




CONVERSATION RECORD

NAME OF PERSON(S)/TITLE CONTACTED OR IN CONTACT WITH YOU		DATE OF CONTACT	TYPE OF CONVERSATION	
Holtec International		09/10/2019	<input type="checkbox"/> E-MAIL <input checked="" type="checkbox"/> TELEPHONE <input type="checkbox"/> INCOMING <input checked="" type="checkbox"/> OUTGOING	
E-MAIL ADDRESS		TELEPHONE NUMBER		
ORGANIZATION		DOCKET NUMBER(S)		
Holtec International		72-1008		
LICENSE NAME AND NUMBER(S)		MAIL CONTROL NUMBER(S)		
Certificate of Compliance No. 1008		001028/L-2018-RNW-0030		
SUBJECT Follow-up discussion of June 28, 2019, Holtec International (Holtec) response to request for supplemental information on the HI-STAR 100 storage certificate of compliance renewal application				
SUMMARY AND ACTION REQUIRED (IF ANY) Holtec attendees: Kimberly Manzione NRC attendees: Kristina Banovac, John Wise A teleconference was held between NRC and Holtec representatives to discuss Holtec's June 28, 2019, response (ADAMS Accession No. ML19184A232) to NRC's request for supplemental information (RSI) on the HI-STAR 100 storage certificate of compliance (CoC) renewal application. This was a follow-up to the August 14, 2019, discussion to seek clarification on the RSI response, specifically the response to RSI-1 that addressed potential time-limited aging analyses (TLAAs). The NRC staff noted that the application needs to clearly identify all TLAAs and then disposition them appropriately, as discussed in NUREG-1927, Rev. 1. The fuel cladding integrity analysis (in Section 4.3 of the final safety analysis report (FSAR)) appears to meet the 6 criteria in the definition of TLAA in 10 CFR 72.3, and thus, the application should identify it as a TLAA. In addition, any corresponding changes to the FSAR (e.g., changes to FSAR Section 4.3 that supports the fuel cladding integrity analysis for Amds. 0, 1, and 2) should be included in the application. Finally, the application should address disposition of the TLAA, which could include managing the effects of aging and the use of ISG-11, Rev. 3 to support a claim that no aging management activities are needed in the requested period of extended operation.				
NAME OF PERSON DOCUMENTING CONVERSATION Kristina L. Banovac				
SIGNATURE 			DATE OF SIGNATURE 09/23/2019	

CONVERSATION RECORD (continued)

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Certificate of Compliance No. 1008

MAIL CONTROL NUMBER(S)

001028/L-2018-RNW-0030

SUMMARY AND ACTION REQUIRED (IF ANY) (Continued)

Holtec noted that it will supplement the application to identify the fuel cladding integrity analysis as a TLAA and include corresponding FSAR changes. Holtec noted that it does not need a separate correspondence from the NRC requesting this information.

NRC staff noted that any time notations in the FSAR (e.g., "[X]-year design life") should also be updated as part of the renewal application.

NRC staff also noted that it will look more closely at the fatigue analysis during its detailed technical review of the application. As the dry storage system was designed to the ASME Boiler and Pressure Vessel Code, Holtec would have completed an initial analysis to determine if a detailed fatigue analysis for cyclic service was needed (per the ASME Code, Section III, NB and NG-3222.4), as part of the original design basis. Even if this initial analysis is not explicitly discussed in the FSAR, it is part of the design basis and would need to be revisited in the renewal application to consider the additional time (in the requested period of extended operation) and to determine whether a detailed fatigue analysis is needed.

ACTION REQUIRED:

Holtec will supplement the application to address the fuel cladding integrity analysis as a TLAA.