

Telephone (856) 797-0900 Fax (856) 797-0909

March 16, 2019

## URGENT COMMUNICATION

Via Regular Mail & Email <u>Michael.Layton@nrc.gov</u>

Mr. Michael C. Layton, Director Division of Spent Fuel Management Office of Nuclear Material Safety and Safeguards U.S. Nuclear Regulatory Commission One White Flint North 11555 Rockville Pike Rockville, MD 20852-2738

Subject: Request for an Urgent Meeting – Docket #1040 (HI-STORM UMAX System)

Dear Director Layton:

Pursuant to our March 15th conference call with you, we hereby request that a public meeting on the above-referenced docket be held in White Flint at the earliest possible date to enable us to present our regulations-informed position on the "scratch" matter for NRC's consideration. The urgency of this request is propelled by the need to establish a path forward to resume loading at the SONGS site without delay. The loaded transfer cask stranded inside the Fuel Building is one of several compelling reasons that beckon us for an urgent regulatory engagement. Thus far, we have not been *directly* involved in the safety dialog that has occurred between SCE and Region IV for the past several months. Now that the "scratch issue" has progressed to the *general-certification* space, we think it is only fitting and proper that the regulatory communication occurs in the purview of our docket with full participation from our company.

Further, we request that the meeting occur in an afternoon so that the concerned citizens on the West coast are able to participate without undue hardship. Our communications staff can reach out to them in advance of the meeting date to ensure that they are fully apprised of the meeting. The ten-day waiting period, which is intended to notify the concerned citizens (to our knowledge, it is not a regulatory requirement), should be waived to address this issue which is both time and safety sensitive.



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We expect the proposed meeting with participation from the NRC and Holtec's solid mechanics and licensing experts will help us reach a concurred path forward that preserves NRC's certification-bases and ensures continued regulatory compliance of the HI-STORM UMAX system.

Dr. Stefan Anton, our VP of Engineering and Licensing, will serve as the Holtec interface with the NRC to organize the meeting. His coordinates are:

Tel. (856) 797-0900 x3659 Cell: (856)-296-9219 <u>s.anton@holtec.com</u>

We appreciate your kind consideration of this request.

Sincerely,

10 pringh.

Dr. Kris Singh, President & CEO Holtec International

cc: Dr. Stefan Anton Pankaj Chaudhary Pierre Oneid Jearl Strickland Steven Soler Dr. Fred Bidrawn Charles Bullard

Document No. 5014868