HOLTEC
INTERNATIONAL

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BY OVERNIGHT MAIL

February 4, 2000

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

Subject: USNRC Docket No. 71-9261; TAC No. L22085
HI-STAR 100 Transportation CoC 9261
License Amendment Request 9261-1, Supplement 1

References: 1. Holtec Project 5014
2. Holtec Letter to NRC dated November 24,1999, LAR 9261-1

Dear Sir:

In accordance with our recent discussions with the NRC, Holtec International is pleased to forward this Supplement 1 to License Amendment Request (LAR) 9261-1 (Ref. 2). This supplement proposes a small number of additional changes to the HI-STAR transportation Certificate of Compliance, the certificate ("C") drawings, and the Safety Analysis Report (SAR). These additional changes arose as a result of final fabrication and field dry-run activities associated with the Plant Hatch loading campaign.

These additional proposed changes are described and justified in Attachment 1 to this letter. Mark-ups of the proposed CoC and SAR changes submitted previously are also included to clearly indicate the nature of the changes and to maintain continuity with the proposed changes submitted previously. Revised "C" drawings are enclosed. Please note that these drawings completely replace those submitted in our November LAR. These proposed changes have been carefully reviewed by our technical discipline experts to ensure consistency between the storage and transportation certificates of compliance.

Thank you for your prompt review of this LAR. If you have any questions or require additional information, please contact us.

Sincerely,

Brian Gutherman, P.E.
Licensing Manager

Approval:

K.P. Singh, Ph.D, P.E.
President and CEO

NMSS01 Public

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cc: Ms. Marissa Bailey, USNRC (w/10 copies of attachment and enclosure)
Mr. Mark. Delligatti, USNRC (w/o attach. and encl.)
Mr. Ross Chappell, USNRC (w/o attach. and encl.)
Mr. E. William Brach, USNRC (w/o attach. and encl.)

Document ID: 5014365

Attachment: 1. Summary of Proposed Changes (3 pages)

Enclosures: 1. Mark-ups of CoC 9261 and SAR pages (7 pages, including cover page)
2. Revised Certificate Drawings (5 sheets, including cover page)

Technical Concurrence:

Mr. Bernard Gilligan (Principal Design Criteria)

Mr. Steve Agace (Operations)

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Mr. John Sanchez	Consolidated Edison Company
Ms. Kathy Picciott	Niagara Mohawk Power Corporation
Mr. John Donnell	Private Fuel Storage, LLC (SWEC)
Dr. Stanley Turner	Holtec International, Florida Operations Center

SUMMARY OF PROPOSED CHANGES (SUPPLEMENT 1)[1]

SECTION I – PROPOSED CHANGES TO CERTIFICATE OF COMPLIANCE 9621

Proposed Change No. S1

Certificate of Compliance, Appendix A, Table A.5

Add the word "CLAD" after "ZIRCALOY" in the table title.

Reason and Justification for Proposed Change

To correct an editorial ommission.

SECTION II – PROPOSED CHANGES TO THE SAR

Proposed Change No. S2

SAR Section 8.1.2.2, Hydrostatic Testing and Table 8.1.2

Re-name the title of this section to "Pressure Testing" and revise the text to allow pneumatic testing as an option to hydrostatic testing for the overpack only. Delete the text regarding filling the overpack from the drain port. Revise text to allow the closure plate bolts to be torqued less than or equal to the full torque requirement for the purposes of this test.

Reason for Proposed Change

Shop experience with hydrostatic testing of the HI-STAR overpack has revealed that drying of certain portions of the overpack is not readily achievable after the test. For example, the drain port at the bottom of the overpack collects a small amount of water during hydrostatic testing which is not readily removed in the fabrication facility. During actual fuel loading operations, the overpack cavity will be dried by the vacuum method. Additionally, it was recognized that is not necessary to fill the overpack from the drain port or to fully torque the closure plate bolts prior to hydrostatic testing. Bolts torqued to a lesser value provide a conservative test arrangement.

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[1] Note that Section 1.1 of the NRC Safety Evaluation Report for CoC 9261 refers to an August 31, 1999 expiration date for NRC approval of the Holtec International QA program. This approval was renewed in August, 1999 via letter from the NRC dated August 23, 1999 (Ref. Approval No. 0784, Rev. 2, expires August 31, 2004). We recommend that the SER be revised accordingly.

Justification for Proposed Change

The ASME Code, Section III, Subsection NB, Article NB-6112 allows for the substitution of pneumatic testing for hydrostatic testing when permitted by NB-6112.1(a). Article NB-6112.1(a)(2) states "when components, appurtenances, or systems which are not readily dried are to be used in services where traces of the testing medium cannot be tolerated." While the overpack is designed to be submerged in licensees' spent fuel pools, it is not desirable to ship an overpack from the fabricator to a licensee's site with residual water in the overpack.

The changes related to the use of the drain port and the bolt torquing are lessons learned from fabrication. Specifying the particular port for filling the overpack for this test is unnecessary detail in the SAR. Allowing torques less than or equal to the required torques for storage provides desired fabricator flexibility.

Proposed Change No. S3

SAR Table 7.1.3

Increase the torque requirement for the closure plate test port plug to 45 ft-lbs (+5/-0).

Reason for Change

To provide sufficient compression for the seals located beneath the port plug heads.

Justification for Change

The seal manufacturer has recommended increasing the port plug torque to ensure sufficient compression of the seal. The depth of the seal groove machined under the heads of the port plugs ensure the seals seat at the higher torque without over-compression.

Proposed Change No. S4

SAR Section 8.4, References

Revise Reference [8.1.9] to refer to the 1997 edition of ANSI N14.5

Reason and Justification for Proposed Change

The 1997 edition of ANSI N14.5 is the most current version of this document and is the appropriate edition to be referenced. This edition was used in developing the allowed containment leakage rate and is used in the fabrication shop in performing leakage testing.

SECTION III – PROPOSED CHANGES TO THE CERTIFICATE DRAWINGS

Proposed Change No. S5

Conforming changes to the following Certificate drawings were required as a result of changes proposed to the storage licensing drawings:

C1397, Sheet 1, Rev. 2
C1397, Sheet 5, Rev. 1
C1399, Sheet 3, Rev. 2
BM-C1476, Sheet 2, Rev. 2

U. S. Nuclear Regulatory Commission
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Document ID 5014365
Enclosure 1 (7 pages including this page)

LICENSE AMENDMENT REQUEST 9261-1
SUPPLEMENT 1

PROPOSED COC AND SAR CHANGES

Table A.5

FUEL ASSEMBLY COOLING, AVERAGE BURNUP, AND MINIMUM ENRICHMENT
MPC-24 PWR FUEL WITH ZIRCALOY *CLAD* AND
WITH ZIRCALOY IN-CORE GRID SPACERS *(Note 1)*

Post-irradiation Cooling Time (years)	**Assembly Burnup (MWD/MTU)**	**Assembly Minimum Enrichment (wt. % U-235)**	**Decay Heat (Watts)**
≥ 7	$\leq 24{,}500$	≥ 2.3	≤ 496
≥ 8	$\leq 29{,}500$	≥ 2.6	≤ 562
≥ 10	$\leq 34{,}500$	≥ 2.9	≤ 610
≥ 12	$\leq 39{,}500$	≥ 3.2	≤ 667
≥ 15	$\leq 44{,}100$	≥ 3.4	≤ 704

Note 1: Linear interpolation between points is permitted.

Table 7.1.3
HI-STAR 100 SYSTEM TORQUE REQUIREMENTS

Fastener	Torque (ft-lbs)	Pattern
Overpack Closure Plate Bolts†, ††	First Pass – Hand Tight Second Pass – Wrench Tight Third Pass – 860+25/-25 Fourth Pass – 1725+50/-50 Final Pass - 2895+90/-90	Figure 7.1.30
Overpack Vent and Drain Port Cover Plate Bolts††	12+2/-0	X-pattern
Overpack Vent and Drain Port Plugs	~~22+2/-0~~ *45+5/-0*	None
Closure Plate Test Port Plug	~~22+2/-0~~ 45 +5/-0	None
Backfill Tool Test Cover Bolts††	16+2/-0	X-pattern
Shear Ring Segments	22+2/-0	None
Overpack Bottom Cover Bolts	200+20/-0	None
Pocket Trunnion Plugs	Hand Tight	None
Threaded Fuel Spacers	Hand Tight	None
MPC Lid Threaded Plugs	Hand Tight	None
Impact Limiter Alignment Pin	Hand Tight	None
Top Impact Limiter Attachment Bolt	256+10/-0	None
Bottom Impact Limiter Attachment Bolt	1500+45/-0	None
Buttress Plate Bolts	150+10/-0	None
Tie-Down Bolts	250+20/-0	None
Transport Frame Bolts	250+20/-0	None

† Detorquing shall be performed by turning the bolts counter-clockwise in 1/3 turn +/- 30 degrees increments per pass according to Figure 7.1.30 for three passes. The bolts may then be removed.

†† Bolts shall be cleaned and inspected for damage or excessive wear (replaced if necessary) and coated with a light layer of Fel-Pro Chemical Products, N-5000, Nuclear Grade Lubricant (or equivalent).

and the local HI-STAR 100 cask areas shall then be visually examined to verify no deformation, distortion, or cracking has occurred. Any evidence of deformation, distortion or cracking of the trunnion or adjacent HI-STAR 100 cask areas shall require replacement of the trunnion and/or repair of the HI-STAR 100 cask. Following any replacements and/or repair, the load testing shall be re-performed and the components re-examined in accordance with the original procedure and acceptance criteria. Testing shall be performed in accordance with written and approved procedures. Certified material test reports verifying trunnion material mechanical properties meet ASME Code Section II requirements provide further verification of the trunnion load capabilities. Test results shall be documented and shall become part of the final quality documentation package.

The acceptance testing of the trunnions in the manner described above provide reasonable assurance that a handling accidents will not occur due to trunnion failure.

Pressure

8.1.2.2 ~~Hydrostatic~~ Testing

or pneumatically pressure

8.1.2.2.1 HI-STAR 100 Containment Boundary

The containment boundary of the HI-STAR Package shall be hydrostatically tested to 150 psig +10,-0 psig, in accordance with the requirements of the ASME Code Section III, Subsection NB, Article NB-6000. The test pressure of 150 psig is 150% of the Maximum Normal Operating Pressure (established per 10CFR71.85(b) requirements). This bounds the ASME Code Section III requirement (NB-6221) for hydrostatic testing to 125% of the design pressure (100 psig). The test shall be performed in accordance with written and approved procedures.

~~The overpack drain port is used for filling the cavity with water and the vent port for venting the cavity.~~ The written and approved test procedure shall clearly define the test equipment arrangement.

pressure

The overpack ~~hydrostatic~~ test *may* ~~shall~~ be performed *at any time during fabrication after the containment boundary is complete.* ~~after the inner shell, bottom plate, and top flange have been welded together, but before the first intermediate shell is attached~~. *Preferably, the* ~~*hydrostatic*~~ *test should be performed after overpack fabrication is complete, including attachment of the intermediate shells.* The HI-STAR overpack shall be assembled for this test with the closure plate mechanical seal (only one required) *or temporary test seal* installed. Closure bolts shall be installed and torqued to the value specified in Chapter 7.

pressure

a value less than or equal to

The calibrated test pressure gage installed on the overpack shall have an upper limit of approximately twice that of the test pressure. The ~~hydrostatic~~ test pressure shall be maintained for ten minutes. During this time period, the pressure *gauge reading* shall not fall below 150 psig. At the end of ten minutes, and while the pressure is being maintained at a minimum of 150 psig, ~~all weld joints~~ *the overpack* shall be ~~visually examined~~ *observed* for leakage. ~~The acceptance criterion shall be zero visible leakage~~ *In particular, the closure plate-to-top forging joint (the only credible leakage point) shall be examined.* If a leak is discovered, the ~~cavity~~ *overpack* shall be emptied and an ~~examination~~ *evaluation* shall be performed to determine the

cause of the leakage. Repairs and retest shall be performed until the ~~hydrostatic~~ pressure test acceptance criterion is met.

Note: If failure of the ~~hydrostatic~~ pressure retest occurs after initial repairs are completed, a nonconformance report shall be issued and root cause and corrective action shall be addressed before further repairs and retest are performed.

After completion of the ~~hydrostatic~~ pressure testing, the overpack closure plate shall be removed and the internal surfaces shall be visually examined for cracking or deformation. Any evidence of cracking or deformation shall be cause for rejection or repair and retest, as applicable. ~~Liquid penetrant examination of welds shall be performed in accordance with ASME Section V, Article 6 with acceptance criteria per ASME Section III, Subsection NB, Article NB-5350. Any unacceptable areas shall be repaired in accordance with the ASME Code Section III, Subsection NB, NB-4450, and re-examined per the applicable ASME Code as specified in Table 8.1.3.~~ The overpack shall ~~also~~ be required to be ~~hydrotested~~ pressure tested until the examinations are found to be acceptable.

Test results shall be documented and shall become part of the final quality documentation package.

8.1.2.2.2 MPC Secondary Containment Boundary

Hydrostatic testing of the MPC secondary containment boundary shall be performed in accordance with the requirements of the ASME Code Section III, Subsection NB, Article NB-6000, when field welding of the MPC lid-to-shell weld is completed. The hydrostatic pressure for the test shall be 125 +5,-0 psig, which is 125% of the design pressure of 100 psig. The MPC vent and drain ports are used for pressurizing the MPC cavity. The loading procedures in Chapter 7 define the test equipment arrangement. The calibrated test pressure gage installed on the MPC pressure boundary shall have an upper limit of approximately twice that of the test pressure. Following completion of the 10-minute hold period at the hydrostatic test pressure, and while maintaining a minimum test pressure of 125 psig, the surface of the MPC lid-to-shell weld shall be visually examined for leakage and then re-examined by liquid penetrant examination performed in accordance with ASME Code Section V, Article 6, with acceptance criteria per ASME Code Section III, Subsection NB, Article NB-5350. Any unacceptable areas shall require repair in accordance with the ASME Code Section III, Subsection NB, Article NB-4450. Any evidence of cracking or deformation shall be cause for rejection, or repair and retest, as applicable. The performance and sequence of the test is described in Section 7.1 (loading procedures).

If a leak is discovered, the test pressure shall be reduced, the MPC cavity water level lowered, the MPC cavity vented (to the pool or the licensee's off-gas system), and the weld shall be examined to determine the cause of the leakage and/or cracking. Repairs to the weld shall be performed in accordance with approved written procedures prepared in accordance with the ASME Code Section III, Subsection NB, NB-4450.

Table 8.1.2 (continued)
HI-STAR OVERPACK
INSPECTION AND TEST ACCEPTANCE CRITERIA

Function	Fabrication	Pre-operation	Maintenance and Operations
Structural	a) Assembly and welding of HI-STAR overpack components shall be performed per ASME Code, Subsection NB and NF, as applicable. b) Verification of structural materials shall be performed through receipt inspection and review of certified material test reports (CMTRs) obtained in accordance with the item's quality classification category. c) A load test of the lifting trunnions shall be performed during fabrication ~~per ANSI N14.6~~. d) A ~~hydrostatic~~ pressure test of the containment boundary in accordance with ASME Code Section III, Subsection NB-6000 and 10CFR71.85(b) shall be performed ~~during fabrication~~. e) A pneumatic pressure test of the neutron shield enclosure shall be performed during fabrication.	a) None.	a) The rupture discs on the neutron shield vessel shall be replaced every 5 years.

8.4 REFERENCES

[8.0.1] U.S. Code of Federal Regulations, Title 10, "Energy", Part 71, "Packaging and Transportation of Radioactive Materials."

[8.1.1] Holtec International Quality Assurance Manual, current revision.

[8.1.2] American Society of Mechanical Engineers, " Boiler and Pressure Vessel Code," Sections II, III, V, IX, and XI, 1995 Edition with 1996 and 1997 Addenda.

[8.1.3] American Society for Nondestructive Testing, "Personnel Qualification and Certification in Nondestructive Testing," Recommended Practice No. SNT-TC-1A, December 1992.

[8.1.4] HI-STAR 100 Topical Safety Analysis Report, Holtec Report No. HI-941184, current revision.

[8.1.5] American National Standards Institute, Institute for Nuclear Materials Management, "American National Standard for Radioactive Materials - Special Lifting Devices for Shipping Containers Weighing 10,000 Pounds (4500 kilograms) or More", ANSI N14.6, September 1993.

[8.1.6] NUREG-0612, "Control of Heavy Loads at Nuclear Power Plants", U.S. Nuclear Regulatory Commission, Washington, D.C., July 1980.

[8.1.7] U.S. Nuclear Regulatory Commission, "Fracture Toughness Criteria of Base Material for Ferritic Steel Shipping Cask Containment Vessels with a Maximum Wall Thickness of 4 Inches (0.1m)," Regulatory Guide 7.11, June 1991.

[8.1.8] U.S. Nuclear Regulatory Commission, "Fracture Toughness Criteria of Base Material for Ferritic Steel Shipping Cask Containment Vessels with a Wall Thickness Greater than 4 Inches (0.1m) But Not Exceeding 12 Inches (0.3m)," Regulatory Guide 7.12, June 1991.

[8.1.9] American National Standards Institute, Institute for Nuclear Materials Management, "American National Standard for Radioactive Materials Leakage Tests on Packages for Shipment", ANSI N14.5~~, January 1987.~~ (1997)

. S. Nuclear Regulatory Commission
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Enclosure 2 (5 sheets, including this page)

LICENSE AMENDMENT REQUEST 9261-1 SUPPLEMENT 1

REVISED CERTIFICATE DRAWINGS

BILL OF MATERIALS FOR HI-STAR 100 OVERPACK (BM-C1476)
(E.I.D. 2883)

REF. DWGS. C1397,C1398 & C1399.

REV. NO.	PREP. BY & DATE	CHECKED BY DATE	PROJ. MANAGER & DATE	QA. MANAGER & DATE
2	S.GEE 2-4-2000 INCORPORATED ECO 1020-4	BG. 2/4/00	2/4/00	2/4/00

ITEM NO.	QTY.	MATERIAL	DESCRIPTION	NOMENCLATURE
27	1	COMMERCIAL	SELF ENERGIZED SEAL.	CLOSURE PLATE OUTER SEAL
28	2	SA-350-LF3 OR SA-203-E	1 1/2" THK. PLATE	PORT COVER
29	8	SA-193 GRADE B7	3/8 - 16 UNC SCREW	PORT COVER BOLT
30	2	ALLOY X750	SPRING ENERGIZED SEAL.	PORT COVER SEAL
31	--	---	DELETED	---
32	52	SB-637-NO7718	1 5/8" - 8 UN CAP SCREW	CLOSURE PLATE LONG BOLT
33	2 (MIN.)	COMMERCIAL	RUPTURE DISK	RUPTURE DISK
34	8	SA-193 GRADE B7	3/8" - 16 UNC SCREW	REMOVEABLE SHEAR RING BOLT
35	1	SA-193 GRADE B8	7/8" Ø BAR	DRAIN PORT PLUG
36	AS REQD	SA 515 GR.70	1/2" THK PLATE	POCKET TRUNNION SURROUND
37	AS REQ.	SILICONE FOAM	TYPE HT-870 (BISCO PRODUCTS) OR EQUIVALENT	THERMAL EXPANSION FOAM
38	--	---	DELETED	---
39	2	SA-516 GRADE 70 OR A569	11 GAGE (1/8" THK.)	RUPTURE DISK PLATE
40	1	SA 240 304	14 GAGE (0.0751" THK.) SHEET	STORAGE MARKING NAME PLATE
41	1	SA 240 304	14 GAGE (0.0751" THK.) SHEET	TRANSPORTATION MARKING NAME PLATE
42	AS REQD	SA515-70	AS REQUIRED	BRIDGE
43	2	SA 240 304	11 GAGE (1/8" THK.) SHEET	POCKET TRUNNION PLUG PLATE
44	2	SA 240 304	11 GAGE (1/8" THK.) SHEET.	POCKET TRUNNION PLUG PLATE
45	2	SA 240 304	11 GAGE (1/8" THK.) SHEET.	POCKET TRUNNION PLUG PLATE
46	2	SA 240 304	11 GAGE (1/8" THK.) SHEET.	POCKET TRUNNION PLUG PLATE
47	2	SA 240 304	11 GAGE (1/8" THK.) SHEET.	POCKET TRUNNION PLUG PLATE
48	4	SA-193 GRADE B7	3/8 - 16 UNC SCREW	POCKET TRUNNION PLUG SCREW
49	54	S/S	11 GAGE (1/8" THK.) SHEET.	CLOSURE BOLT WASHER
50	40	SA-193-B7	1 3/4"-5UNC SOCKET SET SCREW	TOP FLG. LIP HOLE PLUGS
51	20	SA-193-B7	1"-8UNC SOCKET SET SCREW	TOP FLG. SIDE HOLE PLUGS
52	16	SA-193-B7	1 3/4"-8UNC SOCKET SET SCREW	BOTTOM PLATE HOLE PLUGS
53	8	SA-193-B7	2 1/2"-4UN X 2 1/2 LG SOCKET SET SCREW	THREADED PLUG
54	4	SA-193-B7	1/2-13UNC SOCKET SET SCREW	THREADED PLUG

NOTES:
1) ALL DIMENSIONS ARE APPROXIMATE.
2) HOLTITE IS A NEUTRON SHIELD MATERIAL WITH NOMINALLY 1 WT. % B_4C, 6 WT. % H, AND A DENSITY OF 1.68g/cm^3.
3) ITEMS 12 THRU 16, MATERIAL SA-516-GR 70 IS TO BE NORMALIZED.
4) THICKNESS OF ITEM 16 MAY VARY DEPENDING ON THICKNESSES OF ITEMS 12-15.
5) ITEMS 2,12-17 MAY BE MADE FROM MORE THAN ONE PIECE.

FIGURE WITHHELD AS SENSITIVE UNCLASSIFIED INFORMATION

DATE	REV.	DESCRIPTION	PREP. BY:	CHECKED BY:	ENG.	Q. A.
FEB 4-2000	1	INCORPORATED ECO 1020-4	S.GEE 2-4-2000	2/14/00	2/14/00	2/25/00
FEB 17-99	0	FOR APPROVAL	C.Y. 2-17-99	B.G.U. 2-20-99	B.G. 2-20-99	V.G. 2-20-99

REVISION

EQUIPMENT DESIGN
ANALYSIS
CONSULTING

HOLTEC INTERNATIONAL

DESCRIPTION
DETAIL OF LIFTING TRUNNION & LOCKING PAD
OF HI-STAR 100 OVERPACK
CoC No. 9261, APPENDIX B

CLIENT N/A

COMPANION DRAWINGS
C1398, C1399

REV. 1

PROJECT No. 5014

DRAWING No.
C1397 SHT. 5 OF 7
(E.I.D. 2885)

P.O. No. N/A

FIGURE WITHHELD AS SENSITIVE UNCLASSIFIED INFORMATION

DATE	REV.	DESCRIPTION	PREP. BY:	CHECKED BY:	P.M.	Q. A.
FEB. 4-2000	2	INCORPERATED ECU 1020-4	S.GEE 2-4-2000	2/4/00 EG.	2/4/00	2/4/00
NOV 5-99	1	REVISED AS SHOWN	S.GEE 11-5-99	B.G.U. 2-20-99	B.G. 2-20-99	V.G. 2-20-99
FEB 18-99	0	FOR APPROVAL	C.Y. 2-18-99	D.G.U. 2-20-99	B.G. 2 20 99	V.G. 2 20 99

REVISION

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EQUIPMENT DESIGN
ANALYSIS
CONSULTING

DESCRIPTION
DETAIL OF TRUNNION POCKET FORGING
OF HI-STAR 100 OVERPACK
CoC No. 9261, APPENDIX B

CLIENT N/A

COMPANION DRAWINGS
C1397, C1398

REV. 2

PROJECT No. 5014

P.O. No. N/A

DRAWING No. C1399 SHT. 3 OF 3 (E.I.D. 2884)

FIGURE WITHHELD AS SENSITIVE UNCLASSIFIED INFORMATION