



**UNITED STATES  
NUCLEAR REGULATORY COMMISSION**  
WASHINGTON, D.C. 20555-0001  
January 17, 2019

MEMORANDUM TO: Kimyata Morgan-Butler, Chief  
Materials Rulemaking and Project Management Branch  
Division of Rulemaking

FROM: John McKirgan, Chief **/RA/**  
Spent Fuel Licensing Branch  
Division of Spent Fuel Management

SUBJECT: USER NEED FOR RULEMAKING FOR AMENDMENT NO. 13 TO THE  
HOLTEC INTERNATIONAL HI-STORM 100 CASK SYSTEM,

The purpose of this communication is to request support for rulemaking activities in the Division of Spent Fuel Management (DSFM) for the following DSFM's 10 CFR Part 72 licensing action:

1. Changes to 10 CFR 72.214 rule text (changes appear in bold):

Certificate Number: 1014.

Initial Certificate Effective Date: May 31, 2000.

Amendment Number 1 Effective Date: July 15, 2002.

Amendment Number 2 Effective Date: June 7, 2005.

Amendment Number 3 Effective Date: May 29, 2007.

Amendment Number 4 Effective Date: January 8, 2008.

Amendment Number 5 Effective Date: July 14, 2008.

Amendment Number 6 Effective Date: August 17, 2009.

Amendment Number 7 Effective Date: December 28, 2009.

Amendment Number 8 Effective Date: May 2, 2012, as corrected on November 16, 2012 (ADAMS Accession No. ML12213A170); superseded by Amendment 8, Revision 1 Effective Date: February 16, 2016.

Amendment Number 8, Revision 1 Effective Date: February 16, 2016.

Amendment Number 9 Effective Date: March 11, 2014, superseded by Amendment Number 9, Revision 1, on March 21, 2016.

Amendment Number 9, Revision 1, Effective Date: March 21, 2016.

Amendment Number 10 Effective Date: May 31, 2016.

**Amendment Number 11 Effective Date: TBD**

**Amendment Number 12 Effective Date: TBD**

**Amendment Number 13 Effective Date: TBD**

Safety Analysis Report (SAR) Submitted by: Holtec International.

SAR Title: Final Safety Analysis Report for the HI-STORM 100 Cask System.

Docket Number: 72-1014.

Certificate Expiration Date: May 31, 2020.

Model Number: HI-STORM 100.

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2. On November 19, 2018, Holtec International (Holtec) submitted a revised amendment request to the U.S. Nuclear Regulatory Commission (NRC) for the HI-STORM 100 Certificate of Compliance (CoC) No. 1014. The proposed changes include the following:
  - 1) Update the initial uranium weight for the 16x16B and 16x16C assembly classes to match the value for 16x16A in HI-STORM 100 CoC Appendix B.

Specific change to the TS is listed below:

Appendix B: Table 2.1-2: PWR Fuel Assembly Characteristics - The applicant updated the initial uranium weight for the 16x16B and 16x16C assembly classes to match the value for 16x16A.

3. The proposed CoC and technical specifications (TS), and preliminary safety evaluation report (SER) have been placed in ADAMS (see references below) and are available for your use in the rulemaking package. DSFM will designate these documents as Official Agency Records after the Executive Director for Operations has approved the package (ADAMS Package No. ML18351A180).

The Office of the General Counsel has reviewed this memorandum with its referenced documents and has no legal objection to its contents.

CAC No. 001028

Docket No. 72-1014

EPID: L-2018-LLA-0202

ADAMS References:

1. Proposed CoC 1014 Amendment 13 CoC (ML18351A173)
2. Proposed CoC 1014 Amendment 13 Appendix A (ML18351A174)
3. Proposed CoC 1014 Amendment 13 Appendix B (ML18351A175)
4. Proposed CoC 1014 Amendment 13 Appendix A-100U (ML18351A176)
5. Proposed CoC 1014 Amendment 13 Appendix B-100U (ML18351A177)
6. Preliminary CoC 1014 Amendment 13 SER (ML18351A178)

SUBJECT: USER NEED FOR RULEMAKING FOR AMENDMENT NO. 13 TO THE HOLTEC  
INTERNATIONAL HI-STORM 100 CASK SYSTEM, DOCUMENT  
DATE: January 17, 2019

**ADAMS Accession No.: ML18351A172 (Memo); Package: ML18351A180**

<b>OFC</b>	DSFM	DSFM	OGC NLO	DSFM
<b>NAME</b>	CJacobs	WWheatley via email	LClark via email	JMcKirgan
<b>DATE</b>	12/14/18	12/14/18	1/16/19	1/17/19

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