



Holtec Center, One Holtec Drive, Marlton, NJ 08053

Telephone (856) 797-0900

Fax (856) 797-0909

June 4, 2015

Cindy Bladey,  
Office of Administration  
Mail Stop: OWFN-12-H08  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

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80 FR 21770

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Subject: Comments on Draft RIS 2015-XX, "Seismic Stability Analysis Methodologies for Spent Fuel Dry Cask Loading Stack-up Configuration," Docket ID NRC-2015-0098

Dear Ms. Bladey:

Holtec International appreciates the opportunity to present comments on draft RIS 2015-XX on Stack-up. Specifically, Holtec is providing comments on the Federal Register Notice published on April 14, 2015, under Docket ID NRC-2015-0098.

Holtec appreciates the significant work in preparing the draft RIS, and would like to offer the following comments for consideration:

1. The draft RIS states that, "The phasing of the Fourier components associated with the real seed motions *must* be maintained to the maximum extent practical." The use of the word "must" appears to contradict NUREG-0800, SRP Section 3.7.1 Rev. 4, which uses the word "should."
2. The draft RIS describes the "computed" response as the mean plus one standard deviation value of the maximum responses, and specifically identifies maximum rocking angle, maximum sliding displacement, maximum vertical load, and maximum shear load as response parameters. Holtec believes the mean plus one standard deviation value of the maximum responses should be considered as the computed response only for the maximum rocking angle and the maximum sliding displacement. For force and moment results, such as the maximum vertical load and the maximum shear load, the computed response should be taken as the mean value of the maximum responses. This would be consistent with the guidance in Section 3.3.2 of ASCE 4-98 which states: "If five or more accelerograms are used, the mean of the calculated responses may be used in making demand-to capacity checks". Using the mean plus one standard deviation value for forces would be unnecessarily conservative since design codes, such as ASME Section III, Subsection NF, have built-in safety factors associated with their allowable limits.



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Fax (856) 797-0909

If you have any questions, please contact me at (856)-797-0900 ext. 3951.

Sincerely,

Kimberly Manzione  
Licensing Manager  
Holtec International

cc: (via email)  
John Goshen, USNRC  
Mark Lombard, USNRC  
Michelle Sampson, USNRC  
Gordon Bjorkman, USNRC

**Mendiola, Doris**

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**Subject:** FW: Holtec Letter 5014789 - Comments on Draft RIS 2015-XX, Docket ID NRC-2015-0098  
**Attachments:** 5014789-Comments on Draft Stackup RIS.pdf

**From:** Kimberly Manzione [<mailto:K.Manzione@Holtec.com>]

**Sent:** Thursday, June 04, 2015 04:50 PM

**To:** Bladey, Cindy

**Cc:** Goshen, John; Lombard, Mark; Sampson, Michele; Bjorkman, Gordon

**Subject:** Holtec Letter 5014789 - Comments on Draft RIS 2015-XX, Docket ID NRC-2015-0098

Ms. Bladey,

Attached please find Holtec Letter 5014789, submitted to you through the document control desk today, regarding Draft RIS 2015-XX, published for public comment under Docket ID NRC-2015-0098.

If you have any questions, please let me know.

Thank you,

Kimberly Manzione  
Licensing Manager  
Holtec International  
Office: 856-797-0900 ext 3951  
Cell: 609-781-2629

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