

NRC FORM 651

(10-2004)  
10 CFR 72

U.S. NUCLEAR REGULATORY COMMISSION

**CERTIFICATE OF COMPLIANCE  
FOR SPENT FUEL STORAGE CASKS**

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The U.S. Nuclear Regulatory Commission is issuing this Certificate of Compliance pursuant to Title 10 of the *Code of Federal Regulations*, Part 72, "Licensing Requirements for Independent Storage of Spent Nuclear Fuel and High-Level Radioactive Waste" (10 CFR Part 72). This certificate is issued in accordance with 10 CFR 72.238, certifying that the storage design and contents described below meet the applicable safety standards set forth in 10 CFR Part 72, Subpart L, and on the basis of the Final Safety Analysis Report (FSAR) of the cask design. This certificate is conditional upon fulfilling the requirements of 10 CFR Part 72, as applicable, and the conditions specified below.

Certificate No.	Effective Date	Expiration Date	Docket No.	Amendment No.	Amendment Effective Date	Package Identification No.
1014	05/31/00	05/31/20	72-1014	101	TBD	USA/72-1014

Issued To: (Name/Address)

Holtec International  
Holtec Center  
~~555 Lincoln Drive West~~  
Marlton, NJ 08053

Safety Analysis Report Title

Holtec International Inc.,  
Final Safety Analysis Report for the  
HI-STORM 100 Cask System

**CONDITIONS**

This certificate is conditional upon fulfilling the requirements of 10 CFR Part 72, as applicable, the attached Appendix A (Technical Specifications) and Appendix B (Approved Contents and Design Features) for aboveground systems or the attached Appendix A-100U (Technical Specifications) and Appendix B-100U (Approved Contents and Design Features) for underground systems, and the conditions specified below:

**1. CASK****a. Model No.: HI-STORM 100 Cask System**

The HI-STORM 100 Cask System (the cask) consists of the following components: (1) interchangeable multi-purpose canisters (MPCs), which contain the fuel; (2) a storage overpack (HI-STORM), which contains the MPC during storage; and (3) a transfer cask (HI-TRAC), which contains the MPC during loading, unloading and transfer operations. The cask stores up to 32 pressurized water reactor fuel assemblies or 68 boiling water reactor fuel assemblies.

**b. Description**

The HI-STORM 100 Cask System is certified as described in the Final Safety Analysis Report (FSAR) and in the U.S. Nuclear Regulatory Commission's (NRC) Safety Evaluation Report (SER) accompanying the Certificate of Compliance (CoC). The cask comprises three discrete components: the MPC, the HI-TRAC transfer cask, and the HI-STORM storage overpack.

The MPC is the confinement system for the stored fuel. It is a welded, cylindrical canister with a honeycombed fuel basket, a baseplate, a lid, a closure ring, and the canister shell. All MPC components that may come into contact with spent fuel pool water or the ambient environment are made entirely of stainless steel or passivated aluminum/aluminum alloys such as the neutron absorbers. The canister shell, baseplate, lid, vent and drain port cover plates, and closure ring are the main confinement boundary components. All confinement boundary components are made entirely of stainless steel. The honeycombed basket, which contains neutron absorbing material, provides criticality control.

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1. b. Description (continued)

There are nine types of MPCs: the MPC-24, MPC-24E, MPC-24EF, MPC-32, MPC-32F, MPC-68, MPC-68F, MPC-68FF, and MPC-68M. The number suffix indicates the maximum number of fuel assemblies permitted to be loaded in the MPC. All nine MPC models have the same external diameter.

The HI-TRAC transfer cask provides shielding and structural protection of the MPC during loading, unloading, and movement of the MPC from the spent fuel pool to the storage overpack. The transfer cask is a multi-walled (carbon steel/lead/carbon steel) cylindrical vessel with a neutron shield jacket attached to the exterior. Two sizes of HI-TRAC transfer casks are available: the 125 ton HI-TRAC and the 100 ton HI-TRAC. The weight designation indicates the approximate weight of a loaded transfer cask during any loading, unloading, or transfer operation. Both transfer cask sizes have identical cavity diameters. The 125 ton HI-TRAC transfer cask has thicker shielding and larger outer dimensions than the 100 ton HI-TRAC transfer cask.

**Above Ground Systems**

The HI-STORM 100 or 100S storage overpack provides shielding and structural protection of the MPC during storage. The HI-STORM 100S is a variation of the HI-STORM 100 overpack design that includes a modified lid which incorporates the air outlet ducts into the lid, allowing the overpack body to be shortened. The overpack is a heavy-walled steel and concrete, cylindrical vessel. Its side wall consists of plain (un-reinforced) concrete that is enclosed between inner and outer carbon steel shells. The overpack has four air inlets at the bottom and four air outlets at the top to allow air to circulate naturally through the cavity to cool the MPC inside. The inner shell has supports attached to its interior surface to guide the MPC during insertion and removal, provide a medium to absorb impact loads, and allow cooling air to circulate through the overpack. A loaded MPC is stored within the HI-STORM 100 or 100S storage overpack in a vertical orientation. The HI-STORM 100A and 100SA are variants of the HI-STORM 100 family and are outfitted with an extended baseplate and gussets to enable the overpack to be anchored to the concrete storage pad in high seismic applications.

**Underground Systems**

The HI-STORM 100U System is an underground storage system identified with the HI-STORM 100 Cask System. The HI-STORM 100U storage Vertical Ventilated Module (VVM) utilizes a storage design identified as an air-cooled vault or caisson. The HI-STORM 100U storage VVM relies on vertical ventilation instead of conduction through the soil, as it is essentially a below-grade storage cavity. Air inlets and outlets allow air to circulate naturally through the cavity to cool the MPC inside. The subterranean steel structure is seal welded to prevent ingress of any groundwater from the surrounding subgrade, and it is mounted on a stiff foundation. The surrounding subgrade and a top surface pad provide significant radiation shielding. A loaded MPC is stored within the HI-STORM 100U storage VVM in the vertical orientation.

**2. OPERATING PROCEDURES**

Written operating procedures shall be prepared for cask handling, loading, movement, surveillance, and maintenance. The user's site-specific written operating procedures shall be consistent with the technical basis described in Chapter 8 of the FSAR.

**3. ACCEPTANCE TESTS AND MAINTENANCE PROGRAM**

Written cask acceptance tests and maintenance program shall be prepared consistent with the technical basis described in Chapter 9 of the FSAR. At completion of welding the MPC shell to baseplate, an MPC confinement weld helium leak test shall be performed using a helium mass spectrometer. This test shall include the base metals of the MPC shell and baseplate. A helium leak test shall also be performed on the base metal of the fabricated MPC lid. In the field, a helium leak test shall be performed on the vent and drain port confinement welds and cover plate base metal. The confinement boundary leakage rate tests shall be performed in accordance with ANSI N14.5 to "leaktight" criteria. If a leakage rate exceeding the acceptance criteria is detected, then the area of leakage shall be determined and the area repaired per ASME Code Section III, Subsection NB requirements. Re-testing shall be performed until the leakage rate acceptance criterion is met.

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**4. QUALITY ASSURANCE**

Activities in the areas of design, purchase, fabrication, assembly, inspection, testing, operation, maintenance, repair, modification of structures, systems and components, and decommissioning that are important to safety shall be conducted in accordance with a Commission-approved quality assurance program which satisfies the applicable requirements of 10 CFR Part 72, Subpart G, and which is established, maintained, and executed with regard to the cask system.

**5. HEAVY LOADS REQUIREMENTS**

Each lift of an MPC, a HI-TRAC transfer cask, or any HI-STORM overpack must be made in accordance to the existing heavy loads requirements and procedures of the licensed facility at which the lift is made. A plant-specific review (under 10 CFR 50.59 or 10 CFR 72.48, if applicable) is required to show operational compliance with existing plant specific heavy loads requirements. Lifting operations outside of structures governed by 10 CFR Part 50 must be in accordance with Section 5.5 of Appendix A and Sections 3.4.6 and 3.5 (if applicable) of Appendix B, for above ground systems, section 5.5 of Appendix A-100U for the underground systems.

**6. APPROVED CONTENTS**

Contents of the HI-STORM 100 Cask System must meet the fuel specifications given in Appendices B for aboveground systems or B-100U for underground systems to this certificate.

**7. DESIGN FEATURES**

Features or characteristics for the site, cask or ancillary equipment must be in accordance with Appendices B for aboveground systems or B-100U for underground systems to this certificate.

**8. CHANGES TO THE CERTIFICATE OF COMPLIANCE**

The holder of this certificate who desires to make changes to the certificate, which includes Appendices A and A-100U (Technical Specifications) and Appendices B and B-100U (Approved Contents and Design Features), shall submit an application for amendment of the certificate.

**9. SPECIAL REQUIREMENTS FOR FIRST SYSTEMS IN PLACE**

a. For the storage configuration, each user of a HI-STORM 100 Cask and HI-STORM 100U Cask with a heat load equal to or greater than 20 kW shall perform a thermal validation test in which the user measures the total air mass flow rate through the cask system using direct measurements of air velocity in the inlet vents. The user shall then perform an analysis of the cask with the taken measurements to demonstrate that the measurements validate the analytic methods described in Chapter 4 of the FSAR. The thermal validation test and analysis results shall be submitted in a letter report to the NRC pursuant to 10 CFR 72.4 within 180 days of the user's loading of the first cask with heat load equal to or greater than 20 kW. To satisfy condition 9(a) for casks of the same system type (i.e., HI-STORM 100 casks, HI-STORM 100U casks), in lieu of additional submittals pursuant to 10 CFR 72.4, users may document in their 72.212 report a previously performed test and analysis submitted by letter report to the NRC that demonstrates validation of the analytic methods described in Chapter 4 of the FSAR.

b. For transfer configuration, each user of the HI-STORM 100 Cask and HI-STORM 100U Cask shall procure, if necessary, a Supplemental Cooling System (SCS) capable of providing the thermal-hydraulic characteristics (coolant temperature at the annulus inlet, coolant temperature located at the annulus outlet, and coolant flow rate) that will ensure that thermal limits (described in Appendix 2.C of the FSAR) are not exceeded during transfer operations. The thermal-hydraulic characteristics of the SCS shall be determined using the analytical methods described in Chapter 4 for the transfer configuration. For the transfer configuration, each first time user shall measure the SCS thermal-hydraulic characteristics to validate the performance of the SCS. The SCS analysis and validation shall be documented in an update to the 72.212 report within 180 days of the user's first transfer operation with the SCS. Condition 9(b) does not apply to the MPC-68M.

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**10. PRE-OPERATIONAL TESTING AND TRAINING EXERCISE**

A dry run training exercise of the loading, closure, handling, unloading, and transfer of the HI-STORM 100 Cask System shall be conducted by the licensee prior to the first use of the system to load spent fuel assemblies. The training exercise shall not be conducted with spent fuel in the MPC. The dry run may be performed in an alternate step sequence from the actual procedures, but all steps must be performed. The dry run shall include, but is not limited to the following:

- a. Moving the MPC and the transfer cask into the spent fuel pool or cask loading pool.
- b. Preparation of the HI-STORM 100 Cask System for fuel loading.
- c. Selection and verification of specific fuel assemblies to ensure type conformance.
- d. Loading specific assemblies and placing assemblies into the MPC (using a dummy fuel assembly), including appropriate independent verification.
- e. Remote installation of the MPC lid and removal of the MPC and transfer cask from the spent fuel pool or cask loading pool.
- f. MPC welding, NDE inspections, pressure testing, draining, moisture removal (by vacuum drying or forced helium dehydration, as applicable), and helium backfilling. (A mockup may be used for this dry-run exercise.)
- g. Operation of the HI-STORM 100 SCS or equivalent system, if applicable.
- h. Transfer cask upending/downending on the horizontal transfer trailer or other transfer device, as applicable to the site's cask handling arrangement.
- i. Transfer of the MPC from the transfer cask to the overpack/VVM.
- j. Placement of the HI-STORM 100 Cask System at the ISFSI, for aboveground systems only.
- k. HI-STORM 100 Cask System unloading, including flooding MPC cavity, removing MPC lid welds. (A mockup may be used for this dry-run exercise.)

11. The NRC has approved an exemption request by the CoC applicant from the requirements of 10 CFR 72.236(f), to allow a Supplemental Cooling System to provide for decay heat removal in accordance with Section 3.1.4 of Appendices A and A-100U.

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## 12. AUTHORIZATION

The HI-STORM 100 Cask System, which is authorized by this certificate, is hereby approved for general use by holders of 10 CFR Part 50 licenses for nuclear reactors at reactor sites under the general license issued pursuant to 10 CFR 72.210, subject to the conditions specified by 10 CFR 72.212, this certificate, and the attached Appendices A, B, A-100U, and B-100U, as applicable. The HI-STORM 100 Cask System may be fabricated and used in accordance with any approved amendment to CoC No. 1014 listed in 10 CFR 72.214. Each of the licensed HI-STORM 100 System components (i.e., the MPC, overpack, and transfer cask), if fabricated in accordance with any of the approved CoC Amendments, may be used with one another provided an assessment is performed by the CoC holder that demonstrates design compatibility.

FOR THE U.S. NUCLEAR REGULATORY COMMISSION

TBD, Chief  
Licensing Branch  
Division of Spent Fuel Storage and Transportation  
Office of Nuclear Material Safety  
and Safeguards  
Washington, DC 20555

Dated TBD

## Attachments:

1. Appendix A
2. Appendix B
3. Appendix A-100U
4. Appendix B-100U



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## 1.1 Definitions (continued)

LOADING OPERATIONS	LOADING OPERATIONS include all licensed activities on an OVERPACK or TRANSFER CASK while it is being loaded with fuel assemblies. LOADING OPERATIONS begin when the first fuel assembly is placed in the MPC and end when the OVERPACK or TRANSFER CASK is suspended from or secured on the transporter. LOADING OPERATIONS does not include MPC TRANSFER.
MINIMUM ENRICHMENT	MINIMUM ENRICHMENT is the minimum assembly average enrichment. Natural uranium and low enrichment blankets are not considered in determining minimum enrichment.
MULTI-PURPOSE CANISTER (MPC)	MPCs are the sealed spent nuclear fuel canisters which consist of a honeycombed fuel basket contained in a cylindrical canister shell which is welded to a baseplate, lid with welded port cover plates, and closure ring. The MPC provides the confinement boundary for the contained radioactive materials.
MPC TRANSFER	MPC TRANSFER begins when the MPC is lifted off the TRANSFER CASK bottom lid and ends when the MPC is supported from beneath by the OVERPACK or VVM (or the reverse).
NON-FUEL HARDWARE	NON-FUEL HARDWARE is defined as Burnable Poison Rod Assemblies (BPRAs), Thimble Plug Devices (TPDs), Control Rod Assemblies (CRAs), Axial Power Shaping Rods (APSRs), Wet Annular Burnable Absorbers (WABAs), Rod Cluster Control Assemblies (RCCAs), Control Element Assemblies (CEAs), Neutron Source Assemblies (NSAs), water displacement guide tube plugs, orifice rod assemblies, instrument tube tie rods (ITTRs), vibration suppressor inserts, and components of these devices such as individual rods.

(continued)

## 1.1 Definitions (continued)

OVERPACK	OVERPACKs are the casks which receive and contain the sealed MPCs for interim storage on the ISFSI. They provide gamma and neutron shielding, and provide for ventilated air flow to promote heat transfer from the MPC to the environs. The term OVERPACK does not include the TRANSFER CASK.
PLANAR-AVERAGE INITIAL ENRICHMENT	PLANAR AVERAGE INITIAL ENRICHMENT is the average of the distributed fuel rod initial enrichments within a given axial plane of the assembly lattice.
REPAIRED/RECONSTITUTED FUEL ASSEMBLY	Spent nuclear fuel assembly which contains dummy fuel rod(s) that displaces an amount of water greater than or equal to the original fuel rod(s) and/or which contains structural repairs so it can be handled by normal means. <b>If irradiated dummy stainless steel rods are present in the fuel assembly, the dummy/replacement rods will be considered in the site specific dose calculations.</b>
SPENT FUEL STORAGE CASKS (SFSCs)	SFSCs are containers approved for the storage of spent fuel assemblies at the ISFSI. The HI-STORM 100 SFSC System consists of the OVERPACK/VVM and its integral MPC.
STORAGE OPERATIONS	STORAGE OPERATIONS include all licensed activities that are performed at the ISFSI while an SFSC containing spent fuel is situated within the ISFSI perimeter. STORAGE OPERATIONS does not include MPC TRANSFER.
TRANSFER CASK	TRANSFER CASKs are containers designed to contain the MPC during and after loading of spent fuel assemblies and to transfer the MPC to or from the OVERPACK/VVM. The HI-STORM 100 System employs either the 125-Ton or the 100-Ton HI-TRAC TRANSFER CASK.

(continued)



## SFSC Heat Removal System

### 3.1.2

### 3.1 SFSC INTEGRITY

#### 3.1.2 SFSC Heat Removal System

LCO 3.1.2      The SFSC Heat Removal System shall be operable

-----NOTE-----

The SFSC Heat Removal System is operable when 50% or more of the inlet and outlet vent areas are unblocked and available for flow or when air temperature requirements are met.

APPLICABILITY: During STORAGE OPERATIONS.

#### ACTIONS

-----NOTE-----

Separate Condition entry is allowed for each SFSC.

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. SFSC Heat Removal System operable, but partially (<50%) blocked.	A.1 Remove blockage.	N/A
B. SFSC Heat Removal System inoperable.	B.1 Restore SFSC Heat Removal System to operable status.	Table 3-5
C. Required Action B.1 and associated Completion Time not met.	C.1 Measure SFSC dose rates in accordance with the Radiation Protection Program.  <u>AND</u> C.2.1 Restore SFSC Heat Removal System to operable status.  <u>OR</u> C.2.2 Transfer the MPC into a TRANSFER CASK.	Immediately and once per 12 hours thereafter   Table 3-5   Table 3-5

#### SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
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SFSC Heat Removal System  
3.1.2

SR 3.1.2	Verify all OVERPACK inlets and outlets are free of blockage from solid debris or floodwater.	Table 3-5
	<u>OR</u> For OVERPACKS with installed temperature monitoring equipment, verify that the difference between the average OVERPACK air outlet temperature and ISFSI ambient temperature is $\leq 155^{\circ}\text{F}$ for OVERPACKS containing PWR MPCs, $\leq 137^{\circ}\text{F}$ for OVERPACKS containing BWR MPCs.	Table 3-5

## Boron Concentration

### 3.3.1

### 3.3 SFSC CRITICALITY CONTROL

#### 3.3.1 Boron Concentration

- LCO 3.3.1 As required by CoC Appendix B, Table 2.1-2, the concentration of boron in the water in the MPC shall meet the following limits for the applicable MPC model and the most limiting fuel assembly array/class and classification to be stored in the MPC:
- a. MPC-24 with one or more fuel assemblies having an initial enrichment greater than the value in Table 2.1-2 for no soluble boron credit and  $\leq 5.0$  wt%  $^{235}\text{U}$ :  $\geq 400$  ppmb
  - b. MPC-24E or MPC-24EF (all INTACT FUEL ASSEMBLIES) with one or more fuel assemblies having an initial enrichment greater than the value in Table 2.1-2 for no soluble boron credit and  $\leq 5.0$  wt%  $^{235}\text{U}$ :  $\geq 300$  ppmb
  - c. Deleted.
  - d. Deleted.
  - e. MPC-24E or MPC-24EF (one or more DAMAGED FUEL ASSEMBLIES or FUEL DEBRIS) with one or more fuel assemblies having an initial enrichment  $> 4.0$  wt%  $^{235}\text{U}$  and  $\leq 5.0$  wt%  $^{235}\text{U}$ :  $\geq 600$  ppmb
  - f. MPC-32/32F: Minimum soluble boron concentration as required by the table below<sup>†</sup>.

Array/Class	All INTACT FUEL ASSEMBLIES		One or more DAMAGED FUEL ASSEMBLIES or FUEL DEBRIS	
	Maximum Initial Enrichment $\leq 4.1$ wt% $^{235}\text{U}$ (ppmb)	Maximum Initial Enrichment $5.0$ wt% $^{235}\text{U}$ (ppmb)	Maximum Initial Enrichment $\leq 4.1$ wt% $^{235}\text{U}$ (ppmb)	Maximum Initial Enrichment $5.0$ wt% $^{235}\text{U}$ (ppmb)
14x14A/B/C/D/E	1,300	1,900	1,500	2,300
15x15A/B/C/G/I	1,800	2,500	1,900	2,700
15x15D/E/F/H	1,900	2,600	2,100	2,900
16x16A/B/C	1,400	2,000	1,500	2,300
17x17A	1,600	2,200	1,800	2,600
17x17B/C	1,900	2,600	2,100	2,900

<sup>†</sup> For maximum initial enrichments between 4.1 wt% and 5.0 wt%  $^{235}\text{U}$ , the minimum soluble boron concentration may be determined by linear interpolation between the minimum soluble boron concentrations at 4.1 wt% and 5.0 wt%.

MPC Cavity Drying Limits  
Table 3-1

Table 3-1  
MPC Cavity Drying Limits for all MPC Types

Fuel Burnup (MWD/MTU)	MPC Heat Load (kW)	Method of Moisture Removal (Notes 1 and 2)
All Assemblies $\leq$ 45,000	$\leq$ 30 (MPC-24/24E/24EF, MPC-32/32F, MPC-68/68F/68FF) $\leq$ 36.9 (MPC-68M)	VDS <sup>Note 5</sup> or FHD <sup>Note 6</sup>
All Assemblies $\leq$ 45,000	$>$ 30 (MPC-24/24E/24EF, MPC-32/32F, MPC-68/68F/68FF)	FHD <sup>Note 6</sup>
One or more assemblies $>$ 45,000	$\leq$ 29 (MPC-68M)	VDS <sup>Note 4</sup> or FHD <sup>Note 6</sup>
One or more assemblies $>$ 45,000	$\leq$ 36.9 (MPC-24/24E/24EF/MPC-32/32F/MPC-68/68F/68FF/MPC-68M)	FHD <sup>Note 6</sup>

Notes:

1. VDS means a vacuum drying system. The acceptance criterion when using a VDS is MPC cavity pressure shall be  $\leq$  3 torr for  $\geq$  30 minutes.
2. FHD means a forced helium dehydration system. The acceptance criterion when using an FHD system is the gas temperature exiting the demister shall be  $\leq$  21°F for  $\geq$  30 minutes or the gas dew point exiting the MPC shall be  $\leq$  22.9°F for  $\geq$  30 minutes.
3. Deleted
4. The maximum allowable decay heat per fuel storage location is 0.426 kW.
5. Maximum allowable storage cell heat load is 1.25 kW (MPC-24/24E/24EF), 0.937 kW (MPC-32/32F) and 0.441 kW (MPC-68/68F/68FF).
6. Maximum **per assembly** allowable heat loads under uniform or regionalized storage defined in Appendix B, Section 2.4.1 or 2.4.2.

LCO Completion Time  
Table 3-5

Table 3-5: Completion Time for Actions to Restore SFSC Heat Removal System to Operable

MPC Type	Decay Heat Limits per Storage Location	Condition B Completion Time	Condition C Completion Time	Surveillance Frequency
MPC-24/24E/24EF	Appendix B, Section 2.4	8 hrs	24 hrs	24 hrs
MPC-32/32F				
MPC-68/68F/68FF/68M				
MPC-24/24E/24EF	Appendix A, Table 3-3 (Regionalized)  OR Appendix A, Table 3-4 (Uniform)	8 hrs	64 hrs	24 hrs
MPC-32/32F				
MPC-68/68F/68FF/68M				
MPC-24/24E/24EF	0.75 kW	24 hrs	64 hrs	30 days
MPC-32/32F	0.5 kW			
MPC-68/68F/68FF/68M	0.264 kW			

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ADMINISTRATIVE CONTROLS AND PROGRAMS

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5.5 Cask Transport Evaluation Program (continued)

3. The TRANSFER CASK or OVERPACK, when loaded with spent fuel, may be lifted to any height necessary during TRANSPORT OPERATIONS, provided the lifting device is designed in accordance with applicable stress limits from ANSI N14.6, and/or NUREG-0612, and has redundant drop protection features.
  4. The TRANSFER CASK and MPC, when loaded with spent fuel, may be lifted to those heights necessary to perform cask handling operations, including MPC TRANSFER, provided the lifts are made with structures and components designed in accordance with the criteria specified in Section 3.5 of Appendix B to Certificate of Compliance No. 1014, as applicable.
- b. For the transport of OVERPACKS to be anchored to the ISFSI pad, the following requirements apply:
1. Except as provided in 5.5.b.2, user shall determine allowable OVERPACK lift height limit(s) above the transport route surface(s) based on site-specific transport route conditions. The lift heights shall be determined by evaluation or analysis, based on limiting the design basis cask deceleration during a postulated drop event to  $\leq 45$  g's at the top of the MPC fuel basket. Evaluations and/or analyses shall be performed using methodologies consistent with those in the HI-STORM 100 FSAR.
  2. The OVERPACK, when loaded with spent fuel, may be lifted to any height necessary during TRANSPORT OPERATIONS provided the lifting device is designed in accordance with applicable stress limits from ANSI N14.6, and/or NUREG-0612, and has redundant drop protection features.

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## 2.0 Approved Contents

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### 2.1 Fuel Specifications and Loading Conditions (cont'd)

#### 2.1.3 Regionalized Fuel Loading

Users may choose to store fuel using regionalized loading in lieu of uniform loading to allow higher heat emitting fuel assemblies to be stored than would otherwise be able to be stored using uniform loading. Regionalized loading is limited to INTACT FUEL ASSEMBLIES or UNDAMAGED FUEL ASSEMBLIES with ZR cladding. Figures 2.1-1 through 2.1-4 define the regions for the MPC-24, MPC-24E, MPC-24EF, MPC-32, MPC-32F, MPC-68, MPC-68FF, and MPC-68M models, respectively<sup>1</sup>. Fuel assembly ~~burnup~~, decay heat, ~~and cooling time~~ limits for regionalized loading are specified in Section 2.4.2. Fuel assemblies used in regionalized loading shall meet all other applicable limits specified in Tables 2.1-1 through 2.1-3.

### 2.2 Violations

If any Fuel Specifications or Loading Conditions of 2.1 are violated, the following actions shall be completed:

- 2.2.1 The affected fuel assemblies shall be placed in a safe condition.
- 2.2.2 Within 24 hours, notify the NRC Operations Center.
- 2.2.3 Within 30 days, submit a special report which describes the cause of the violation, and actions taken to restore compliance and prevent recurrence.

### 2.3 Not Used

---

<sup>1</sup> These figures are only intended to distinguish the fuel loading regions. Other details of the basket design are illustrative and may not reflect the actual basket design details. The design drawings should be consulted for basket design details.

Table 2.1-1 (page 1 of 2930)  
Fuel Assembly Limits

## I. MPC MODEL: MPC-24

## A. Allowable Contents

1. Uranium oxide, PWR INTACT FUEL ASSEMBLIES listed in Table 2.1-2, with or without NON-FUEL HARDWARE and meeting the following specifications (Note 1):

a. Cladding Type: ZR or Stainless Steel (SS) as specified in Table 2.1-2 for the applicable fuel assembly array/class.

b. Initial Enrichment: As specified in Table 2.1-2 for the applicable fuel assembly array/class.

c. Post-irradiation Cooling Time and Average Burnup Per Assembly:

i. Array/Classes 14x14D, 14x14E, and 15x15G Cooling time  $\geq 8$  years and an average burnup  $\leq 40,000$  MWD/MTU.

ii. All Other Array/Classes Cooling time  ~~$\geq 3$  years~~ and average burnup  ~~$\leq 68,200$~~  as specified in Section 2.4. MWD/MTU as specified in Section 2.4.

ii. NON-FUEL HARDWARE As specified in Table 2.1-8.

Table 2.1-1 (page 2 of 2930)  
Fuel Assembly Limits

## I. MPC MODEL: MPC-24 (continued)

## A. Allowable Contents (continued)

d. Decay Heat Per Fuel Storage  
Location:i. Array/Classes 14x14D,  
14x14E, and 15x15G  $\leq 710$  Watts

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

e. Fuel Assembly Length:  $\leq 176.8$  inches (nominal design)f. Fuel Assembly Width:  $\leq 8.54$  inches (nominal design)g. Fuel Assembly Weight:  $\leq 1720$  lbs (including NON-FUEL  
HARDWARE) for assemblies that do not  
require fuel spacers, otherwise  $\leq 1680$   
lbs (including NON-FUEL HARDWARE)

B. Quantity per MPC: Up to 24 fuel assemblies.

C. Deleted.

D. DAMAGED FUEL ASSEMBLIES and FUEL DEBRIS are not authorized for  
loading into the MPC-24.

E. One NSA is authorized for loading into the MPC-24.

Note 1: Fuel assemblies containing BPRAs, TPDs, WABAs, water displacement guide tube plugs, orifice rod assemblies, or vibration suppressor inserts with or without ITTRs, may be stored in any fuel storage location. Fuel assemblies containing APSRs or NSAs may only be loaded in fuel storage locations 9, 10, 15, and/or 16. Fuel assemblies containing CRAs, RCCAs, CEAs may only be stored in fuel storage locations 4, 5, 8 - 11, 14 - 17, 20 and/or 21 (see Figure 2.1-1). These requirements are in addition to any other requirements specified for uniform or regionalized fuel loading.

Table 2.1-1 (page 3 of 2930)  
Fuel Assembly Limits

## II. MPC MODEL: MPC-68F

## A. Allowable Contents

1. Uranium oxide, BWR INTACT FUEL ASSEMBLIES, with or without ZR channels. Uranium oxide BWR INTACT FUEL ASSEMBLIES shall meet the criteria specified in Table 2.1-3 for fuel assembly array class 6x6A, 6x6C, 7x7A or 8x8A, and meet the following specifications:
  - a. Cladding Type: ZR
  - 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. Post-irradiation Cooling Time and Average Burnup Per Assembly: Cooling time  $\geq 18$  years and an average burnup  $\leq 30,000$  MWD/MTU.
  - e. Decay Heat Per Assembly  $\leq 115$  Watts
  - f. Fuel Assembly Length:  $\leq 135.0$  inches (nominal design)
  - g. Fuel Assembly Width:  $\leq 4.70$  inches (nominal design)
  - h. Fuel Assembly Weight:  $\leq 400$  lbs, including channels

Table 2.1-1 (page 4 of 2930)  
Fuel Assembly Limits

## II. MPC MODEL: MPC-68F (continued)

## A. Allowable Contents (continued)

2. Uranium oxide, BWR DAMAGED FUEL ASSEMBLIES, with or without ZR channels, placed in DAMAGED FUEL CONTAINERS. Uranium oxide BWR DAMAGED FUEL ASSEMBLIES shall meet the criteria specified in Table 2.1-3 for fuel assembly array/class 6x6A, 6x6C, 7x7A, or 8x8A, and meet the following specifications:

a. Cladding Type:	ZR
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. Post-irradiation Cooling Time and Average Burnup Per Assembly:	Cooling time $\geq$ 18 years and an average burnup $\leq$ 30,000 MWD/MTU.
e. Decay Heat Per Assembly:	$\leq$ 115 Watts
f. Fuel Assembly Length:	$\leq$ 135.0 inches (nominal design)
g. Fuel Assembly Width:	$\leq$ 4.70 inches (nominal design)
h. Fuel Assembly Weight:	$\leq$ 550 lbs, including channels and DFC



Table 2.1-1 (page 5 of 2930)  
Fuel Assembly Limits

## II. MPC MODEL: MPC-68F (continued)

## A. Allowable Contents (continued)

3. Uranium oxide, BWR FUEL DEBRIS, with or without ZR channels, placed in DAMAGED FUEL CONTAINERS. The original fuel assemblies for the uranium oxide BWR FUEL DEBRIS shall meet the criteria specified in Table 2.1-3 for fuel assembly array/class 6x6A, 6x6C, 7x7A, or 8x8A, and meet the following specifications:

a. Cladding Type:	ZR
b. Maximum PLANAR-AVERAGE INITIAL ENRICHMENT:	As specified in Table 2.1-3 for the applicable original fuel assembly array/class.
c. Initial Maximum Rod Enrichment:	As specified in Table 2.1-3 for the applicable original fuel assembly array/class.
d. Post-irradiation Cooling Time and Average Burnup Per Assembly	Cooling time $\geq 18$ years and an average burnup $\leq 30,000$ MWD/MTU for the original fuel assembly.
e. Decay Heat Per Assembly	$\leq 115$ Watts
f. Original Fuel Assembly Length	$\leq 135.0$ inches (nominal design)
g. Original Fuel Assembly Width	$\leq 4.70$ inches (nominal design)
h. Fuel Debris Weight	$\leq 550$ lbs, including channels and DFC

Table 2.1-1 (page 6 of 2930)  
Fuel Assembly Limits

## II. MPC MODEL: MPC-68F (continued)

## A. Allowable Contents (continued)

4. Mixed oxide (MOX), BWR INTACT FUEL ASSEMBLIES, with or without ZR channels. MOX BWR INTACT FUEL ASSEMBLIES shall meet the criteria specified in Table 2.1-3 for fuel assembly array/class 6x6B, and meet the following specifications:

a. Cladding Type:	ZR
b. Maximum PLANAR-AVERAGE INITIAL ENRICHMENT:	As specified in Table 2.1-3 for fuel assembly array/class 6x6B.
c. Initial Maximum Rod Enrichment:	As specified in Table 2.1-3 for fuel assembly array/class 6x6B.
d. Post-irradiation Cooling Time and Average Burnup Per Assembly:	Cooling time $\geq$ 18 years and an average burnup $\leq$ 30,000 MWD/MTIHM.
e. Decay Heat Per Assembly	$\leq$ 115 Watts
f. Fuel Assembly Length:	$\leq$ 135.0 inches (nominal design)
g. Fuel Assembly Width:	$\leq$ 4.70 inches (nominal design)
h. Fuel Assembly Weight:	$\leq$ 400 lbs, including channels

Table 2.1-1 (page 7 of 2930)  
Fuel Assembly Limits

## II. MPC MODEL: MPC-68F (continued)

## A. Allowable Contents (continued)

5. Mixed oxide (MOX), BWR DAMAGED FUEL ASSEMBLIES, with or without ZR channels, placed in DAMAGED FUEL CONTAINERS. MOX BWR DAMAGED FUEL ASSEMBLIES shall meet the criteria specified in Table 2.1-3 for fuel assembly array/class 6x6B, and meet the following specifications:

a. Cladding Type:	ZR
b. Maximum PLANAR-AVERAGE INITIAL ENRICHMENT:	As specified in Table 2.1-3 for fuel assembly array/class 6x6B.
c. Initial Maximum Rod Enrichment:	As specified in Table 2.1-3 for fuel assembly array/class 6x6B.
d. Post-irradiation Cooling Time and Average Burnup Per Assembly:	Cooling time $\geq$ 18 years and an average burnup $\leq$ 30,000 MWD/MTIHM.
e. Decay Heat Per Assembly	$\leq$ 115 Watts
f. Fuel Assembly Length:	$\leq$ 135.0 inches (nominal design)
g. Fuel Assembly Width:	$\leq$ 4.70 inches (nominal design)
h. Fuel Assembly Weight:	$\leq$ 550 lbs, including channels and DFC

Table 2.1-1 (page 8 of 2930)  
Fuel Assembly Limits

## II. MPC MODEL: MPC-68F (continued)

## A. Allowable Contents (continued)

6. Mixed Oxide (MOX), BWR FUEL DEBRIS, with or without ZR channels, placed in DAMAGED FUEL CONTAINERS. The original fuel assemblies for the MOX BWR FUEL DEBRIS shall meet the criteria specified in Table 2.1-3 for fuel assembly array/class 6x6B, and meet the following specifications:

- |                                                                   |                                                                                                            |
|-------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------|
| a. Cladding Type:                                                 | ZR                                                                                                         |
| b. Maximum PLANAR-AVERAGE INITIAL ENRICHMENT:                     | As specified in Table 2.1-3 for original fuel assembly array/class 6x6B.                                   |
| c. Initial Maximum Rod Enrichment:                                | As specified in Table 2.1-3 for original fuel assembly array/class 6x6B.                                   |
| d. Post-irradiation Cooling Time and Average Burnup Per Assembly: | Cooling time $\geq 18$ years and an average burnup $\leq 30,000$ MWD/MTIHM for the original fuel assembly. |
| e. Decay Heat Per Assembly                                        | $\leq 115$ Watts                                                                                           |
| f. Original Fuel Assembly Length:                                 | $\leq 135.0$ inches (nominal design)                                                                       |
| g. Original Fuel Assembly Width:                                  | $\leq 4.70$ inches (nominal design)                                                                        |
| h. Fuel Debris Weight:                                            | $\leq 550$ lbs, including channels and DFC                                                                 |

Table 2.1-1 (page 9 of 2930)  
Fuel Assembly Limits

## II. MPC MODEL: MPC-68F (continued)

## A. Allowable Contents (continued)

7. Thoria rods ( $\text{ThO}_2$  and  $\text{UO}_2$ ) placed in Dresden Unit 1 Thoria Rod Canisters and meeting the following specifications:

- |                                                                                   |                                                                                                                                                                                                                      |
|-----------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| a. Cladding Type:                                                                 | ZR                                                                                                                                                                                                                   |
| b. Composition:                                                                   | 98.2 wt.% $\text{ThO}_2$ , 1.8 wt. % $\text{UO}_2$ with an enrichment of 93.5 wt. % $^{235}\text{U}$<br><br>OR<br>98.5 wt.% $\text{ThO}_2$ , 1.5 wt.% $\text{UO}_2$ with an enrichment of 93.5 wt.% $^{235}\text{U}$ |
| c. Number of Rods Per Thoria Rod Canister:                                        | $\leq 18$                                                                                                                                                                                                            |
| d. Decay Heat Per Thoria Rod Canister:                                            | $\leq 115$ Watts                                                                                                                                                                                                     |
| e. Post-irradiation Fuel Cooling Time and Average Burnup Per Thoria Rod Canister: | A fuel post-irradiation cooling time $\geq 18$ years and an average burnup $\leq 16,000$ MWD/MTIHM.                                                                                                                  |
| f. Initial Heavy Metal Weight:                                                    | $\leq 27$ kg/canister                                                                                                                                                                                                |
| g. Fuel Cladding O.D.:                                                            | $\geq 0.412$ inches                                                                                                                                                                                                  |
| h. Fuel Cladding I.D.:                                                            | $\leq 0.362$ inches                                                                                                                                                                                                  |
| i. Fuel Pellet O.D.:                                                              | $\leq 0.358$ inches                                                                                                                                                                                                  |
| j. Active Fuel Length:                                                            | $\leq 111$ inches                                                                                                                                                                                                    |
| k. Canister Weight:                                                               | $\leq 550$ lbs, including fuel                                                                                                                                                                                       |

Table 2.1-1 (page 10 of 2930)  
Fuel Assembly Limits

## II. MPC MODEL: MPC-68F (continued)

## B. Quantity per MPC (up to a total of 68 assemblies):

(All fuel assemblies must be array/class 6x6A, 6x6B, 6x6C, 7x7A, or 8x8A):

Up to four (4) DFCs containing uranium oxide BWR FUEL DEBRIS or MOX BWR FUEL DEBRIS. The remaining MPC-68F fuel storage locations may be filled with fuel assemblies of the following type, as applicable:

1. Uranium oxide BWR INTACT FUEL ASSEMBLIES;
  2. MOX BWR INTACT FUEL ASSEMBLIES;
  3. Uranium oxide BWR DAMAGED FUEL ASSEMBLIES placed in DFCs;
  4. MOX BWR DAMAGED FUEL ASSEMBLIES placed in DFCs; or
  5. Up to one (1) Dresden Unit 1 Thoria Rod Canister.
- C. Fuel assemblies with stainless steel channels are not authorized for loading in the MPC-68F.
- D. Dresden Unit 1 fuel assemblies with one Antimony-Beryllium neutron source are authorized for loading in the MPC-68F. The Antimony-Beryllium source material shall be in a water rod location.



Table 2.1-1 (page 11 of 2930)  
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. Post-irradiation Cooling Time and Average Burnup Per Assembly |                                                                                                                                       |
| i. Array/Classes 6x6A, 6x6B, 6x6C, 7x7A, and 8x8A                | Cooling time $\geq$ 18 years and an average burnup $\leq$ 30,000 MWD/MTU (or MWD/MTIHM).                                              |
| ii. Array/Class 8x8F                                             | Cooling time $\geq$ 10 years and an average burnup $\leq$ 27,500 MWD/MTU.                                                             |
| iii. Array/Classes 10x10D and 10x10E                             | Cooling time $\geq$ 10 years and an average burnup $\leq$ 22,500 MWD/MTU.                                                             |
| iv. All Other Array/Classes                                      | <del>Cooling time <math>\geq</math> 3 years and an average burnup <math>\leq</math> 65,000 MWD/MTU</del> As specified in Section 2.4. |

Table 2.1-1 (page 12 of 2930)  
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,<br>6x6C, 7x7A, and 8x8A | $\leq 115$ Watts             |
| ii. Array/Class 8x8F                                 | $\leq 183.5$ Watts           |
| iii. Array/Classes 10x10D<br>and 10x10E              | $\leq 95$ Watts              |
| iv. All Other Array/Classes                          | As specified in Section 2.4. |

## f. Fuel Assembly Length

- |                                                   |                                      |
|---------------------------------------------------|--------------------------------------|
| i. Array/Class 6x6A, 6x6B,<br>6x6C, 7x7A, or 8x8A | $\leq 135.0$ inches (nominal design) |
| ii. All Other Array/Classes                       | $\leq 176.5$ inches (nominal design) |

## g. Fuel Assembly Width

- |                                                   |                                     |
|---------------------------------------------------|-------------------------------------|
| i. Array/Class 6x6A, 6x6B,<br>6x6C, 7x7A, or 8x8A | $\leq 4.70$ inches (nominal design) |
| ii. All Other Array/Classes                       | $\leq 5.85$ inches (nominal design) |

## h. Fuel Assembly Weight

- |                                                   |                                    |
|---------------------------------------------------|------------------------------------|
| i. Array/Class 6x6A, 6x6B,<br>6x6C, 7x7A, or 8x8A | $\leq 400$ lbs, including channels |
| ii. All Other Array/Classes                       | $\leq 730$ lbs, including channels |

Table 2.1-1 (page 13 of 2930)  
Fuel Assembly Limits

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

## A. Allowable Contents (continued)

2. Uranium oxide or MOX BWR DAMAGED FUEL ASSEMBLIES or FUEL DEBRIS, with or without channels, placed in DAMAGED FUEL CONTAINERS. Uranium oxide and MOX BWR DAMAGED FUEL ASSEMBLIES and FUEL DEBRIS shall meet the criteria specified in Table 2.1-3, and meet the following specifications:

a. Cladding Type:	ZR or Stainless Steel (SS) in accordance with Table 2.1-3 for the applicable fuel assembly array/class.
b. Maximum PLANAR-AVERAGE INITIAL ENRICHMENT:	
i. Array/Classes 6x6A, 6x6B, 6x6C, 7x7A, and 8x8A.	As specified in Table 2.1-3 for the applicable fuel assembly array/class.
ii. All Other Array Classes	$\leq 4.0 \text{ wt. \% } ^{235}\text{U}$ .
c. Initial Maximum Rod Enrichment	As specified in Table 2.1-3 for the applicable fuel assembly array/class.
d. Post-irradiation Cooling Time and Average Burnup Per Assembly:	
i. Array/Class 6x6A, 6x6B, 6x6C, 7x7A, or 8x8A	Cooling time $\geq 18$ years and an average burnup $\leq 30,000 \text{ MWD/MTU}$ (or MWD/MTIHM).
ii. Array/Class 8x8F	Cooling time $\geq 10$ years and an average burnup $\leq 27,500 \text{ MWD/MTU}$ .
iii. Array/Class 10x10D and 10x10E	Cooling time $\geq 10$ years and an average burnup $\leq 22,500 \text{ MWD/MTU}$ .
iv. All Other Array/Classes	<del>Cooling time <math>\geq 3</math> years and an average burnup <math>\leq 65,000 \text{ MWD/MTU}</math> as specified in Section 2.4.</del> As specified in Section 2.4.

Table 2.1-1 (page 14 of 2930)  
Fuel Assembly Limits

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

## A. Allowable Contents (continued)

## e. Decay Heat Per Assembly

- |                                                   |                              |
|---------------------------------------------------|------------------------------|
| i. Array/Class 6x6A, 6x6B,<br>6x6C, 7x7A, or 8x8A | $\leq 115$ Watts             |
| ii. Array/Class 8x8F                              | $\leq 183.5$ Watts           |
| iii. Array/Classes 10x10D<br>and 10x10E           | $\leq 95$ Watts              |
| iv. All Other Array/Classes                       | As specified in Section 2.4. |

## f. Fuel Assembly Length

- |                                                   |                                      |
|---------------------------------------------------|--------------------------------------|
| i. Array/Class 6x6A, 6x6B,<br>6x6C, 7x7A, or 8x8A | $\leq 135.0$ inches (nominal design) |
| ii. All Other Array/Classes                       | $\leq 176.5$ inches (nominal design) |

## g. Fuel Assembly Width

- |                                                   |                                     |
|---------------------------------------------------|-------------------------------------|
| i. Array/Class 6x6A, 6x6B,<br>6x6C, 7x7A, or 8x8A | $\leq 4.70$ inches (nominal design) |
| ii. All Other Array/Classes                       | $\leq 5.85$ inches (nominal design) |

## h. Fuel Assembly Weight

- |                                                   |                                             |
|---------------------------------------------------|---------------------------------------------|
| i. Array/Class 6x6A, 6x6B,<br>6x6C, 7x7A, or 8x8A | $\leq 550$ lbs, including channels and DFC  |
| ii. All Other Array/Classes                       | $\leq 7830$ lbs, including channels and DFC |

Table 2.1-1 (page 15 of 2930)  
Fuel Assembly limits

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

## A. Allowable Contents (continued)

3. Thoria rods ( $\text{ThO}_2$  and  $\text{UO}_2$ ) placed in Dresden Unit 1 Thoria Rod Canisters and meeting the following specifications:

a. Cladding type	ZR
b. Composition	98.2 wt.% $\text{ThO}_2$ , 1.8 wt.% $\text{UO}_2$ with an enrichment of 93.5 wt.% $^{235}\text{U}$  OR 98.5 wt.% $\text{ThO}_2$ , 1.5 wt.% $\text{UO}_2$ with an enrichment of 93.5% wt.% $^{235}\text{U}$
c. Number of Rods per Thoria Rod Canister:	$\leq 18$
d. Decay Heat Per Thoria Rod Canister:	$\leq 115$ Watts
e. Post-irradiation Fuel Cooling Time and Average Burnup per Thoria Rod Canister:	A fuel post-irradiation cooling time $\geq 18$ years and an average burnup $\leq 16,000$ MWD/MTIHM
f. Initial Heavy Metal Weight:	$\leq 27$ kg/canister
g. Fuel Cladding O.D.:	$\geq 0.412$ inches
h. Fuel Cladding I.D.:	$\leq 0.362$ inches
i. Fuel Pellet O.D.:	$\leq 0.358$ inches
j. Active Fuel Length:	$\leq 111$ inches
k. Canister Weight:	$\leq 550$ lbs, including fuel

Table 2.1-1 (page 16 of 2930)  
Fuel Assembly Limits

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

## B. Quantity per MPC (up to a total of 68 assemblies)

1. For fuel assembly array/classes 6x6A, 6X6B, 6x6C, 7x7A, or 8x8A, up to 68 BWR INTACT FUEL ASSEMBLIES and/or DAMAGED FUEL ASSEMBLIES. Up to eight (8) DFCs containing FUEL DEBRIS from these array/classes may be stored.
  2. For all other array/classes, up to sixteen (16) DFCs containing BWR DAMAGED FUEL ASSEMBLIES and/or up to eight (8) DFCs containing FUEL DEBRIS. DFCs shall be located only in fuel storage locations 1, 2, 3, 8, 9, 16, 25, 34, 35, 44, 53, 60, 61, 66, 67, and/or 68. The remaining fuel storage locations may be filled with fuel assemblies of the following type:
    - i. Uranium Oxide BWR INTACT FUEL ASSEMBLIES; or
    - ii. MOX BWR INTACT FUEL ASSEMBLIES.
  3. Up to one (1) Dresden Unit 1 Thoria Rod Canister
- C. Dresden Unit 1 fuel assemblies with one Antimony-Beryllium neutron source are authorized for loading. The Antimony-Beryllium source material shall be in a water rod location.
- D. Array/Class 10x10D and 10x10E fuel assemblies in stainless steel channels must be stored in fuel storage locations 19 - 22, 28 - 31, 38 -41, and/or 47 - 50 (see Figure 2.1-4).



Table 2.1-1 (page 17 of 2930)  
Fuel Assembly Limits

## IV. MPC MODEL: MPC-24E and MPC-24EF

## A. Allowable Contents

1. Uranium oxide, PWR INTACT FUEL ASSEMBLIES listed in Table 2.1-2, with or without NON-FUEL HARDWARE and meeting the following specifications (Note 1):

- a. Cladding Type: ZR or Stainless Steel (SS) as specified in Table 2.1-2 for the applicable fuel assembly array/class
- b. Initial Enrichment: As specified in Table 2.1-2 for the applicable fuel assembly array/class.

## c. Post-irradiation Cooling Time and Average Burnup Per Assembly:

- i. Array/Classes 14x14D, 14x14E, and 15x15G Cooling time  $\geq 8$  years and an average burnup  $\leq 40,000$  MWD/MTU.
- ii. All Other Array/Classes ~~Cooling time  $\geq 3$  years and an average burnup in section 2.4.  $\leq 68,200$  MWD/MTU As specified in Section 2.4.~~
- iii. NON-FUEL HARDWARE As specified in Table 2.1-8.

Table 2.1-1 (page 18 of 2930)  
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  $\leq 710$  Watts.

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

e. Fuel Assembly Length:  $\leq 176.8$  inches (nominal design)f. Fuel Assembly Width:  $\leq 8.54$  inches (nominal design)g. Fuel Assembly Weight:  $\leq 1,720$  lbs (including NON-FUEL  
HARDWARE) for assemblies that do not  
require fuel spacers, otherwise,  
 $\leq 1,680$  lbs (including NON-FUEL  
HARDWARE)

Table 2.1-1 (page 19 of 2930)  
Fuel Assembly Limits

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

## A. Allowable Contents (continued)

2. Uranium oxide, PWR DAMAGED FUEL ASSEMBLIES and FUEL DEBRIS, with or without NON-FUEL HARDWARE, placed in DAMAGED FUEL CONTAINERS. Uranium oxide PWR DAMAGED FUEL ASSEMBLIES and FUEL DEBRIS shall meet the criteria specified in Table 2.1-2 and meet the following specifications (Note 1):

- |                                                                   |                                                                                                                                                                    |
|-------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| a. Cladding Type:                                                 | ZR or Stainless Steel (SS) as specified in Table 2.1-2 for the applicable fuel assembly array/class                                                                |
| b. Initial Enrichment:                                            | As specified in Table 2.1-2 for the applicable fuel assembly array/class.                                                                                          |
| c. Post-irradiation Cooling Time and Average Burnup Per Assembly: |                                                                                                                                                                    |
| i. Array/Classes 14x14D, 14x14E, and 15x15G                       | Cooling time $\geq$ 8 years and an average burnup $\leq$ 40,000 MWD/MTU.                                                                                           |
| ii. All Other Array/Classes                                       | <del>As specified in Section 2.4. Cooling time <math>\geq</math> 3 years and an average burnup <math>\leq</math> 68,200 MWD/MTU as specified in Section 2.4.</del> |
| iii. NON-FUEL HARDWARE                                            | As specified in Table 2.1-8.                                                                                                                                       |

Table 2.1-1 (page 20 of 2930)  
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  $\leq 710$  Watts.

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

e. Fuel Assembly Length  $\leq 176.8$  inches (nominal design)f. Fuel Assembly Width  $\leq 8.54$  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 four (4) DAMAGED FUEL ASSEMBLIES and/or FUEL DEBRIS in DAMAGED FUEL CONTAINERS, stored in fuel storage locations 3, 6, 19 and/or 22. 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, with or without ITTRs, may be stored in any fuel storage location. Fuel assemblies containing APSRs or NSAs may only be loaded in fuel storage locations 9, 10, 15, and/or 16 (see Figure 2.1-2). Fuel assemblies containing CRAs, RCCAs, or CEAs may only be stored in fuel storage locations 4, 5, 8 - 11, 14 - 17, 20 and/or 21 (see Figure 2.1-2). These requirements are in addition to any other requirements specified for uniform or regionalized fuel loading.

Table 2.1-1 (page 21 of 2930)  
Fuel Assembly Limits

## V. MPC MODEL: MPC-32 and MPC-32F

## A. Allowable Contents

1. Uranium oxide, PWR INTACT FUEL ASSEMBLIES listed in Table 2.1-2, with or without NON-FUEL HARDWARE and meeting the following specifications (Note 1):

- |                                                                   |                                                                                                                                                                                  |
|-------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| a. Cladding Type:                                                 | ZR or Stainless Steel (SS) as specified in Table 2.1-2 for the applicable fuel assembly array/class                                                                              |
| b. Initial Enrichment:                                            | As specified in Table 2.1-2 for the applicable fuel assembly array/class.                                                                                                        |
| c. Post-irradiation Cooling Time and Average Burnup Per Assembly: |                                                                                                                                                                                  |
| i. Array/Classes 14x14D, 14x14E, and 15x15G                       | Cooling time $\geq$ 9 years and an average burnup $\leq$ 30,000 MWD/MTU or cooling time $\geq$ 20 years and an average burnup $\leq$ 40,000 MWD/MTU.                             |
| ii. All Other Array/Classes                                       | <del>As specified in Section 2.4. cooling time <math>\geq</math> 3 years and an average burnup <math>\leq</math> 68,200 MWD/MTU</del><br><del>As specified in Section 2.4.</del> |
| iii. NON-FUEL HARDWARE                                            | As specified in Table 2.1-8.                                                                                                                                                     |

Table 2.1-1 (page 22 of 2930)  
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  $\leq 500$  Watts.

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

e. Fuel Assembly Length  $\leq 176.8$  inches (nominal design)f. Fuel Assembly Width  $\leq 8.54$  inches (nominal design)g. Fuel Assembly Weight  $\leq 1,720$  lbs (including NON-FUEL HARDWARE) for assemblies that do not require fuel spacers, otherwise,  $\leq 1,680$  lbs (including NON-FUEL HARDWARE)

Table 2.1-1 (page 23 of 2930)  
Fuel Assembly Limits

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

## A. Allowable Contents (cont'd)

2. Uranium oxide, PWR DAMAGED FUEL ASSEMBLIES and FUEL DEBRIS, with or without NON-FUEL HARDWARE, placed in DAMAGED FUEL CONTAINERS. Uranium oxide PWR DAMAGED FUEL ASSEMBLIES and FUEL DEBRIS shall meet the criteria specified in Table 2.1-2 and meet the following specifications (Note 1):

- |                                                                   |                                                                                                                                                                        |
|-------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| a. Cladding Type:                                                 | ZR or Stainless Steel (SS) as specified in Table 2.1-2 for the applicable fuel assembly array/class                                                                    |
| b. Initial Enrichment:                                            | As specified in Table 2.1-2 for the applicable fuel assembly array/class.                                                                                              |
| c. Post-irradiation Cooling Time and Average Burnup Per Assembly: |                                                                                                                                                                        |
| i. Array/Classes 14x14D, 14x14E, and 15x15G                       | Cooling time $\geq 9$ years and an average burnup $\leq 30,000$ MWD/MTU or cooling time $\geq 20$ years and an average burnup $\leq 40,000$ MWD/MTU.                   |
| ii. All Other Array/Classes                                       | <del>See As specified in Section 2.4. Cooling time <math>\geq 3</math> years and an average burnup <math>\leq 68,200</math> MWD/MTU As specified in Section 2.4.</del> |
| iii. NON-FUEL HARDWARE                                            | As specified in Table 2.1-8.                                                                                                                                           |

Table 2.1-1 (page 24 of 2930)  
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  $\leq 500$  Watts.

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

e. Fuel Assembly Length  $\leq 176.8$  inches (nominal design)f. Fuel Assembly Width  $\leq 8.54$  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, with or without ITTRs, 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.



Table 2.1-1 (page 25 of 2930)  
Fuel Assembly Limits

## VI. MPC MODEL: MPC-68M

## A. Allowable Contents

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

a. Cladding Type:	ZR
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. Post-irradiation Cooling Time and Average Burnup Per Assembly	
i. Array/Class 8x8F	Cooling time $\geq$ 10 years and an average burnup $\leq$ 27,500 MWD/MTU.
ii. All Other Array/Classes	<del>Cooling time <math>\geq</math> 3 years and an average burnup <math>\leq</math> 65,000 MWD/MTU</del> As specified in Section 2.4.

Table 2.1-1 (page 26 of 2930)  
Fuel Assembly Limits

## VI. MPC MODEL: MPC-68M (continued)

## A. Allowable Contents (continued)

## e. Decay Heat Per Assembly

i. Array/Class 8x8F  $\leq 183.5$  Watts

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

f. Fuel Assembly Length  $\leq 176.5$  inches (nominal design)g. Fuel Assembly Width  $\leq 5.85$  inches (nominal design)h. Fuel Assembly Weight  $\leq 730$  lbs, including channels

Table 2.1-1 (page 27 of 2930)  
Fuel Assembly Limits

## VI. MPC MODEL: MPC-68M (continued)

## A. Allowable Contents (continued)

2. Uranium oxide BWR DAMAGED FUEL ASSEMBLIES or FUEL DEBRIS, with or without channels, placed in DAMAGED FUEL CONTAINERS. Uranium oxide BWR DAMAGED FUEL ASSEMBLIES and FUEL DEBRIS shall meet the criteria specified in Table 2.1-3, and meet the following specifications:

- |                                                                   |                                                                                                                                                          |
|-------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------|
| a. Cladding Type:                                                 | ZR                                                                                                                                                       |
| 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. Post-irradiation Cooling Time and Average Burnup Per Assembly: |                                                                                                                                                          |
| i. Array/Class 8x8F                                               | Cooling time $\geq$ 10 years and an average burnup $\leq$ 27,500 MWD/MTU.                                                                                |
| ii. All Other Array/Classes                                       | <del>As specified in Section 2.4. <math>\geq</math> 3 years and an average burnup <math>\leq</math> 65,000 MWD/MTU</del><br>As specified in Section 2.4. |

Table 2.1-1 (page 28 of 2930)  
Fuel Assembly Limits

## VI. MPC MODEL: MPC-68M (continued)

## A. Allowable Contents (continued)

## e. Decay Heat Per Assembly

i. Array/Class 8x8F  $\leq 183.5$  Watts

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

f. Fuel Assembly Length  $\leq 176.5$  inches (nominal design)g. Fuel Assembly Width  $\leq 5.85$  inches (nominal design)h. Fuel Assembly Weight  $\leq 7830$  lbs, including channels and DFC

Table 2.1-1 (page 29 of 2930)  
Fuel Assembly Limits

## VI. MPC MODEL: MPC-68M (continued)

## A. Allowable Contents (continued)

3. Thoria rods ( $\text{ThO}_2$  and  $\text{UO}_2$ ) placed in Dresden Unit 1 Thoria Rod Canisters and meeting the following specifications:

a. Cladding type	ZR
b. Composition	98.2 wt.% $\text{ThO}_2$ , 1.8 wt.% $\text{UO}_2$ with an enrichment of 93.5 wt.% $^{235}\text{U}$ OR 98.5 wt.% $\text{ThO}_2$ , 1.5 wt.% $\text{UO}_2$ with an enrichment of 93.5% wt.% $^{235}\text{U}$
c. Number of Rods per Thoria Rod Canister:	$\leq 18$
d. Decay Heat Per Thoria Rod Canister:	$\leq 115$ Watts
e. Post-irradiation Fuel Cooling Time and Average Burnup per Thoria Rod Canister:	A fuel post-irradiation cooling time $\geq 18$ years and an average burnup $\leq 16,000$ MWD/MTIHM
f. Initial Heavy Metal Weight:	$\leq 27$ kg/canister
g. Fuel Cladding O.D.:	$\geq 0.412$ inches
h. Fuel Cladding I.D.:	$\leq 0.362$ inches
i. Fuel Pellet O.D.:	$\leq 0.358$ inches
j. Active Fuel Length:	$\leq 111$ inches
k. Canister Weight:	$\leq 550$ lbs, including fuel

Table 2.1-1 (page 30 of 30)  
Fuel Assembly Limits

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VI. MPC MODEL: MPC-68M (continued)

B. Quantity per MPC (up to a total of 68 assemblies)

1. Up to sixteen (16) DFCs containing BWR DAMAGED FUEL ASSEMBLIES and/or up to eight (8) DFCs containing FUEL DEBRIS. DFCs shall be located only in fuel storage locations 1, 2, 3, 8, 9, 16, 25, 34, 35, 44, 53, 60, 61, 66, 67, and/or 68. The remaining fuel storage locations may be filled with Uranium Oxide BWR UNDAMAGED FUEL ASSEMBLIES.
2. Up to one (1) Dresden Unit 1 Thoria Rod Canister

Table 2.1-3 (page 4 of 5)  
BWR FUEL ASSEMBLY CHARACTERISTICS (Note 1)

Fuel Assembly Array/Class	10x10A	10x10B	10x10C	10x10D	10x10E	10x10F	10x10G
Clad Material	ZR	ZR	ZR	SS	SS	ZR	ZR
Design Initial U (kg/assy.) (Note 3)	≤ 188	≤ 188	≤ 179	≤ 125	≤ 125	≤ 192	≤ 188
Maximum PLANAR-AVERAGE INITIAL ENRICHMENT(MPC-68, 68F, and 68FF) (wt.% <sup>235</sup> U) (Note 14)	≤ 4.2	≤ 4.2	≤ 4.2	≤ 4.0	≤ 4.0	Note 17	Note 17
Maximum PLANAR-AVERAGE INITIAL ENRICHMENT (MPC-68M) (wt.% <sup>235</sup> U) (Note 16, 19)	≤ 4.8	≤ 4.8	≤ 4.8	Note 18	Note 18	≤ 4.7 (Note 15)	≤ 4.675 (Note 15)
Initial Maximum Rod Enrichment (wt.% <sup>235</sup> U)	≤ 5.0	≤ 5.0	≤ 5.0	≤ 5.0	≤ 5.0	≤ 5.0	≤ 5.0
No. of Fuel Rod Locations	92/78 (Note 8)	91/83 (Note 9)	96	100	96	92/78 (Note 8)	96/84
Fuel Rod Clad O.D. (in.)	≥ 0.4040	≥ 0.3957	≥ 0.3780	≥ 0.3960	≥ 0.3940	≥ 0.4035	≥ 0.387
Fuel Rod Clad I.D. (in.)	≤ 0.3520	≤ 0.3480	≤ 0.3294	≤ 0.3560	≤ 0.3500	≤ 0.3570	≤ 0.340
Fuel Pellet Dia. (in.)	≤ 0.3455	≤ 0.3420	≤ 0.3224	≤ 0.3500	≤ 0.3430	≤ 0.3500	≤ 0.334
Fuel Rod Pitch (in.)	≤ 0.510	≤ 0.510	≤ 0.488	≤ 0.565	≤ 0.557	≤ 0.510	≤ 0.512
Design Active Fuel Length (in.)	≤ 150	≤ 150	≤ 150	≤ 83	≤ 83	≤ 150	≤ 150
No. of Water Rods (Note 11)	2	1 (Note 6)	5 (Note 10)	0	4	2	5 (Note 10)
Water Rod Thickness (in.)	≥ 0.030	> 0.00	≥ 0.031	N/A	≥ 0.022	≥ 0.030	≥ 0.031
Channel Thickness (in.)	≤ 0.120	≤ 0.120	≤ 0.055	≤ 0.080	≤ 0.080	≤ 0.120	≤ 0.060

Table 2.1-3 (page 5 of 5)  
BWR FUEL ASSEMBLY CHARACTERISTICS

## Notes:

1. All dimensions are design nominal values. Maximum and minimum dimensions are specified to bound variations in design nominal values among fuel assemblies within a given array/class.
2. Deleted.
3. Design initial uranium weight is the nominal uranium weight specified for each assembly by the fuel manufacturer or reactor user. For each BWR fuel assembly, the total uranium weight limit specified in this table may be increased up to 1.5 percent for comparison with users' fuel records to account for manufacturer tolerances.
4.  $\leq 0.635$  wt. %  $^{235}\text{U}$  and  $\leq 1.578$  wt. % total fissile plutonium ( $^{239}\text{Pu}$  and  $^{241}\text{Pu}$ ), (wt. % of total fuel weight, i.e.,  $\text{UO}_2$  plus  $\text{PuO}_2$ ).
5. This assembly class contains 74 total rods; 66 full length rods and 8 partial length rods.
6. Square, replacing nine fuel rods.
7. Variable.
8. This assembly contains 92 total fuel rods; 78 full length rods and 14 partial length rods.
9. This assembly class contains 91 total fuel rods; 83 full length rods and 8 partial length rods.
10. One diamond-shaped water rod replacing the four center fuel rods and four rectangular water rods dividing the assembly into four quadrants.
11. These rods may also be sealed at both ends and contain Zr material in lieu of water.
12. This assembly is known as "QUAD+." It has four rectangular water cross segments dividing the assembly into four quadrants.
13. For the SPC 9x9-5 fuel assembly, each fuel rod must meet either the 9x9E or the 9x9F set of limits for clad O.D., clad I.D., and pellet diameter.
14. For MPC-68, 68F, and 68FF loaded with both INTACT FUEL ASSEMBLIES and DAMAGED FUEL ASSEMBLIES or FUEL DEBRIS, the maximum PLANAR AVERAGE INITIAL ENRICHMENT for the INTACT FUEL ASSEMBLIES is limited to 3.7 wt.%  $^{235}\text{U}$ , as applicable.
15. Fuel assemblies classified as damaged fuel assemblies are limited to 4.6 wt.%  $^{235}\text{U}$  for the 10x10F and 10x10G arrays/classes and 4.0 wt.%  $^{235}\text{U}$  for the 8x8F, 9x9E, and 9x9F ~~and 10x10G~~ arrays/classes.
16. For MPC-68M loaded with both UNDAMAGED FUEL ASSEMBLIES and DAMAGED FUEL ASSEMBLIES or FUEL DEBRIS, the maximum PLANAR AVERAGE INITIAL ENRICHMENT for the UNDAMAGED FUEL ASSEMBLIES is limited to the enrichment limit of the damaged assembly.
17. This fuel assembly array/class is not allowable contents in MPC-68, 68F, or 68FF.
18. This fuel assembly array/class is not allowable contents in MPC-68M.
19. In accordance with the definition of UNDAMAGED FUEL ASSEMBLY, certain assemblies may be limited to up to 3.3 wt.% U-235. When loading these fuel



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assemblies, all ~~other undamaged~~ fuel assemblies in the MPC are limited to ~~3.3~~  
~~wt% U-235~~ enrichments as specified in this table.

Table 2.1-8  
NON-FUEL HARDWARE COOLING AND AVERAGE BURNUP (Notes 1, 2, 3, and 7)

Post-irradiation Cooling Time (years)	NSA with NFH INSERTS (Note 4) BURNUP (MWD/MTU)	NSA without NFH, GUIDE TUBE HARDWARE, or CONTROL COMPONENT (Note 5) BURNUP (MWD/MTU)	APSR BURNUP (MWD/MTU)
$\geq 3$	$\leq 24,635$	NA (Note 6)	NA
$\geq 4$	$\leq 30,000$	NA	NA
$\geq 5$	$\leq 36,748$	$\leq 630,000$	$\leq 45,000$
$\geq 6$	$\leq 44,102$	-	$\leq 54,500$
$\geq 7$	$\leq 52,900$	-	$\leq 68,000$
$\geq 8$	$\leq 60,000$	-	$\leq 83,000$
$\geq 9$	$\leq 79,784$	-	$\leq 111,000$
$\geq 10$	$\leq 101,826$	-	$\leq 180,000$
$\geq 11$	$\leq 141,982$	-	$\leq 630,000$
$\geq 12$	$\leq 360,000$	-	-

- Notes:
1. Burnups for NON-FUEL HARDWARE are to be determined based on the burnup and uranium mass of the fuel assemblies in which the component was inserted during reactor operation.
  2. Linear interpolation between points is permitted, except that APSR burnups  $> 180,000$  MWD/MTU and  $\leq 630,000$  MWD/MTU must be cooled  $\geq 11$  years.
  3. Applicable to uniform loading and regionalized loading.
  4. Includes Burnable Poison Rod Assemblies (BPRAs), Wet Annular Burnable Absorbers (WABAs), ~~and~~ vibration suppressor inserts ~~and Neutron Source Assemblies (NSAs) in combination with other control components (i.e. BPRAs, TPDs, and/or RCCAs).~~
  5. Includes Thimble Plug Devices (TPDs), water displacement guide tube plugs, orifice rod assemblies, Control Rod Assemblies (CRAs), Control Element Assemblies (CEAs), ~~and~~ Rod Cluster Control Assemblies (RCCAs) ~~and NSAs without other forms of control components.~~
  6. NA means not authorized for loading at this cooling time.
  7. Non-fuel hardware burnup and cooling times are not applicable to ITTRs since they are installed post irradiation.

## 2.4 Decay Heat Limits for ZR-Clad Fuel

This section provides the limits on ZR-clad fuel assembly decay heat for storage in the HI-STORM 100 System. **The method to calculate the limits and verify compliance, including examples, is provided in Chapter 12 of the HI-STORM 100 FASR.**

### 2.4.1 Uniform Fuel Loading Decay Heat Limits for ZR-clad fuel

Table 2.4-1 provides the maximum allowable decay heat per fuel storage location for ZR-clad fuel in uniform fuel loading for each MPC model.

Table 2.4-1  
Maximum Allowable Decay Heat per Fuel Storage Location  
(Uniform Loading, ZR-Clad)

MPC Model	Decay Heat per Fuel Storage Location (kW)	
	Intact or Undamaged Fuel Assemblies	Damaged Fuel Assemblies and Fuel Debris
MPC-24	$\leq 1.416$	Not Permitted
MPC-24E/24EF	$\leq 1.416$	$\leq 1.114$
MPC-32/32F	$\leq 1.062$	$\leq 0.718$
MPC-68/68FF/68M	$\leq 0.500$	$\leq 0.393$

### 2.4.3 Burnup Limits as a Function of Cooling Time

The maximum allowable fuel assembly average burnup varies with the following parameters:

- Minimum fuel assembly cooling time
- Maximum fuel assembly decay heat
- Minimum fuel assembly average enrichment

The maximum allowable ZR-clad fuel assembly average burnup for a given MINIMUM ENRICHMENT is calculated as described below for minimum cooling times between 3 and 20 years using the maximum permissible decay heat determined in Section 2.4.1 or 2.4.2. Different fuel assembly average burnup limits may be calculated for different minimum enrichments (by individual fuel assembly) for use in choosing the fuel assemblies to be loaded into a given MPC.

2.4.3.1 Choose a fuel assembly minimum enrichment,  $E_{235}$ .

2.4.3.2 Calculate the maximum allowable fuel assembly average burnup for a minimum cooling time between 3 and 20 years using the equation below.

$$Bu = (A \times q) + (B \times q^2) + (C \times q^3) + [D \times (E_{235})^2] + (E \times q \times E_{235}) + (F \times q^2 \times E_{235}) + G$$

Where:

Bu = Maximum allowable average burnup per fuel assembly (MWD/MTU)

q = Maximum allowable decay heat per fuel storage location determined in Section 2.4.1 or 2.4.2 (kW)

$E_{235}$  = Minimum fuel assembly average enrichment (wt. %  $^{235}\text{U}$ ) (e.g., for 4.05 wt.%, use 4.05)

A through G = Coefficients from Tables 2.4-3 and 2.4-4 for the applicable fuel assembly array/class and minimum cooling time

2.4.3.3 Calculated burnup limits shall be rounded down to the nearest integer.

2.4.3.4 Calculated burnup limits greater than 68,200 MWD/MTU for PWR fuel and 65,000 MWD/MTU for BWR must be reduced to be equal to these values.

2.4.3.5 Linear interpolation of calculated burnups between cooling times for a given fuel assembly maximum decay heat and minimum enrichment is permitted. For example, the allowable burnup for a cooling time of 4.5 years may be interpolated between those burnups calculated for 4 year and 5 years.

2.4.3.6 Each ZR-clad fuel assembly to be stored must have a

MINIMUM ENRICHMENT greater than or equal to the value  
used in Step 2.4.3.2

- 2.4.4 When complying with the maximum fuel storage location decay heat limits, users must account for the decay heat from both the fuel assembly and any NON-FUEL HARDWARE, as applicable for the particular fuel storage location, to ensure the decay heat emitted by all contents in a storage location does not exceed the limit.

Table 2.4.3  
PWR FUEL ASSEMBLY COOLING TIME-DEPENDENT COEFFICIENTS  
(ZR-CLAD FUEL)

Cooling Time (years)	Array/Class 14x14A						
	A	B	C	D	E	F	G
$\geq 3$	19311.5	275.367	-59.0252	-139.41	2851.12	-451.845	-615.413
$\geq 4$	33865.9	-5473.03	851.121	-132.739	3408.58	-656.479	-609.523
$\geq 5$	46686.2	-13226.9	2588.39	-150.149	3871.87	-806.533	-90.2065
$\geq 6$	56328.9	-20443.2	4547.38	-176.815	4299.19	-927.358	603.192
$\geq 7$	64136	-27137.5	6628.18	-200.933	4669.22	-1018.94	797.162
$\geq 8$	71744.1	-34290.3	9036.9	-214.249	4886.95	-1037.59	508.703
$\geq 9$	77262	-39724.2	11061	-228.2	5141.35	-1102.05	338.294
$\geq 10$	82939.8	-45575.6	13320.2	-233.691	5266.25	-1095.94	-73.3159
$\geq 11$	86541	-49289.6	14921.7	-242.092	5444.54	-1141.6	-83.0603
$\geq 12$	91383	-54456.7	17107	-242.881	5528.7	-1149.2	-547.579
$\geq 13$	95877.6	-59404.7	19268	-240.36	5524.35	-1094.72	-933.64
$\geq 14$	97648.3	-61091.6	20261.7	-244.234	5654.56	-1151.47	-749.836
$\geq 15$	102533	-66651.5	22799.7	-240.858	5647.05	-1120.32	-1293.34
$\geq 16$	106216	-70753.8	24830.1	-237.04	5647.63	-1099.12	-1583.89
$\geq 17$	109863	-75005	27038	-234.299	5652.45	-1080.98	-1862.07
$\geq 18$	111460	-76482.3	28076.5	-234.426	5703.52	-1104.39	-1695.77
$\geq 19$	114916	-80339.6	30126.5	-229.73	5663.21	-1065.48	-1941.83
$\geq 20$	119592	-86161.5	33258.2	-227.256	5700.49	-1100.21	-2474.01

Table 2.4-3 (cont'd)

**PWR FUEL ASSEMBLY COOLING TIME-DEPENDENT COEFFICIENTS  
(ZR-CLAD FUEL)**

Cooling Time (years)	Array/Class 14x14B						
	A	B	C	D	E	F	G
$\geq 3$	18036.1	63.7639	-24.7251	-130.732	2449.87	-347.748	-858.192
$\geq 4$	30303.4	-4304.2	598.79	-118.757	2853.18	-486.453	-459.902
$\geq 5$	40779.6	-9922.93	1722.83	-138.174	3255.69	-608.267	245.251
$\geq 6$	48806.7	-15248.9	3021.47	-158.69	3570.24	-689.876	833.917
$\geq 7$	55070.5	-19934.6	4325.62	-179.964	3870.33	-765.849	1203.89
$\geq 8$	60619.6	-24346	5649.29	-189.701	4042.23	-795.324	1158.12
$\geq 9$	64605.7	-27677.1	6778.12	-205.459	4292.35	-877.966	1169.88
$\geq 10$	69083.8	-31509.4	8072.42	-206.157	4358.01	-875.041	856.449
$\geq 11$	72663.2	-34663.9	9228.96	-209.199	4442.68	-889.512	671.567
$\geq 12$	74808.9	-36367	9948.88	-214.344	4571.29	-942.418	765.261
$\geq 13$	78340.3	-39541.1	11173.8	-212.8	4615.06	-957.833	410.807
$\geq 14$	81274.8	-42172.3	12259.9	-209.758	4626.13	-958.016	190.59
$\geq 15$	83961.4	-44624.5	13329.1	-207.697	4632.16	-952.876	20.8575
$\geq 16$	84968.5	-44982.1	13615.8	-207.171	4683.41	-992.162	247.54
$\geq 17$	87721.6	-47543.1	14781.4	-203.373	4674.3	-988.577	37.9689
$\geq 18$	90562.9	-50100.4	15940.4	-198.649	4651.64	-982.459	-247.421
$\geq 19$	93011.6	-52316.6	17049.9	-194.964	4644.76	-994.63	-413.021
$\geq 20$	95567.8	-54566.6	18124	-190.22	4593.92	-963.412	-551.983

Table 2.4-3 (cont'd)

PWR FUEL ASSEMBLY COOLING TIME-DEPENDENT COEFFICIENTS  
(ZR-CLAD FUEL)

Cooling Time (years)	Array/Class 14x14C						
	A	B	C	D	E	F	G
$\geq 3$	18263.7	174.161	-57.6694	-138.112	2539.74	-369.764	-1372.33
$\geq 4$	30514.5	-4291.52	562.37	-124.944	2869.17	-481.139	-889.883
$\geq 5$	41338	-10325.7	1752.96	-141.247	3146.48	-535.709	-248.078
$\geq 6$	48969.7	-15421.3	2966.33	-163.574	3429.74	-587.225	429.331
$\geq 7$	55384.6	-20228.9	4261.47	-180.846	3654.55	-617.255	599.251
$\geq 8$	60240.2	-24093.2	5418.86	-199.974	3893.72	-663.995	693.934
$\geq 9$	64729	-27745.7	6545.45	-205.385	3986.06	-650.124	512.528
$\geq 10$	68413.7	-30942.2	7651.29	-216.408	4174.71	-702.931	380.431
$\geq 11$	71870.6	-33906.7	8692.81	-218.813	4248.28	-704.458	160.645
$\geq 12$	74918.4	-36522	9660.01	-218.248	4283.68	-696.498	-29.0682
$\geq 13$	77348.3	-38613.7	10501.8	-220.644	4348.23	-702.266	-118.646
$\geq 14$	79817.1	-40661.8	11331.2	-218.711	4382.32	-710.578	-236.123
$\geq 15$	82354.2	-42858.3	12257.3	-215.835	4405.89	-718.805	-431.051
$\geq 16$	84787.2	-44994.5	13185.9	-213.386	4410.99	-711.437	-572.104
$\geq 17$	87084.6	-46866.1	14004.8	-206.788	4360.3	-679.542	-724.721
$\geq 18$	88083.1	-47387.1	14393.4	-208.681	4420.85	-709.311	-534.454
$\geq 19$	90783.6	-49760.6	15462.7	-203.649	4403.3	-705.741	-773.066
$\geq 20$	93212	-51753.3	16401.5	-197.232	4361.65	-692.925	-964.628



Table 2.4-3 (cont'd)

**PWR FUEL ASSEMBLY COOLING TIME-DEPENDENT COEFFICIENTS  
(ZR-CLAD FUEL)**

Cooling Time (years)	Array/Class 15x15A/B/C						
	A	B	C	D	E	F	G
$\geq 3$	15037.3	108.689	-18.8378	-127.422	2050.02	-242.828	-580.66
$\geq 4$	25506.6	-2994.03	356.834	-116.45	2430.25	-350.901	-356.378
$\geq 5$	34788.8	-7173.07	1065.9	-124.785	2712.23	-424.681	267.705
$\geq 6$	41948.6	-11225.3	1912.12	-145.727	3003.29	-489.538	852.112
$\geq 7$	47524.9	-14770.9	2755.16	-165.889	3253.9	-542.7	1146.96
$\geq 8$	52596.9	-18348.8	3699.72	-177.17	3415.69	-567.012	1021.41
$\geq 9$	56055.4	-20837.1	4430.93	-192.168	3625.93	-623.325	1058.61
$\geq 10$	59611.3	-23402.1	5179.52	-195.105	3699.18	-626.448	868.517
$\geq 11$	62765.3	-25766.5	5924.71	-195.57	3749.91	-627.139	667.124
$\geq 12$	65664.4	-28004.8	6670.75	-195.08	3788.33	-628.904	410.783
$\geq 13$	67281.7	-29116.7	7120.59	-202.817	3929.38	-688.738	492.309
$\geq 14$	69961.4	-31158.6	7834.02	-197.988	3917.29	-677.565	266.561
$\geq 15$	72146	-32795.7	8453.67	-195.083	3931.47	-681.037	99.0606
$\geq 16$	74142.6	-34244.8	9023.57	-190.645	3905.54	-663.682	10.8885
$\geq 17$	76411.4	-36026.3	9729.98	-188.874	3911.21	-663.449	-151.805
$\geq 18$	77091	-36088	9884.09	-188.554	3965.08	-708.55	59.3839
$\geq 19$	79194.5	-37566.4	10477.5	-181.656	3906.93	-682.4	-117.952
$\geq 20$	81600.4	-39464.5	11281.9	-175.182	3869.49	-677.179	-367.705

Table 2.4-3 (cont'd)

PWR FUEL ASSEMBLY COOLING TIME-DEPENDENT COEFFICIENTS  
(ZR-CLAD FUEL)

Cooling Time (years)	Array/Class 15x15D/E/F/H/I						
	A	B	C	D	E	F	G
$\geq 3$	14376.7	102.205	-20.6279	-126.017	1903.36	-210.883	-493.065
$\geq 4$	24351.4	-2686.57	297.975	-110.819	2233.78	-301.615	-152.713
$\geq 5$	33518.4	-6711.35	958.544	-122.85	2522.7	-371.286	392.608
$\geq 6$	40377	-10472.4	1718.53	-144.535	2793.29	-426.436	951.528
$\geq 7$	46105.8	-13996.2	2515.32	-157.827	2962.46	-445.314	1100.56
$\geq 8$	50219.7	-16677.7	3198.3	-175.057	3176.74	-492.727	1223.62
$\geq 9$	54281.2	-19555.6	3983.47	-181.703	3279.03	-499.997	1034.55
$\geq 10$	56761.6	-21287.3	4525.98	-195.045	3470.41	-559.074	1103.3
$\geq 11$	59820	-23445.2	5165.43	-194.997	3518.23	-561.422	862.68
$\geq 12$	62287.2	-25164.6	5709.9	-194.771	3552.69	-561.466	680.488
$\geq 13$	64799	-27023.7	6335.16	-192.121	3570.41	-561.326	469.583
$\geq 14$	66938.7	-28593.1	6892.63	-194.226	3632.92	-583.997	319.867
$\geq 15$	68116.5	-29148.6	7140.09	-192.545	3670.39	-607.278	395.344
$\geq 16$	70154.9	-30570.1	7662.91	-187.366	3649.14	-597.205	232.318
$\geq 17$	72042.5	-31867.6	8169.01	-183.453	3646.92	-603.907	96.0388
$\geq 18$	73719.8	-32926.1	8596.12	-177.896	3614.57	-592.868	46.6774
$\geq 19$	75183.1	-33727.4	8949.64	-172.386	3581.13	-586.347	3.57256
$\geq 20$	77306.1	-35449	9690.02	-173.784	3636.87	-626.321	-205.513

Table 2.4-3 (cont'd)

PWR FUEL ASSEMBLY COOLING TIME-DEPENDENT COEFFICIENTS  
(ZR-CLAD FUEL)

Cooling Time (years)	Array/Class 16x16A						
	A	B	C	D	E	F	G
$\geq 3$	16226.8	143.714	-32.4809	-136.707	2255.33	-291.683	-699.947
$\geq 4$	27844.2	-3590.69	444.838	-124.301	2644.09	-411.598	-381.106
$\geq 5$	38191.5	-8678.48	1361.58	-132.855	2910.45	-473.183	224.473
$\geq 6$	46382.2	-13819.6	2511.32	-158.262	3216.92	-532.337	706.656
$\geq 7$	52692.3	-18289	3657.18	-179.765	3488.3	-583.133	908.839
$\geq 8$	57758.7	-22133.7	4736.88	-199.014	3717.42	-618.83	944.903
$\geq 9$	62363.3	-25798.7	5841.18	-207.025	3844.38	-625.741	734.928
$\geq 10$	66659.1	-29416.3	6993.31	-216.458	3981.97	-642.641	389.366
$\geq 11$	69262.7	-31452.7	7724.66	-220.836	4107.55	-681.043	407.121
$\geq 12$	72631.5	-34291.9	8704.8	-219.929	4131.5	-662.513	100.093
$\geq 13$	75375.3	-36589.3	9555.88	-217.994	4143.15	-644.014	-62.3294
$\geq 14$	78178.7	-39097.1	10532	-221.923	4226.28	-667.012	-317.743
$\geq 15$	79706.3	-40104	10993.3	-218.751	4242.12	-670.665	-205.579
$\geq 16$	82392.6	-42418.9	11940.7	-216.278	4274.09	-689.236	-479.752
$\geq 17$	84521.8	-44150.5	12683.3	-212.056	4245.99	-665.418	-558.901
$\geq 18$	86777.1	-45984.8	13479	-204.867	4180.8	-621.805	-716.366
$\geq 19$	89179.7	-48109.8	14434.5	-206.484	4230.03	-648.557	-902.1
$\geq 20$	90141.7	-48401.4	14702.6	-203.284	4245.54	-670.655	-734.604

Table 2.4-3 (cont'd)

PWR FUEL ASSEMBLY COOLING TIME-DEPENDENT COEFFICIENTS  
(ZR-CLAD FUEL)

Cooling Time (years)	Array/Class 17x17A/16x16B/C						
	A	B	C	D	E	F	G
$\geq 3$	15985.1	3.53963	-9.04955	-128.835	2149.5	-260.415	-262.997
$\geq 4$	27532.9	-3494.41	428.199	-119.504	2603.01	-390.91	-140.319
$\geq 5$	38481.2	-8870.98	1411.03	-139.279	3008.46	-492.881	388.377
$\geq 6$	47410.9	-14479.6	2679.08	-162.13	3335.48	-557.777	702.164
$\geq 7$	54596.8	-19703.2	4043.46	-181.339	3586.06	-587.634	804.05
$\geq 8$	60146.1	-24003.4	5271.54	-201.262	3830.32	-621.706	848.454
$\geq 9$	65006.3	-27951	6479.04	-210.753	3977.69	-627.805	615.84
$\geq 10$	69216	-31614.7	7712.58	-222.423	4173.4	-672.33	387.879
$\geq 11$	73001.3	-34871.1	8824.44	-225.128	4238.28	-657.259	101.654
$\geq 12$	76326.1	-37795.9	9887.35	-226.731	4298.11	-647.55	-122.236
$\geq 13$	78859.9	-40058.9	10797.1	-231.798	4402.14	-669.982	-203.383
$\geq 14$	82201.3	-43032.5	11934.1	-228.162	4417.99	-661.61	-561.969
$\geq 15$	84950	-45544.6	12972.4	-225.369	4417.84	-637.422	-771.254
$\geq 16$	87511.8	-47720	13857.7	-219.255	4365.24	-585.655	-907.775
$\geq 17$	90496.4	-50728.9	15186	-223.019	4446.51	-613.378	-1200.94
$\geq 18$	91392.5	-51002.4	15461.4	-220.272	4475.28	-636.398	-1003.81
$\geq 19$	94343.9	-53670.8	16631.6	-214.045	4441.31	-616.201	-1310.01
$\geq 20$	96562.9	-55591.2	17553.4	-209.917	4397.67	-573.199	-1380.64

Table 2.4-3 (cont'd)

PWR FUEL ASSEMBLY COOLING TIME-DEPENDENT COEFFICIENTS  
(ZR-CLAD FUEL)

Cooling Time (years)	Array/Class 17x17B/C						
	A	B	C	D	E	F	G
$\geq 3$	14738	47.5402	-13.8187	-127.895	1946.58	-219.289	-389.029
$\geq 4$	25285.2	-3011.92	350.116	-115.75	2316.89	-319.23	-220.413
$\geq 5$	34589.6	-7130.34	1037.26	-128.673	2627.27	-394.58	459.642
$\geq 6$	42056.2	-11353.7	1908.68	-150.234	2897.38	-444.316	923.971
$\geq 7$	47977.6	-15204.8	2827.4	-173.349	3178.25	-504.16	1138.82
$\geq 8$	52924	-18547.6	3671.08	-183.025	3298.64	-501.278	1064.68
$\geq 9$	56465.5	-21139.4	4435.67	-200.386	3538	-569.712	1078.78
$\geq 10$	60190.9	-23872.7	5224.31	-203.233	3602.88	-562.312	805.336
$\geq 11$	63482.1	-26431.1	6035.79	-205.096	3668.84	-566.889	536.011
$\geq 12$	66095	-28311.8	6637.72	-204.367	3692.68	-555.305	372.223
$\geq 13$	67757.4	-29474.4	7094.08	-211.649	3826.42	-606.886	437.412
$\geq 14$	70403.7	-31517.4	7807.15	-207.668	3828.69	-601.081	183.09
$\geq 15$	72506.5	-33036.1	8372.59	-203.428	3823.38	-594.995	47.5175
$\geq 16$	74625.2	-34620.5	8974.32	-199.003	3798.57	-573.098	-95.0221
$\geq 17$	76549	-35952.6	9498.14	-193.459	3766.52	-556.928	-190.662
$\geq 18$	77871.9	-36785.5	9916.91	-195.592	3837.65	-599.45	-152.261
$\geq 19$	79834.8	-38191.6	10501.9	-190.83	3812.46	-589.635	-286.847
$\geq 20$	81975.5	-39777.2	11174.5	-185.767	3795.78	-595.664	-475.978

Table 2.4-4

**BWR FUEL ASSEMBLY COOLING TIME-DEPENDENT COEFFICIENTS  
(ZR-CLAD FUEL)**

Cooling Time (years)	Array/Class 7x7B & 10x10F						
	A	B	C	D	E	F	G
$\geq 3$	26409.1	28347.5	-16858	-147.076	5636.32	-1606.75	1177.88
$\geq 4$	61967.8	-6618.31	-4131.96	-113.949	6122.77	-2042.85	-96.7439
$\geq 5$	91601.1	-49298.3	17826.5	-132.045	6823.14	-2418.49	-185.189
$\geq 6$	111369	-80890.1	35713.8	-150.262	7288.51	-2471.1	86.6363
$\geq 7$	126904	-108669	53338.1	-167.764	7650.57	-2340.78	150.403
$\geq 8$	139181	-132294	69852.5	-187.317	8098.66	-2336.13	97.5285
$\geq 9$	150334	-154490	86148.1	-193.899	8232.84	-2040.37	-123.029
$\geq 10$	159897	-173614	100819	-194.156	8254.99	-1708.32	-373.605
$\geq 11$	166931	-186860	111502	-193.776	8251.55	-1393.91	-543.677
$\geq 12$	173691	-201687	125166	-202.578	8626.84	-1642.3	-650.814
$\geq 13$	180312	-215406	137518	-201.041	8642.19	-1469.45	-810.024
$\geq 14$	185927	-227005	148721	-197.938	8607.6	-1225.95	-892.876
$\geq 15$	191151	-236120	156781	-191.625	8451.86	-846.27	-1019.4
$\geq 16$	195761	-244598	165372	-187.043	8359.19	-572.561	-1068.19
$\geq 17$	200791	-256573	179816	-197.26	8914.28	-1393.37	-1218.63
$\geq 18$	206068	-266136	188841	-187.191	8569.56	-730.898	-1363.79
$\geq 19$	210187	-273609	197794	-182.151	8488.23	-584.727	-1335.59
$\geq 20$	213731	-278120	203074	-175.864	8395.63	-457.304	-1364.38

Table 2.4-4 (cont'd)

**BWR FUEL ASSEMBLY COOLING TIME-DEPENDENT COEFFICIENTS  
(ZR-CLAD FUEL)**

Cooling Time (years)	Array/Class 8x8B						
	A	B	C	D	E	F	G
$\geq 3$	28219.6	28963.7	-17616.2	-147.68	5887.41	-1730.96	1048.21
$\geq 4$	66061.8	-10742.4	-1961.82	-123.066	6565.54	-2356.05	-298.005
$\geq 5$	95790.7	-53401.7	19836.7	-134.584	7145.41	-2637.09	-298.858
$\geq 6$	117477	-90055.9	41383.9	-154.758	7613.43	-2612.69	-64.9921
$\geq 7$	134090	-120643	60983	-168.675	7809	-2183.3	-40.8885
$\geq 8$	148186	-149181	81418.7	-185.726	8190.07	-2040.31	-260.773
$\geq 9$	159082	-172081	99175.2	-197.185	8450.86	-1792.04	-381.705
$\geq 10$	168816	-191389	113810	-195.613	8359.87	-1244.22	-613.594
$\geq 11$	177221	-210599	131099	-208.3	8810	-1466.49	-819.773
$\geq 12$	183929	-224384	143405	-207.497	8841.33	-1227.71	-929.708
$\geq 13$	191093	-240384	158327	-204.95	8760.17	-811.708	-1154.76
$\geq 14$	196787	-252211	169664	-204.574	8810.95	-610.928	-1208.97
$\geq 15$	203345	-267656	186057	-208.962	9078.41	-828.954	-1383.76
$\geq 16$	207973	-276838	196071	-204.592	9024.17	-640.808	-1436.43
$\geq 17$	213891	-290411	211145	-202.169	9024.19	-482.1	-1595.28
$\geq 18$	217483	-294066	214600	-194.243	8859.35	-244.684	-1529.61
$\geq 19$	220504	-297897	219704	-190.161	8794.97	-10.9863	-1433.86
$\geq 20$	227821	-318395	245322	-194.682	9060.96	-350.308	-1741.16

Table 2.4-4 (cont'd)

**BWR FUEL ASSEMBLY COOLING TIME-DEPENDENT COEFFICIENTS  
(ZR-CLAD FUEL)**

Cooling Time (years)	Array/Class 8x8C/D/E						
	A	B	C	D	E	F	G
$\geq 3$	28592.7	28691.5	-17773.6	-149.418	5969.45	-1746.07	1063.62
$\geq 4$	66720.8	-12115.7	-1154	-128.444	6787.16	-2529.99	-302.155
$\geq 5$	96929.1	-55827.5	21140.3	-136.228	7259.19	-2685.06	-334.328
$\geq 6$	118190	-92000.2	42602.5	-162.204	7907.46	-2853.42	-47.5465
$\geq 7$	135120	-123437	62827.1	-172.397	8059.72	-2385.81	-75.0053
$\geq 8$	149162	-152986	84543.1	-195.458	8559.11	-2306.54	-183.595
$\geq 9$	161041	-177511	103020	-200.087	8632.84	-1864.4	-433.081
$\geq 10$	171754	-201468	122929	-209.799	8952.06	-1802.86	-755.742
$\geq 11$	179364	-217723	137000	-215.803	9142.37	-1664.82	-847.268
$\geq 12$	186090	-232150	150255	-216.033	9218.36	-1441.92	-975.817
$\geq 13$	193571	-249160	165997	-213.204	9146.99	-1011.13	-1119.47
$\geq 14$	200034	-263671	180359	-210.559	9107.54	-694.626	-1312.55
$\geq 15$	205581	-275904	193585	-216.242	9446.57	-1040.65	-1428.13
$\geq 16$	212015	-290101	207594	-210.036	9212.93	-428.321	-1590.7
$\geq 17$	216775	-299399	218278	-204.611	9187.86	-398.353	-1657.6
$\geq 18$	220653	-306719	227133	-202.498	9186.34	-181.672	-1611.86
$\geq 19$	224859	-314004	235956	-193.902	8990.14	145.151	-1604.71
$\geq 20$	228541	-320787	245449	-200.727	9310.87	-230.252	-1570.18



Table 2.4-4 (cont'd)

**BWR FUEL ASSEMBLY COOLING TIME-DEPENDENT COEFFICIENTS  
(ZR-CLAD FUEL)**

Cooling Time (years)	Array/Class 9x9A						
	A	B	C	D	E	F	G
$\geq 3$	30538.7	28463.2	-18105.5	-150.039	6226.92	-1876.69	1034.06
$\geq 4$	71040.1	-16692.2	1164.15	-128.241	7105.27	-2728.58	-414.09
$\geq 5$	100888	-60277.7	24150.1	-142.541	7896.11	-3272.86	-232.197
$\geq 6$	124846	-102954	50350.8	-161.849	8350.16	-3163.44	-91.1396
$\geq 7$	143516	-140615	76456.5	-185.538	8833.04	-2949.38	-104.802
$\geq 8$	158218	-171718	99788.2	-196.315	9048.88	-2529.26	-259.929
$\geq 9$	172226	-204312	126620	-214.214	9511.56	-2459.19	-624.954
$\geq 10$	182700	-227938	146736	-215.793	9555.41	-1959.92	-830.943
$\geq 11$	190734	-246174	163557	-218.071	9649.43	-1647.5	-935.021
$\geq 12$	199997	-269577	186406	-223.975	9884.92	-1534.34	-1235.27
$\geq 13$	207414	-287446	204723	-228.808	10131.7	-1614.49	-1358.61
$\geq 14$	215263	-306131	223440	-220.919	9928.27	-988.276	-1638.05
$\geq 15$	221920	-321612	239503	-217.949	9839.02	-554.709	-1784.04
$\geq 16$	226532	-331778	252234	-216.189	9893.43	-442.149	-1754.72
$\geq 17$	232959	-348593	272609	-219.907	10126.3	-663.84	-1915.3
$\geq 18$	240810	-369085	296809	-219.729	10294.6	-859.302	-2218.87
$\geq 19$	244637	-375057	304456	-210.997	10077.8	-425.446	-2127.83
$\geq 20$	248112	-379262	309391	-204.191	9863.67	100.27	-2059.39

Table 2.4-4 (cont'd)

**BWR FUEL ASSEMBLY COOLING TIME-DEPENDENT COEFFICIENTS  
(ZR-CLAD FUEL)**

Cooling Time (years)	Array/Class 9x9B						
	A	B	C	D	E	F	G
$\geq 3$	30613.2	28985.3	-18371	-151.117	6321.55	-1881.28	988.92
$\geq 4$	71346.6	-15922.9	631.132	-128.876	7232.47	-2810.64	-471.737
$\geq 5$	102131	-60654.1	23762.7	-140.748	7881.6	-3156.38	-417.979
$\geq 6$	127187	-105842	51525.2	-162.228	8307.4	-2913.08	-342.13
$\geq 7$	146853	-145834	79146.5	-185.192	8718.74	-2529.57	-484.885
$\geq 8$	162013	-178244	103205	-197.825	8896.39	-1921.58	-584.013
$\geq 9$	176764	-212856	131577	-215.41	9328.18	-1737.12	-1041.11
$\geq 10$	186900	-235819	151238	-218.98	9388.08	-1179.87	-1202.83
$\geq 11$	196178	-257688	171031	-220.323	9408.47	-638.53	-1385.16
$\geq 12$	205366	-280266	192775	-223.715	9592.12	-472.261	-1661.6
$\geq 13$	215012	-306103	218866	-231.821	9853.37	-361.449	-1985.56
$\geq 14$	222368	-324558	238655	-228.062	9834.57	3.47358	-2178.84
$\geq 15$	226705	-332738	247316	-224.659	9696.59	632.172	-2090.75
$\geq 16$	233846	-349835	265676	-221.533	9649.93	913.747	-2243.34
$\geq 17$	243979	-379622	300077	-222.351	9792.17	1011.04	-2753.36
$\geq 18$	247774	-386203	308873	-220.306	9791.37	1164.58	-2612.25
$\geq 19$	254041	-401906	327901	-213.96	9645.47	1664.94	-2786.2
$\geq 20$	256003	-402034	330566	-215.242	9850.42	1359.46	-2550.06

Table 2.4-4 (cont'd)

BWR FUEL ASSEMBLY COOLING TIME-DEPENDENT COEFFICIENTS  
(ZR-CLAD FUEL)

Cooling Time (years)	Array/Class 9x9C/D						
	A	B	C	D	E	F	G
$\geq 3$	30051.6	29548.7	-18614.2	-148.276	6148.44	-1810.34	1006
$\geq 4$	70472.7	-14696.6	-233.567	-127.728	7008.69	-2634.22	-444.373
$\geq 5$	101298	-59638.9	23065.2	-138.523	7627.57	-2958.03	-377.965
$\geq 6$	125546	-102740	49217.4	-160.811	8096.34	-2798.88	-259.767
$\geq 7$	143887	-139261	74100.4	-184.302	8550.86	-2517.19	-275.151
$\geq 8$	159633	-172741	98641.4	-194.351	8636.89	-1838.81	-486.731
$\geq 9$	173517	-204709	124803	-212.604	9151.98	-1853.27	-887.137
$\geq 10$	182895	-225481	142362	-218.251	9262.59	-1408.25	-978.356
$\geq 11$	192530	-247839	162173	-217.381	9213.58	-818.676	-1222.12
$\geq 12$	201127	-268201	181030	-215.552	9147.44	-232.221	-1481.55
$\geq 13$	209538	-289761	203291	-225.092	9588.12	-574.227	-1749.35
$\geq 14$	216798	-306958	220468	-222.578	9518.22	-69.9307	-1919.71
$\geq 15$	223515	-323254	237933	-217.398	9366.52	475.506	-2012.93
$\geq 16$	228796	-334529	250541	-215.004	9369.33	662.325	-2122.75
$\geq 17$	237256	-356311	273419	-206.483	9029.55	1551.3	-2367.96
$\geq 18$	242778	-369493	290354	-215.557	9600.71	659.297	-2589.32
$\geq 19$	246704	-377971	302630	-210.768	9509.41	1025.34	-2476.06
$\geq 20$	249944	-382059	308281	-205.495	9362.63	1389.71	-2350.49

Table 2.4-4 (cont'd)

**BWR FUEL ASSEMBLY COOLING TIME-DEPENDENT COEFFICIENTS  
(ZR-CLAD FUEL)**

Cooling Time (years)	Array/Class 9x9E/F						
	A	B	C	D	E	F	G
$\geq 3$	30284.3	26949.5	-16926.4	-147.914	6017.02	-1854.81	1026.15
$\geq 4$	69727.4	-17117.2	1982.33	-127.983	6874.68	-2673.01	-359.962
$\geq 5$	98438.9	-58492	23382.2	-138.712	7513.55	-3038.23	-112.641
$\geq 6$	119765	-95024.1	45261	-159.669	8074.25	-3129.49	221.182
$\geq 7$	136740	-128219	67940.1	-182.439	8595.68	-3098.17	315.544
$\geq 8$	150745	-156607	88691.5	-193.941	8908.73	-2947.64	142.072
$\geq 9$	162915	-182667	109134	-198.37	8999.11	-2531	-93.4908
$\geq 10$	174000	-208668	131543	-210.777	9365.52	-2511.74	-445.876
$\geq 11$	181524	-224252	145280	-212.407	9489.67	-2387.49	-544.123
$\geq 12$	188946	-240952	160787	-210.65	9478.1	-2029.94	-652.339
$\geq 13$	193762	-250900	171363	-215.798	9742.31	-2179.24	-608.636
$\geq 14$	203288	-275191	196115	-218.113	9992.5	-2437.71	-1065.92
$\geq 15$	208108	-284395	205221	-213.956	9857.25	-1970.65	-1082.94
$\geq 16$	215093	-301828	224757	-209.736	9789.58	-1718.37	-1303.35
$\geq 17$	220056	-310906	234180	-201.494	9541.73	-1230.42	-1284.15
$\geq 18$	224545	-320969	247724	-206.807	9892.97	-1790.61	-1381.9
$\geq 19$	226901	-322168	250395	-204.073	9902.14	-1748.78	-1253.22
$\geq 20$	235561	-345414	276856	-198.306	9720.78	-1284.14	-1569.18

Table 2.4-4 (cont'd)

**BWR FUEL ASSEMBLY COOLING TIME-DEPENDENT COEFFICIENTS  
(ZR-CLAD FUEL)**

Cooling Time (years)	Array/Class 9x9G						
	A	B	C	D	E	F	G
$\geq 3$	35158.5	26918.5	-17976.7	-149.915	6787.19	-2154.29	836.894
$\geq 4$	77137.2	-19760.1	2371.28	-130.934	8015.43	-3512.38	-455.424
$\geq 5$	113405	-77931.2	35511.2	-150.637	8932.55	-4099.48	-629.806
$\geq 6$	139938	-128700	68698.3	-173.799	9451.22	-3847.83	-455.905
$\geq 7$	164267	-183309	109526	-193.952	9737.91	-3046.84	-737.992
$\geq 8$	182646	-227630	146275	-210.936	10092.3	-2489.3	-1066.96
$\geq 9$	199309	-270496	184230	-218.617	10124.3	-1453.81	-1381.41
$\geq 10$	213186	-308612	221699	-235.828	10703.2	-1483.31	-1821.73
$\geq 11$	225587	-342892	256242	-236.112	10658.5	-612.076	-2134.65
$\geq 12$	235725	-370471	285195	-234.378	10604.9	118.591	-2417.89
$\geq 13$	247043	-404028	323049	-245.79	11158.2	-281.813	-2869.82
$\geq 14$	253649	-421134	342682	-243.142	11082.3	400.019	-2903.88
$\geq 15$	262750	-448593	376340	-245.435	11241.2	581.355	-3125.07
$\geq 16$	270816	-470846	402249	-236.294	10845.4	1791.46	-3293.07
$\geq 17$	279840	-500272	441964	-241.324	11222.6	1455.84	-3528.25
$\geq 18$	284533	-511287	458538	-240.905	11367.2	1459.68	-3520.94
$\geq 19$	295787	-545885	501824	-235.685	11188.2	2082.21	-3954.2
$\geq 20$	300209	-556936	519174	-229.539	10956	2942.09	-3872.87

Table 2.4-4 (cont'd)

**BWR FUEL ASSEMBLY COOLING TIME-DEPENDENT COEFFICIENTS  
(ZR-CLAD FUEL)**

Cooling Time (years)	Array/Class 10x10A/B/G						
	A	B	C	D	E	F	G
$\geq 3$	29285.4	27562.2	-16985	-148.415	5960.56	-1810.79	1001.45
$\geq 4$	67844.9	-14383	395.619	-127.723	6754.56	-2547.96	-369.267
$\geq 5$	96660.5	-55383.8	21180.4	-137.17	7296.6	-2793.58	-192.85
$\geq 6$	118098	-91995	42958	-162.985	7931.44	-2940.84	60.9197
$\geq 7$	135115	-123721	63588.9	-171.747	8060.23	-2485.59	73.6219
$\geq 8$	148721	-151690	84143.9	-190.26	8515.81	-2444.25	-63.4649
$\geq 9$	160770	-177397	104069	-197.534	8673.6	-2101.25	-331.046
$\geq 10$	170331	-198419	121817	-213.692	9178.33	-2351.54	-472.844
$\geq 11$	179130	-217799	138652	-209.75	9095.43	-1842.88	-705.254
$\geq 12$	186070	-232389	151792	-208.946	9104.52	-1565.11	-822.73
$\geq 13$	192407	-246005	164928	-209.696	9234.7	-1541.54	-979.245
$\geq 14$	200493	-265596	183851	-207.639	9159.83	-1095.72	-1240.61
$\geq 15$	205594	-276161	195760	-213.491	9564.23	-1672.22	-1333.64
$\geq 16$	209386	-282942	204110	-209.322	9515.83	-1506.86	-1286.82
$\geq 17$	214972	-295149	217095	-202.445	9292.34	-893.6	-1364.97
$\geq 18$	219312	-302748	225826	-198.667	9272.27	-878.536	-1379.58
$\geq 19$	223481	-310663	235908	-194.825	9252.9	-785.066	-1379.62
$\geq 20$	227628	-319115	247597	-199.194	9509.02	-1135.23	-1386.19

Table 2.4-4 (cont'd)

**BWR FUEL ASSEMBLY COOLING TIME-DEPENDENT COEFFICIENTS  
(ZR-CLAD FUEL)**

Cooling Time (years)	Array/Class 10x10C						
	A	B	C	D	E	F	G
$\geq 3$	31425.3	27358.9	-17413.3	-152.096	6367.53	-1967.91	925.763
$\geq 4$	71804	-16964.1	1000.4	-129.299	7227.18	-2806.44	-416.92
$\geq 5$	102685	-62383.3	24971.2	-142.316	7961	-3290.98	-354.784
$\geq 6$	126962	-105802	51444.6	-164.283	8421.44	-3104.21	-186.615
$\geq 7$	146284	-145608	79275.5	-188.967	8927.23	-2859.08	-251.163
$\geq 8$	162748	-181259	105859	-199.122	9052.91	-2206.31	-554.124
$\geq 9$	176612	-214183	133261	-217.56	9492.17	-1999.28	-860.669
$\geq 10$	187756	-239944	155315	-219.56	9532.45	-1470.9	-1113.42
$\geq 11$	196580	-260941	174536	-222.457	9591.64	-944.473	-1225.79
$\geq 12$	208017	-291492	204805	-233.488	10058.3	-1217.01	-1749.84
$\geq 13$	214920	-307772	221158	-234.747	10137.1	-897.23	-1868.04
$\geq 14$	222562	-326471	240234	-228.569	9929.34	-183.47	-2016.12
$\geq 15$	228844	-342382	258347	-226.944	9936.76	117.061	-2106.05
$\geq 16$	233907	-353008	270390	-223.179	9910.72	360.39	-2105.23
$\geq 17$	244153	-383017	304819	-227.266	10103.2	380.393	-2633.23
$\geq 18$	249240	-395456	321452	-226.989	10284.1	169.947	-2623.67
$\geq 19$	254343	-406555	335240	-220.569	10070.5	764.689	-2640.2
$\geq 20$	260202	-421069	354249	-216.255	10069.9	854.497	-2732.77

DESIGN FEATURES

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3.3.1 Alternatives to Codes, Standards, and Criteria

Table 3-1 lists approved alternatives to the ASME Code for the design of the MPCs, OVERPACKs, and TRANSFER CASKs of the HI-STORM 100 Cask System.

3.3.2 Construction/Fabrication Alternatives to Codes, Standards, and Criteria

Proposed alternatives to the ASME Code, Sections **II and III**, 1995 Edition with Addenda through 1997 including modifications to the alternatives allowed by Specification 3.3.1 may be used on a case-specific basis when authorized by the Director of the Office of Nuclear Material Safety and Safeguards or designee. The request for such alternative should demonstrate that:

1. The proposed alternatives would provide an acceptable level of quality and safety, or
2. Compliance with the specified requirements of the ASME Code, Section III, 1995 Edition with Addenda through 1997, would result in hardship or unusual difficulty without a compensating increase in the level of quality and safety.

Requests for alternatives shall be submitted in accordance with 10 CFR 72.4.

(continued)



## DESIGN FEATURES (continued)

## 3.4 Site-Specific Parameters and Analyses (continued)

NOTE: The above anchorage specifications are required for the seismic spectra defined in item 3.4.3.c.i. Users may use fewer studs or those of different diameter to account for site-specific seismic spectra less severe than those specified above. The embedment design shall comply with Appendix B of ACI-349-97. A later edition of this Code may be used, provided a written reconciliation is performed.

- iii. Embedment Concrete Compressive Strength:  $\geq 4,000$  psi at 28 days
- 4. The analyzed flood condition of 15 fps water velocity and a height of 125 feet of water (full submergence of the loaded cask) are not exceeded.
- 5. The potential for fire and explosion while handling a loaded OVERPACK or TRANSFER CASK shall be addressed, based on site-specific considerations. The user shall demonstrate that the site-specific potential for fire is bounded by the fire conditions analyzed by the Certificate Holder, or an analysis of the site-specific fire considerations shall be performed.
- 6.
  - a. For freestanding casks, the ISFSI pad shall be verified by analysis to limit cask deceleration during design basis drop and non-mechanistic tip-over events to  $\leq 45$  g's at the top of the MPC fuel basket. Analyses shall be performed using methodologies consistent with those described in the HI-STORM 100 FSAR. A restriction on the lift and/or drop height is not required if the cask is lifted with a device designed in accordance with applicable stress limits from ANSI N14.6, and/or NUREG-0612, and has redundant drop protection features.
  - b. For anchored casks, the ISFSI pad shall be designed to meet the embedment requirements of the anchorage design. A cask tip-over event for an anchored cask is not credible. The ISFSI pad shall be verified by analysis to limit cask deceleration during a design basis drop event to  $\leq 45$  g's at the top of the MPC fuel basket, except as provided for in this paragraph below. Analyses shall be performed using methodologies consistent with those described in the HI-STORM 100 FSAR. A restriction on the lift and/or drop height is not required to be established if the cask is lifted with a device designed in accordance with applicable stress limits from ANSI N14.6, and/or NUREG-0612, and has redundant drop protection features.

(continued)