

August 18, 2000

DOCKET NUMBER

PETITION RULE PRM 72-5
(65FR36647)

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Holtec International Supports NEI's petition for rulemaking to streamline the dry storage cask amendment process. Our experience with the CoC amendment process has revealed that a straightforward amendment request, with no formal Requests for Additional Information from the NRC staff, takes nine months to a year to complete after the submittal is made to the NRC. This does not take into account the time to prepare the amendment request submittal.

Our primary concern is that the lengthy nature of the current Part 72 CoC amendment process makes it difficult to respond to our utility customers' needs in a timely manner if a change to a CoC is required. In most cases, the utilities do not have the margin in their fuel load and/or decommissioning schedules to insert a task of nine-months to one year duration. Because of this, users are requesting exemptions to the Part 72 regulation to implement the necessary CoC changes. Our experience indicates that the number of exemption requests will increase dramatically as more utilities load fuel into dry storage casks. If the CoC amendment process is not streamlined, the exemption process will become a routinely used path to obtain NRC approval to implement changes.

An amendment process with the attributes discussed in the NEI petition for rulemaking is appropriate and was prepared with Holtec's input.

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Template = SECY-067

SECY-02