



One Holtec Drive, Marlton, NJ 08053

Telephone (856) 797-0900

Fax (856) 797-0909

May 16, 2016

Pierre Saverot, Project Manager
Spent Fuel Licensing Branch
Division of Spent Fuel Management
Office of Nuclear Material Safety and Safeguards
ATTN: Document Control Desk
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Reference: 1. Docket No. 71-9373 (HI-STAR 190 Model)
 2. TAC No. L25056
 3. Holtec Letter 5024001, dated August 7, 2015
 4. USNRC Letters to Holtec dated October 1, 2015 and October 21, 2015
 5. USNRC Letter to Holtec dated April 8, 2016

Subject: Extension Request for Submittal of RAI Responses on HI-STAR 190 Application

Dear Mr. Saverot:

Holtec requests an extension for the submittal of RAI responses in order to allow the necessary enhancements to the HI-STAR 190 application that will address the staff's request for additional information in reference [5].

The extension request is mainly due to the large volume of technical work to be performed to address near term licensing actions. These licensing actions include various ongoing transport and storage applications and license amendments that require a consistent licensing approach in technical areas that are common to multiple package designs, such as transport after interim storage and its corresponding aging considerations. The enhancements in licensing approach will therefore ensure the necessary standardization across Holtec product lines that will also be beneficial to an efficient NRC review process. In the area of shielding in particular, Holtec has been requested to justify the uncertainty in the source terms in a manner that will require a solution that is more involved and detailed than has been required for previous applications of similar package designs with similar contents. In this case it is essential that Holtec develop a path forward on a methodology that is sound yet sustainable for near term applications such as HI-STAR 80 and into the future. Establishing the methodology will require thorough investigations and computer runs. Once the methodology has been established, further shielding evaluations and computer runs can be performed

NMSSDI



One Holtec Drive, Marlton, NJ 08053

Telephone (856) 797-0900

Fax (856) 797-0909

taking into consideration the impact of other shielding related RAIs. Other technical areas of significance that have been factored into this extension request are in the thermal (e.g. determination of analysis discretization error) and structural (e.g. LS-DYNA modeling) areas where time intensive computer runs will need to be performed.

Due to the above reasons and consistent with the high quality demanded by Holtec's QA program, Holtec requests a submittal date of August 5, 2016.

If you have any questions, then please contact me at 856-797-0900, ext. 3698.

Sincerely,

Luis Hinojosa
Corporate Adjunct Licensing Manager
Project Manager of Licensing of Transportation Systems
Holtec International

cc:

Mark Lombard (NRC)
Steve Ruffin (NRC)
Bo Pham (NRC)