



February 6, 2019

Mr. Bernard White, Senior Project Manager – Spent Fuel Licensing Branch
Division of Spent Fuel Management
U.S. Nuclear Regulatory Commission

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

Subject: HI-STAR 100 Amendment Request (1008-3), removal of Preferential Fuel Loading requirement from Certificate of Compliance (CoC)

Reference: “Holtec International HI-STAR 100 System, USNRC Docket No. 72-1008, Amendment Request (1008-3)”, Letter No. 5014795 from Kimberly Manzione (Holtec) to Mark Lombard (NRC) dated September 25, 2015.

Dear Mr. White:

By letter dated September 25, 2015 [Ref.] Holtec International submitted an amendment (Amendment #3) to the Certificate of Compliance (CoC) for the HI-STAR 100 Dry Cask Storage System. This letter and its enclosures provide supplemental information that justifies removal of Preferential Fuel Loading from HI-STAR 100 CoC 1008 Appendix B (Section 1.1.2) in the amendment request. Enclosure 1 to this letter contains the justification for removal of Preferential Fuel Loading from CoC Appendix B. Enclosures 2 and 3 contain related proposed changes to CoC Appendix B and HI-STAR 100 FSAR Chapter 4 (Proposed Rev. 4D) respectively. Proposed changes related to Preferential Fuel Loading in Enclosures 2 and 3 are highlighted.

If you have any questions, please contact me at 856-797-0900, ext 3844.

Sincerely,

Royston Ngwayah
Licensing Engineer
Holtec International

cc: Mr. Mike Layton (NRC)
Mr. John McKirgan (NRC)



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Enclosures

Enclosure 1: HI-STAR 100 CoC 1008 Preferential Fuel Loading removal justification

Enclosure 2: Proposed changes to CoC 1008 Appendix B

Enclosure 3: HI-STAR 100 FSAR Proposed Revision 4D