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U.S. Nuclear Regulatory Commission
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November 26, 2008

Subject: USNRC Docket No. 72-1014, TAC L24208
HI-STORM 100 Certificate of Compliance 1014, LAR 1014-7

Reference: 1. Holtec Project 5014
2. Holtec Project 1717

Holtec understands that the review of License Amendment Request (LAR) #7 to the HI-STORM 100 Certificate of Compliance (CoC) 1014 is almost complete. This LAR requested approval of the addition of instrument tube tie rods to the Approved Contents in the MPC-24 and MPC-32.

Holtec would like to draw attention to the following minor editorial errors found in approved CoC 1014 Amendment #5 on which the Proposed CoC for this LAR was based.

- a. TS Appendix A, Section 3.1.1, LCO 3.1.1, Required Action C.2 should be C.2.1.
- b. TS Appendix B, Table 2.1-1, III.A.1.e (currently the first e) – section should be changed to III.A.1.d and the burnup units listed in III.A.1.d.i (as corrected) should read “(MWD/MTIHM)” instead of “(MTU/MTIHM)”.
- c. TS Appendix B, Table 2.1-1, III.A.1.e.i (currently the second e) – the “6x6b” should be “6x6B”.
- d. TS Appendix B, Table 2.1-1, IV.A.1.g and V.A.1.g should be modified to remove the two instances of “and DFC” in each statement.
- e. TS Appendix B, Table 2.1-1, V.A.2.d.ii – “Section 2.3” should be “Section 2.4”

Provided as Attachment 1 to this letter are marked up pages of the currently approved CoC 1014 Amendment #5 for HI-STORM 100 with the editorial corrections.

Please contact us if you have any questions.

Sincerely,

Tammie S. Morin
Acting Licensing Manager
Holtec International

cc: Mr. John Goshen, NRC

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LM5501
LMES

Multi-Purpose Canister (MPC)
3.1.1

CONDITION	REQUIRED ACTION	COMPLETION TIME
B. MPC cavity vacuum drying acceptance criteria not met during allowable time.	B.1 Backfill the MPC cavity with helium to a pressure of at least 0.5 atm.	6 hours
C. MPC helium backfill limit not met.	<p>C.1 Perform an engineering evaluation to determine the impact of helium differential.</p> <p><u>AND</u> C.2.1</p> <p>C.2 Develop and initiate corrective actions necessary to return the MPC to an analyzed condition by adding helium to or removing helium from the MPC.</p> <p><u>OR</u></p> <p>C.2.2 Develop and initiate corrective actions necessary to demonstrate through analysis, using the models and methods from the HI-STORM FSAR, that all limits for cask components and contents will be met.</p>	<p>72 hours</p> <p>14 days</p>

ACTIONS

Certificate of Compliance No. 1014
Appendix A

3.1.1-2

Table 2.1-1 (page 11 of 24)
Fuel Assembly Limits

III. MPC MODEL: MPC-68 and MPC-68FF

A. Allowable Contents

1. Uranium oxide or MOX BWR INTACT FUEL ASSEMBLIES listed in Table 2.1-3, with or without channels and meeting the following specifications:

- a. Cladding Type: ZR or Stainless Steel (SS) as specified in Table 2.1-3 for the applicable fuel assembly array/class
- b. Maximum PLANAR-AVERAGE INITIAL ENRICHMENT: As specified in Table 2.1-3 for the applicable fuel assembly array/class.
- c. Initial Maximum Rod Enrichment: As specified in Table 2.1-3 for the applicable fuel assembly array/class.

d. ~~e.~~ Post-irradiation Cooling Time and Average Burnup Per Assembly

- i. Array/Classes 6x6A, 6x6B, 6x6C, 7x7A, and 8x8A: Cooling time ≥ 18 years and an average burnup $\leq 30,000$ MWD/MTU (or $\frac{\text{MTU}}{\text{MTIHM}}$)
MWD
- ii. Array/Class 8x8F: Cooling time ≥ 10 years and an average burnup $\leq 27,500$ MWD/MTU.
- iii. Array/Classes 10x10D and 10x10E: Cooling time ≥ 10 years and an average burnup $\leq 22,500$ MWD/MTU.
- iv. All Other Array/Classes: As specified in Section 2.4.

Table 2.1-1 (page 12 of 24)
Fuel Assembly Limits

III. MPC MODEL: MPC-68 and MPC-68FF (continued)

A. Allowable Contents (continued)

e. Decay Heat Per Assembly

- i. Array/Classes 6x6A, 6x6B, 6x6C, 7x7A, and 8x8A ≤ 115 Watts
- ii. Array/Class 8x8F ≤ 183.5 Watts
- iii. Array/Classes 10x10D and 10x10E ≤ 95 Watts
- iv. All Other Array/Classes As specified in Section 2.4.

f. Fuel Assembly Length

- i. Array/Class 6x6A, 6x6B, 6x6C, 7x7A, or 8x8A ≤ 135.0 inches (nominal design)
- ii. All Other Array/Classes ≤ 176.5 inches (nominal design)

g. Fuel Assembly Width

- i. Array/Class 6x6A, 6x6B, 6x6C, 7x7A, or 8x8A ≤ 4.70 inches (nominal design)
- ii. All Other Array/Classes ≤ 5.85 inches (nominal design)

h. Fuel Assembly Weight

- i. Array/Class 6x6A, 6x6B, 6x6C, 7x7A, or 8x8A ≤ 550 lbs, including channels
- ii. All Other Array/Classes ≤ 730 lbs, including channels

Table 2.1-1 (page 18 of 24)
Fuel Assembly Limits

IV. MPC MODEL: MPC-24E and MPC-24EF (continued)

A. Allowable Contents (continued)

d. Decay Heat Per Fuel Storage Location:

i. Array/Classes 14x14D, 14x14E, and 15x15G ≤ 710 Watts.

ii. All other Array/Classes As specified in Section 2.4.

e. Fuel Assembly Length: ≤ 176.8 inches (nominal design)

f. Fuel Assembly Width: ≤ 8.54 inches (nominal design)

g. Fuel Assembly Weight: $\leq 1,720$ lbs (including NON-FUEL HARDWARE and BPC) for assemblies that do not require fuel spacers, otherwise, $\leq 1,680$ lbs (including NON-FUEL HARDWARE and BPC).

Table 2.1-1 (page 22 of 24)
Fuel Assembly Limits

V. MPC MODEL: MPC-32 and MPC-32F (cont'd)

A. Allowable Contents (cont'd)

d. Decay Heat Per Fuel
Storage Location:

i. Array/Classes 14x14D,
14x14E, and 15x15G ≤ 500 Watts.

ii. All Other Array/Classes As specified in Section 2.4.

e. Fuel Assembly Length ≤ 176.8 inches (nominal design)

f. Fuel Assembly Width ≤ 8.54 inches (nominal design)

g. Fuel Assembly Weight $\leq 1,720$ lbs (including NON-FUEL
HARDWARE and DFC) for assemblies that
do not require fuel spacers; otherwise,
 $\leq 1,680$ lbs (including NON-FUEL
HARDWARE and DFC)

Table 2.1-1 (page 24 of 24)
Fuel Assembly Limits

V. MPC MODEL: MPC-32 and MPC-32F (cont'd)

A. Allowable Contents (cont'd)

d. Decay Heat Per Fuel Storage Location:

i. Array/Classes 14x14D, 14x14E, and 15x15G ≤ 500 Watts.

ii. All Other Array/Classes As specified in Section 2.3.4

e. Fuel Assembly Length ≤ 176.8 inches (nominal design)

f. Fuel Assembly Width ≤ 8.54 inches (nominal design)

g. Fuel Assembly Weight $\leq 1,720$ lbs (including NON-FUEL HARDWARE and DFC) for assemblies that do not require fuel spacers, otherwise, $\leq 1,680$ lbs (including NON-FUEL HARDWARE and DFC)

B. Quantity per MPC: Up to eight (8) DAMAGED FUEL ASSEMBLIES and/or FUEL DEBRIS in DAMAGED FUEL CONTAINERS, stored in fuel storage locations 1, 4, 5, 10, 23, 28, 29, and/or 32. The remaining fuel storage locations may be filled with PWR INTACT FUEL ASSEMBLIES meeting the applicable specifications.

C. One NSA is permitted for loading.

Note 1: Fuel assemblies containing BPRAs, TPDs, WABAs, water displacement guide tube plugs, orifice rod assemblies, or vibration suppressor inserts may be stored in any fuel storage location. Fuel assemblies containing NSAs may only be loaded in fuel storage locations 13, 14, 19 and/or 20 (see Figure 2.1-3). Fuel assemblies containing CRAs, RCCAs, CEAs or APSRs may only be loaded in fuel storage locations 7, 8, 12-15, 18-21, 25 and/or 26 (see Figure 2.1-3). These requirements are in addition to any other requirements specified for uniform or regionalized fuel loading.