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December 21, 2017

May Ma
Office of Administration
Mail Stop: OWFN-2-A13

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555-0001

Subject: Holtec International Comments on Draft NUREG-2214, Managing Aging Processes
in Storage (MAPS)

Reference: [1] NRC-2016-0238, Draft "Managing Aging Processes in Storage Report," dated
October 24, 2017

Dear Ms. Ma:

Holtec International appreciates the opportunity to comment on the NRC's draft "Managing
Aging Processes in Storage report [1]. Holtec is currently involved in aging management work
related to our system, and we appreciate the staff's guidance document.

Holtec has participated with the industry comment consolidation and supports the comments
submitted by the Nuclear Energy Institute. However, because portions of the report discuss
specifics of the Holtec systems and designs, we would like to offer the attached comments for
the staff's consideration on the Holtec specific information.

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

Sincerely,

A handwritten signature in cursive script, appearing to read "Kim Manzione".

Kimberly Manzione
Licensing Manager,
Holtec International

(7)
82 FR 49233
10/24/2017

cc: (via email)
Mr. John McKirgan, USNRC
Mr. Michael Layton, USNRC
Mr. Meraj Rahimi, USNRC

SUNSI Review Complete
Template = ADM - 013
E-RIDS= ADM-03
Add= John Wise (JPro1)



Comments on Holtec specific items in draft NUREG-2214

Location In Document	Comment
Page 4-94, lines 28 and 29	Suggest also noting that the enclosed helium also provides an inert environment that makes corrosion issues non-credible.
Page 4-99, line 20	The statement says that the pool lid incorporates two gasket seals, however, the remainder of the sentence correctly notes that those seals are actually one between the pool lid and bottom flange and a second between the MPC and transfer cask, near the top. Suggest removing the "pool lid incorporates two gasket seals," statement.
Page 4-106, Table 4-7, "Basket Supports"	The table does not include the "Basket Shim" component (used only in the MPC-68M), which have a thermal function. However, they are stored in the same inert environment, so no aging management is expected to be needed.
Page 4-108, Table 4-7, "Vent and drain tubes"	The table identifies these as having a structural function, but these components are not credited with any structural function. These components are only used during initial loading and drying, and are not necessary for long term storage.
Page 4-109, Table 4-7, "Damaged Fuel Container"	The table identifies that the Damaged Fuel Container has a confinement "CO" function. However, the DFCs have screens at the top and bottom and are not credited as a confinement boundary. It may be more appropriate to add a criticality function to the DFCs, as they are credited in that analysis.
Page 4-109, Table 4-7, "Threaded disc plug adjustment"	These components are not credited as part of the confinement boundary for the MPC.
Page 4-111, Table 4-8, "Lid inner ring"	The lid inner ring is also credited for shielding.
Page 4-111, Table 4-8, "Lid outer ring"	The lid outer ring also has a structural function.
Page 4-112, Table 4-8, "Outer Shell"	The outer shell is also credited for shielding.
Page 4-113, Table 4-8, "Inner shell, lid bottom plate, and lid shell"	These components are also credited for shielding.
Page 4-115, Table 4-8, "Lid Stud"	The material for the lid stud appears to be incomplete, see the HI-STORM 100 FSAR Table 2.2.6.
Page 4-119, Table 4-8, "Closure lid steel (HI-STORM 100U)"	This component is also credited in the structural analysis for missile protection.
Page 4-129, Table 4-9, "Inner Shell"	The inner shell also provides a structural function, and a thermal function due to heat conduction.
Page 4-132, Table 4-9, "Intermediate Shells"	The intermediate shells also provide a thermal function.



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Page 4-132, Table 4-9, "Removable Shear Ring"	The removable shield ring does not have a shielding function; its primary safety function is structural.
Page 4-133, Table 4-9, "Pocket trunnion"	The main intended safety function of the pocket trunnions is structural.
Page 4-134, Table 4-9, "Lifting trunnion"	The lifting trunnions are also credited in shielding.
Page 4-135, Table 4-9, "Enclosure shell panels and enclosure shell return"	These components also provide a thermal and shielding purpose.
Page 4-144, Table 4-10, "Top lid Shielding"	This component does not have a thermal function.
Page 4-144, Table 4-10, "Fill port plugs"	This component does not have a shielding function.