

From: [Saverot, Pierre](#)
To: [Luis Hinojosa \(l.hinojosa@holtec.com\)](mailto:Luis.Hinojosa@holtec.com)
Subject: The additional RAI
Date: Monday, October 28, 2019 1:44:00 PM

1. Provide justification for classifying the Friction Stir Welds (FSW) along the length of the exterior corners of HI-STAR 180D fuel baskets as full penetration corner welds.

Appendix 17B, the fuel basket weld calculation, of Holtec Report No. HI-2125252, "Calculation Package for the HI-STAR 180D Transportation Cask System," analyzes FSWs that are designated Important-to-Safety. This calculation uses a weld quality factor taken from Table NG-3352-1 of the ASME Boiler & Pressure Vessel Code, Section III, Subsection NG. As stated in the calculation, this weld quality factor is associated with Type III full penetration welded joints. However, these FSWs are not full penetration welds. As noted by the applicant in the report, "Summary of Proposed Changes HI-STAR 180D Transport LAR 9367-2, Revision 0," and Licensing Drawing 8553, these FSWs have a weld size less than the basket panel fitness. Further justification is needed for classifying the welds as full penetration welds and the use of the associated weld quality factor.

This information is needed to satisfy the requirements of 10 CFR 71.31.