



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

August 1, 2022

MEMORANDUM TO: Linda Howell, Deputy Director  
Division of Fuel Management  
Office of Nuclear Material Safety  
and Safeguards

FROM: Christian Jacobs, Sr. Project Manager  
Storage and Transportation Licensing Branch  
Division of Fuel Management  
Office of Nuclear Material Safety  
and Safeguards

SUBJECT: SUMMARY OF JULY 20, 2022, PUBLIC MEETING WITH HOLTEC  
INTERNATIONAL TO DISCUSS CLARIFICATIONS OF THE  
REQUEST FOR SUPPLEMENTAL INFORMATION TO THE  
APPLICATION OF CERTIFICATE OF COMPLIANCE NO. 1014,  
AMENDMENT NO. 18

A handwritten signature in blue ink, appearing to read "Christian Jacobs", is located to the right of the "FROM:" line.

Signed by Jacobs  
on 08/01/22

On July 20, 2022, an Observation public meeting was held between the U.S. Nuclear Regulatory Commission (NRC) and Holtec International (Holtec, the applicant). The purpose of the meeting was for NRC staff to provide clarifications to Holtec regarding a request of supplemental information (RSI) (Agencywide Documents Access and Management System (ADAMS) Accession No. ML22122A198) pertaining to the application of Certificate of Compliance (CoC) No. 1014, Amendment No. 18 for the HI-STORM 100 System. Holtec presented slides titled, "HI-STORM 100 Amendment 18 RSI Clarification Meeting", which is available at ADAMS Accession No. ML22187A270. The meeting notice and agenda, dated July 7, 2022, are available in ADAMS at Accession No. ML22188A189. The enclosure to this document contains the meeting attendance list.

Holtec added a new step (Step 2c) to their flow chart in their presentation on slide 5, and Holtec indicated that the Topical Report invariant model "bounds the 72.48 model". The NRC staff asked if the comparison between step 2c and 2b was for the "PCT" only. Holtec confirmed that it was for "PCT" only, and also stated that it was possible to have other component temperatures that are above the invariant model, but below the acceptance criteria in the final safety analysis report (FSAR) and Topical Report. Therefore, NRC staff does not see how the Topical Report invariant model is broadly bounding of the 72.48 model if component temperatures or pressures are higher than those in the Topical Report invariant model, and Holtec understands that they need to provide clarification in their response to RSI 4-1.

Regarding step 3 on slide 6, this step has to do with implementation. Holtec is recommending

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that a qualification report be referenced in the 72.212 reports, rather than in the CoC itself. Holtec clarified that the CoC may have a reference that a qualification report needs to be generated at the site for the 72.212 report. There is uncertainty on both sides (Holtec and NRC) as to how this implementation is going to work without requiring a need to amend the CoC every time a qualification report is generated. Holtec understands this is part of the question in RSI 4-1 and will be providing clarification in their response.

Step 5 on slide 6 is related to RSI 4-4. This step indicates that the restrictions on loading procedures are already captured in the Topical Report methodology. NRC staff is not seeing the connection to those restrictions or how those values are calculated in the Topical Report. In their response to this RSI, Holtec plans to outline where the answers are in the Topical Report.

The NRC staff noted that there are challenges in providing responses to other RSIs as well. Holtec stated the focus of their discussion at this meeting was in regard to the change control process question in RSI 4-1. Holtec stated that they needed the most clarification from NRC staff in regard to RSI 4-1, but they intend to respond completely to all RSIs. Holtec indicated they would request another clarification meeting with NRC staff in regard to other RSIs if needed.

NRC staff questioned why Holtec was not choosing the option to revise the Topical Report instead of trying to supplement the Topical Report in this application? NRC staff stated this was a rhetorical question because it was more of a curiosity to NRC staff and not a requirement for Holtec to answer. However, NRC staff still believes that revising the Topical Report is a cleaner path. Holtec stated they would take this option under consideration.

After the break, the second part of the meeting focused on the shielding RSIs. The lead NRC shielding reviewer provided some overarching feedback to Holtec that he was not seeing how Holtec was making the connection between the thermal loading patterns approved in the Topical Report to the potential shielding impacts in the amendment application. It was not obvious to NRC staff where the shielding analysis, if any, was located in the application submittal. NRC staff also noted that the Topical Report was specific to thermal changes, but that the Topical Report intentionally did not address potential impacts to other disciplines such as shielding. Holtec stated they would provide clarifications and connections to the Topical Report in their response to RSI 6-1. Holtec also stated that they will remove "UVH" from the CoC and clarify which systems (approved in Topical Report) are included in the CoC. NRC staff also noted that RSI 4-1 points out additional MPCs, transfer casks, and overpacks from the application that were not included in the limitations of the Topical Report Safety Evaluation. Holtec requested NRC staff clarify the questioning of "essentially identical" language mentioned in several of the RSIs, because that same language has been included in their FSAR for years. NRC staff clarified that the question in RSI 6-1 is related to the dose rate comparisons. Holtec stated they now understand the question and intend to provide clarifying language in their response to the RSI.

There was a brief discussion regarding RSI 6-3. Holtec understands that NRC staff is requesting Holtec to provide shielding analyses as necessary and/or to assess any impacts on shielding analyses and conclusions the application of the Topical Report may cause. Holtec stated they understood the question and will provide the requested information in their response.

Holtec indicated that they had received the clarifications they needed on the RSIs from NRC staff during this meeting. Holtec intends to follow-up with NRC staff at a later date with the proposed schedule response to the RSIs.

No regulatory decisions were made during the meeting. One member of the public attended the meeting, and another person requested to be registered as a public member. No one asked any questions during the Questions and Answers session.

CAC: 001028

Docket No.: 72-1014

EPID: L-2022-LLA-0002

Enclosure:

List of Attendees

LIST OF ATTENDEES SELF IDENTIFIED

JULY 20, 2022, PUBLIC MEETING REGARDING RSI CLARIFICATIONS OF

HOLTEC'S HI-STORM 100 AMENDMENT NO. 18

<b>Name</b>	<b>Affiliation</b>
Christian Jacobs	U.S. Nuclear Regulatory Commission (NRC)
Zhian Li	NRC
Darrell Dunn	NRC
JoAnn Ireland	NRC
Earl Love	NRC
Patrick Koch	NRC
Tim McCartin	NRC
Jason Piotter	NRC
Yaira Diaz Sanabria	NRC
Aida Rivera Varona	NRC
Marilyn Diaz Maldonado	NRC
Joseph Colaccino	NRC
Damaris Marcano	NRC
Linda Howell	NRC
Aaron Thomlinson	NRC
Azmi Djapari	NRC
Yen Chen	NRC
Christopher Tyree	NRC
Kim Manzione	Holtec International (Holtec)
Abrar Muhammad	Holtec
Debu Majumdar	Holtec
Stefan Anton	Holtec
Glenn Matheus	Orano
Carlyn Greene	public
Hui Liu	Registered as a public member

Enclosure

Holtec HI-STORM 100 Amendment No. 18 - RSI Clarifications Meeting Summary DATE August 1, 2022

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**ADAMS Accession No.: ML22207B783; Memo ML22207B784**

OFFICE	NMSS/DFM/STLB	NMSS/DFM/STLB	NMSS/DFM/STLB	NMSS/DFM/STLB
NAME	CJacobs	CJWWheatley	WWYDiaz-Sanabria	YDCJacobs
DATE	Jul 27, 2022	Jul 27, 2022	Aug 1, 2022	Aug 1, 2022

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