

HOLTEC INTERNATIONAL

HI-STAR 100 CERTIFICATE OF COMPLIANCE 72-1008

CERTIFICATE AMENDMENT REQUEST 1008-1



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November 24, 1999

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

Subject: NRC 10 CFR 72 Certificate of Compliance No. 1008, TAC L22019
License Amendment Request 1008-1

References: 1. Holtec Project No. 5014
2. Holtec Topical Safety Analysis Report No. HI-941184, Revision 10.

Dear Sir:

Holtec International hereby submits License Amendment Request (LAR) 1008-1, Revision 0, proposing certain amendments to 10 CFR 72 Certificate of Compliance (CoC) No. 1008 and its supporting Topical Safety Analysis Report for the HI-STAR 100 System. 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 Topical Safety Analysis Report (TSAR) 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 11 of the HI-STAR 100 TSAR will be submitted within 90 days of the date of publication of the final rulemaking that issues the CoC amendment.

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

Attachment 2: Mark-ups of Proposed Changes to CoC Appendices A and B (strikeout/italic format).

Attachment 3: Proposed Revised CoC Appendices A and B (final form).

Attachment 4: Drawing Revision Summary, Revised Holtec Design Drawings, and New Dresden Unit 1 Damaged Fuel Canister and Thoria Rod Canister Drawings.

Attachment 5: Proposed Revision 11 Changes to the HI-STAR Topical Safety Analysis Report.

This LAR proposes changes to the Appendices to the CoC, the design drawings, and the TSAR which include 1) editorial corrections and clarifications, 2) revisions to limits for existing fuel

NFBF

PDR APPROX 07201008



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array/classes 3) two new fuel array/classes, 4) two new fuel canisters, 5) two types of non-fuel PWR hardware, and 6) 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.

The drawing changes (indicated by "Rev triangles" in the body of the design drawings and Bills-of-Material) are entirely due to the minor errors, internal consistencies, and ambiguities in the previous revisions which have been detected during the manufacturing process of the prototype and the first production unit (Serial No. 001) for Plant Hatch. The changes to the drawings accordingly seek to clarify inspection criteria, remove ambiguity in verbiage, provide explicit design direction to the manufacturer, eliminate internal inconsistencies, and replace unfabricable details with those that can be fabricated with reduced welding-induced distortion. In some cases, where experience has shown that a higher quality level can be achieved through well-calibrated fixturing, the recourse to inherently inferior palliatives (such as shims) has been removed to assure improved hardware quality. In all cases, the safety margins reported in the TSAR and in the NRC's Safety Evaluation Report continue to 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.

In order to be able to implement these enhancements into the ongoing fabrication of the HI-STAR 100 Systems for Southern Company's Plant Hatch and Commonwealth Edison's Dresden Unit 1, and to support defueling of the D-1 pool in ca. 2000, it is essential that we receive NRC's approval of this amendment by February 28, 2000. We believe that the scope of this amendment request, as it relates to the underlying design analyses, is minor enough that direct-to-final rulemaking would be the appropriate process for approval.

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.



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We appreciate the SFPO's consideration of our request for an expedited review and approval of this amendment application.

Sincerely,

Brian Gutherman, P.E.
Licensing Manager

Approved:

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

Document I.D.: 5014354

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

Enclosure: Holtec Standard Procedure HSP-107

Cc: Ms. Virginia Tharpe, USNRC, (10 hard copies, w/attach and encl.; one HI-STAR TSAR, Revision 10 on CD-ROM; and floppy disk of cover letter and Attachments 1 through 3)

Dr. Stan Turner Florida Operations Center (cover letter only)
Mr. E. W. Brach (cover letter only)
Ms. S. Frant-Shankman (cover letter only)
Mr. Ross Chappell (cover letter only)



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Technical Concurrence:

Mr. Bernard Gilligan (Configuration Control)

Dr. Alan Soler (Structural Evaluation)

Dr. Indresh Rampall (Thermal/Accident Evaluations)

Dr. Everett Redmond II (Shielding Evaluation)

Dr. Stefan Anton (Criticality Evaluation)

Mr. Kris Cummings (Confinement Evaluation)

Mr. Steve Agace (Operations)

Mr. Mark Soler (Quality Assurance)

[Handwritten signatures on lines]
Bernard Gilligan
Alan Soler
Indresh Rampall
Everett Redmond II
Stefan Anton
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Client Distribution (w/ attach. 1, w/o encl.):

Recipient

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Dr. Max DeLong	Private Fuel Storage
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