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**BY OVERNIGHT MAIL**

November 22, 2000

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

Subject: USNRC Docket No. 72-1014, TAC L23082  
HI-STORM 100 Certificate of Compliance 1014  
HI-STORM License Amendment Request 1014-1, Revision 1, Supplement 2

References: 1. Holtec Project 5014  
2. NRC Letter, Christopher Jackson to Brian Gutherman, Holtec, dated October 30, 2000

Dear Sir:

On November 2, 2000, we received a letter from the NRC describing the results of your acceptance review of our August 31, 2000 License Amendment Request (LAR) 1014-1, Revision 1 (Reference 2). In that letter you requested supplemental information on our submittal that is required to complete NRC's technical review. On November 20, 2000, we provided a response to Item 3 and a partial response to Item 4 of the Attachment to the Reference 2 letter. This correspondence provides a commitment to respond to Item 1 and the balance of Item 4. In addition, this letter and its enclosures provide the response to Item 2 as well as two corrections to portions of the LAR package. *There are no new changes proposed.*

The responses to Items 1 and the balance of 4 are currently being prepared. Revised CoC pages and modified proposed Revision 1 FSAR pages will be provided by December 11, 2000 to address the issues related to thermal margins and the storage of high-burnup fuel in the HI-STORM 100 System.

Item 2 has prompted us to re-evaluate the manner in which design basis events that result in potential long-term blockage<sup>1</sup> of the HI-STORM overpack inlet or outlet air ducts is addressed. This new approach has been discussed with our NRC Project Manager. Accordingly, we have deleted previously proposed new Actions B.3.1 and B.3.2 from LCO 3.1.2. We have also clarified the Bases for this LCO in FSAR Appendix 12.A to clearly state that the intent of this LCO is to address those

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<sup>1</sup> Blockage that can potentially last longer than the total completion time of the actions in Limiting Condition for Operation (LCO) 3.1.2. This is a modification to Proposed Change Number 2A in Attachment 1 of the LAR package

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duct blockages that can be postulated to occur from time to time during storage operations (i.e., ANSI/ANS 57.9 Design Event Class II). These events include, for example, loose debris found blocking one or more of the events that is easily removed either manually or with standard maintenance equipment found at a nuclear plant site.

To address the situation where a utility user may have a site-specific design basis event (i.e., ANSI/ANS 57.9 Design Event Classes III and IV), such as a flood, that is postulated to block the air ducts for an extended period of time without the ability to take immediate action to clear the ducts, we have proposed new specification 3.4.9 in Appendix B to the CoC. This new specification allows users that have such an event in their ISFSI design basis to perform an evaluation or analysis to establish that fuel cladding temperatures will not exceed the short term temperature limit for the duration of the event. Additionally, where the evaluation or analysis is not performed, or is unsuccessful in demonstrating that fuel cladding temperatures remain below the limit, these users are required to be equipped to implement alternate means of cooling identified with appropriate administrative controls for their use. Section 11.2.13.4 of the FSAR has been revised to be consistent with this new specification.

The following enclosure are included with this letter as Supplement 2 to LAR 1014-1, Revision 1:

Enclosure 1: Instructions for replacing pages in LAR 1014-1, Revision 1.

Enclosure 2: Replacement pages for marked-up proposed CoC changes.

Enclosure 3: Replacement pages for revised proposed CoC changes.

Enclosure 4: Replacement pages for the FSAR list of effective pages for proposed Revision 1.

Enclosure 5: Replacement pages for FSAR proposed Revision 1.

Proposed revised CoC Appendix B, Table 2.1-4, and proposed Revision 1 FSAR Section 3.4, submitted in October, 2000, were found to have small discrepancies. The allowed maximum burnup for damaged fuel in the MPC-24E/24EF at  $\geq 7$  years cooling time was found to have a typographical error and has been corrected. The equations on FSAR page 3.4-76 were found to have small discrepancies that have been corrected, resulting in minor and inconsequential changes to the results when the equations are executed.



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The replacement pages for FSAR section 3.4 include text in shaded presentation, indicating their proprietary status. These pages replace existing pages already covered by the 10 CFR 2.790 affidavit included with our October 6, 2000 submittal of LAR 1014-1, Revision 1, Supplement 1. Therefore, we have not enclosed a new affidavit with this submittal. The replacement pages for proposed FSAR Revision 1 are identified with "Proposed Revision 1A" in the footer and in the updated list of effective pages to maintain document control and distinguish them from previously submitted versions of the same pages.

Those Holtec users who possess controlled copies of LAR 1014-1, Revision 1, Supplement 1, will receive the instructions and replacement pages for their LAR packages under separate cover.

If you have any questions or require additional information, please contact me at (856) 797-0900, extension 668.

Sincerely,

Brian Gutherman, P.E.  
Licensing Manager

Approval:

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

Document ID: 5014407

Enclosures: As Stated

Cc: Mr. Christopher Jackson, USNRC (w/ 10 copies of enclosures)

**Technical Concurrence**

Mr. Evan Rosenbaum (Accident Analysis)

Dr. Alan Soler (Structural Evaluation)