	2200	4.70	4.25	4.65	4.35	4.80	4.55	4.80	4.45
	2300	4.85	4.35	4.75	4.45	5.00	4.50	4.95	4.50
	2400	4.95	4.50	4.90	4.50	5.00	4.90	5.00	4.80
	2500	5.00	4.75	5.00	4.65	5.00	5.00	5.00	5.00
CE 15x15 Assembly Class	2000	4.60	4.25	4.55	4.20	4.75	4.35	4.70	4.30
	2100	4.70	4.45	4.65	4.40	4.85	4.50	4.85	4.35
	2200	4.85	4.50	4.80	4.45	5.00	4.60	4.95	4.60
	2300	5.00	4.55	4.90	4.65	5.00	5.00	5.00	4.80
	2400	5.00	5.00	5.00	4.85	5.00	5.00	5.00	5.00
	2500	-	-	5.00	5.00	-	-	-	-
CE 14x14 Assembly Class	2000	5.00	5.00	5.00	4.50	5.00	5.00	5.00	4.95
	2100	-	-	5.00	4.95	-	-	5.00	5.00
	2200	-	-	5.00	5.00	-	-	-	-
	2300	-	-	-	-	-	-	-	-
	2400	-	-	-	-	-	-	-	-
	2500	-	-	-	-	-	-	-	-

**Table 4**  
**Maximum Planar Average Initial Enrichment for EOS-37PTH**  
(2 Pages)

PWR Fuel Class	Maximum Planar Average Initial Enrichment (wt. % U-235) as a Function of Soluble Boron Concentration and Basket Type (Fixed Poison Loading) With and Without CCs								
	Minimum Soluble Boron (ppm)	Basket Type							
		A1/A2/A3/A4H/A4L/A5				B1/B2/B3/B4H/B4L/B5			
		w/o CCs		w/ CCs		w/o CCs		w/ CCs	
		INTACT FUEL	DAMAGED/ FAILED FUEL <sup>(2)</sup>	INTACT FUEL	DAMAGED/ FAILED FUEL <sup>(2)</sup>	INTACT FUEL	DAMAGED/ FAILED FUEL <sup>(3)</sup>	INTACT FUEL	DAMAGED/ FAILED FUEL <sup>(3)</sup>
WE 14x14 Class	2000	5.00	5.00	5.00	5.00	5.00	5.00	5.00	5.00
	2100	-	-	-	-	-	-	-	-
	2200	-	-	-	-	-	-	-	-
	2300	-	-	-	-	-	-	-	-
	2400	-	-	-	-	-	-	-	-
	2500	-	-	-	-	-	-	-	-

Notes:

1. Not analyzed.
2. May only be stored in basket types A4H and A4L
3. May only be stored in basket types B4H and B4L



**Table 5**  
**Minimum B-10 Content in the Neutron Poison Plates of the EOS-37PTH**  
**DSC**

<b>Basket Type</b>	<b>Minimum B-10 Content (areal density) for MMC (mg/cm<sup>2</sup>)</b>
A1/A2/A3/A4H/A4L/A5	28.0
B1/B2/B3/B4H/B4L/B5	35.0

**Table 6**  
**Fuel Assembly Design Characteristics for the EOS-89BTH DSC**

<b>BWR FUEL CLASS</b>	<b>BWR Fuel ID</b>	<b>Example Fuel Designs <sup>(1)(2)</sup></b>
7 x 7	ENC-7-A	ENC-III A
7 x 7	ENC-7-B	ENC-III ENC-III E ENC-III F
7 x 7	GE-7-A	GE-1, GE-2, GE-3
8 x 8	ENC-8-A	ENC Va and Vb
8 x 8	ABB-8-A	SVEA-64
8 x 8	ABB-8-B	SVEA-64
8 x 8	FANP-8-A	FANP 8x8-2
8 x 8	GE-8-A	GE-4, XXX-RCN
8 x 8	GE-8-B	GE-5, GE-Pres GE-Barrier GE-8 Type 1
8 x 8	GE-8-C	GE-8 Type II
8 x 8	GE-8-D	GE-9, GE-10
9 x 9	FANP-9-A	FANP-9x9-79/2 FANP-9x9-72 FANP-9x9-80 FANP-9x9-81
9 x 9	FANP-9-B	Siemens QFA ATRIUM 9
9 x 9	GE-9-A	GE-11, GE-13
10 x 10	ABB-10-A	SVEA-92 SVEA-96Opt SVEA-100
10 x 10	ABB-10-B	SVEA-92 SVEA-96 SVEA-100
10 x 10	ABB-10-C	SVEA-96Opt2
10 x 10	FANP-10-A	ATRIUM 10 ATRIUM 10XM
10 x 10	GE-10-A	GE-12, GE-14
10 x 10	GE-10-B	GNF2
11 x 11	FANP-11-A	ATRIUM 11

Notes:

1. Any fuel channel average thickness up to 0.120 inch is acceptable on any of the fuel designs.
2. Example BWR fuel designs are listed herein and are not all-inclusive.

**Table 7A**  
**PWR Minimum Enrichments as a Function of Burnup**

<b>Burnup Range (GWd/MTU)</b>	<b>Minimum Enrichment (wt. % U-235)</b>
1-6	0.7
7-16	1.3
17-30	1.8
31-62	Burnup/16 <sup>(1)</sup>

Notes:

- (1) Round enrichment down to the nearest 0.1%. Example: for 62 GWd/MTU,  $62/16 = 3.875\%$ , round down to 3.8%.
- (2) Fuel below the minimum enrichment defined in this table is classified as LOW-ENRICHED OUTLIER FUEL. Number and location are specified in Section 2.1.

**Table 7B**  
**EOS-37PTH DSC Fuel Qualification Table for Storage in the HSM-MX, All Fuel**

(Minimum required years of cooling time after reactor core discharge)

Burnup (GWd/FA)	Fuel Assembly Average Initial U-235 Enrichment (wt.%)												
	0.7	1.3	1.8	2.0	2.5	2.8	3.1	3.4	3.7	3.8	4.0	4.5	5.0
2.95	2.00	2.00	2.00	2.00	2.00	2.00	2.00	2.00	2.00	2.00	2.00	2.00	2.00
4.92		2.00	2.00	2.00	2.00	2.00	2.00	2.00	2.00	2.00	2.00	2.00	2.00
9.84			2.00	2.00	2.00	2.00	2.00	2.00	2.00	2.00	2.00	2.00	2.00
14.76			2.00	2.00	2.00	2.00	2.00	2.00	2.00	2.00	2.00	2.00	2.00
19.68					2.00	2.00	2.00	2.00	2.00	2.00	2.00	2.00	2.00
22.14						2.16	2.12	2.09	2.05	2.04	2.02	2.00	2.00
24.60							2.35	2.31	2.28	2.26	2.24	2.18	2.14
27.06								2.55	2.51	2.49	2.47	2.41	2.35
29.52									2.76	2.75	2.71	2.64	2.58
30.50										2.85	2.82	2.74	2.67
34.10										3.22	3.20	3.11	3.03

Notes:

- (1) The minimum cooling time is 2.0 years.
- (2) The burnup in GWd/FA is the assembly average burnup in GWd/MTU multiplied by the MTU of the fuel assembly.
- (3) Linear interpolation is allowed to obtain a cooling time within the specified range of burnup and enrichment values.
- (4) Extrapolation is allowed to obtain a cooling time in the gray-shaded region.

**Table 7C**  
**EOS-37PTH DSC Fuel Qualification Table for Storage in the EOS-HSM,**  
**All Fuel**

(Minimum required years of cooling time after reactor core discharge)

Burnup (GWd/FA)	Fuel Assembly Average Initial U-235 Enrichment (wt.%)												
	0.7	1.3	1.8	2.0	2.5	2.8	3.1	3.4	3.7	3.8	4.0	4.5	5.0
2.95	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
3.44		1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
7.87		1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
8.36			1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
9.84			1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
14.76			1.08	1.07	1.03	1.01	1.00	1.00	1.00	1.00	1.00	1.00	1.00
19.68					1.35	1.32	1.30	1.27	1.25	1.24	1.23	1.20	1.17
22.14						1.48	1.46	1.43	1.40	1.39	1.38	1.34	1.31
24.60							1.62	1.59	1.56	1.55	1.53	1.49	1.45
27.06								1.75	1.72	1.71	1.69	1.65	1.60
29.52									1.89	1.88	1.85	1.80	1.76
30.50										1.94	1.92	1.87	1.82
34.10										2.19	2.17	2.11	2.06

Notes:

- (1) The minimum cooling time is 1 year. For fuel transferred in the EOS-TC108, the minimum cooling time is 2.0 years.
- (2) The burnup in GWd/FA is the assembly average burnup in GWd/MTU multiplied by the MTU of the fuel assembly.
- (3) Linear interpolation is allowed to obtain a cooling time within the specified range of burnup and enrichment values.
- (4) Extrapolation is allowed to obtain a cooling time in the gray-shaded region.

**Table 8**  
**Maximum Lattice Average Initial Enrichment and Minimum B-10 Areal**  
**Density for the EOS-89BTH DSC**

Basket Type	Loading Configuration - Number of Fuel Assemblies <sup>(1)</sup>	Maximum Lattice Average Initial Enrichment (wt. % U-235)			Minimum B-10 Areal Density (mg/cm <sup>2</sup> )	
		All fuel Except ABB-10-C and ATRIUM 11	ABB-10-C Fuel	ATRIUM 11 Fuel	MMC	BORAL <sup>®</sup>
A1/A2/A3 <sup>(2)</sup>	89	4.20	4.05	4.05	32.7	39.2
	88	4.45	4.25	4.25		
	87	4.60	4.40	4.35		
	84	5.00	4.90	4.80		
B1/B2/B3 <sup>(2)</sup>	89	4.55	4.35	4.30	41.3	49.6
	88	4.80	4.60	4.50		
	87	4.95	4.70	4.65		
	84	5.00	5.00	5.00		
C1/C2/C3 <sup>(2)</sup>	89	4.85	4.60	(3)	Not Allowed	60.0

Note:

1. See Figure 10 for 88-FA, 87-FA and 84-FA loading configurations.
2. Mixing fuel types in the same DSC is permissible based on the calculated enrichments for each fuel type for a given basket type and loading configuration. For example, when mixing GNF2 and ATRIUM 11 fuels in basket type A1/A2/A3 and 88-fuel-assembly loading configuration, the maximum enrichment for GNF2 fuels is 4.45wt% and the maximum enrichment for ATRIUM 11 fuels is 4.25wt%.
3. ATRIUM 11 fuel is not an allowed content for basket type C1/C2/C3.

**Table 9**  
**Maximum Lattice Average Initial Enrichment and Minimum B-10 Areal Density for the 61BTH Type 2 DSC (Intact Fuel)**

Basket Type	Maximum Lattice Average Initial Enrichment (wt. % U-235) <sup>(1)</sup>	Minimum B-10 Areal Density, (mg/cm <sup>2</sup> )	
		Borated Aluminum/MMC	Boral®
A	3.7	22	27
B	4.1	32	38
C	4.4	42	50
D	4.6	48	58
E	4.8	55	66
F	5.0 <sup>(1)</sup>	62	75

Note:

- 1) For ATRIUM 11 fuel assemblies, the U-235 wt. % enrichment is reduced by 0.55%. The ATRIUM 11 fuel assemblies are authorized for storage in the Type F basket only.

**Table 10**  
**Maximum Lattice Average Initial Enrichment and Minimum B-10 Areal**  
**Density for the 61BTH Type 2 DSC (Damaged Fuel)**

Basket Type	Maximum Lattice Average Initial Enrichment (wt. % U-235)		Minimum B-10 Areal Density, (mg/cm <sup>2</sup> )	
	Up to 4 Damaged Assemblies <sup>(1)</sup>	Five or More Damaged Assemblies <sup>(1)</sup> (16 Maximum)	Borated Aluminum/MMC	Boral®
A	3.7	2.80	22	27
B	4.1	3.10	32	38
C	4.4	3.20	42	50
D	4.6	3.40	48	58
E	4.8	3.50	55	66
F	5.0 <sup>(2, 3)</sup>	3.60	62	75

Notes:

- 1) See Figure 5 for the location of damaged fuel assemblies within the 61BTH Type 2 DSC.
- 2) ATRIUM 11 fuel assemblies are authorized for storage only in the Type F basket only with a maximum of 4 damaged fuel assemblies.
- 3) For ATRIUM 11 fuel assemblies, the U-235 wt. % enrichment is reduced by 0.55%.



**Table 11**  
**Maximum Lattice Average Initial Enrichment and Minimum B-10 Areal**  
**Density for the 61BTH Type 2 DSC (Failed and Damaged Fuel)**

Basket Type	Maximum Lattice Average Initial Enrichment (wt. % U-235)		Minimum B-10 Areal Density (mg/cm <sup>2</sup> )	
	Up to 4 Failed Assemblies (Corner Locations) <sup>(1, 2)</sup>	Up to 4 Failed Assemblies (Corner Locations) and up to 12 Damaged Assemblies (Interior Locations) <sup>(1, 2)</sup>	Borated Aluminum/MMC	Boral®
A	3.7	2.8	22	27
B	4.0	3.1	32	38
C	4.4	3.2	42	50
D	4.6	3.4	48	58
E	4.8	3.4	55	66
F	5.0	3.5	62	75

Notes:

- 1) See Figure 5 for the locations of the failed and damaged assemblies within the 61BTH Type 2 DSC.
- 2) Failed ATRIUM 11 fuel assemblies are not authorized for storage in the 61BTH Type 2 DSC.

**Table 12**  
**Maximum Lattice Average Initial Enrichments and Minimum B-10 Areal Density for the 61BTH Type 2 DSC for > 16 Damaged Fuel Assemblies**

<b>Basket Type</b>	<b>Up to 57 Damaged Fuel at 3.30 wt. % U-235</b>		<b>Minimum B-10 Areal Density (mg/cm<sup>2</sup>)</b>	
	<b>Remaining Four Intact Assemblies <sup>(1)</sup></b>	<b>Remaining Four Damaged Assemblies <sup>(1)</sup></b>	<b>Borated Aluminum/MMC</b>	<b>Boral<sup>®</sup></b>
A	-	-	-	-
B	-	-	-	-
C	-	-	-	-
D	5.00	4.20	48	58
E	5.00	4.20	55	66
F	5.00	4.20	62	75

Note:

1) See Figure 5 for the locations of the damaged assemblies within the 61BTH Type 2 DSC

**Table 13**  
**BWR Fuel Assembly Design Characteristics for the 61BTH Type 2 DSC**

<b>BWR FUEL CLASS</b>	<b>Initial Design or Reload Fuel Designation<sup>(1) (3)</sup></b>
<b>7x7-49/0</b>	GE1 GE2 GE3
<b>8x8-63/1</b>	GE4
<b>8x8-62/2</b>	GE-5 GE-Pres GE-Barrier GE8 Type I
<b>8x8-60/4</b>	GE8 Type II
<b>8x8-60/1</b>	GE9 GE10
<b>9x9-74/2</b>	GE11 GE13
<b>10x10-92/2</b>	GE12 GE14 GNF2
<b>7x7-49/0</b>	ENC-III A
<b>7x7-48/1Z</b>	ENC-III <sup>(2)</sup>
<b>8x8-60/4Z</b>	ENC Va ENC Vb
<b>8x8-62/2</b>	FANP 8x8-2
<b>9x9-79/2</b>	FANP9 9x9-2
<b>Siemens QFA</b>	9x9
<b>10x10-91/1</b>	ATRIUM-10 ATRIUM-10XM
<b>11x11</b>	ATRIUM-11

Notes:

- (1) Any fuel channel average thickness up to 0.120 inch is acceptable on any of the fuel designs.
- (2) Includes ENC-IIIE and ENC-IIIF.
- (3) Initial designs or reload fuel designations belonging to a listed fuel class, but not listed herein may be qualified for storage using the same methodology as documented in the UFSAR.

**Table 14**  
**Maximum Uranium Loading per FFC for Failed 61BTH Type 2 Fuel**

<b>Fuel Assembly Class</b>	<b>Maximum MTU/Assembly</b>
<b>7x7</b>	0.198
<b>8x8</b>	0.188
<b>9x9</b>	0.180
<b>10x10</b>	0.187

**Table 15**  
**Deleted**

|

|

**Table 16**  
**Deleted**

**Table 17**  
**System Configurations for 61BTH Type 2 HLZCs**

<b>HLZC</b>	<b>Storage Module</b>	<b>Transfer Cask</b>
1	HSM-MX	OS197/OS197H/ OS197FC-B/OS197HFC-B
2	HSM-MX	OS197/OS197H/ OS197FC-B/OS197HFC-B
3	HSM-MX	OS197/OS197H/ OS197FC-B/OS197HFC-B
4	HSM-MX	OS197/OS197H/ OS197FC-B/OS197HFC-B
5	HSM-MX	OS197FC-B/OS197HFC-B
6	HSM-MX	OS197FC-B/OS197HFC-B
7	HSM-MX	OS197FC-B/OS197HFC-B
8	HSM-MX	OS197FC-B/OS197HFC-B
9	HSM-MX	OS197/OS197H/ OS197FC-B/OS197HFC-B
10	HSM-MX	OS197FC-B/OS197HFC-B

**Table 18**  
**BWR Minimum Enrichments as a Function of Burnup (EOS-89BTH DSC and 61BTH Type 2 DSC)**

Burnup Range (GWd/MTU)	Minimum Enrichment (wt. %)
1-6	0.7
7-19	0.9
20-35	Burnup/20 <sup>(1)</sup>
36-62	Burnup/16 <sup>(1)</sup>

Notes:

- 1) Round down to the nearest 0.1%. Example: for 62 GWd/MTU,  $62/16 = 3.875\%$ , round down to 3.8%.
- 2) Fuel below the minimum enrichment defined in this table is classified as LOW-ENRICHED OUTLIER FUEL. Number and location are specified in Section 2.2 for the EOS-89BTH DSC and in Section 2.3 for the 61BTH Type 2 DSC.



**Table 19**  
**61BTH Type 2 DSC Fuel Qualification Table, All Fuel**

(Minimum required years of cooling time after reactor core discharge)

Burnup (GWd/FA)	Fuel Assembly Average Initial U-235 Enrichment (wt.%)														
	0.7	0.9	1.0	1.5	1.7	2.2	2.5	2.8	3.1	3.4	3.7	3.8	4.0	4.5	5.0
1.19	2.00	2.00	2.00	2.00	2.00	2.00	2.00	2.00	2.00	2.00	2.00	2.00	2.00	2.00	2.00
1.39		2.00	2.00	2.00	2.00	2.00	2.00	2.00	2.00	2.00	2.00	2.00	2.00	2.00	2.00
2.97		2.00	2.00	2.00	2.00	2.00	2.00	2.00	2.00	2.00	2.00	2.00	2.00	2.00	2.00
3.76		2.00	2.00	2.00	2.00	2.00	2.00	2.00	2.00	2.00	2.00	2.00	2.00	2.00	2.00
3.96			2.00	2.00	2.00	2.00	2.00	2.00	2.00	2.00	2.00	2.00	2.00	2.00	2.00
5.94				2.00	2.00	2.00	2.00	2.00	2.00	2.00	2.00	2.00	2.00	2.00	2.00
6.93					2.00	2.00	2.00	2.00	2.00	2.00	2.00	2.00	2.00	2.00	2.00
7.13						2.00	2.00	2.00	2.00	2.00	2.00	2.00	2.00	2.00	2.00
7.92							2.00	2.00	2.00	2.00	2.00	2.00	2.00	2.00	2.00
8.91								2.00	2.00	2.00	2.00	2.00	2.00	2.00	2.00
9.90									2.11	2.06	2.01	2.00	2.00	2.00	2.00
10.89										2.29	2.24	2.22	2.19	2.11	2.05
11.88											2.48	2.46	2.43	2.34	2.27
12.28												2.57	2.53	2.44	2.36

Notes:

- 1) The minimum cooling time is 2.0 years.
- 2) The burnup in GWd/FA is the assembly average burnup in GWd/MTU multiplied by the MTU of the fuel assembly.
- 3) Linear interpolation is allowed to obtain a cooling time within the specified range of burnup and enrichment values.
- 4) Extrapolation is allowed to obtain a cooling time in the gray-shaded region.

**Table 20**  
**61BTH Type 2 DSC Fuel Qualification Table, HLZC 2, 4, 5, 6, 7, and 8,**  
**Peripheral Locations**

(Minimum required years of cooling time after reactor core discharge)

Burnup (GWd/FA)	Fuel Assembly Average Initial U-235 Enrichment (wt.%)														
	0.7	0.9	1.0	1.5	1.7	2.2	2.5	2.8	3.1	3.4	3.7	3.8	4.0	4.5	5.0
1.19	2.00	2.00	2.00	2.00	2.00	2.00	2.00	2.00	2.00	2.00	2.00	2.00	2.00	2.00	2.00
1.39		2.00	2.00	2.00	2.00	2.00	2.00	2.00	2.00	2.00	2.00	2.00	2.00	2.00	2.00
2.97		2.00	2.00	2.00	2.00	2.00	2.00	2.00	2.00	2.00	2.00	2.00	2.00	2.00	2.00
3.76		2.35	2.33	2.23	2.20	2.12	2.09	2.06	2.03	2.01	2.00	2.00	2.00	2.00	2.00
3.96			2.41	2.31	2.28	2.20	2.16	2.13	2.10	2.08	2.06	2.05	2.04	2.02	2.00
5.94				3.13	3.09	2.98	2.93	2.88	2.83	2.79	2.75	2.74	2.72	2.67	2.63
6.93					3.55	3.43	3.36	3.29	3.24	3.18	3.14	3.12	3.10	3.03	2.98
7.13						3.52	3.45	3.39	3.33	3.27	3.22	3.21	3.18	3.11	3.06
7.92							3.87	3.79	3.71	3.64	3.58	3.57	3.53	3.45	3.38
8.91								4.39	4.29	4.20	4.12	4.10	4.05	3.94	3.85
9.90									5.03	4.91	4.80	4.77	4.70	4.56	4.43
10.89										5.86	5.70	5.65	5.56	5.35	5.18
11.88											6.97	6.89	6.75	6.45	6.19
12.28												7.53	7.36	7.00	6.70

Notes:

- 1) The minimum cooling time is 2.0 years.
- 2) The burnup in GWd/FA is the assembly average burnup in GWd/MTU multiplied by the MTU of the fuel assembly.
- 3) Linear interpolation is allowed to obtain a cooling time within the specified range of burnup and enrichment values.
- 4) Extrapolation is allowed to obtain a cooling time in the gray-shaded region.
- 5) The peripheral locations are defined in Figure 6.

**Table 21**  
**EOS-89BTH DSC Fuel Qualification Table, All Fuel**

(Minimum required years of cooling time after reactor core discharge)

Burnup (GWd/FA)	Fuel Assembly Average Initial U-235 Enrichment (wt.%)														
	0.7	0.9	1.0	1.5	1.7	2.2	2.5	2.8	3.1	3.4	3.7	3.8	4.0	4.5	5.0
1.19	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
1.39		1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
2.97		1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
3.76		1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
3.96			1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
5.94				1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
6.93					1.11	1.06	1.03	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
7.13						1.09	1.06	1.03	1.00	1.00	1.00	1.00	1.00	1.00	1.00
7.92							1.17	1.14	1.11	1.08	1.06	1.05	1.04	1.00	1.00
8.91								1.28	1.25	1.22	1.19	1.18	1.16	1.12	1.09
9.90									1.40	1.36	1.33	1.32	1.30	1.25	1.21
10.89										1.51	1.48	1.46	1.44	1.39	1.34
11.88											1.63	1.62	1.59	1.53	1.48
12.28												1.68	1.66	1.60	1.54

Notes:

- 1) The minimum cooling time is 1.0 year.
- 2) The burnup in GWd/FA is the assembly average burnup in GWd/MTU multiplied by the MTU of the fuel assembly.
- 3) Linear interpolation is allowed to obtain a cooling time within the specified range of burnup and enrichment values.
- 4) Extrapolation is allowed to obtain a cooling time in the gray-shaded region.
- 5) For fuel transferred in the EOS-TC108, additional cooling time restrictions are specified in Figure 2.

**Table 22**  
**EOS-89BTH DSC Reconstituted Fuel Limits for Transfer in the EOS-TC125**

Parameter						Limit				
Number of RECONSTITUTED FUEL ASSEMBLIES per DSC						≤ 89				
Maximum number of irradiated stainless steel rods per RECONSTITUTED FUEL ASSEMBLY						Per table below				
Minimum cooling time						Per table below				
Number of Irradiated Stainless Steel Rods per Fuel Assembly										Minimum Cooling Time (years)
7x7 Class		8x8 Class		9x9 Class		10x10 Class		11x11 Class		
Min.	Max.	Min.	Max.	Min.	Max.	Min.	Max.	Min.	Max.	
0	5	0	6	0	7	0	9	0	11	Per Table 21
6	15	7	18	8	22	10	26	12	34	2.00
16	20	19	24	23	29	27	34	35	46	2.25
21	25	25	30	30	37	35	43	47	57	2.50
26	30	31	36	38	44	44	51	58	69	2.75
31	35	37	42	45	51	52	60	70	80	3.00
36	49	43	64	52	81	61	100	81	112	3.25

**Table 23**  
**EOS-89BTH DSC Reconstituted Fuel Limits for Transfer in the EOS-TC108**

Parameter	Limit
Number of RECONSTITUTED FUEL ASSEMBLIES per DSC	<ul style="list-style-type: none"> <li>• <math>\leq 89</math> (all types)</li> <li>• <math>\leq 49</math> containing irradiated stainless steel rods</li> </ul>
Maximum number of irradiated stainless steel rods per DSC	<ul style="list-style-type: none"> <li>• 100 for 7x7 Class</li> <li>• 120 for 8x8 Class</li> <li>• 140 for 9x9 Class</li> <li>• 180 for 10x10 Class</li> <li>• 220 for 11x11 Class</li> </ul>
Maximum number of irradiated stainless steel rods per RECONSTITUTED FUEL ASSEMBLY	<ul style="list-style-type: none"> <li>• 5 for 7x7 Class</li> <li>• 6 for 8x8 Class</li> <li>• 7 for 9x9 Class</li> <li>• 9 for 10x10 Class</li> <li>• 11 for 11x11 Class</li> </ul>
Loading restrictions for locations within the basket	Per Figure 9
Minimum cooling time	Per Table 21

**Table 24**  
**EOS-37PTH DSC Reconstituted Fuel Limits for Transfer in the**  
**EOS-TC125/135 AND Storage in the EOS-HSM**

Parameter					Limit			
Number of RECONSTITUTED FUEL ASSEMBLIES per DSC					≤ 37			
Maximum number of irradiated stainless steel rods per RECONSTITUTED FUEL ASSEMBLY					Per table below			
Minimum cooling time					Per table below			
Number of Irradiated Stainless Steel Rods per Fuel Assembly								Minimum Cooling Time (years)
14x14 Class		15x15 Class		16x16 Class		17x17 Class		
Min.	Max.	Min.	Max.	Min.	Max.	Min.	Max.	
0	8	0	10	0	11	0	13	Per Table 7C
9	17	11	20	12	23	14	25	3.00
18	34	21	40	24	45	26	51	4.00
35	51	41	60	46	68	52	76	4.50
52	68	61	80	69	91	77	102	5.00
69	85	81	100	92	113	103	127	5.25
86	102	101	120	114	136	128	152	5.50
103	118	121	140	137	159	153	178	5.75
119	135	141	160	160	182	179	203	6.00
136	179	161	216	183	236	204	264	6.25

**Table 25**  
**EOS-37PTH DSC Reconstituted Fuel Limits for Transfer in the EOS-TC108**

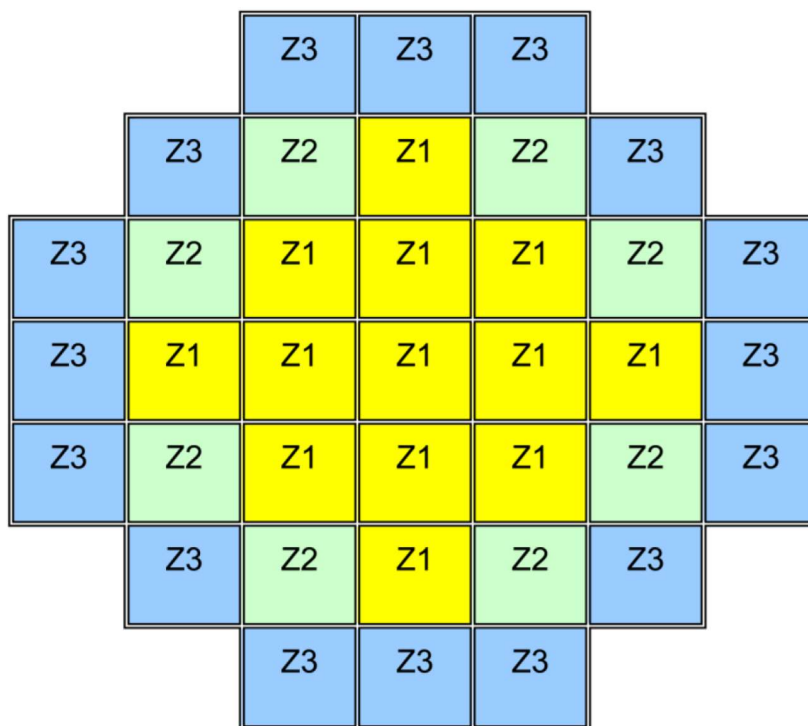
Number of RECONSTITUTED FUEL ASSEMBLIES per DSC	<ul style="list-style-type: none"> <li>• <math>\leq 37</math> (all types)</li> <li>• <math>\leq 21</math> containing irradiated stainless steel rods</li> </ul>
Maximum number of irradiated stainless steel rods per DSC	<ul style="list-style-type: none"> <li>• 32 for 14x14 Class</li> <li>• 40 for 15x15 Class</li> <li>• 48 for 16x16 and 17x17 Classes</li> </ul>
Maximum number of irradiated stainless steel rods per RECONSTITUTED FUEL ASSEMBLY	<ul style="list-style-type: none"> <li>• 4 for 14x14 Class</li> <li>• 5 for 15x15 Class</li> <li>• 6 for 16x16 and 17x17 Classes</li> </ul>
Loading restrictions for locations within the basket	Per Figure 14
Minimum cooling time	2 years

**Figure 1A**  
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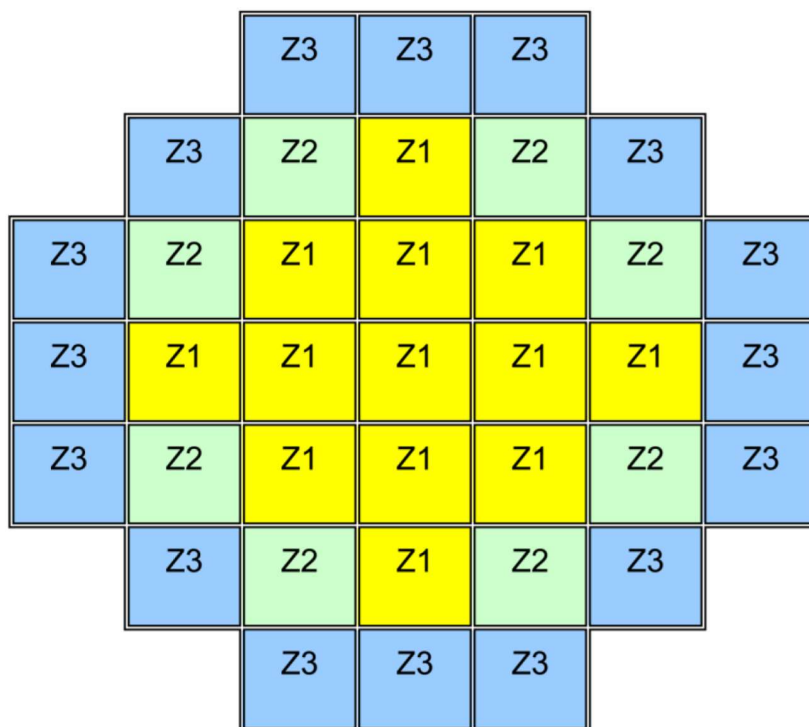
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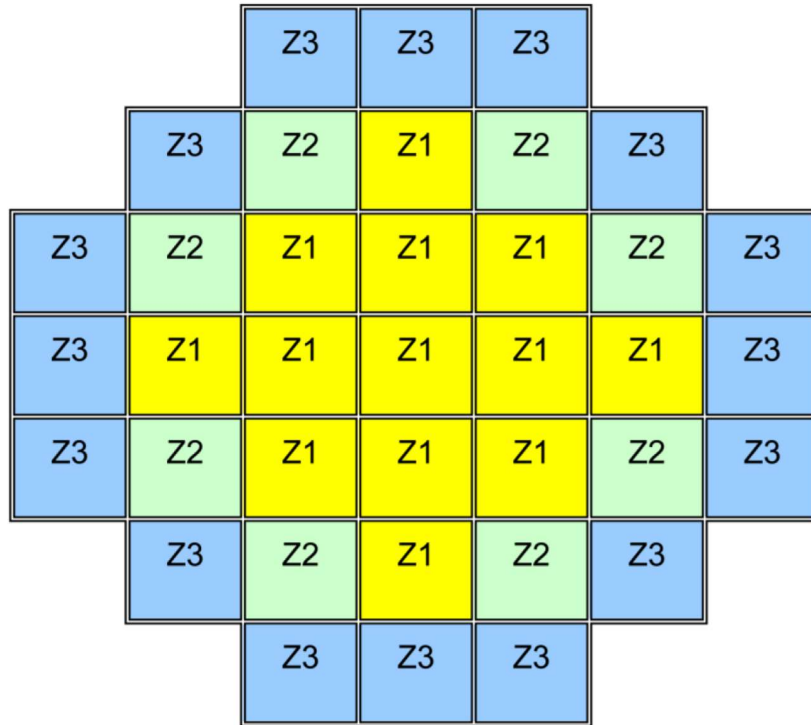
Zone Number	1	2	3
Maximum Decay Heat, (H), (kW/FA plus CCs, if included)	1.0	1.5	1.05
Maximum Number of Fuel Assemblies	13	8	16
Maximum Decay Heat per DSC (kW)	41.8		

**Figure 1B**  
**Heat Load Zone Configuration 2 for the EOS-37PTH DSC**



Zone Number	1	2	3
Maximum Decay Heat (kW/FA plus CCs, if included)	0.95	1.0	1.0
Maximum Number of Fuel Assemblies	13	8	16
Maximum Decay Heat per DSC (kW)	36.35		

**Figure 1C**  
**Heat Load Zone Configuration 3 for the EOS-37PTH DSC**

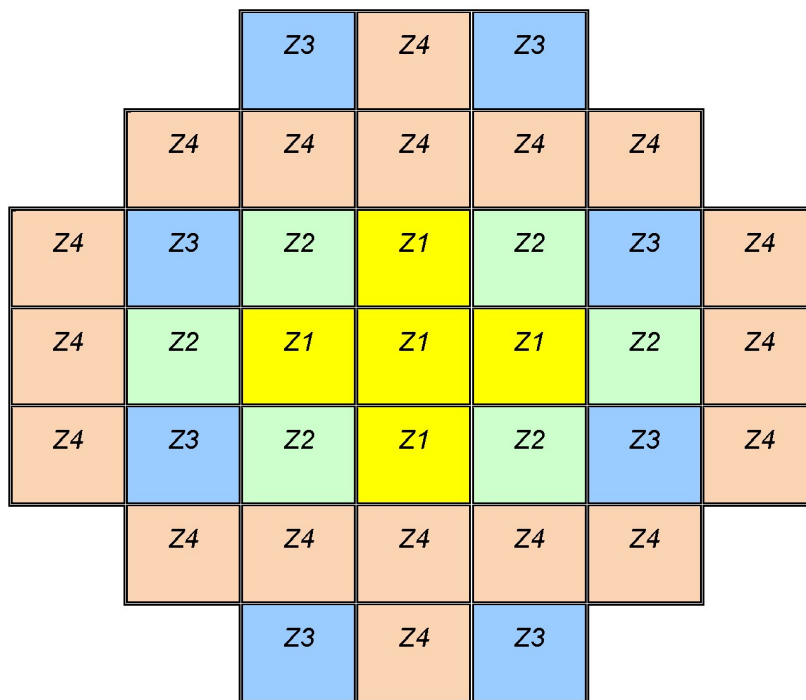


Zone Number	1	2	3
Maximum Decay Heat (kW/FA plus CCs, if included)	1.0	1.625	1.6
Maximum Number of Fuel Assemblies	13	8	16
Maximum Decay Heat per DSC (kW)	50.0 <sup>(1)</sup>		

Notes:

1. Adjust payload to maintain total canister heat load within the specified limit.

**Figure 1D**  
**Heat Load Zone Configuration 4 for the EOS-37PTH DSC**

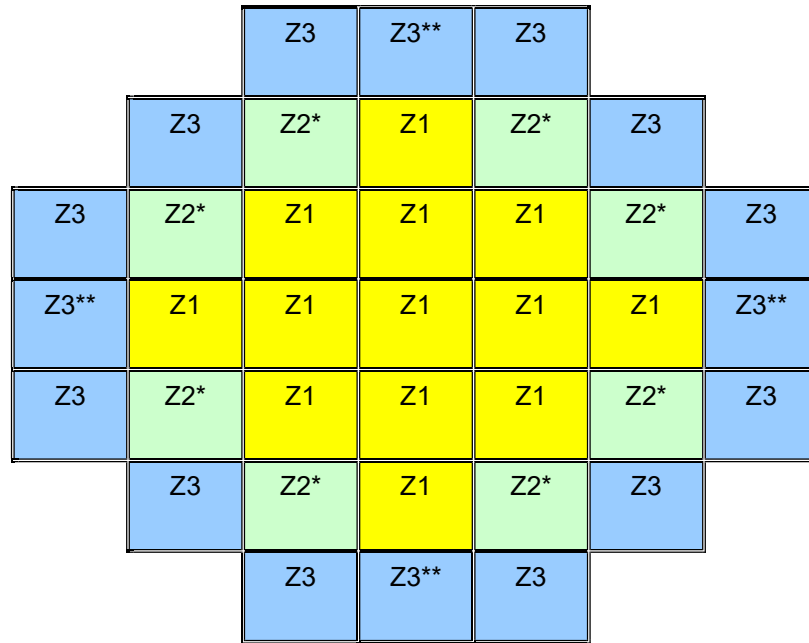


Zone Number	1	2	3	4
Maximum Decay Heat (kW/FA plus CCs, if included)	0.7	0.5	2.4	0.85
Maximum Number of Fuel Assemblies	5	6	8	18
Maximum Decay Heat per DSC (kW)	41.0			

Notes:

1. Adjust payload to maintain total canister heat load within the specified limit.

**Figure 1E**  
**Heat Load Zone Configuration 5 for the EOS-37PTH DSC**

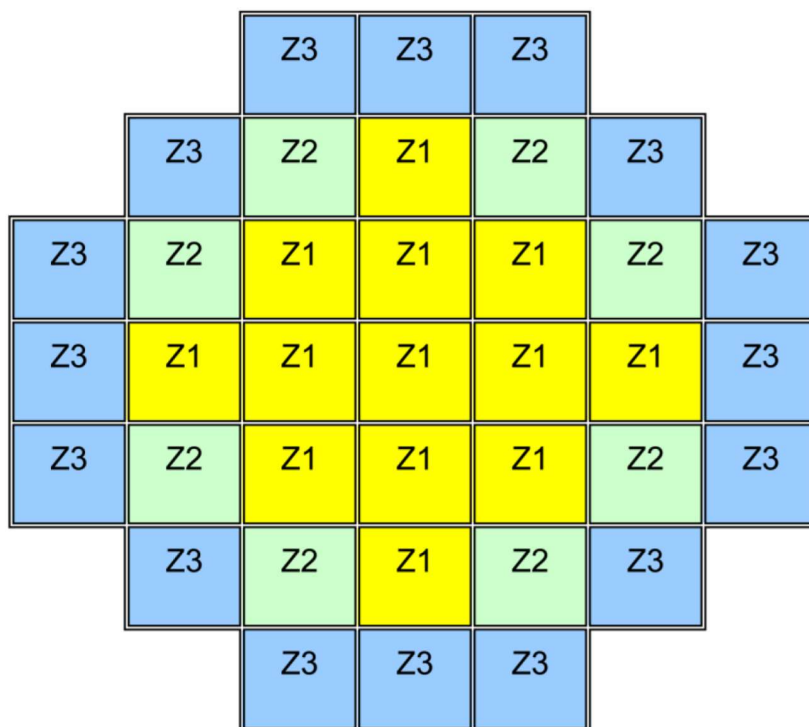


(\*) denotes location where INTACT or DAMAGED FUEL can be stored.  
 (\*\*) denotes location where INTACT or FAILED FUEL can be stored.

Zone Number	1	2 <sup>(1)</sup>	3 <sup>(1)</sup>
Maximum Decay Heat (kW/FA plus CCs, if included)	1.0	1.5	1.3125 <sup>(2)</sup>
Maximum Number of Fuel Assemblies	13	8	16
Maximum Decay Heat per DSC (kW)	46.00		

1. DAMAGED FUEL and FAILED FUEL shall not be loaded in the same DSC.
2. The maximum allowable heat load per FAILED FUEL compartment is 0.8 kW.

**Figure 1F**  
**Heat Load Zone Configuration 6 for the EOS-37PTH DSC**

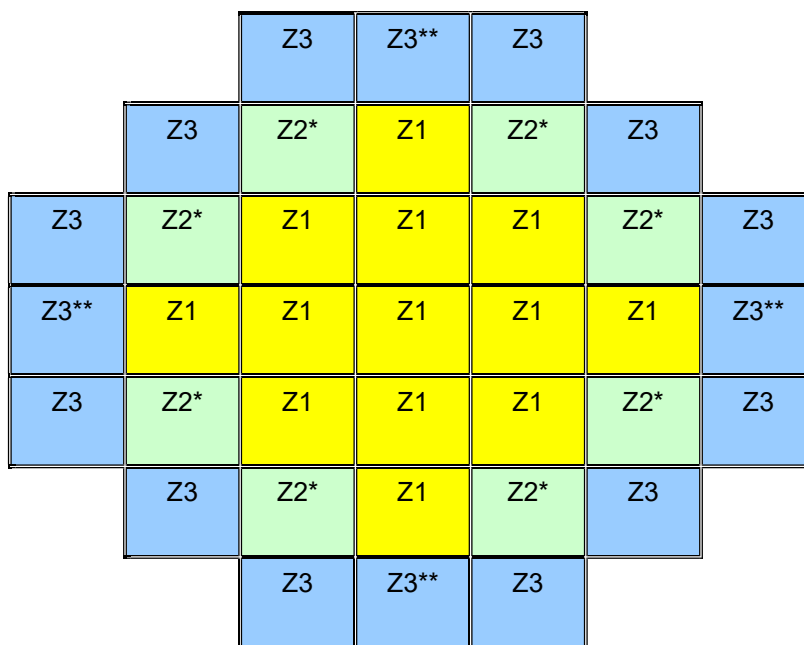


Zone Number	1	2	3
Maximum Number of Fuel Assemblies	13	8	16
Upper Compartment			
Maximum Decay Heat (kW/FA plus CCs, if included)	1.0	1.60	1.3125
Maximum Decay Heat per DSC (kW)	41.8 <sup>(1)</sup>		
Lower Compartment			
Maximum Decay Heat (kW/FA plus CCs, if included)	0.9	1.60	1.60
Maximum Decay Heat per DSC (kW)	50.0 <sup>(1)</sup>		

Notes:

1. Adjust payload to maintain total canister heat load within the specified limit.

**Figure 1G**  
**Heat Load Zone Configuration 7 for the EOS-37PTH DSC**



(\*) denotes location where INTACT or DAMAGED FUEL can be stored.

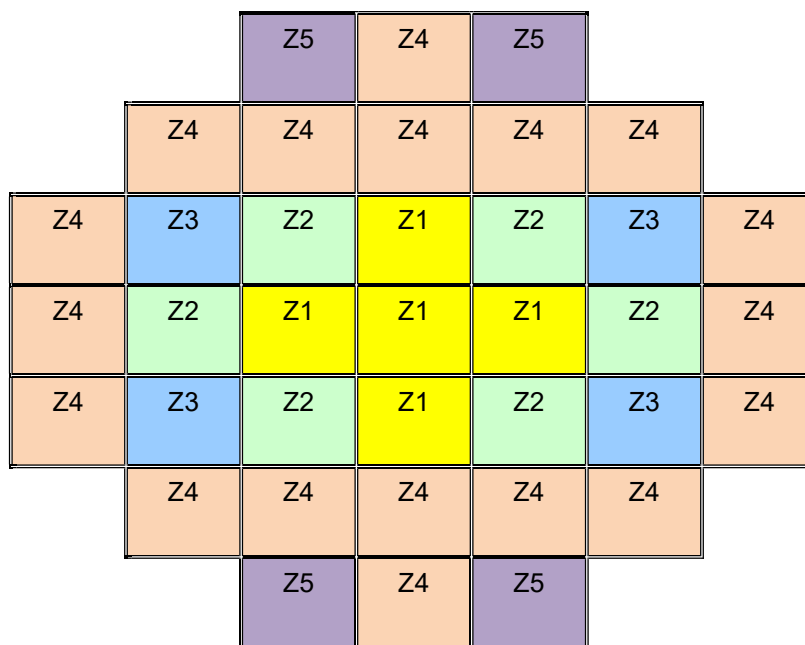
(\*\*) denotes location where INTACT or FAILED FUEL can be stored.

Zone Number	1	2 <sup>(2)</sup>	3 <sup>(2)(3)</sup>
Maximum Number of Fuel Assemblies	13	8	16
Upper Compartment			
Maximum Decay Heat (kW/FA plus CCs, if included)	0.8	1.50	1.50
Maximum Decay Heat per DSC (kW)	41.8 <sup>(1)(4)</sup>		
Lower Compartment			
Maximum Decay Heat (kW/FA plus CCs, if included)	0.8	1.50	1.50
Maximum Decay Heat per DSC (kW)	46.4 <sup>(1)</sup>		

Notes:

1. The maximum decay heat per DSC is limited to 41.8 kW when DAMAGED or FAILED FUEL is loaded.
2. DAMAGED FUEL and FAILED FUEL shall not be loaded in the same DSC.
3. The maximum allowable heat load per FAILED FUEL is 0.8 kW.
4. Adjust payload to maintain total canister heat load within the specified limit.

**Figure 1H**  
**Heat Load Zone Configuration 8 for the EOS-37PTH DSC**



Zone Number	1	2	3	4	5
Maximum Decay Heat (kW/FA plus CCs, if included)	0.50	0.70	2.0	0.75	2.4
Maximum Number of Fuel Assemblies	5	6	4	18	4
Maximum Decay Heat per DSC (kW)	37.80				

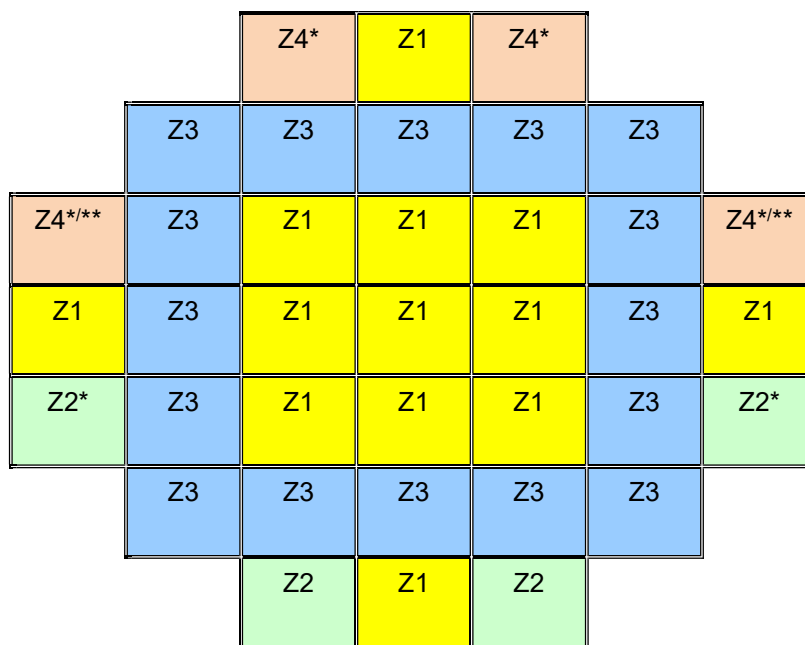
**Figure 11**  
**Heat Load Zone Configuration 9 for the EOS-37PTH DSC**



**Figure 1J**  
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(\*) denotes location where INTACT or DAMAGED FUEL ASSEMBLY can be stored.

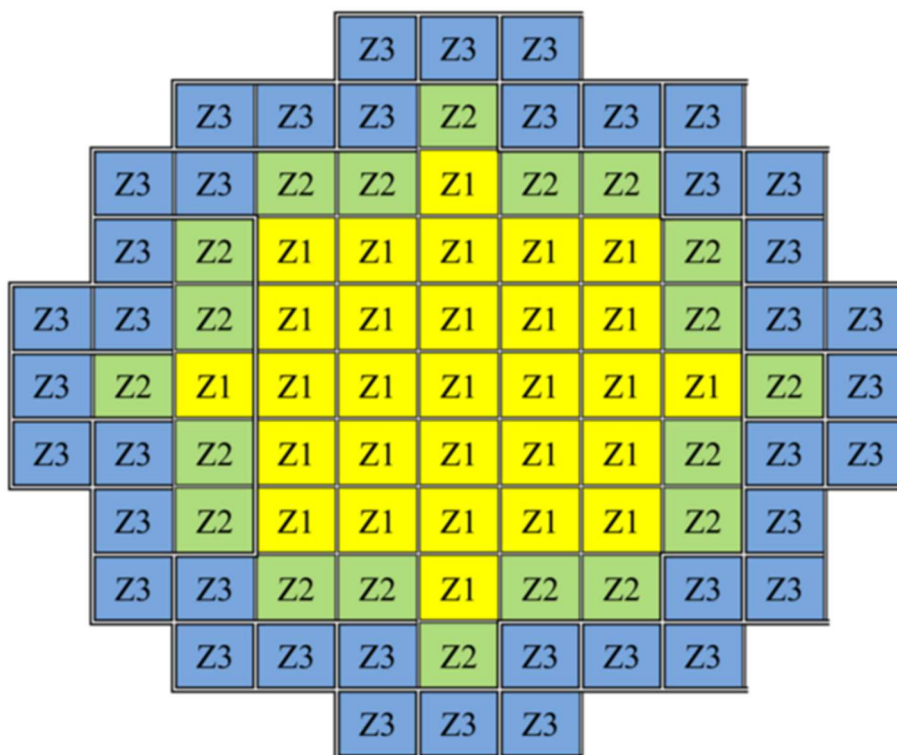
(\*\*) denotes location where INTACT or FAILED FUEL can be stored.

Zone Number	1	2 <sup>(1)</sup>	3	4 <sup>(1)</sup>
Maximum Number of Fuel Assemblies	13	4	16	4
Upper Compartment				
Maximum Decay Heat (kW/FA plus CCs, if included)	0.5	3.0	0.7	3.0 <sup>(2)</sup>
Maximum Decay Heat per DSC (kW)	41.8			
Lower Compartment				
Maximum Decay Heat (kW/FA plus CCs, if included)	0.5	3.5	0.7	3.2 <sup>(2)</sup>
Maximum Decay Heat per DSC (kW)	44.5			

Notes:

1. DAMAGED FUEL and FAILED FUEL shall not be loaded in the same DSC.
2. The maximum allowable heat load per FAILED FUEL is 0.8 kW.

**Figure 1K**  
**Heat Load Zone Configuration 11 for the EOS-37PTH DSC**



**Heat Load Zone Configuration 2**

Zone Number	1	2	3 <sup>(1)</sup>
Maximum Decay Heat (kW/FA plus channel, if included)	0.4	0.5	0.5
Maximum Number of Fuel Assemblies	29	20	40
Maximum Decay Heat per DSC (kW)	41.6		

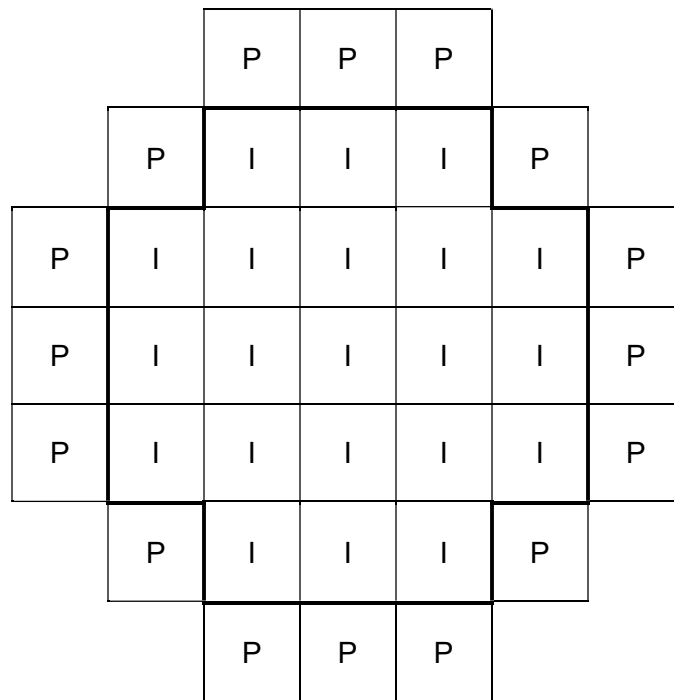
**Heat Load Zone Configuration 3**

Zone Number	1	2	3 <sup>(2)</sup>
Maximum Decay Heat (kW/FA plus channel, if included)	0.36	0.4	0.4
Maximum Number of Fuel Assemblies	29	20	40
Maximum Decay Heat per DSC (kW)	34.44		

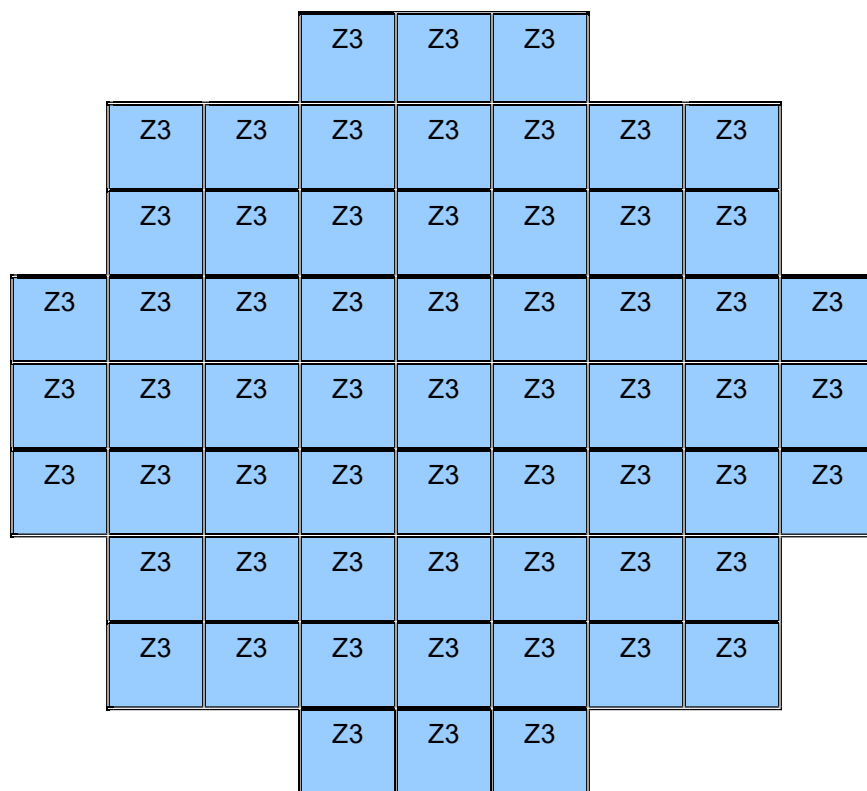
Notes:

1. The minimum cooling time for HLZC 2 Zone 3 in the EOS-TC108 is 9.7 years.
2. The minimum cooling time for HLZC 3 Zone 3 in the EOS-TC108 is 9.0 years.

**Figure 2**  
**EOS-89BTH DSC Heat Load Zone Configurations for transfer in the EOS-TC108**

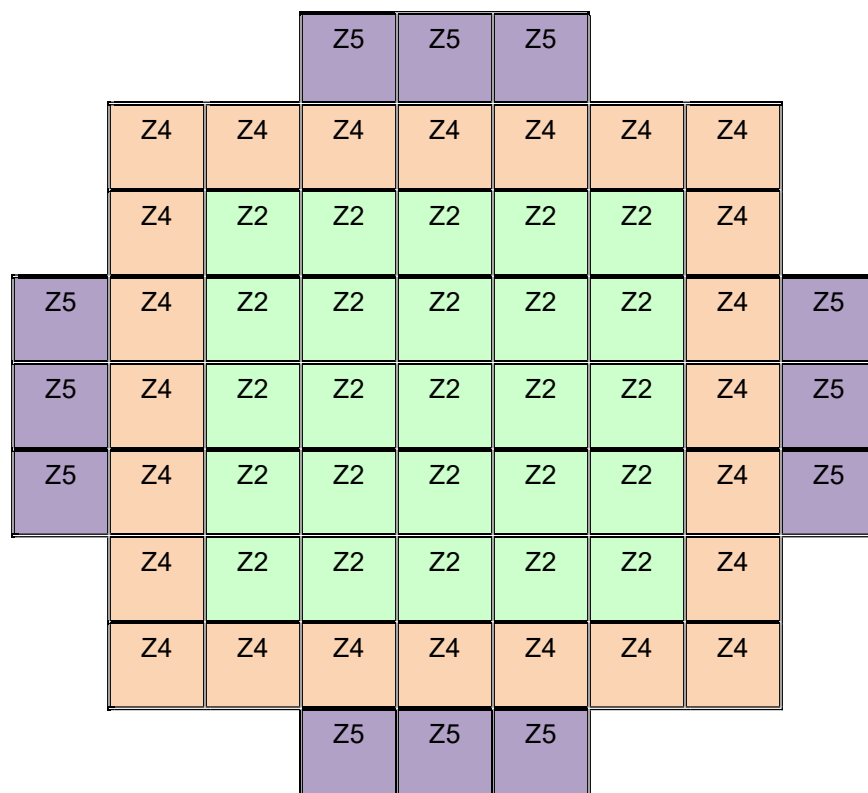


**Figure 3**  
**Peripheral (P) and Inner (I) Fuel Locations for the EOS-37PTH DSC**



	Zone 1	Zone 2	Zone 3	Zone 4	Zone 5	Zone 6
Maximum Decay Heat (kW/FA)	NA	NA	0.393	NA	NA	NA
Maximum Decay Heat per Zone (kW)	NA	NA	22.0	NA	NA	NA
Maximum Decay Heat per DSC (kW)	22.0					

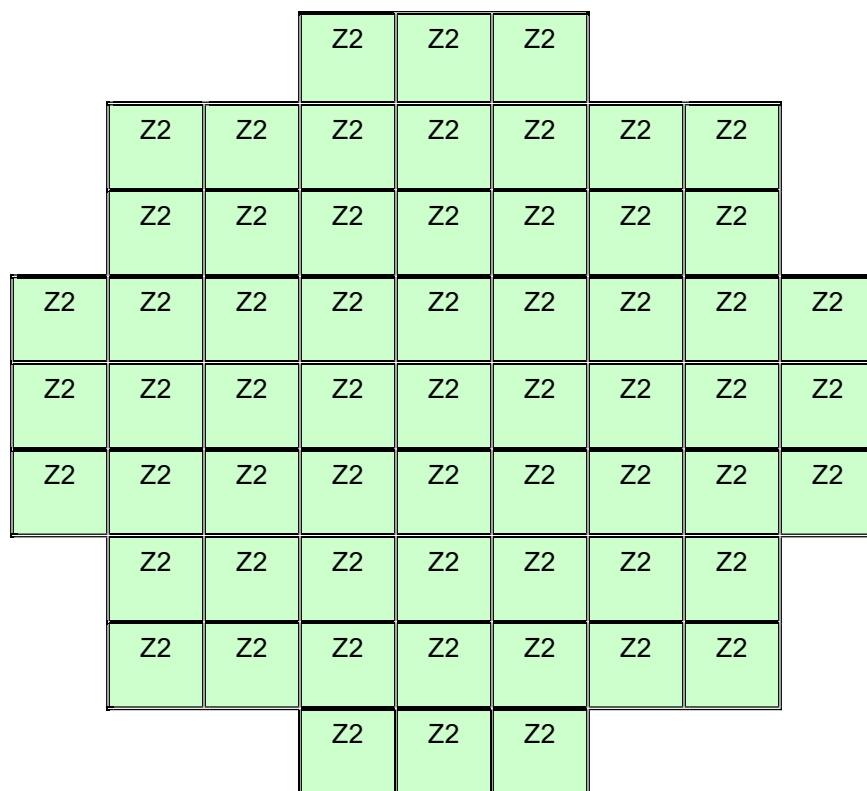
**Figure 4A**  
**Heat Load Zone Configuration 1 for the 61BTH Type 2 DSC**



	Zone 1	Zone 2	Zone 3	Zone 4	Zone 5	Zone 6
Maximum Decay Heat (kW/FA)	NA	0.35	NA	0.48	0.54	NA
Maximum Decay Heat per Zone (kW)	NA	8.75	NA	11.52	6.48	NA
Maximum Decay Heat per DSC (kW)	22.0 <sup>(1)</sup>					

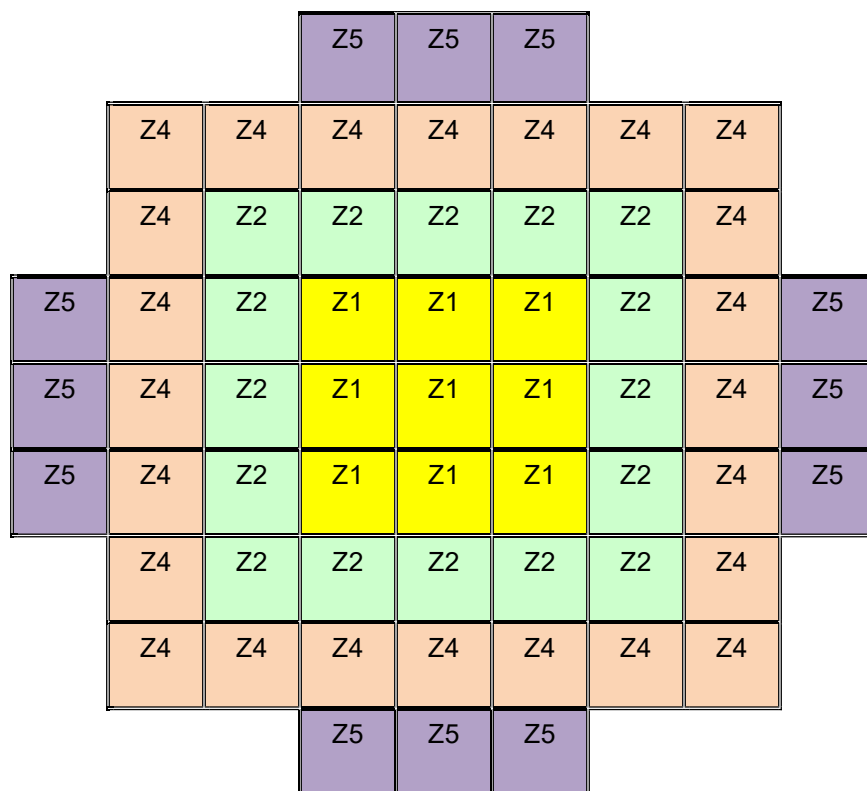
<sup>(1)</sup> Adjust payload to maintain total DSC heat load within the specified limit

**Figure 4B**  
**Heat Load Zone Configuration 2 for the 61BTH Type 2 DSC**



	Zone 1	Zone 2	Zone 3	Zone 4	Zone 5	Zone 6
Maximum Decay Heat (kW/FA)	NA	0.35	NA	NA	NA	NA
Maximum Decay Heat per Zone (kW)	NA	19.4	NA	NA	NA	NA
Maximum Decay Heat per DSC (kW)	19.4					

**Figure 4C**  
**Heat Load Zone Configuration 3 for the 61BTH Type 2 DSC**

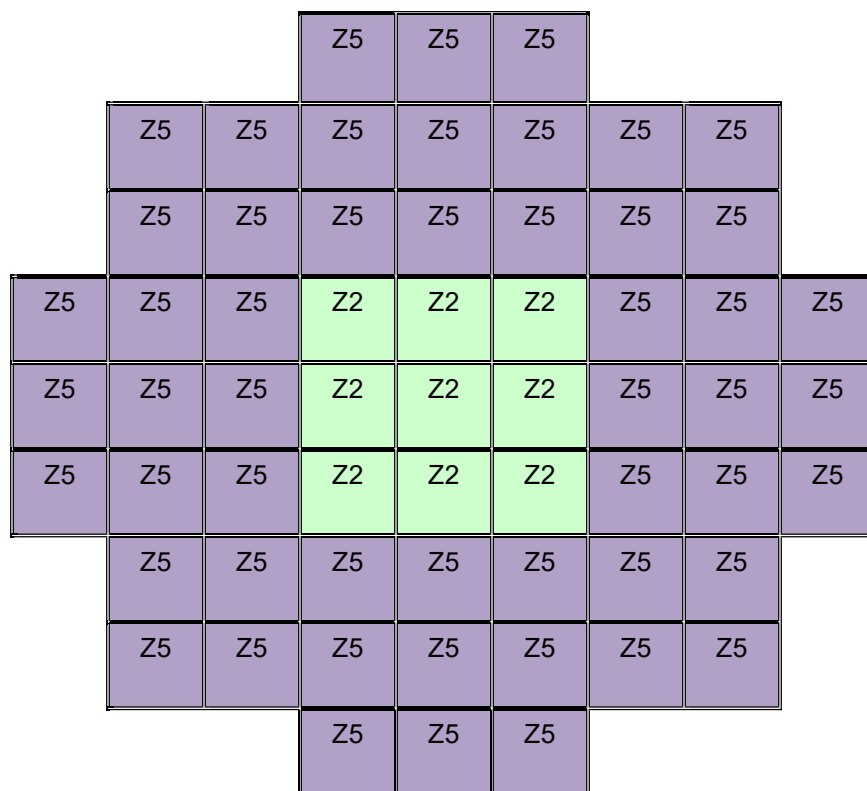


	Zone 1	Zone 2	Zone 3	Zone 4	Zone 5	Zone 6
Maximum Decay Heat (kW/FA)	0.22	0.35	NA	0.48	0.54	NA
Maximum Decay Heat per Zone (kW)	1.98	5.60	NA	11.52	6.48	NA
Maximum Decay Heat per DSC (kW)	19.4 <sup>(1)</sup>					

<sup>(1)</sup> Adjust payload to maintain total DSC heat load within the specified limit.

**Figure 4D**  
**Heat Load Zone Configuration 4 for the 61BTH Type 2 DSC**

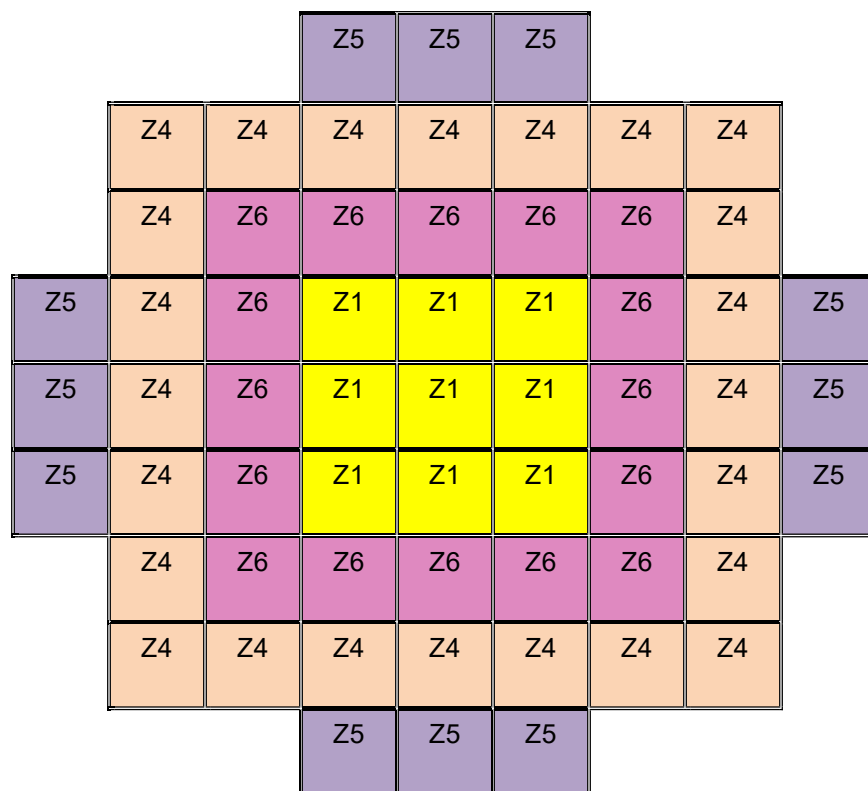




	Zone 1	Zone 2	Zone 3	Zone 4	Zone 5	Zone 6
Maximum Decay Heat (kW/FA)	NA	0.35	NA	NA	0.54	NA
Maximum Decay Heat per Zone (kW)	NA	3.15	NA	NA	28.08	NA
Maximum Decay Heat per DSC (kW)	31.2 <sup>(1)</sup>					

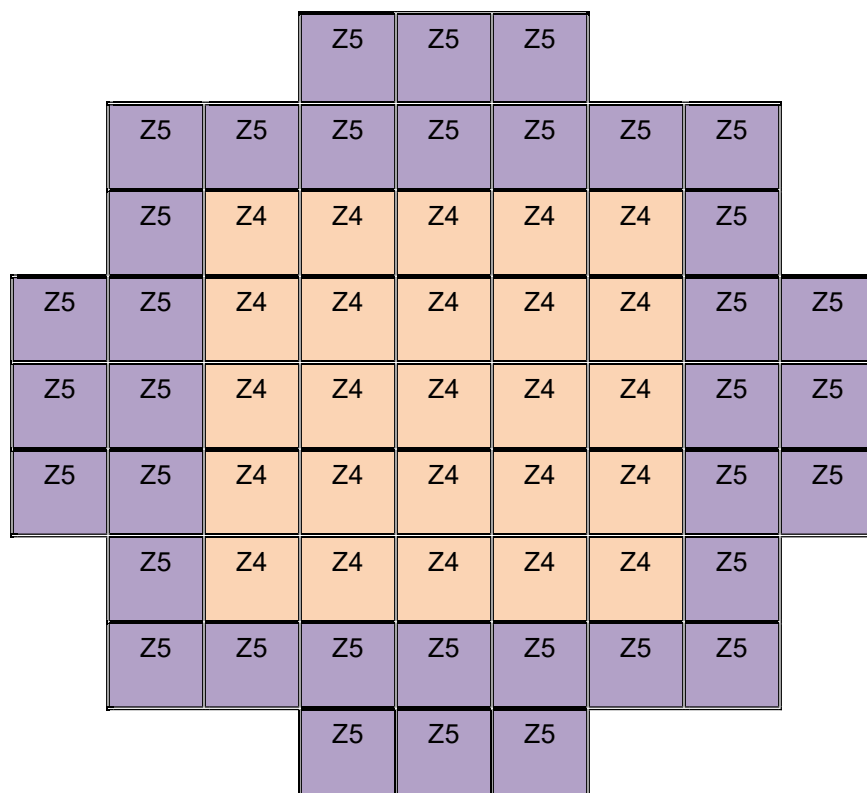
<sup>(1)</sup> Adjust payload to maintain total DSC heat load within the specified limit.

**Figure 4E**  
**Heat Load Zone Configuration 5 for the 61BTH Type 2 DSC**



	Zone 1	Zone 2	Zone 3	Zone 4	Zone 5	Zone 6
Maximum Decay Heat (kW/FA)	0.22	NA	NA	0.48	0.54	0.70
Maximum Decay Heat per Zone (kW)	1.98	NA	NA	11.52	6.48	11.20
Maximum Decay Heat per DSC (kW)	31.2					

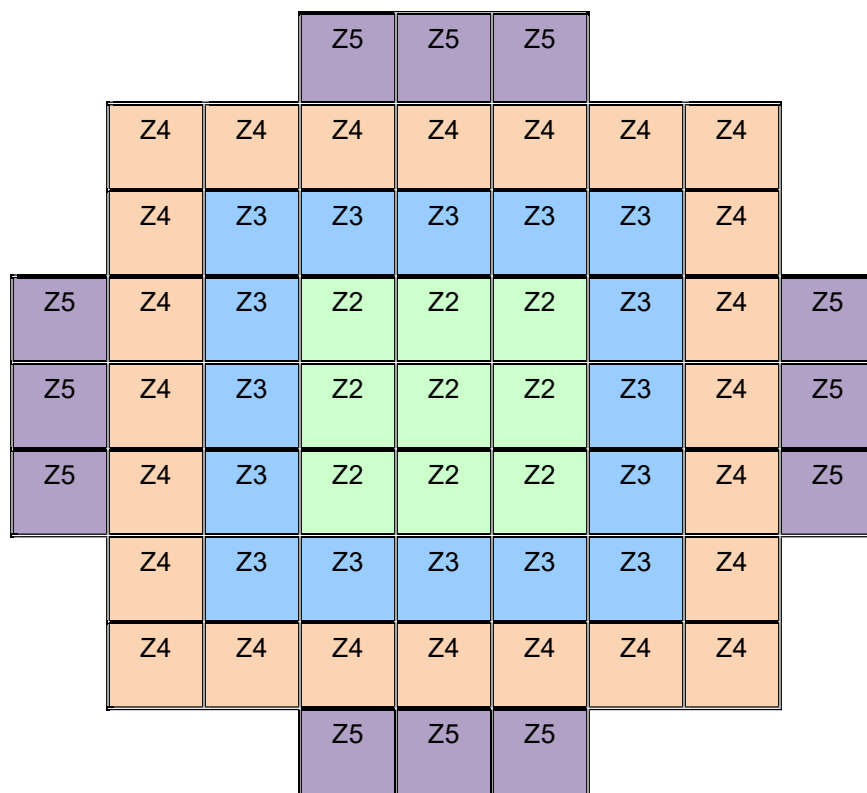
**Figure 4F**  
**Heat Load Zone Configuration 6 for the 61BTH Type 2 DSC**



	Zone 1	Zone 2	Zone 3	Zone 4	Zone 5	Zone 6
Maximum Decay Heat (kW/FA)	NA	NA	NA	0.48	0.54	NA
Maximum Decay Heat per Zone (kW)	NA	NA	NA	12.00	19.44	NA
Maximum Decay Heat per DSC (kW)	31.2 <sup>(1)</sup>					

<sup>(1)</sup> Adjust payload to maintain total DSC heat load within the specified limit.

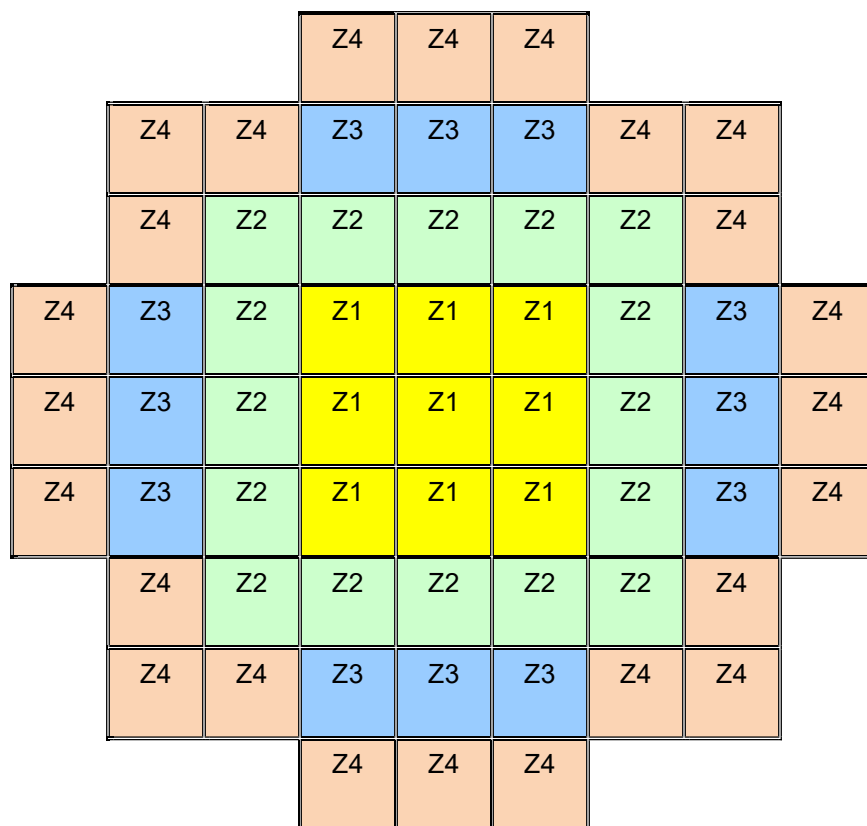
**Figure 4G**  
**Heat Load Zone Configuration 7 for the 61BTH Type 2 DSC**



	Zone 1	Zone 2	Zone 3	Zone 4	Zone 5	Zone 6
Maximum Decay Heat (kW/FA)	NA	0.35	0.393	0.48	0.54	NA
Maximum Decay Heat per Zone (kW)	NA	3.15	6.288	11.52	6.48	NA
Maximum Decay Heat per DSC (kW)	27.4 <sup>(1)</sup>					

<sup>(1)</sup> Adjust payload to maintain total DSC heat load within the specified limit.

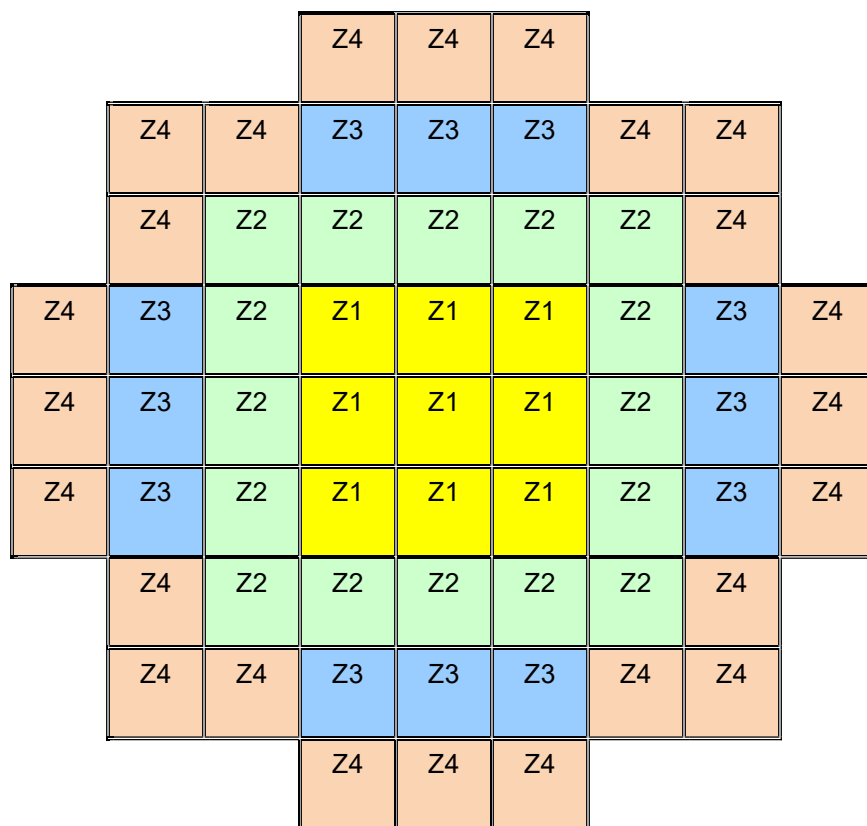
**Figure 4H**  
**Heat Load Zone Configuration 8 for the 61BTH Type 2 DSC**



	Zone 1	Zone 2	Zone 3	Zone 4
Maximum Decay Heat (kW/FA)	0.393	0.48	0.35	0.35
Maximum Decay Heat per Zone (kW)	3.54	7.68	4.2	8.4
Maximum Decay Heat per DSC (kW)	22.0 <sup>(1)</sup>			

Note 1: Adjust payload to maintain total canister heat load within the specified limit.

**Figure 4I**  
**Heat Load Zone Configuration 9 for the 61BTH Type 2 DSC**

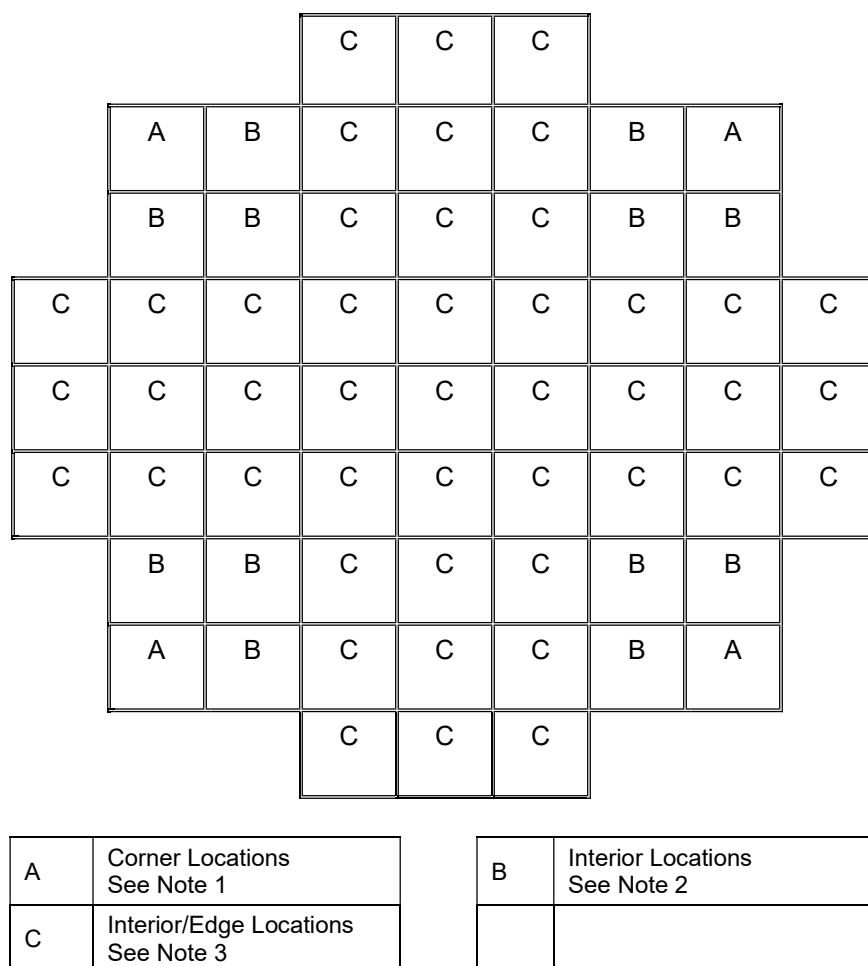


	Zone 1	Zone 2	Zone 3	Zone 4
Maximum Decay Heat (kW/FA)	0.393	0.48 <sup>(2)</sup>	1.20 <sup>(2)</sup>	0.48 <sup>(2)</sup>
Maximum Decay Heat per Zone (kW)	3.54	7.68	14.4	11.52
Maximum Decay Heat per DSC (kW)	31.2 <sup>(1)</sup>			

Note 1: Adjust payload to maintain total canister heat load within the specified limit.

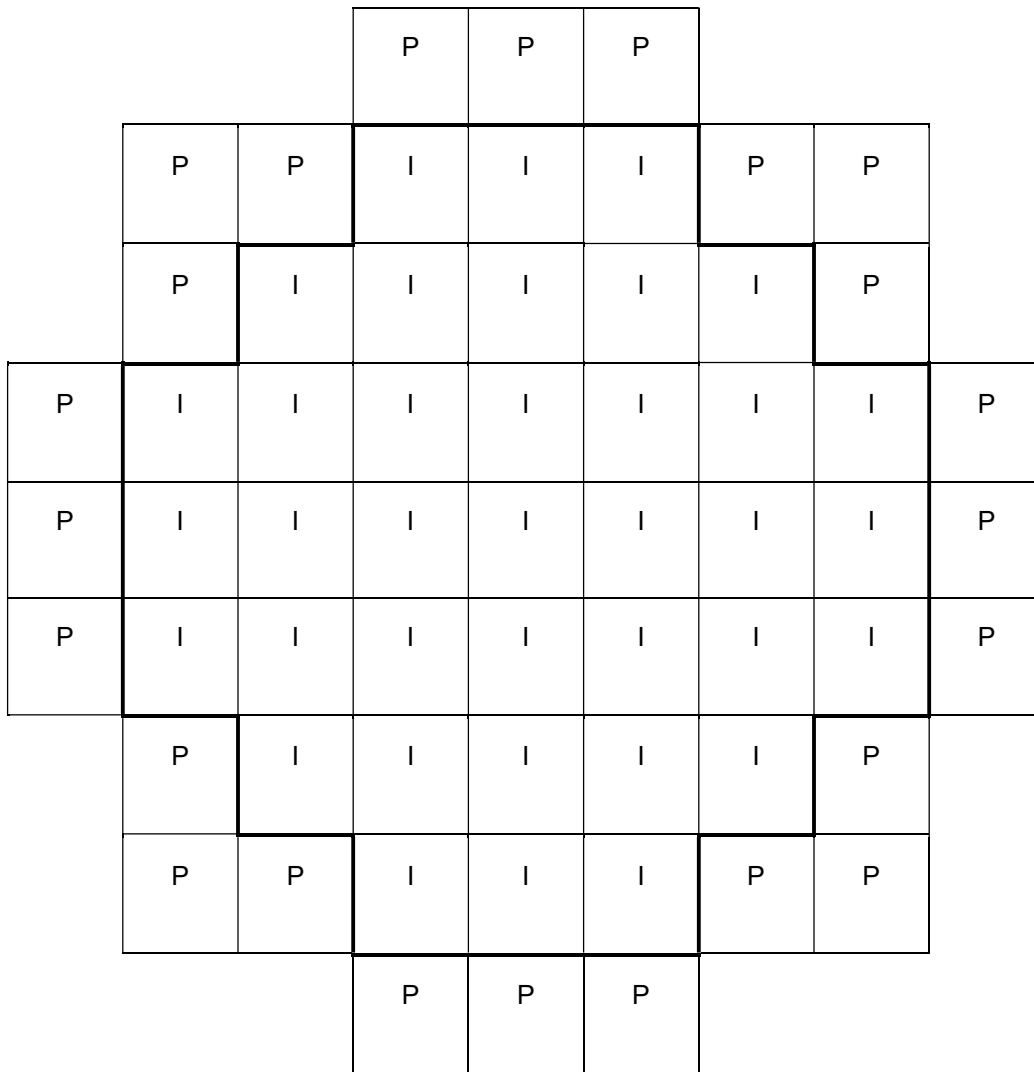
Note 2: If the maximum decay heat per FA in Zone 3 is greater than 0.9 kW, the maximum decay heat per FA in Zone 2 and Zone 4 shall be less than or equal to 0.393 kW.

**Figure 4J**  
**Heat Load Zone Configuration 10 for the 61BTH Type 2 DSC**



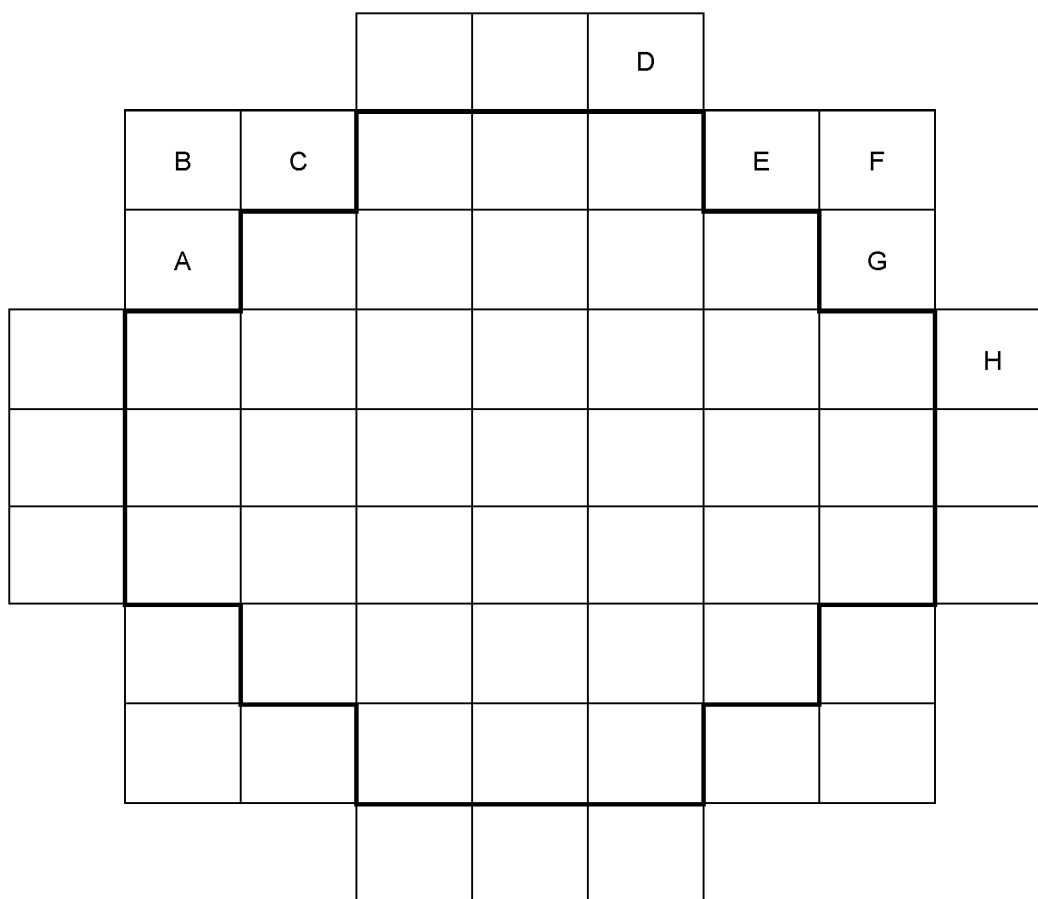
- Note 1: When loading up to 4 damaged or 4 failed assemblies, these must be placed in corner “A” locations, and the remaining locations “B” and “C” shall be loaded with intact fuel. If fewer than 4 damaged or 4 failed assemblies are to be stored, the remaining “A” locations may be loaded with intact fuel provided they meet the respective damaged or failed enrichment limits of Table 10 or Table 11. Damaged and failed fuel shall not be mixed, i.e., up to four damaged assemblies may be stored, or up to four failed assemblies may be stored in “A” locations.
- Note 2: If loading more than four damaged assemblies, place first four damaged assemblies in the corner “A” locations per Note 1, and up to 12 additional damaged assemblies in these interior “B” locations, with the remaining intact in a 61BTH Type 2 Basket. The maximum lattice average initial enrichment of assemblies (damaged or intact stored in the 2x2 cells) is limited to the “Five or More Damaged Assemblies” column of Table 10. For the 61BTH Type 2 DSC containing both damaged and failed fuel assemblies, this enrichment is limited to the “and up to 12 Damaged Assemblies” column of Table 11.
- Note 3: If loading more than 16 damaged assemblies, place the first 57 damaged assemblies in the interior/edge “C” and the interior “B” locations. Place the remaining four intact or damaged assemblies in the corner “A” locations. The maximum lattice average initial enrichments of assemblies is limited to the “Remaining Four Intact Assemblies” or “Remaining Four Damaged Assemblies” column of Table 12.

**Figure 5**  
**Location of Damaged and Failed Fuel Assemblies inside the 61BTH Type 2 DSC**



**Figure 6**  
**Peripheral (P) and Inner (I) Fuel Locations for the 61BTH Type 2 DSC**



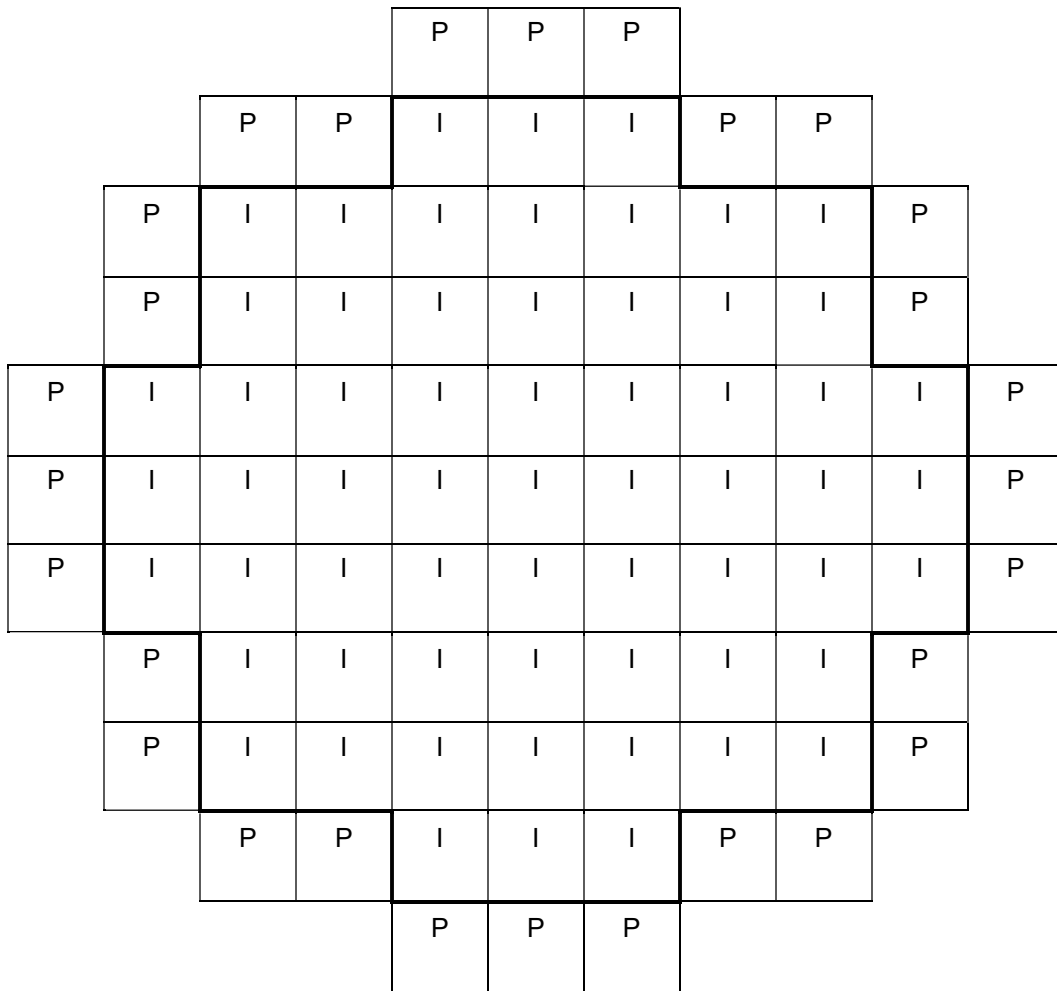


RECONSTITUTED FUEL ASSEMBLIES with  $\leq 5$  irradiated stainless steel rods may be loaded into all peripheral locations (i.e., not restricted). See Figure 6 for peripheral locations.

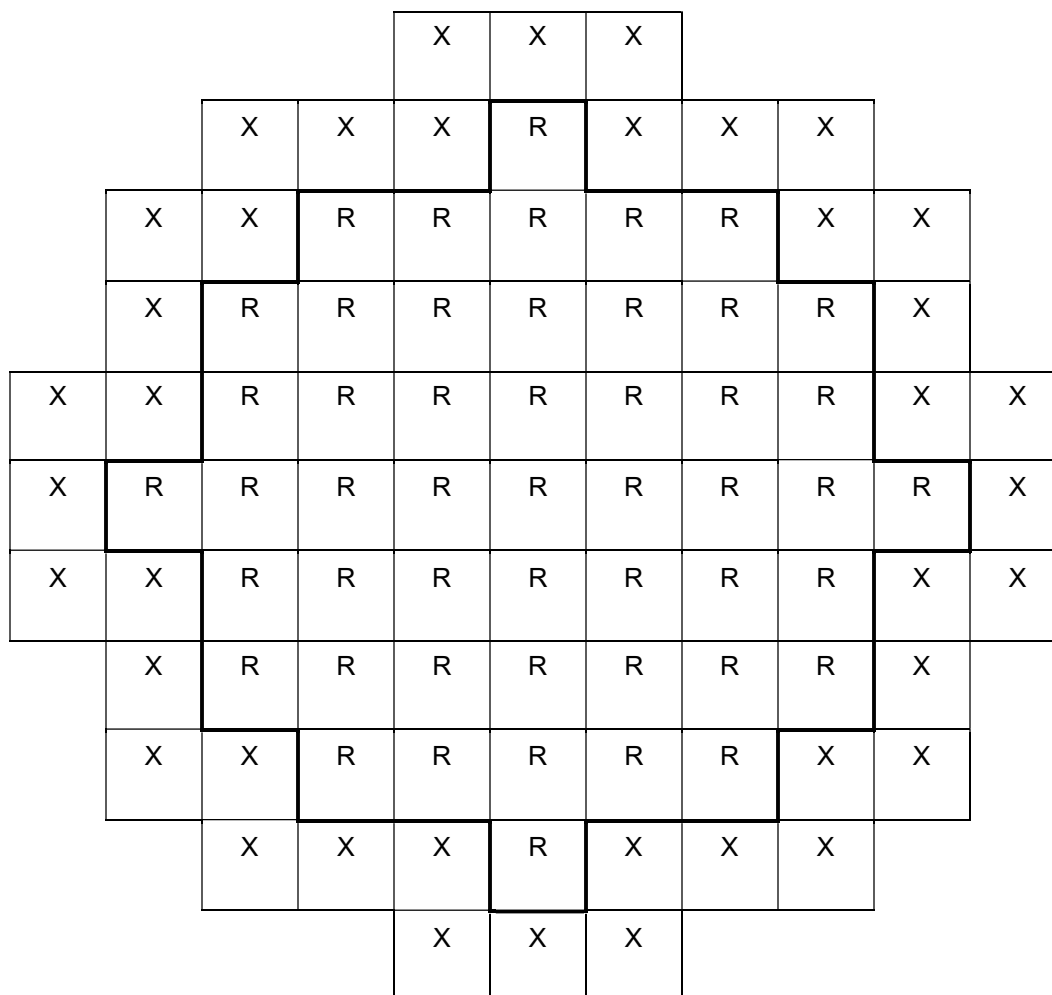
A RECONSTITUTED FUEL ASSEMBLY with  $> 5$  and  $\leq 10$  irradiated stainless steel rods may be loaded in any peripheral location, with additional restrictions in accordance with Section 2.3. Examples:

- If Location B contains a RECONSTITUTED FUEL ASSEMBLY with  $> 5$  irradiated stainless steel rods, peripherally adjacent Locations A and C shall contain fuel assemblies that do not contain irradiated stainless steel rods.
- If Locations E and G contain RECONSTITUTED FUEL ASSEMBLIES with  $> 5$  irradiated stainless steel rods, peripherally adjacent Locations D, F, and H shall contain fuel assemblies that do not contain irradiated stainless steel rods.

**Figure 7**  
**Peripheral Location Restrictions for Reconstituted Fuel with Irradiated Stainless Steel Rods for the 61BTH Type 2 DSC**



**Figure 8**  
**Peripheral (P) and Inner (I) Fuel Locations for the EOS-89BTH DSC**

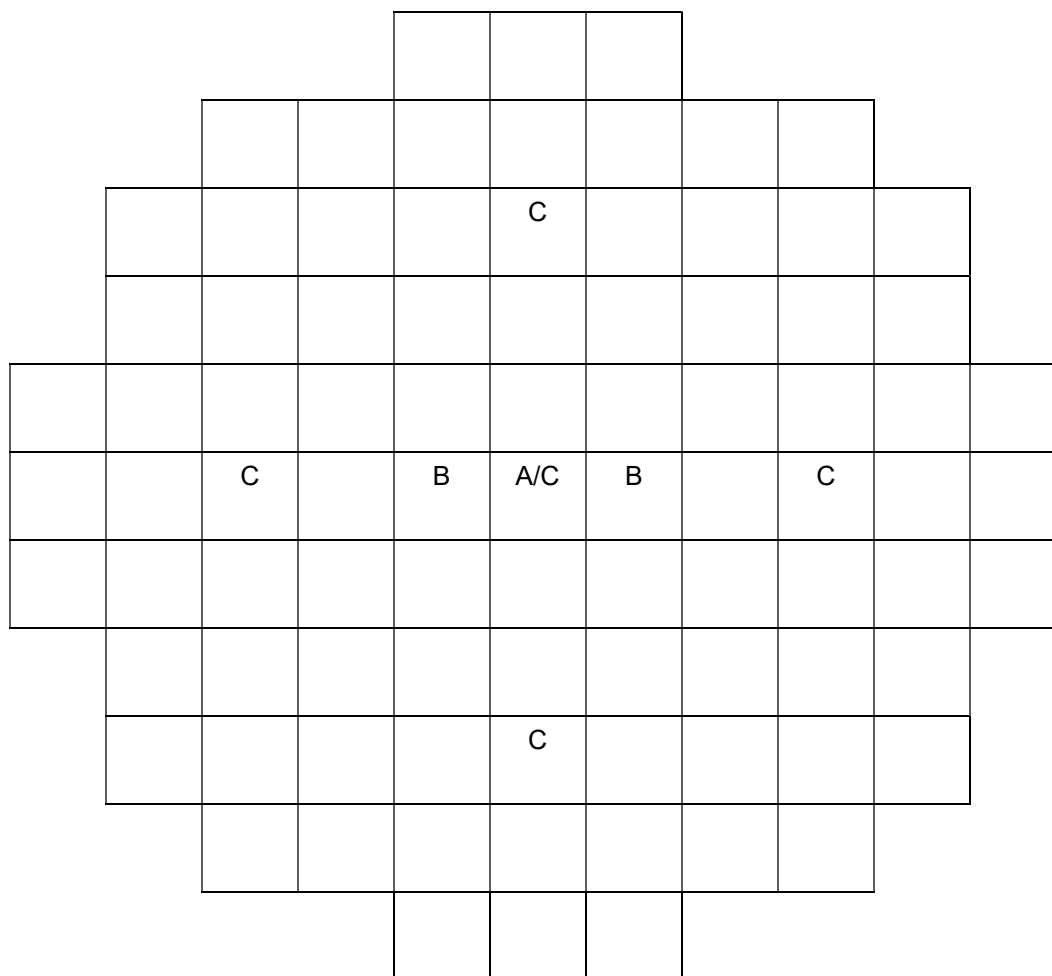


R = RECONSTITUTED FUEL ASSEMBLIES with irradiated stainless steel rods allowed at these locations.

X = RECONSTITUTED FUEL ASSEMBLIES with irradiated stainless steel rods not allowed at these locations.

Note: No restrictions on location for RECONSTITUTED FUEL ASSEMBLIES that do not contain irradiated stainless steel rods.

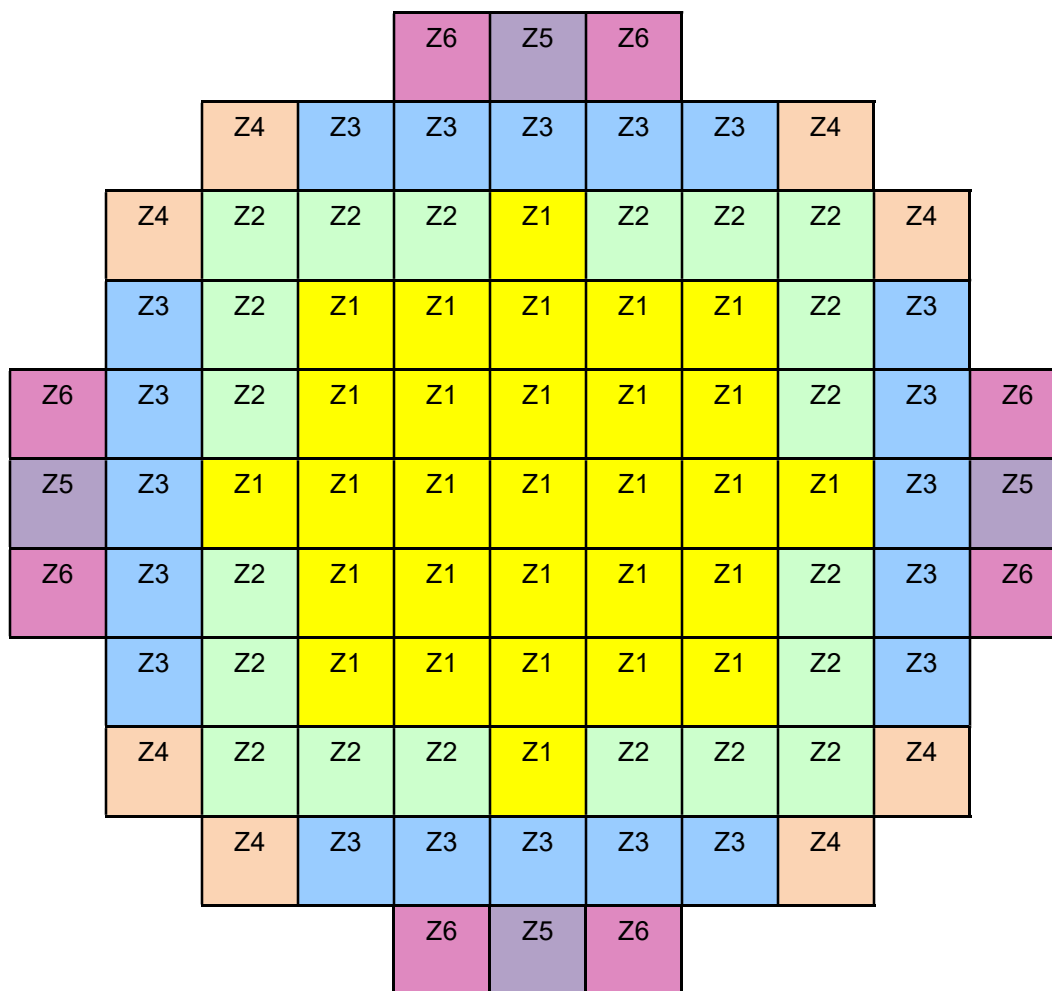
**Figure 9**  
**EOS-89BTH DSC Allowed Reconstituted Fuel Locations for Transfer in the EOS-TC108**



Note:

1. Location identified as “A” is for empty placement in 88-FA Loading
2. Locations identified as “B” are for empty placements in 87-FA Loading
3. Locations identified as “C” are for empty placements in 84-FA Loading

**Figure 10**  
**Empty Locations in Short-Loading Configurations for the EOS-89BTH DSC**

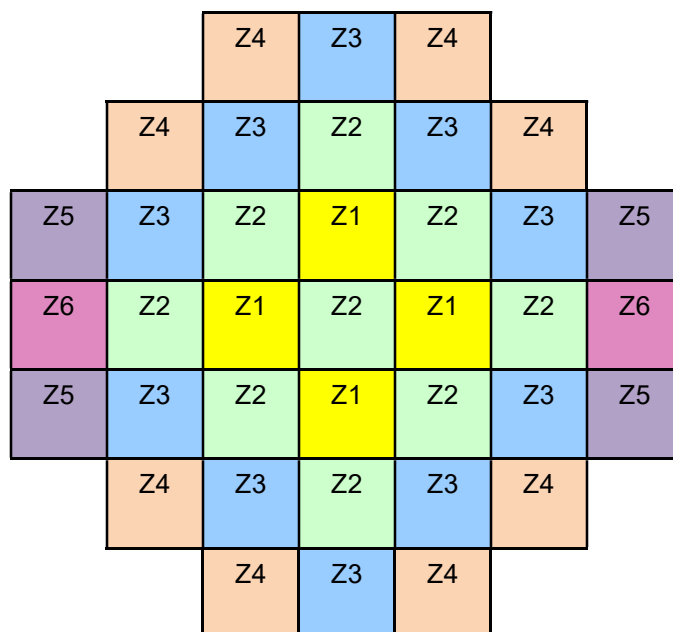


Zone No.	Z1	Z2	Z3	Z4	Z5	Z6
Max. Decay Heat per SFA (kW)	0.40	0.60	1.30	1.70	1.30	1.70
No. of Fuel Assemblies	29	20	20	8	4	8
Heat Load Per Zone	11.6	12.0	26.0	13.6	5.2	13.6
Max. Decay Heat per DSC (kW)	See Note 1 for EOS-HSM and Note 2 for HSM-MX					

Notes:

1. Maximum heat load for EOS-89BTH DSC during Storage is 48.2 kW in EOS-HSM.
2. Maximum heat load for EOS-89BTH DSC during Storage is 48.2 kW in lower compartment of HSM-MX and 41.8 kW in upper compartment of HSM-MX.

**Figure 11**  
**Maximum Heat Load Configuration 1 for EOS-89BTH DSC (MHLC-89-1) Transferred in the EOS-TC125**

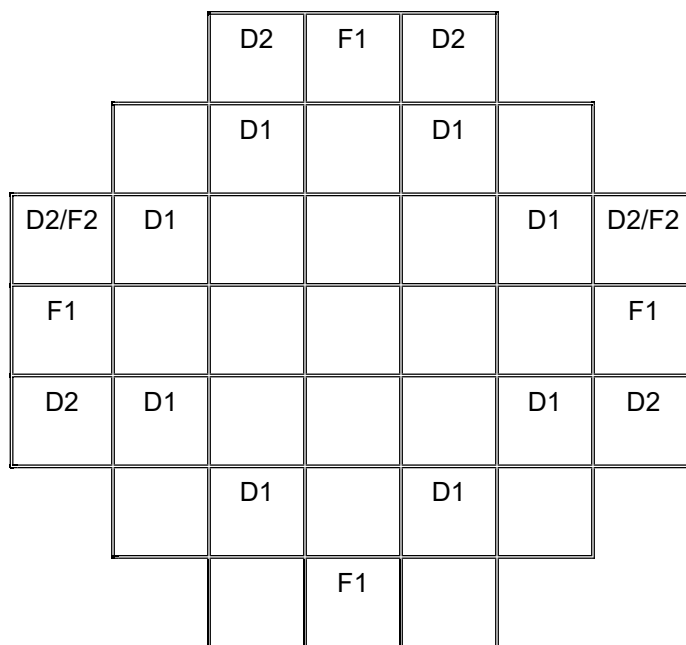


Zone No.	Z1	Z2	Z3	Z4	Z5	Z6
Max. Decay Heat per SFA (kW)	1.5	1.0	2.4	3.5	4.3	1.6
No. of Fuel Assemblies	4	9	10	8	4	2
Heat Load Per Zone	6.0	9.0	24.0	28.0	17.2	3.2
Max. Decay Heat per DSC (kW)	See Note 1					

Notes:

- Maximum heat load for EOS-37PTH DSC during Storage is 50.0 kW in the EOS-HSM.
- See Figure 13 for Damaged/failed fuel locations.
- MHLC-37-1 is only applicable for transfer operations in an EOS-TC125 or EOS-TC135 transfer cask and storage in an EOS-HSM storage module. It is not applicable to the following configurations:
  - transfer in an EOS-TC108 transfer cask and storage in either an EOS-HSM or HSM-MX storage module or
  - transfer in an EOS-TC125 or EOS-TC135 transfer cask and storage in an HSM-MX storage module.

**Figure 12**  
**Maximum Heat Load Configuration 1 for EOS-37PTH DSC (MHLC-37-1) Transferred in the EOS-TC125/135 AND Stored in the EOS-HSM**



Notes:

1. The damaged fuel locations are marked with a "D1" for configuration 1, and "D2" for configuration 2. Only one configuration may be loaded in each DSC.
2. The Failed fuel locations are marked with an "F1" for configuration 1, and "F2" for configuration 2. Only one configuration may be loaded in each DSC. Failed fuel in all configurations is limited to 0.8 kW.
3. Damaged and failed fuel shall not be loaded in the same DSC.

**Figure 13**  
**Damaged and Failed Fuel Configurations for the EOS-37PTH DSC**

		X	X	X		
	X	R	R	R	X	
X	R	R	R	R	R	X
X	R	R	R	R	R	X
X	R	R	R	R	R	X
	X	R	R	R	X	
		X	X	X		

R = RECONSTITUTED FUEL ASSEMBLIES with irradiated stainless steel rods allowed at these locations.

X = RECONSTITUTED FUEL ASSEMBLIES with irradiated stainless steel rods not allowed at these locations.

Note: No restrictions on location for RECONSTITUTED FUEL ASSEMBLIES that do not contain irradiated stainless steel rods.

**Figure 14**  
**EOS-37PTH DSC Allowed Reconstituted Fuel Locations for Transfer in the EOS-TC108**