

November 23, 2005

Dr. Stephan Anton
Licensing Manager
Holtec International
555 Lincoln Drive West
Marlton, NJ 08053

SUBJECT: HI-STORM 100, AMENDMENT 4, ACKNOWLEDGMENT REVIEW
(TAC NO. L23923)

Dear Dr. Anton:

On November 7, 2005, Holtec International (Holtec) submitted a License Amendment Request (LAR) application in accordance with 10 CFR Part 72 for an amendment to Certificate of Compliance (CoC) No. 1014 for the HI-STORM 100 Cask System. This amendment proposed to: (a) add additional fuel debris and non-fuel hardware to the approved contents and (b) streamline several loading operations thereby reducing occupational exposures.

This letter acknowledges receipt of your Amendment 4 application and informs you that the application appears to contain the necessary information to begin our technical review. It should be noted, however, that with respect to LAR Proposed Change No. 2, the staff at this time does not consider the elimination of the helium leak test requirement for the vent and drain port cover plates as constituting an acceptable approach for ensuring the integrity of a storage cask confinement boundary. The Nuclear Regulatory Commission (NRC) has recognized that the language of Interim Staff Guidance (ISG) -18, "The Design/Qualification of Final Closure Welds on Austenitic Stainless Steel Canisters as Confinement Boundary for Spent Fuel Storage and Containment Boundary for Spent Fuel transportation," as written, is unclear and may therefore result in misinterpretation and misapplication. The intent of ISG-18 was to provide relief from the helium leak test requirement for the structural lid to shell weld only. No other welds were intended to be subject to this relief. Revised staff guidance is being prepared to provide clarification of the language contained in ISG-18. During the course of the technical review for this proposed amendment when scheduled, the staff will provide additional clarification of its determination and findings pertinent to this proposed change.

At this time we have not established a schedule for the technical review of your amendment request. The staff is currently reviewing your proposed Amendment 3 to the HI-STORM 100 Cask System CoC. We recognize that you have requested parallel reviews with Amendment 3 and we are examining the resource implications of conducting concurrent technical reviews. However, we are placing priority on the review of your Amendment 3 application. We will inform you when a schedule for review of Amendment 4 has been established. At that time we would suggest a public meeting be arranged to discuss the content of the Amendment 4 application.

In general, no additional changes to the application will be allowed except for those minor changes that result in responding to a Request for Additional Information. Additional changes, supplements, or enhancements may be treated as a new application.

S. Anton

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Reference Docket No. 72-1014 and TAC No. L23923 in future correspondence related to this licensing action. If you have any questions regarding this matter, you may contact me at (301) 415-8500.

Sincerely,
/RA/

Christopher M. Regan, Senior Project Manager
Licensing Section
Spent Fuel Project Office
Office of Nuclear Material Safety
and Safeguards

Docket No. 72-1014
TAC No. L23923

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Christopher M. Regan, Senior Project Manager
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