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June 20, 2020

Earl Love, Inspections and Operations Branch
Division of Spent Fuel
Office of Nuclear Material Safety and Safeguards

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

Subject: Clarification of Response to NRC Follow-Up Inspection and NOV

Reference(s): [1] "Staff Review of Holtec International Response to the U.S. Nuclear Regulatory Commission Follow-Up Inspection Report Number 07201014/2019-201, and Notice of Violation" (Letter from Alayna Pearson (NRC) to Dr. Kris Singh (Holtec) dated March 18, 2020)

Dear Mr. Love:

By letter dated March 18, 2020 [1], NRC staff requested that Holtec clarify its response to the previous inspection and NOV. The previous information submitted included discussions of minimum wall thickness per ASME NB-3324. These were intended to be supplemental to the engineering justification by providing an additional comparison to demonstrate available margin. However, Holtec understands that this minimum wall thickness formula is not to be construed as a formula for acceptable thickness and that it doesn't take into account all of the load conditions for the MPC. Therefore, Holtec has updated the engineering documents (included as Attachments 1 through 4 of this letter) to clarify that the basis for the change is acceptable because the indications are local structural discontinuities. Based on the ASME Code and the material of the MPC, these local structural discontinuities are not of concern for compliance with ASME Section III or any of the design or licensing requirements for the HI-STORM UMAX. A full technical justification is provided in the attached ECOs and 72.48s.

Additionally, Holtec has performed an analysis to demonstrate that any credible scratch is still within the definition of local structural discontinuity. This information is provided to the NRC as additional assurance that any scratch is within the technical justification above.

Because the attached documents are considered proprietary, an affidavit requesting they be withheld from public disclosure is also included.



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If you have any questions, please contact me at 856-797-0900 ext. 3951.

Sincerely,

Kimberly Manzione
Licensing Manager,
Holtec International

Attachments:

- Attachment 1: ECO 5021-39 Rev 4 (proprietary)
- Attachment 2: ECO 5021-42 Rev 3 (proprietary)
- Attachment 3: 72.48 # 1357 Rev 4 (proprietary)
- Attachment 4: 72.48 # 1384 Rev 3 (proprietary)
- Attachment 5: HI-2125228 Rev 15, Calculation 13 (proprietary)
- Attachment 6: Affidavit Pursuant to 10 CFR 2.390 to Withhold Information from Public
Disclosure (non-proprietary)