

**HOLTEC INTERNATIONAL**

**HI-STAR 100 CERTIFICATE OF COMPLIANCE 71-9261**

**CERTIFICATE AMENDMENT REQUEST 9261-1**



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November 24, 1999

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

**Subject:** NRC 10 CFR 71 Certificate of Compliance No. 9261, Docket No. 71-9261  
License Amendment Request 9261-1

**References:**

1. Holtec Project No. 5014
2. Holtec Safety Analysis Report No. HI-951251, Revision 8
3. Holtec License Amendment Request 1008-1, dated November 24, 1999

Dear Sir:

Pursuant to 10 CFR 71.31(b), Holtec International hereby submits License Amendment Request (LAR) 9261-1, Revision 0, proposing certain amendments to 10 CFR 71 Certificate of Compliance (CoC) No. 9261 for the HI-STAR 100 transportation package. Information describing and justifying the changes requested by this LAR is contained in the attachments listed below. In preparing this amendment request package, we have intentionally included non-mandatory material, such as marked-up and final versions of the CoC, and proposed Safety Analysis Report (SAR) changes. This non-mandatory information adds to the overall bulk of the submittal, but should greatly facilitate the NRC staff's review effort. A final Revision 9 of the HI-STAR 100 SAR will be submitted within 90 days of the issuance of the amended Certificate of Compliance.

**Attachment 1:** Summary of Proposed Changes, including the descriptions, reasons, and justifications for the proposed changes.

**Attachment 2:** Mark-ups of Proposed CoC Changes, Including Appendix A (strikeout/italic form).

**Attachment 3:** Proposed Revised CoC, Including Appendix A (final form).

**Attachment 4:** Draft New Certificate Drawings.

**Attachment 5:** Proposed Revision 9 Changes to the HI-STAR Safety Analysis Report .

This LAR proposes changes to the CoC, including Appendix A; the design drawings referenced by the CoC; and the SAR which include (1) editorial corrections and clarifications, (2) revisions

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to limits for existing fuel array/classes, (3) two new fuel array/classes, (4) two new fuel canisters, and (5) antimony-beryllium neutron sources. The new fuel canisters added are those in which Dresden Unit 1 fuel assemblies previously stored at West Valley are now stored in Dresden Units 2 and 3 spent fuel pools. Please note that authorization for *transportation* of PWR fuel assemblies containing non-fuel hardware in the HI-STAR 100 System is not being requested at this time. Authorization for *storage* of non-fuel hardware (Burnable Poison Rod Assemblies (BPRAs) and Thimble Plug Devices (TPDs)) is being requested under a separate LAR for the HI-STAR 100 Part 72 CoC 1008 (Reference 3). Aside from this difference, the certificate drawings discussed below, and certain editorial changes that are unique to the respective CoCs, the amendment requests for HI-STAR storage and transportation are identical.

Also included in this amendment request is a set of "certificate drawings" proposed to be added as Appendix B to the CoC in accord with NRC's previous instructions. These certificate drawings contain all dimensional, welding, NDE, and Code compliance information appropriate for a transport CoC, but dispense with the non-significant bits of data which have no reference in the SAR, but which in the real world of custom fabrication would, inevitably, vary from one overpack unit to another. Recognizing the need to pre-empt repetitive amendment requests, the SFPO had asked us prior to the certification issuance to recast our existing licensing drawings on the SAR into Certificate Drawings with all safety-significant information clearly set down. Unfortunately, because of paucity of time, the review of these enhanced drawings could not occur before the issuance of the transport CoC. Through this amendment request we seek to fulfill our commitment with respect to the Certificate Drawings that could not be achieved in the original CoC. These drawings are fully consistent with licensing drawings submitted with the sister storage amendment request number 1008-1 (Ref. 3). They are numbered the same except that the certificate drawing numbers are prefixed with a "C." Certain of the "C" drawings, however, are unique to transportation (e.g., impact limiter drawings). These are enhanced versions of the drawings contained in Revision 8 of the transportation SAR.

In summary, the certificate drawings, created to ensure a high-quality transportation package meeting all licensing requirements, minimize extraneous details, but contain all critical dimensions. Extraneous dimensions/notes which do not bear on the safety analyses have been deleted to minimize the need for repetitive and/or non-safety significant amendment requests in the future. In all cases the safety margins reported in our SAR and in the NRC's Safety Evaluation Report remain robust. All changes in the drawings and TSAR text material have been subjected to our rigorous multi-disciplinary engineering change acceptance review process and appropriately documented in our quality files.



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In order to be able to implement these enhancements and ensure our ability to certify all existing and future HI-STAR 100 Systems for dual-purpose use, we request approval of this amendment request by February 28, 2000.

This submittal also contains information in the form of a Holtec Standard Procedure (HSP-107) which is commercially sensitive to Holtec International and is treated by us with strict confidentiality. This information is of the type described in 10CFR2.790(b)(4). The entirety of this procedure is considered proprietary to Holtec. The attached affidavit sets forth the bases for which the information is required to be withheld by the NRC from further disclosure, consistent with these considerations and pursuant to the provisions of 10CFR2.790(b)(1). It is therefore requested that the proprietary information enclosed be withheld from public disclosure in accordance with applicable NRC regulations.

We appreciate the SFPO's efforts in working through this first-of-a-kind evolution in dry spent fuel storage and transportation technology.

Sincerely,

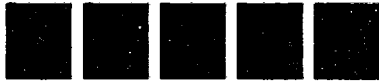
Brian Gutherman  
Licensing Manager

Approved:

K. P. Singh, Ph.D., P.E.  
President and CEO

Document I.D.: 5014355

Attachments: 1 - 5: As Stated Above  
6. Affidavit Pursuant to 10 CFR 2.790



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Enclosure: Holtec Standard Procedure HSP-107

Cc: Ms. Virginia Tharpe, USNRC, (10 hard copies, w/attach and encl., and floppy disk of cover letter and Attachments 1 through 3)

Cc: Mr. E. W. Brach (cover letter only)  
Ms. S. Frant-Shankman (cover letter only)  
Mr. R. Chappell (cover letter only)

**Technical Concurrence:**

Mr. Bernard Gilligan (Configuration Control)

Dr. Alan Soler (Structural Evaluation)

Dr. Indresh Rampall (Thermal Evaluation)

Mr. Kris Cummings (Containment Evaluation)

Dr. Everett Redmond II (Shielding Evaluation)

Dr. Stefan Anton (Criticality Evaluation)

Mr. Steve Agace (Operations)

*[Handwritten signatures and initials on lines]*  
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*Alan Soler*  
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*Indresh Rampall*  
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*[Signature] for Stefan Anton*  
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*S. Agace*  
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