

**CERTIFICATE OF COMPLIANCE  
FOR RADIOACTIVE MATERIAL PACKAGES**

1. a. CERTIFICATE NUMBER <b>9261</b>	b. REVISION NUMBER <b>8</b>	c. DOCKET NUMBER <b>71-9261</b>	d. PACKAGE IDENTIFICATION NUMBER <b>USA/9261/B(U)F-96</b>	PAGE <b>1</b>	PAGES <b>OF 7</b>
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2. PREAMBLE

- a. This certificate is issued to certify that the package (packaging and contents) described in Item 5 below meets the applicable safety standards set forth in Title 10, Code of Federal Regulations, Part 71, "Packaging and Transportation of Radioactive Material."
  - b. This certificate does not relieve the consignor from compliance with any requirement of the regulations of the U.S. Department of Transportation or other applicable regulatory agencies, including the government of any country through or into which the package will be transported.
3. THIS CERTIFICATE IS ISSUED ON THE BASIS OF A SAFETY ANALYSIS REPORT OF THE PACKAGE DESIGN OR APPLICATION

a. ISSUED TO (Name and Address) <b>Holtec International 555 Lincoln Drive West Marlton, NJ 08053</b>	b. TITLE AND IDENTIFICATION OF REPORT OR APPLICATION <b>Safety Analysis Report on the HI-STAR 100 Cask System, Revision No. 15, dated October 11, 2010.</b>
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4. CONDITIONS

This certificate is conditional upon fulfilling the requirements of 10 CFR Part 71, as applicable, and the conditions specified below.

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(a) Packaging

- (1) Model No.: **HI-STAR 100 System**
- (2) Description

The HI-STAR 100 System is a canister system comprising a Multi-Purpose Canister (MPC) inside of an overpack designed for both storage and transportation (with impact limiters) of irradiated nuclear fuel. The HI-STAR 100 System consists of interchangeable MPCs that house the spent nuclear fuel and an overpack that provides the containment boundary, helium retention boundary, gamma and neutron radiation shielding, and heat rejection capability. The outer diameter of the overpack of the HI-STAR 100 is approximately 96 inches without impact limiters and approximately 128 inches with impact limiters. Maximum gross weight for transportation (including overpack, MPC, fuel, and impact limiters) is 282,000 pounds. Specific tolerances germane to the safety analyses are called out in the drawings listed below. The HI-STAR 100 System includes the HI-STAR 100 Version HB (also referred to as the HI-STAR HB).

**Multi-Purpose Canister**

There are seven Multi-Purpose Canister (MPC) models designated as the MPC-24, MPC-24E, MPC-24EF, MPC-32, MPC-68, MPC-68F, and the MPC-HB. All MPCs are designed to have identical exterior dimensions, except 1) MPC-24E/EFs custom-designed for the Trojan plant, which are approximately nine inches shorter than the generic Holtec MPC design; and 2) MPC-HBs custom-designed for the Humboldt Bay plant, which are approximately 6.3 feet

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5.(a)(2) Description (continued)

shorter than the generic Holtec MPC designs. The two digits after the MPC designate the number of reactor fuel assemblies for which the respective MPCs are designed. The MPC-24 series is designed to contain up to 24 Pressurized Water Reactor (PWR) fuel assemblies; the MPC-32 is designed to contain up to 32 intact PWR assemblies; and the MPC-68 and MPC-68F are designed to contain up to 68 Boiling Water Reactor (BWR) fuel assemblies. The MPC-HB is designed to contain up to 80 Humboldt Bay BWR fuel assemblies.

The HI-STAR 100 MPC is a welded cylindrical structure with flat ends. Each MPC is an assembly consisting of a honeycombed fuel basket, baseplate, canister shell, lid, and closure ring. The outer diameter and cylindrical height of each generic MPC is fixed. The outer diameter of the Trojan MPCs is the same as the generic MPC, but the height is approximately nine inches shorter than the generic MPC design. A steel spacer is used with the Trojan plant MPCs to ensure the MPC-overpack interface is bounded by the generic design. The outer diameter of the Humboldt Bay MPCs is the same as the generic MPC, but the height is approximately 6.3 feet shorter than the generic MPC design. The Humboldt Bay MPCs are transported in a shorter version of the HI-STAR overpack, designated as the HI-STAR HB. The fuel basket designs vary based on the MPC model.

**Overpack**

The HI-STAR 100 overpack is a multi-layer steel cylinder with a welded baseplate and bolted lid (closure plate). The inner shell of the overpack forms an internal cylindrical cavity for housing the MPC. The outer surface of the overpack inner shell is buttressed with intermediate steel shells for radiation shielding. The overpack closure plate incorporates a dual O-ring design to ensure its containment function. The containment system consists of the overpack inner shell, bottom plate, top flange, top closure plate, top closure inner O-ring seal, vent port plug and seal, and drain port plug and seal.

**Impact Limiters**

The HI-STAR 100 overpack is fitted with two impact limiters fabricated of aluminum honeycomb completely enclosed by an all-welded austenitic stainless steel skin. The two impact limiters are attached to the overpack with 20 and 16 bolts at the top and bottom, respectively.

(3) Drawings

The package shall be constructed and assembled in accordance with the following drawings or figures in Holtec International Report No. HI-951251, *Safety Analysis Report on the HI-STAR 100 Cask System*, Revision No. 15:

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5.(a)(3)

Drawings (continued)

- (a) HI-STAR 100 Overpack Drawing 3913, Sheets 1-9, Rev. 10
- (b) MPC Enclosure Vessel Drawing 3923, Sheets 1-5, Rev. 25
- (c) MPC-24E/EF Fuel Basket Drawing 3925, Sheets 1-4, Rev. 9
- (d) MPC-24 Fuel Basket Assembly Drawing 3926, Sheets 1-4, Rev. 11
- (e) MPC-68/68F/68FF Fuel Basket Drawing 3928, Sheets 1-4, Rev. 14
- (f) HI-STAR 100 Impact Limiter Drawing C1765, Sheet 1, Rev. 6; Sheet 2, Rev. 4; Sheet 3, Rev. 5; Sheet 4, Rev. 5; Sheet 5, Rev. 2; Sheet 6; Rev. 5; and Sheet 7, Rev. 1.
- (g) HI-STAR 100 Assembly for Transport Drawing 3930, Sheets 1-3, Rev. 2
- (h) Trojan MPC-24E/EF Spacer Ring Drawing 4111, Sheets 1-2, Rev. 0
- (i) Damaged Fuel Container for Trojan Plant SNF Drawing 4119, Sheet 1-4, Rev. 1
- (j) Spacer for Trojan Failed Fuel Can Drawing 4122, Sheets 1-2, Rev. 0
- (k) Failed Fuel Can for Trojan SNC Drawings PFFC-001, Rev. 8 and PFFC-002, Sheets 1 and 2, Rev. 7
- (l) MPC-32 Fuel Basket Assembly Drawing 3927, Sheets 1-4, Rev. 16
- (m) HI-STAR HB Overpack Drawing 4082, Sheets 1-7, Rev. 7
- (n) MPC-HB Enclosure Vessel Drawing 4102, Sheets 1-4, Rev. 1
- (o) MPC-HB Fuel Basket Drawing 4103, Sheets 1-3, Rev. 6
- (p) Damaged Fuel Container HB Drawing 4113, Sheets 1-2, Rev. 2

5.(b) Contents

(1) Type, Form, and Quantity of Material

- (a) Fuel assemblies meeting the specifications and quantities provided in Appendix A to this Certificate of Compliance and meeting the requirements provided in Conditions 5.b(1)(b) through 5.b(1)(i) below are authorized for transportation.

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5.(b)(1) Type, Form, and Quantity of Material (continued)

(b) The following definitions apply:

**Damaged Fuel Assemblies** are fuel assemblies with known or suspected cladding defects, as determined by review of records, greater than pinhole leaks or hairline cracks, empty fuel rod locations that are not filled with dummy fuel rods, missing structural components such as grid spacers, whose structural integrity has been impaired such that geometric rearrangement of fuel or gross failure of the cladding is expected based on engineering evaluations, or that cannot be handled by normal means. Fuel assemblies that cannot be handled by normal means due to fuel cladding damage are considered FUEL DEBRIS.

**Damaged Fuel Containers (or Canisters) (DFCs)** are specially designed fuel containers for damaged fuel assemblies or fuel debris that permit gaseous and liquid media to escape while minimizing dispersal of gross particulates.

The DFC designs authorized for use in the HI-STAR 100 are shown in Figures 1.2.10, 1.2.11, and 1.1.1 of the HI-STAR 100 System Safety Analysis Report, Rev. 15.

**Fuel Debris** is ruptured fuel rods, severed rods, loose fuel pellets, and fuel assemblies with known or suspected defects which cannot be handled by normal means due to fuel cladding damage, including containers and structures supporting these parts. Fuel debris also includes certain Trojan plant-specific fuel material contained in Trojan Failed Fuel Cans.

**Incore Grid Spacers** are fuel assembly grid spacers located within the active fuel region (i.e., not including top and bottom spacers).

**Intact Fuel Assemblies** are fuel assemblies without known or suspected cladding defects greater than pinhole leaks or hairline cracks and which can be handled by normal means. Fuel assemblies without fuel rods in fuel rod locations shall not be classified as intact fuel assemblies unless dummy fuel rods are used to displace an amount of water greater than or equal to that displaced by the original fuel rod(s). Trojan fuel assemblies not loaded into DFCs or FFCs are classified as intact assemblies.

**Minimum Enrichment** is the minimum assembly average enrichment. Natural uranium blankets are not considered in determining minimum enrichment.

**Non-Fuel Hardware** is defined as Burnable Poison Rod Assemblies (BPRA), Thimble Plug Devices (TPDs), and Rod Cluster Control Assemblies (RCCAs).

**Planar-Average Initial Enrichment** is the average of the distributed fuel rod initial enrichments within a given axial plane of the assembly lattice.

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5.(b)(1)(b) Definitions (continued)

**Trojan Damaged Fuel Containers (or Canisters)** are Holtec damaged fuel containers custom-designed for Trojan plant damaged fuel and fuel debris as depicted in Drawing 4119, Rev. 1.

**Trojan Failed Fuel Cans** are non-Holtec designed Trojan plant-specific damaged fuel containers that may be loaded with Trojan plant damaged fuel assemblies, Trojan fuel assembly metal fragments (e.g., portions of fuel rods and grid assemblies, bottom nozzles, etc.), a Trojan fuel rod storage container, a Trojan Fuel Debris Process Can Capsule, or a Trojan Fuel Debris Process Can. The Trojan Failed Fuel Can is depicted in Drawings PFFC-001, Rev. 8 and PFFC-002, Rev. 7.

**Trojan Fuel Debris Process Cans** are Trojan plant-specific canisters containing fuel debris (metal fragments) and were used to process organic media removed from the Trojan plant spent fuel pool during cleanup operations in preparation for spent fuel pool decommissioning. Trojan Fuel Debris Process Cans are loaded into Trojan Fuel Debris Process Can Capsules or directly into Trojan Failed Fuel Cans. The Trojan Fuel Debris Process Can is depicted in Figure 1.2.10B of the HI-STAR100 System Safety Analysis Report, Rev. 15.

**Trojan Fuel Debris Process Can Capsules** are Trojan plant-specific canisters that contain up to five Trojan Fuel Debris Process Cans and are vacuumed, purged, backfilled with helium and then seal-welded closed. The Trojan Fuel Debris Process Can Capsule is depicted in Figure 1.2.10C of the HI-STAR 100 System Safety Analysis Report, Rev. 15.

**Undamaged Fuel Assemblies** are fuel assemblies where all the exterior rods in the assembly are visually inspected and shown to be intact. The interior rods of the assembly are in place; however, the cladding of these rods is of unknown condition. This definition only applies to Humboldt Bay fuel assembly array/class 6x6D and 7x7C.

**ZR** means any zirconium-based fuel cladding materials authorized for use in a commercial nuclear power plant reactor.

- (c) For MPCs partially loaded with stainless steel clad fuel assemblies, all remaining fuel assemblies in the MPC shall meet the more restrictive of the decay heat limits for the stainless steel clad fuel assemblies or the applicable ZR clad fuel assemblies.
- (d) For MPCs partially loaded with damaged fuel assemblies or fuel debris, all remaining ZR clad intact fuel assemblies in the MPC shall meet the more

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5.(b)(1) Type, Form, and Quantity of Material (continued)

restrictive of the decay heat limits for the damaged fuel assemblies or the intact fuel assemblies.

- (e) For MPC-68s partially loaded with array/class 6x6A, 6x6B, 6x6C, or 8x8A fuel assemblies, all remaining ZR clad intact fuel assemblies in the MPC shall meet the more restrictive of the decay heat limits for the 6x6A, 6x6B, 6x6C, and 8x8A fuel assemblies or the applicable Zircaloy clad fuel assemblies.
- (f) PWR non-fuel hardware and neutron sources are not authorized for transportation except as specifically provided for in Appendix A to this CoC.
- (g) BWR stainless-steel channels and control blades are not authorized for transportation.
- (h) For spent fuel assemblies to be loaded into MPC-32s, core average soluble boron, assembly average specific power, and assembly average moderator temperature in which the fuel assemblies were irradiated, shall be determined according to Section 1.2.3.7.1 of the SAR, and the values shall be compared against the limits specified in Part VI of Table A.1 in Appendix A of this Certificate of Compliance.
- (i) For spent fuel assemblies to be loaded into MPC-32s, the reactor records on spent fuel assemblies average burnup shall be confirmed through physical burnup measurements as described in Section 1.2.3.7.2 of the application.

5.(c) Criticality Safety Index (CSI) = 0.0

6. In addition to the requirements of Subpart G of 10 CFR Part 71:

- (a) Each package shall be both prepared for shipment and operated in accordance with detailed written operating procedures. Procedures for both preparation and operation shall be developed. At a minimum, those procedures shall include the provisions provided in Chapter 7 of the application.
- (b) All acceptance tests and maintenance shall be performed in accordance with detailed written procedures. Procedures for acceptance testing and maintenance shall be developed and shall include the provisions provided in Chapter 8 of the application.

7. The maximum gross weight of the package as presented for shipment shall not exceed 282,000 pounds, except for the HI-STAR HB, where the gross weight shall not exceed 187,200 pounds.

8. The package shall be located on the transport vehicle such that the bottom surface of the bottom impact limiter is at least 9 feet (along the axis of the overpack) from the edge of the vehicle.

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- 9. The personnel barrier shall be installed at all times while transporting a loaded overpack.
- 10. The package authorized by this certificate is hereby approved for use under the general license provisions of 10 CFR 71.17.
- 11. Transport by air of fissile material is not authorized.
- 12. Revision No.7 of this certificate may be used until October 31, 2011.
- 13. Expiration Date: March 31, 2014

Attachment: Appendix A

REFERENCES:

Holtec International Report No. HI-951251, *Safety Analysis Report on the HI-STAR 100 Cask System*, Revision 15, dated October 11, 2010.



Date: October 12, 2010

**APPENDIX A**

**CERTIFICATE OF COMPLIANCE NO. 9261, REVISION 8**

**MODEL NO. HI-STAR 100 SYSTEM**



**Appendix A - Certificate of Compliance 9261, Revision 8**

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Page A-1		MPC-24: Uranium oxide, PWR intact fuel assemblies listed in Table A.2.
A-2		MPC-68: Uranium oxide, BWR intact fuel assemblies listed in Table A.3 with or without Zircaloy channels.
A-3		MPC-68: Uranium oxide, BWR damaged fuel assemblies, with or without Zircaloy channels, placed in damaged fuel containers. Uranium oxide BWR damaged fuel assemblies shall meet the criteria specified in Table A.3 for fuel assembly array/class 6x6A, 6X6C, 7x7A, or 8x8A.
A-4		MPC-68: Mixed oxide (MOX), BWR intact fuel assemblies, with or without Zircaloy channels. MOX BWR intact fuel assemblies shall meet the criteria specified in Table A.3 for fuel assembly array/class 6x6B.
A-5		MPC-68: Mixed oxide (MOX), BWR damaged fuel assemblies, with or without Zircaloy channels, placed in damaged fuel containers. MOX BWR damaged fuel assemblies shall meet the criteria specified in Table A.3 for fuel assembly array/class 6x6B.
A-6		MPC-68: Thoria rods ( $\text{ThO}_2$ and $\text{UO}_2$ ) placed in Dresden Unit 1 Thoria Rod Canisters
A-7		MPC-68F: Uranium oxide, BWR intact fuel assemblies, with or without Zircaloy channels. Uranium oxide BWR intact fuel assemblies shall meet the criteria specified in Table A.3 for fuel assembly array/class 6x6A, 6x6C, 7x7A, or 8x8A.
A-8		MPC-68F: Uranium oxide, BWR damaged fuel assemblies, with or without Zircaloy channels, placed in damaged fuel containers. Uranium oxide BWR damaged fuel assemblies shall meet the criteria specified in Table A.3 for fuel assembly array/class 6x6A, 6x6C, 7x7A, or 8x8A.
A-9		MPC-68F: Uranium oxide, BWR fuel debris, with or without Zircaloy channels, placed in damaged fuel containers. The original fuel assemblies for the uranium oxide BWR fuel debris shall meet the criteria specified in Table A.3 for fuel assembly array/class 6x6A, 6x6C, 7x7A, or 8x8A.

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A-10	Table A. 1 (Cont'd)	MPC-68F: Mixed oxide (MOX), BWR intact fuel assemblies, with or without Zircaloy channels. MOX BWR intact fuel assemblies shall meet the criteria specified in Table A.3 for fuel assembly array/class 6x6B.
A-11		MPC-68F: Mixed oxide (MOX), BWR damaged fuel assemblies, with or without Zircaloy channels, placed in damaged fuel containers. MOX BWR damaged fuel assemblies shall meet the criteria specified in Table A.3 for fuel assembly array/class 6x6B.
A-12		MPC-68F: Mixed Oxide (MOX), BWR fuel debris, with or without Zircaloy channels, placed in damaged fuel containers. The original fuel assemblies for the MOX BWR fuel debris shall meet the criteria specified in Table A.3 for fuel assembly array/class 6x6B.
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A-15		MPC-24E: Uranium oxide, PWR intact fuel assemblies listed in Table A.2.
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A-18		MPC-24EF: Trojan plant damaged fuel assemblies.
A-19		MPC-24EF: Trojan plant Fuel Debris Process Can Capsules and/or Trojan plant fuel assemblies classified as fuel debris.
A-20 to A-21		MPC-32: Uranium oxide, PWR intact fuel assemblies in array classes 15X15D, E, F, and H and 17X17A, B, and C as listed in Table A.2.
A-22 to A-23		MPC-HB: Uranium oxide, intact and/or undamaged fuel assemblies and damaged fuel assemblies, with or without channels, meeting the criteria specified in Table A.3 for fuel assembly array/class 6x6D or 7x7C.
A-24 to A-27	Table A.2	PWR Fuel Assembly Characteristics
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A-35	Table A.6	Fuel Assembly Cooling, Average Burnup, and Initial Enrichment MPC-24/24E/24EF PWR Fuel with Stainless Steel Clad.
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A-38	Table A.12	Fuel Assembly Maximum Enrichment and Minimum Burnup Requirement for Transportation in MPC-32.
A-39	Table A.13	Loading Configurations for the MPC-32.
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Fuel Assembly Limits

I. MPC MODEL: MPC-24

A. Allowable Contents

1. Uranium oxide, PWR intact fuel assemblies listed in Table A.2 and meeting the following specifications:

- |   |  |
|---|--|
| a. Cladding type:   | ZR or stainless steel (SS) as specified in Table A.2 for the applicable fuel assembly array/class  |
| b. Maximum initial enrichment:  | As specified in Table A.2 for the applicable fuel assembly array/class.  |
| c. Post-irradiation cooling time, average burnup, and minimum initial enrichment per assembly |  |
| i. ZR clad:   | An assembly post-irradiation cooling time, average burnup, and minimum initial enrichment as specified in Table A.4 or A.5, as applicable. |
| ii. SS clad:  | An assembly post-irradiation cooling time, average burnup, and minimum initial enrichment as specified in Table A.6, as applicable.        |
| d. Decay heat per assembly:   |  |
| i. ZR Clad:   | ≤833 Watts   |
| ii. SS Clad:  | ≤488 Watts   |
| e. Fuel assembly length:  | ≤ 176.8 inches (nominal design)  |
| f. Fuel assembly width:   | ≤ 8.54 inches (nominal design)   |
| g. Fuel assembly weight:  | ≤ 1,680 lbs  |

B. Quantity per MPC: Up to 24 PWR fuel assemblies.

C. Fuel assemblies shall not contain non-fuel hardware or neutron sources.

D. Damaged fuel assemblies and fuel debris are not authorized for transport in the MPC-24.

E. Trojan plant fuel is not permitted to be transported in the MPC-24.

Table A.1 (Page 4 of 23)  
Fuel Assembly Limits

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II. MPC MODEL: MPC-68 (continued)

A. Allowable Contents (continued)

3. Mixed oxide (MOX), BWR intact fuel assemblies, with or without Zircaloy channels. MOX BWR intact fuel assemblies shall meet the criteria specified in Table A.3 for fuel assembly array/class 6x6B and meet the following specifications:

a. Cladding type:	ZR
b. Maximum planar-average initial enrichment:	As specified in Table A.3 for fuel assembly array/class 6x6B.
c. Initial maximum rod enrichment:	As specified in Table A.3 for fuel assembly array/class 6x6B.
d. Post-irradiation cooling time, average burnup, and minimum initial enrichment per assembly:	An assembly post-irradiation cooling time $\geq 18$ years, an average burnup $\leq 30,000$ MWD/MTIHM, and a minimum initial enrichment $\geq 1.8$ wt% $^{235}\text{U}$ for the $\text{UO}_2$ rods.
e. Fuel assembly length:	$\leq 135.0$ inches (nominal design)
f. Fuel assembly width:	$\leq 4.70$ inches (nominal design)
g. Fuel assembly weight:	$\leq 400$ lbs, including channels

Table A.1 (Page 5 of 23)  
Fuel Assembly Limits

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II. MPC MODEL: MPC-68 (continued)

A. Allowable Contents (continued)

4. Mixed oxide (MOX), BWR damaged fuel assemblies, with or without Zircaloy channels, placed in damaged fuel containers. MOX BWR damaged fuel assemblies shall meet the criteria specified in Table A.3 for fuel assembly array/class 6x6B and meet the following specifications:

a. Cladding type:	ZR
b. Maximum planar-average initial enrichment:	As specified in Table A.3 for array/class 6x6B.
c. Initial maximum rod enrichment:	As specified in Table A.3 for array/class 6x6B.
d. Post-irradiation cooling time, average burnup, and minimum initial enrichment per assembly:	An assembly post-irradiation cooling time $\geq 18$ years, an average burnup $\leq 30,000$ MWD/MTIHM, and a minimum initial enrichment $\geq 1.8$ wt% $^{235}\text{U}$ for the $\text{UO}_2$ rods.
e. Fuel assembly length:	$\leq 135.0$ inches (nominal design)
f. Fuel assembly width:	$\leq 4.70$ inches (nominal design)
g. Fuel assembly weight:	$\leq 550$ lbs, including channels and damaged fuel containers.

Table A.1 (Page 6 of 23)  
Fuel Assembly Limits

II. MPC MODEL: MPC-68 (continued)

A. Allowable Contents (continued)

5. Thoria rods (ThO<sub>2</sub> and UO<sub>2</sub>) placed in Dresden Unit 1 Thoria Rod Canisters (as shown in Figure 1.2.11A of the HI-STAR 100 System application, Revision 15) and meeting the following specifications:

a. Cladding type:	ZR
b. Composition:	98.2 wt.% ThO <sub>2</sub> , 1.8 wt. % UO <sub>2</sub> with an enrichment of 93.5 wt. % <sup>235</sup> U.
c. Number of rods per Thoria Rod Canister:	≤ 18
d. Decay heat per Thoria Rod Canister:	≤ 115 Watts
e. Post-irradiation fuel cooling time and average burnup per Thoria Rod Canister:	A fuel post-irradiation cooling time ≥ 18 years and an average burnup ≤ 16,000 MWD/MTIHM.
f. Initial heavy metal weight:	≤ 27 kg/canister
g. Fuel cladding O.D.:	≥ 0.412 inches
h. Fuel cladding I.D.:	≤ 0.362 inches
i. Fuel pellet O.D.:	≤ 0.358 inches
j. Active fuel length:	≤ 111 inches
k. Canister weight:	≤ 550 lbs, including fuel

- B. Quantity per MPC: Up to one (1) Dresden Unit 1 Thoria Rod Canister plus any combination of damaged fuel assemblies in damaged fuel containers and intact fuel assemblies, up to a total of 68.
- C. Fuel assemblies with stainless steel channels are not authorized for loading in the MPC-68.
- D. Dresden Unit 1 fuel assemblies (fuel assembly array/class 6x6A, 6x6B, 6x6C, or 8x8A) with one Antimony-Beryllium neutron source are authorized for loading in the MPC-68. The Antimony-Beryllium source material shall be in a water rod location.

Table A.1 (Page 7 of 23)  
Fuel Assembly Limits

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III. MPC MODEL: MPC-68F

A. Allowable Contents

1. Uranium oxide, BWR intact fuel assemblies, with or without Zircaloy channels. Uranium oxide BWR intact fuel assemblies shall meet the criteria specified in Table A.3 for fuel assembly array/class 6x6A, 6x6C, 7x7A, or 8x8A and meet the following specifications:

a. Cladding type:	ZR
b. Maximum planar-average initial enrichment:	As specified in Table A.3 for the applicable fuel assembly array/class.
c. Initial maximum rod enrichment:	As specified in Table A.3 for the applicable fuel assembly array/class.
d. Post-irradiation cooling time, average burnup, and minimum initial enrichment per assembly:	An assembly post-irradiation cooling time $\geq 18$ years, an average burnup $\leq 30,000$ MWD/MTU, and a minimum initial enrichment $\geq 1.45$ wt% $^{235}\text{U}$ .
e. Fuel assembly length:	$\leq 176.2$ inches (nominal design)
f. Fuel assembly width:	$\leq 5.85$ inches (nominal design)
g. Fuel assembly weight:	$\leq 400$ lbs, including channels

Table A.1 (Page 8 of 23)  
Fuel Assembly Limits

III. MPC MODEL: MPC-68F (continued)

A. Allowable Contents (continued)

2. Uranium oxide, BWR damaged fuel assemblies, with or without Zircaloy channels, placed in damaged fuel containers. Uranium oxide BWR damaged fuel assemblies shall meet the criteria specified in Table A.3 for fuel assembly array/class 6x6A, 6x6C, 7x7A, or 8x8A, and meet the following specifications:

a. Cladding type:	ZR
b. Maximum planar-average initial enrichment:	As specified in Table A.3 for the applicable fuel assembly array/class.
c. Initial maximum rod enrichment:	As specified in Table A.3 for the applicable fuel assembly array/class.
d. Post-irradiation cooling time, average burnup, and minimum initial enrichment per assembly:	An assembly post-irradiation cooling time $\geq 18$ years, an average burnup $\leq 30,000$ MWD/MTU, and a minimum initial enrichment $\geq 1.45$ wt% $^{235}\text{U}$ .
e. Fuel assembly length:	$\leq 135.0$ inches (nominal design)
f. Fuel assembly width:	$\leq 4.70$ inches (nominal design)
g. Fuel assembly weight:	$\leq 550$ lbs, including channels and damaged fuel containers

Table A.1 (Page 9 of 23)  
Fuel Assembly Limits

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III. MPC MODEL: MPC-68F (continued)

A. Allowable Contents (continued)

3. Uranium oxide, BWR fuel debris, with or without Zircaloy channels, placed in damaged fuel containers. The original fuel assemblies for the uranium oxide BWR fuel debris shall meet the criteria specified in Table A.3 for fuel assembly array/class 6x6A, 6x6C, 7x7A, or 8x8A, and meet the following specifications:

a. Cladding type:	ZR
b. Maximum planar-average initial enrichment:	As specified in Table A.3 for the applicable original fuel assembly array/class.
c. Initial maximum rod enrichment:	As specified in Table A.3 for the applicable original fuel assembly array/class.
d. Post-irradiation cooling time, average burnup, and minimum initial enrichment per assembly:	An assembly post-irradiation cooling time $\geq 18$ years, an average burnup $\leq 30,000$ MWD/MTU, and a minimum initial enrichment $\geq 1.45$ wt% $^{235}\text{U}$ for the original fuel assembly.
e. Fuel assembly length:	$\leq 135.0$ inches (nominal design)
f. Fuel assembly width:	$\leq 4.70$ inches (nominal design)
g. Fuel assembly weight:	$\leq 550$ lbs, including channels and damaged fuel containers

Table A.1 (Page 10 of 23)  
Fuel Assembly Limits

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III. MPC MODEL: MPC-68F (continued)

A. Allowable Contents (continued)

4. Mixed oxide (MOX), BWR intact fuel assemblies, with or without Zircaloy channels. MOX BWR intact fuel assemblies shall meet the criteria specified in Table A.3 for fuel assembly array/class 6x6B and meet the following specifications:

- |  |  |
|--|--|
| a. Cladding type:  | ZR   |
| b. Maximum planar-average initial enrichment:  | As specified in Table A.3 for fuel assembly array/class 6x6B.  |
| c. Initial maximum rod enrichment:   | As specified in Table A.3 for fuel assembly array/class 6x6B.  |
| d. Post-irradiation cooling time, average burnup, and minimum initial enrichment per assembly: | An assembly post-irradiation cooling time $\geq 18$ years, an average burnup $\leq 30,000$ MWD/MT1HM, and a minimum initial enrichment $\geq 1.8$ wt% $^{235}\text{U}$ for the $\text{UO}_2$ rods. |
| e. Fuel assembly length:   | $\leq 135.0$ inches (nominal design)   |
| f. Fuel assembly width:  | $\leq 4.70$ inches (nominal design)  |
| g. Fuel assembly weight:   | $\leq 400$ lbs, including channels   |

Table A.1 (Page 11 of 23)  
Fuel Assembly Limits

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III. MPC MODEL: MPC-68F (continued)

A. Allowable Contents (continued)

5. Mixed oxide (MOX), BWR damaged fuel assemblies, with or without Zircaloy channels, placed in damaged fuel containers. MOX BWR intact fuel assemblies shall meet the criteria specified in Table A.3 for fuel assembly array/class 6x6B and meet the following specifications:

- |  |  |
|--|--|
| a. Cladding type:  | ZR   |
| b. Maximum planar-average initial enrichment:  | As specified in Table A.3 for array/class 6x6B.  |
| c. Initial maximum rod enrichment:   | As specified in Table A.3 for array/class 6x6B.  |
| d. Post-irradiation cooling time, average burnup, and minimum initial enrichment per assembly: | An assembly post-irradiation cooling time $\geq 18$ years, an average burnup $\leq 30,000$ MWD/MTIHM, and a minimum initial enrichment $\geq 1.8$ wt% $^{235}\text{U}$ for the $\text{UO}_2$ rods. |
| e. Fuel assembly length:   | $\leq 135.0$ inches (nominal design)   |
| f. Fuel assembly width:  | $\leq 4.70$ inches (nominal design)  |
| g. Fuel assembly weight:   | $\leq 550$ lbs, including channels and damaged fuel containers   |

Table A.1 (Page 12 of 23)  
Fuel Assembly Limits

III. MPC MODEL: MPC-68F (continued)

A. Allowable Contents (continued)

6. Mixed oxide (MOX), BWR fuel debris, with or without Zircaloy channels, placed in damaged fuel containers. The original fuel assemblies for the MOX BWR fuel debris shall meet the criteria specified in Table A.3 for fuel assembly array/class 6x6B and meet the following specifications:

- |  |  |
|--|--|
| a. Cladding type:  | ZR   |
| b. Maximum planar-average initial enrichment:  | As specified in Table A.3 for original fuel assembly array/class 6x6B.   |
| c. Initial maximum rod enrichment:   | As specified in Table A.3 for original fuel assembly array/class 6x6B.   |
| d. Post-irradiation cooling time, average burnup, and minimum initial enrichment per assembly: | An assembly post-irradiation cooling time $\geq 18$ years, an average burnup $\leq 30,000$ MWD/MTIHM, and a minimum initial enrichment $\geq 1.8$ wt% $^{235}\text{U}$ for the $\text{UO}_2$ rods in the original fuel assembly. |
| e. Fuel assembly length:   | $\leq 135.0$ inches (nominal design)   |
| f. Fuel assembly width:  | $\leq 4.70$ inches (nominal design)  |
| g. Fuel assembly weight:   | $\leq 550$ lbs, including channels and damaged fuel containers   |

Table A.1 (Page 13 of 23)  
Fuel Assembly Limits

III. MPC MODEL: MPC-68F (continued)

A. Allowable Contents (continued)

7. Thoria rods ( $\text{ThO}_2$  and  $\text{UO}_2$ ) placed in Dresden Unit 1 Thoria Rod Canisters (as shown in Figure 1.2.11A of the HI-STAR 100 System application, Revision 15) and meeting the following specifications:

- |   |   |
|---|---|
| a. Cladding Type:   | ZR  |
| b. Composition:   | 98.2 wt. % $\text{ThO}_2$ , 1.8 wt. % $\text{UO}_2$ with an enrichment of 93.5 wt. % $^{235}\text{U}$ . |
| c. Number of rods per Thoria Rod Canister:  | $\leq 18$   |
| d. Decay heat per Thoria Rod Canister:  | $\leq 115$ Watts  |
| e. Post-irradiation fuel cooling time and average burnup per Thoria Rod Canister: | A fuel post-irradiation cooling time $\geq 18$ years and an average burnup $\leq 16,000$ MWD/MTIHM.     |
| f. Initial heavy metal weight:  | $\leq 27$ kg/canister   |
| g. Fuel cladding O.D.:  | $\geq 0.412$ inches   |
| h. Fuel cladding I.D.:  | $\leq 0.362$ inches   |
| i. Fuel pellet O.D.:  | $\leq 0.358$ inches   |
| j. Active fuel length:  | $\leq 111$ inches   |
| k. Canister weight:   | $\leq 550$ lbs, including fuel  |

Table A.1 (Page 14 of 23)  
Fuel Assembly Limits

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III. MPC MODEL: MPC-68F (continued)

B. Quantity per MPC:

Up to four (4) damaged fuel containers containing uranium oxide or MOX BWR fuel debris. The remaining MPC-68F fuel storage locations may be filled with array/class 6x6A, 6x6B, 6x6C, 7x7A, and 8x8A fuel assemblies of the following type, as applicable:

1. Uranium oxide BWR intact fuel assemblies;
2. MOX BWR intact fuel assemblies;
3. Uranium oxide BWR damaged fuel assemblies placed in damaged fuel containers;
4. MOX BWR damaged fuel assemblies placed in damaged fuel containers; or
5. Up to one (1) Dresden Unit 1 Thoria Rod Canister.

C. Fuel assemblies with stainless steel channels are not authorized for loading in the MPC-68F.

D. Dresden Unit 1 fuel assemblies (fuel assembly array/class 6x6A, 6x6B, 6x6C or 8x8A) with one Antimony-Beryllium neutron source are authorized for loading in the MPC-68F. The Antimony-Beryllium neutron source material shall be in a water rod location.

Table A.1 (Page 15 of 23)  
Fuel Assembly Limits

IV. MPC MODEL: MPC-24E

A. Allowable Contents

1. Uranium oxide, PWR intact fuel assemblies listed in Table A.2 and meeting the following specifications:

a. Cladding type:	ZR or stainless steel (SS) as specified in Table A.2 for the applicable fuel assembly array/class
b. Maximum initial enrichment:	As specified in Table A.2 for the applicable fuel assembly array/class.
c. Post-irradiation cooling time, average burnup, and minimum initial enrichment per assembly	
i. ZR clad:	Except for Trojan plant fuel, an assembly post-irradiation cooling time, average burnup, and minimum initial enrichment as specified in Table A.4 or A.5, as applicable.
ii. SS clad:	An assembly post-irradiation cooling time, average burnup, and minimum initial enrichment as specified in Table A.6, as applicable.
iii. Trojan plant fuel	An assembly post-irradiation cooling time, average burnup, and minimum initial enrichment as specified in Table A.8.
iv Trojan plant non-fuel hardware and neutron sources	Post-irradiation cooling time, and average burnup as specified in Table A.9
d. Decay heat per assembly	
i. ZR Clad:	Except for Trojan plant fuel, decay heat $\leq$ 833 Watts. Trojan plant fuel decay heat: $\leq$ 725 Watts
ii. SS Clad:	$\leq$ 488 Watts
e. Fuel assembly length:	$\leq$ 176.8 inches (nominal design)
f. Fuel assembly width:	$\leq$ 8.54 inches (nominal design)
g. Fuel assembly weight:	$\leq$ 1,680 lbs, including non-fuel hardware and neutron sources

Table A.1 (Page 16 of 23)  
Fuel Assembly Limits

IV. MPC MODEL: MPC-24E

A. Allowable Contents (continued)

2. Trojan plant damaged fuel assemblies meeting the applicable criteria listed in Table A.2 and meeting the following specifications:

- |   |  |
|---|--|
| a. Cladding type:   | ZR   |
| b. Maximum initial enrichment:  | 3.7% <sup>235</sup> U  |
| c. Fuel assembly post-irradiation cooling time, average burnup, decay heat, and minimum initial enrichment per assembly | An assembly post-irradiation cooling time, average burnup, and initial enrichment as specified in Table A.8<br><br>Decay Heat: ≤ 725 Watts |
| d. Fuel assembly length:  | ≤ 169.3 inches (nominal design)  |
| e. Fuel assembly width:   | ≤ 8.43 inches (nominal design)   |
| f. Fuel assembly weight:  | ≤ 1,680 lbs, including DFC or Failed Fuel Can  |

- B. Quantity per MPC: Up to 24 PWR intact fuel assemblies. For Trojan plant fuel only, up to four (4) damaged fuel assemblies may be stored in fuel storage locations 3, 6, 19, and/or 22. The remaining MPC-24E fuel storage locations may be filled with Trojan plant intact fuel assemblies.
- C. Trojan plant fuel must be transported in the custom-designed Trojan MPCs with the MPC spacer installed. Fuel from other plants is not permitted to be transported in the Trojan MPCs.
- D. Except for Trojan plant fuel, the fuel assemblies shall not contain non-fuel hardware or neutron sources. Trojan intact fuel assemblies containing non-fuel hardware may be transported in any fuel storage location.
- E. Trojan plant damaged fuel assemblies must be transported in a Trojan Failed Fuel Can or a Holtec damaged fuel container designed for Trojan Plant fuel.
- F. One (1) Trojan plant Sb-Be and /or up to two (2) Cf neutron sources in a Trojan plant intact fuel assembly (one source per fuel assembly) may be transported in any one MPC. Each fuel assembly neutron source may be transported in any fuel storage location.
- G. Fuel debris is not authorized for transport in the MPC-24E.
- H. Trojan plant non-fuel hardware and neutron sources may not be transported in the same fuel storage location as a damaged fuel assembly.

Table A.1 (Page 17 of 23)  
Fuel Assembly Limits

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V. MPC MODEL: MPC-24EF

A. Allowable Contents

1. Uranium oxide, PWR intact fuel assemblies listed in Table A.2 and meeting the following specifications:
  - a. Cladding type: ZR or stainless steel (SS) as specified in Table A.2 for the applicable fuel assembly array/class.
  - b. Maximum initial enrichment: As specified in Table A.2 for the applicable fuel assembly array/class.
  - c. Post-irradiation cooling time, average burnup, and minimum initial enrichment per assembly
    - i. ZR clad: Except for Trojan plant fuel, an assembly post-irradiation cooling time, average burnup, and minimum initial enrichment as specified in Table A.4 or A.5, as applicable.
    - ii. SS clad: An assembly post-irradiation cooling time, average burnup, and minimum initial enrichment as specified in Table A.6, as applicable.
    - iii Trojan plant fuel: An assembly post-irradiation cooling time, average burnup, and minimum initial enrichment as specified in Table A.8.
    - iv Trojan plant non-fuel hardware and neutron sources: Post-irradiation cooling time, and average burnup as specified in Table A.9.
  - d. Decay heat per assembly:
    - a. ZR Clad: Except for Trojan plant fuel, decay heat  $\leq$  833 Watts. Trojan plant fuel decay heat:  $\leq$  725 Watts.
    - b. SS Clad:  $\leq$  488 Watts
  - e. Fuel assembly length:  $\leq$  176.8 inches (nominal design)
  - f. Fuel assembly width:  $\leq$  8.54 inches (nominal design)
  - g. Fuel assembly weight:  $\leq$  1,680 lbs, including non-fuel hardware and neutron sources.

Table A.1 (Page 18 of 23)  
Fuel Assembly Limits

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V. MPC MODEL: MPC-24EF

A. Allowable Contents (continued)

2. Trojan plant damaged fuel assemblies meeting the applicable criteria listed in Table A.2 and meeting the following specifications:

- |  |   |
|--|---|
| a. Cladding type:  | ZR  |
| b. Maximum initial enrichment:   | 3.7% <sup>235</sup> U   |
| c. Fuel assembly post-irradiation cooling time, average burnup, decay heat, and minimum initial enrichment per assembly: | An assembly post-irradiation cooling time, average burnup, and initial enrichment as specified in Table A.8.<br><br>Decay Heat: ≤ 725 Watts |
| d. Fuel assembly length:   | ≤ 169.3 inches (nominal design)   |
| e. Fuel assembly width:  | ≤ 8.43 inches (nominal design)  |
| f. Fuel assembly weight:   | ≤ 1,680 lbs, including DFC or Failed Fuel Can.  |

Table A.1 (Page 19 of 23)  
Fuel Assembly Limits

V. MPC MODEL: MPC-24EF

A. Allowable Contents (continued)

3. Trojan Fuel Debris Process Can Capsules and/or Trojan plant fuel assemblies classified as fuel debris, for which the original fuel assemblies meet the applicable criteria listed in Table A.2 and meet the following specifications:

- |  |   |
|--|---|
| a. Cladding type:  | ZR  |
| b. Maximum initial enrichment:   | 3.7% <sup>235</sup> U   |
| c. Fuel debris post-irradiation cooling time, average burnup, decay heat, and minimum initial enrichment per assembly: | Post-irradiation cooling time, average burnup, and initial enrichment as specified in Table A.8.<br><br>Decay Heat: ≤ 725 Watts |
| d. Fuel assembly length:   | ≤ 169.3 inches (nominal design)   |
| e. Fuel assembly width:  | ≤ 8.43 inches (nominal design)  |
| f. Fuel assembly weight:   | ≤ 1,680 lbs, including DFC or Failed Fuel Can.  |

- B. Quantity per MPC: Up to 24 PWR intact fuel assemblies. For Trojan plant fuel only, up to four (4) damaged fuel assemblies, fuel assemblies classified as fuel debris, and/or Trojan Fuel Debris Process Can Capsules may be stored in fuel storage locations 3, 6, 19, and/or 22. The remaining MPC-24EF fuel storage locations may be filled with Trojan plant intact fuel assemblies.
- C. Trojan plant fuel must be transported in the custom-designed Trojan MPCs with the MPC spacer installed. Fuel from other plants is not permitted to be transported in the Trojan MPCs.
- D. Except for Trojan plant fuel, the fuel assemblies shall not contain non-fuel hardware or neutron sources. Trojan intact fuel assemblies containing non-fuel hardware may be transported in any fuel storage location.
- E. Trojan plant damaged fuel assemblies, fuel assemblies classified as fuel debris, and Fuel Debris Process Can Capsules must be transported in a Trojan Failed Fuel Can or a Holtec damaged fuel container designed for Trojan Plant fuel.
- F. One (1) Trojan plant Sb-Be and /or up to two (2) Cf neutron sources in a Trojan plant intact fuel assembly (one source per fuel assembly) may be transported in any one MPC. Each fuel assembly neutron source may be transported in any fuel storage location.
- G. Trojan plant non-fuel hardware and neutron sources may not be transported in the same fuel storage location as a damaged fuel assembly.

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Table A.1 (Page 20 of 23)  
Fuel Assembly Limits

VI. MPC MODEL: MPC-32

A. Allowable Contents

1. Uranium oxide, PWR intact fuel assemblies in array/classes 15x15D, E, F, and H and 17x17A, B, and C listed in Table A.2 and meeting the following specifications:

a. Cladding type:	ZR
b. Maximum initial enrichment:	As specified in Table A.2 for the applicable fuel assembly array/class.
c. Post-irradiation cooling time, maximum average burnup, and minimum initial enrichment per assembly:	An assembly post-irradiation cooling time, average burnup, and minimum initial enrichment as specified in Table A.10 or A.11, as applicable.
d. Minimum average burnup per assembly (Assembly Burnup shall be confirmed per Subsection 1.2.3.7.2 of the SAR, which is hereby included by reference)	Calculated value as a function of initial enrichment. See Table A.12.
e. Decay heat per assembly:	$\leq 625$ Watts
f. Fuel assembly length:	$\leq 176.8$ inches (nominal design)
g. Fuel assembly width:	$\leq 8.54$ inches (nominal design)
h. Fuel assembly weight:	$\leq 1,680$ lbs
i. Operating parameters during irradiation of the assembly (Assembly operating parameters shall be determined per Subsection 1.2.3.7.1 of the SAR, which is hereby included by reference)	
Core ave. soluble boron concentration:	$\leq 1,000$ ppmb
Assembly ave. moderator temperature:	$\leq 601$ K for array/classes 15x15D, E, F, and H $\leq 610$ K for array/classes 17x17A, B, and C
Assembly ave. specific power:	$\leq 47.36$ kW/kg-U for array/classes 15x15D, E, F, and H $\leq 61.61$ kW/kg-U for array/classes 17x17A, B, and C

**Appendix A - Certificate of Compliance 9261, Revision 8**

**Table A.1 (Page 21 of 23)  
Fuel Assembly Limits**

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**VI. MP C MODEL: MPC-32 (continued)**

- B. Quantity per MPC: Up to 32 PWR intact fuel assemblies.
- C. Fuel assemblies shall not contain non-fuel hardware.
- D. Damaged fuel assemblies and fuel debris are not authorized for transport in MPC-32.
- E. Trojan plant fuel is not permitted to be transported in the MPC-32.

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Table A.1 (Page 22 of 23)  
Fuel Assembly Limits

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### VII. MPC MODEL: MPC-HB

#### A. Allowable Contents

1. Uranium oxide, INTACT and/or UNDAMAGED FUEL ASSEMBLIES, DAMAGED FUEL ASSEMBLIES, and FUEL DEBRIS, with or without channels, meeting the criteria specified in Table A.3 for fuel assembly array/class 6x6D or 7x7C and the following specifications:

a. Cladding type:	ZR
b. Maximum planar-average enrichment:	As specified in Table A.3 for the applicable fuel assembly array/class.
c. Initial maximum rod enrichment:	As specified in Table A.3 for the applicable fuel assembly array/class.
d. Post-irradiation cooling time, average burnup, and minimum initial enrichment per assembly:	An assembly post-irradiation cooling time $\geq$ 29 years, an average burnup $\leq$ 23,000 MWD/MTU, and a minimum initial enrichment $\geq$ 2.09 wt% $^{235}\text{U}$ .
e. Fuel assembly length:	$\leq$ 96.91 inches (nominal design)
f. Fuel assembly width:	$\leq$ 4.70 inches (nominal design)
g. Fuel assembly weight:	$\leq$ 400 lbs, including channels and DFC
h. Decay heat per assembly:	$\leq$ 50 W
h. Decay heat per MPC:	$\leq$ 2000 W

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Table A.1 (Page 23 of 23)  
Fuel Assembly Limits

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### VII. MPC MODEL: MPC-HB (continued)

B. Quantity per MPC-HB: Up to 80 fuel assemblies

C. Damaged fuel assemblies and fuel debris must be stored in a damaged fuel container. Allowable Loading Configurations: Up to 28 damaged fuel assemblies/fuel debris, in damaged fuel containers, may be placed into the peripheral fuel storage locations as shown in SAR Figure 6.1.3, or up to 40 damaged fuel assemblies/fuel debris, in damaged fuel containers, can be placed in a checkerboard pattern as shown in SAR Figure 6.1.4. The remaining fuel locations may be filled with intact and/or undamaged fuel assemblies meeting the above applicable specifications, or with intact and/or undamaged fuel assemblies placed in damaged fuel containers.

NOTE 1: The total quantity of damaged fuel or fuel debris permitted in a single damaged fuel container is limited to the equivalent weight and special nuclear material quantity of one intact assembly.

NOTE 2: Fuel debris includes material in the form of loose debris consisting of zirconium clad pellets, stainless steel clad pellets, unclad pellets, or rod segments up to a maximum of one equivalent fuel assembly. A maximum of 1.5 kg of stainless steel clad is allowed per cask.

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Table A.2 (Page 1 of 4)  
PWR FUEL ASSEMBLY CHARACTERISTICS (Note 1)

Fuel Assembly Array/Class	14x14A	14x14B	14x14C	14x14D	14x14E
Clad Material (Note 2)	ZR	ZR	ZR	SS	Zr
Design Initial U (kg/assy.) (Note 3)	≤ 407	≤ 407	≤ 425	≤ 400	≤ 206
Initial Enrichment (MPC-24, 24E, and 24EF) (wt % <sup>235</sup> U)	≤ 4.6 (24) ≤ 5.0 (24E/EF)	≤ 4.6 (24) ≤ 5.0 (24E/EF)	≤ 4.6 (24) ≤ 5.0 (24E/EF)	≤ 4.0 (24) ≤ 5.0 (24E/EF)	≤ 5.0
No. of Fuel Rod Locations	179	179	176	180	173
Fuel Clad O.D. (in.)	≥ 0.400	≥ 0.417	≥ 0.440	≥ 0.422	≥ 0.3415
Fuel Clad I.D. (in.)	≤ 0.3514	≤ 0.3734	≤ 0.3880	≤ 0.3890	≤ 0.3175
Fuel Pellet Dia. (in.)	≤ 0.3444	≤ 0.3659	≤ 0.3805	≤ 0.3835	≤ 0.3130
Fuel Rod Pitch (in.)	≤ 0.556	≤ 0.556	≤ 0.580	≤ 0.556	Note 6
Active Fuel Length (in.)	≤ 150	≤ 150	≤ 150	≤ 144	≤ 102
No. of Guide Tubes	17	17	5 (Note 4)	16	0
Guide Tube Thickness (in.)	≥ 0.017	≥ 0.017	≥ 0.038	≥ 0.0145	N/A

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**Table A.2 (Page 2 of 4)  
PWR FUEL ASSEMBLY CHARACTERISTICS (Note 1)**

Fuel Assembly Array/Class	15x15A	15x15B	15x15C	15x15D	15x15E	15x15F
Clad Material (Note 2)	ZR	ZR	ZR	ZR	ZR	ZR
Design Initial U (kg/assy.) (Note 3)	≤ 464	≤ 464	≤ 464	≤ 475	≤ 475	≤ 475
Initial Enrichment (MPC-24, 24E, and 24EF) (wt. % <sup>235</sup> U)	≤ 4.1 (24) ≤ 4.5 (24E/EF)					
Initial Enrichment (MPC-32) (wt. % <sup>235</sup> U) (Note 5)	N/A	N/A	N/A	(Note 5)	(Note 5)	(Note 5)
No. of Fuel Rod Locations	204	204	204	208	208	208
Fuel Clad O.D. (in.)	≥ 0.418	≥ 0.420	≥ 0.417	≥ 0.430	≥ 0.428	≥ 0.428
Fuel Clad I.D. (in.)	≤ 0.3660	≤ 0.3736	≤ 0.3640	≤ 0.3800	≤ 0.3790	≤ 0.3820
Fuel Pellet Dia. (in.)	≤ 0.3580	≤ 0.3671	≤ 0.3570	≤ 0.3735	≤ 0.3707	≤ 0.3742
Fuel Rod Pitch (in.)	≤ 0.550	≤ 0.563	≤ 0.563	≤ 0.568	≤ 0.568	≤ 0.568
Active Fuel Length (in.)	≤ 150	≤ 150	≤ 150	≤ 150	≤ 150	≤ 150
No. of Guide and/or Instrument Tubes	21	21	21	17	17	17
Guide/Instrument Tube Thickness (in.)	≥ 0.015	≥ 0.015	≥ 0.0165	≥ 0.0150	≥ 0.0140	≥ 0.0140

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**Table A.2 (Page 3 of 4)  
PWR FUEL ASSEMBLY CHARACTERISTICS (Note 1)**

Fuel Assembly Array/ Class	15x15G	15x15H	16x16A	17x17A	17x17B	17x17C
Clad Material (Note 2)	SS	ZR	ZR	ZR	ZR	ZR
Design Initial U (kg/assy.) (Note 3)	≤ 420	≤ 475	≤ 443	≤ 467	≤ 467	≤ 474
Initial Enrichment (MPC-24, 24E, and 24EF) (wt. % <sup>235</sup> U)	≤ 4.0 (24) ≤ 4.5 (24E/EF)	≤ 3.8 (24) ≤ 4.2 (24E/EF)	≤ 4.6 (24) ≤ 5.0 (24E/EF)	≤ 4.0 (24) ≤ 4.4 (24E/EF)	≤ 4.0 (24) ≤ 4.4 (24E/EF) (Note 7)	≤ 4.0 (24) ≤ 4.4 (24E/EF)
Initial Enrichment (MPC-32) (wt. % <sup>235</sup> U) (Note 5)	N/A	(Note 5)	N/A	(Note 5)	(Note 5)	(Note 5)
No. of Fuel Rod Locations	204	208	236	264	264	264
Fuel Clad O.D. (in.)	≥ 0.422	≥ 0.414	≥ 0.382	≥ 0.360	≥ 0.372	≥ 0.377
Fuel Clad I.D. (in.)	≤ 0.3890	≤ 0.3700	≤ 0.3320	≤ 0.3150	≤ 0.3310	≤ 0.3330
Fuel Pellet Dia. (in.)	≤ 0.3825	≤ 0.3622	≤ 0.3255	≤ 0.3088	≤ 0.3232	≤ 0.3252
Fuel Rod Pitch (in.)	≤ 0.563	≤ 0.568	≤ 0.506	≤ 0.496	≤ 0.496	≤ 0.502
Active Fuel Length (in.)	≤ 144	≤ 150	≤ 150	≤ 150	≤ 150	≤ 150
No. of Guide and/or Instrument Tubes	21	17	5 (Note 4)	25	25	25
Guide/Instrument Tube Thickness (in.)	≥ 0.0145	≥ 0.0140	≥ 0.0400	≥ 0.016	≥ 0.014	≥ 0.020

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Table A.2 (Page 4 of 4)  
PWR FUEL ASSEMBLY CHARACTERISTICS (Note 1)

### Notes:

1. All dimensions are design nominal values. Maximum and minimum dimensions are specified to bound variations in design nominal values among fuel assemblies within a given array/class.
2. ZR Designates cladding material made of Zirconium or Zirconium alloys.
3. Design initial uranium weight is the nominal uranium weight specified for each assembly by the fuel manufacturer or reactor user. For each PWR fuel assembly, the total uranium weight limit specified in this table may be increased up to 2.0 percent for comparison with users' fuel records to account for manufacturer tolerances.
4. Each guide tube replaces four fuel rods.
5. Minimum burnup and maximum initial enrichment as specified in Table A.12.
6. This fuel assembly array/class includes only the Indian Point Unit 1 fuel assembly. This fuel assembly has two pitches in different sectors of the assembly. These pitches are 0.441 inches and 0.453 inches.
7. Trojan plant-specific fuel is governed by the limits specified for array/class 17x17B and will be transported in the custom-designed Trojan MPC-24E/EF canisters. The Trojan MPC-24E/EF design is authorized to transport only Trojan plant fuel with a maximum initial enrichment of 3.7 wt.% <sup>235</sup>U.

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**Table A.3 (Page 1 of 6)  
BWR FUEL ASSEMBLY CHARACTERISTICS (Note 1)**

Fuel Assembly Array/Class	6x6A	6x6B	6x6C	7x7A	7x7B	8x8A
Clad Material (Note 2)	ZR	ZR	ZR	ZR	ZR	ZR
Design Initial U (kg/assy.) (Note 3)	≤ 110	≤ 110	≤ 110	≤ 100	≤ 195	≤ 120
Maximum planar-average initial enrichment (wt. % <sup>235</sup> U)	≤ 2.7	≤ 2.7 for the UO <sub>2</sub> rods. See Note 4 for MOX rods	≤ 2.7	≤ 2.7	≤ 4.2	≤ 2.7
Initial Maximum Rod Enrichment (wt. % <sup>235</sup> U)	≤ 4.0	≤ 4.0	≤ 4.0	≤ 5.5	≤ 5.0	≤ 4.0
No. of Fuel Rod Locations	35 or 36	35 or 36 (up to 9 MOX rods)	36	49	49	63 or 64
Fuel Clad O.D. (in.)	≥ 0.5550	≥ 0.5625	≥ 0.5630	≥ 0.4860	≥ 0.5630	≥ 0.4120
Fuel Clad I.D. (in.)	≤ 0.5105	≤ 0.4945	≤ 0.4990	≤ 0.4204	≤ 0.4990	≤ 0.3620
Fuel Pellet Dia. (in.)	≤ 0.4980	≤ 0.4820	≤ 0.4880	≤ 0.4110	≤ 0.4910	≤ 0.3580
Fuel Rod Pitch (in.)	≤ 0.710	≤ 0.710	≤ 0.740	≤ 0.631	≤ 0.738	≤ 0.523
Active Fuel Length (in.)	≤ 120	≤ 120	≤ 77.5	≤ 80	≤ 150	≤ 120
No. of Water Rods (Note 11)	1 or 0	1 or 0	0	0	0	1 or 0
Water Rod Thickness (in.)	≥ 0	≥ 0	N/A	N/A	N/A	≥ 0
Channel Thickness (in.)	≤ 0.060	≤ 0.060	≤ 0.060	≤ 0.060	≤ 0.120	≤ 0.100

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**Table A.3 (Page 2 of 6)  
BWR FUEL ASSEMBLY CHARACTERISTICS (Note 1)**

Fuel Assembly Array/Class	8x8B	8x8C	8x8D	8x8E	8x8F	9x9A
Clad Material (Note 2)	ZR	ZR	ZR	ZR	ZR	ZR
Design Initial U (kg/assy.) (Note 3)	≤ 185	≤ 185	≤ 185	≤ 185	≤ 185	≤ 177
Maximum planar-average initial enrichment (wt. % <sup>235</sup> U)	≤ 4.2	≤ 4.2	≤ 4.2	≤ 4.2	< 4.0	≤ 4.2
Initial Maximum Rod Enrichment (wt. % <sup>235</sup> U)	≤ 5.0	≤ 5.0	≤ 5.0	≤ 5.0	≤ 5.0	≤ 5.0
No. of Fuel Rod Locations	63 or 64	62	60 or 61	59	64	74/66 (Note 5)
Fuel Clad O.D. (in.)	≥ 0.4840	≥ 0.4830	≥ 0.4830	≥ 0.4930	≥ 0.4576	≥ 0.4400
Fuel Clad I.D. (in.)	≤ 0.4295	≤ 0.4250	≤ 0.4230	≤ 0.4250	≤ 0.3996	≤ 0.3840
Fuel Pellet Dia. (in.)	≤ 0.4195	≤ 0.4160	≤ 0.4140	≤ 0.4160	≤ 0.3913	≤ 0.3760
Fuel Rod Pitch (in.)	≤ 0.642	≤ 0.641	≤ 0.640	≤ 0.640	≤ 0.609	≤ 0.566
Design Active Fuel Length (in.)	≤ 150	≤ 150	≤ 150	≤ 150	≤ 150	≤ 150
No. of Water Rods (Note 11)	1 or 0	2	1 - 4 (Note 7)	5	N/A (Note 12)	2
Water Rod Thickness (in.)	≥ 0.034	> 0.00	> 0.00	≥ 0.034	≥ 0.0315	> 0.00
Channel Thickness (in.)	≤ 0.120	≤ 0.120	≤ 0.120	≤ 0.100	≤ 0.055	≤ 0.120

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**Table A.3 (Page 3 of 6)  
BWR FUEL ASSEMBLY CHARACTERISTICS (Note 1)**

Fuel Assembly Array/Class	9x9B	9x9C	9x9D	9x9E (Note 13)	9x9F (Note 13)	9x9G
Clad Material (Note 2)	ZR	ZR	ZR	ZR	ZR	ZR
Design Initial U (kg/assy.) (Note 3)	≤ 177	≤ 177	≤ 177	≤ 177	≤ 177	≤ 177
Maximum planar-average initial enrichment (wt. % <sup>235</sup> U)	≤ 4.2	≤ 4.2	≤ 4.2	≤ 4.0	≤ 4.0	≤ 4.2
Initial Maximum Rod Enrichment (wt. % <sup>235</sup> U)	≤ 5.0	≤ 5.0	≤ 5.0	≤ 5.0	≤ 5.0	≤ 5.0
No. of Fuel Rods	72	80	79	76	76	72
Fuel Clad O.D. (in.)	≥ 0.4330	≥ 0.4230	≥ 0.4240	≥ 0.4170	≥ 0.4430	≥ 0.4240
Fuel Clad I.D. (in.)	≤ 0.3810	≤ 0.3640	≤ 0.3640	≤ 0.3640	≤ 0.3860	≤ 0.3640
Fuel Pellet Dia. (in.)	≤ 0.3740	≤ 0.3565	≤ 0.3565	≤ 0.3530	≤ 0.3745	≤ 0.3565
Fuel Rod Pitch (in.)	≤ 0.572	≤ 0.572	≤ 0.572	≤ 0.572	≤ 0.572	≤ 0.572
Design Active Fuel Length (in.)	≤ 150	≤ 150	≤ 150	≤ 150	≤ 150	≤ 150
No. of Water Rods (Note 11)	1 (Note 6)	1	2	5	5	1 (Note 6)
Water Rod Thickness (in.)	> 0.00	≥ 0.020	≥ 0.0300	≥ 0.0120	≥ 0.0120	≥ 0.0320
Channel Thickness (in.)	≤ 0.120	≤ 0.100	≤ 0.100	≤ 0.120	≤ 0.120	≤ 0.120

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**Table A.3 (Page 4 of 6)  
BWR FUEL ASSEMBLY CHARACTERISTICS (Note 1)**

<b>Fuel Assembly Array/Class</b>	<b>10x10A</b>	<b>10x10B</b>	<b>10x10C</b>	<b>10x10D</b>	<b>10x10E</b>
Clad Material (Note 2)	ZR	ZR	ZR	SS	SS
Design Initial U (kg/assy.) (Note 3)	≤ 186	≤ 186	≤ 186	≤ 125	≤ 125
Maximum planar-average initial enrichment (wt.% <sup>235</sup> U)	≤ 4.2	≤ 4.2	≤ 4.2	≤ 4.0	≤ 4.0
Initial Maximum Rod Enrichment (wt.% <sup>235</sup> U)	≤ 5.0	≤ 5.0	≤ 5.0	≤ 5.0	≤ 5.0
No. of Fuel Rod Locations	92/78 (Note 8)	91/83 (Note 9)	96	100	96
Fuel Clad O.D. (in.)	≥ 0.4040	≥ 0.3957	≥ 0.3780	≥ 0.3960	≥ 0.3940
Fuel Clad I.D. (in.)	≤ 0.3520	≤ 0.3480	≤ 0.3294	≤ 0.3560	≤ 0.3500
Fuel Pellet Dia. (in.)	≤ 0.3455	≤ 0.3420	≤ 0.3224	≤ 0.3500	≤ 0.3430
Fuel Rod Pitch (in.)	≤ 0.510	≤ 0.510	≤ 0.488	≤ 0.565	≤ 0.557
Design Active Fuel Length (in.)	≤ 150	≤ 150	≤ 150	≤ 83	≤ 83
No. of Water Rods (Note 11)	2	1 (Note 6)	5 (Note 10)	0	4
Water Rod Thickness (in.)	≥ 0.0300	> 0.00	≥ 0.031	N/A	≥ 0.022
Channel Thickness (in.)	≤ 0.120	≤ 0.120	≤ 0.055	≤ 0.080	≤ 0.080

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Table A.3 (Page 5 of 6)  
**BWR FUEL ASSEMBLY CHARACTERISTICS (Note 1)**

<b>Fuel Assembly Array/Class</b>	<b>6x6D</b>	<b>7x7C</b>
Clad Material (Note 2)	Zr	Zr
Design Initial U (kg/assy.)(Note 3)	≤ 78	≤ 78
Maximum planar-average initial enrichment (wt.% <sup>235</sup> U)	≤ 2.6	≤ 2.6
Initial Maximum Rod Enrichment (wt.% <sup>235</sup> U)	≤ 4.0 (Note 14)	≤ 4.0
No. of Fuel Rod Locations	38	49
Fuel Clad O.D. (in.)	≥ 0.5585	≥ 0.486
Fuel Clad I.D. (in.)	≤ 0.505	≤ 0.426
Fuel Pellet Dia. (in.)	≤ 0.488	≤ 0.411
Fuel Rod Pitch (in.)	≤ 0.740	≤ 0.631
Active Fuel Length (in.)	≤ 80	≤ 80
No. of Water Rods (Note 11)	0	0
Water Rod Thickness (in.)	N/A	N/A
Channel Thickness (in.)	≤ 0.060	≤ 0.060

## Appendix A - Certificate of Compliance 9261, Revision 8

Table A.3 (Page 6 of 6)  
BWR FUEL ASSEMBLY CHARACTERISTICS (Note 1)

### Notes:

1. All dimensions are design nominal values. Maximum and minimum dimensions are specified to bound variations in design nominal values among fuel assemblies within a given array/class.
2. ZR designates cladding material made from Zirconium or Zirconium alloys.
3. Design initial uranium weight is the uranium weight specified for each assembly by the fuel manufacturer or reactor user. For each BWR fuel assembly, the total uranium weight limit specified in this table may be increased up to 1.5% for comparison with users' fuel records to account for manufacturer's tolerances.
4.  $\leq 0.635$  wt. %  $^{235}\text{U}$  and  $\leq 1.578$  wt. % total fissile plutonium ( $^{239}\text{Pu}$  and  $^{241}\text{Pu}$ ), (wt. % of total fuel weight, i.e.,  $\text{UO}_2$  plus  $\text{PuO}_2$ ).
5. This assembly class contains 74 total fuel rods; 66 full length rods and 8 partial length rods.
6. Square, replacing nine fuel rods.
7. Variable
8. This assembly class contains 92 total fuel rods; 78 full length rods and 14 partial length rods.
9. This assembly class contains 91 total fuel rods; 83 full length rods and 8 partial length rods.
10. One diamond-shaped water rod replacing the four center fuel rods and four rectangular water rods dividing the assembly into four quadrants.
11. These rods may be sealed at both ends and contain Zr material in lieu of water.
12. This assembly is known as "QUAD+" and has four rectangular water cross segments dividing the assembly into four quadrants.
13. For the SPC 9x9-5 fuel assembly, each fuel rod must meet either the 9x9E or 9x9F set of limits for clad O.D., clad I.D., and pellet diameter.
14. Only two assemblies may contain one rod each with an initial maximum enrichment up to 5.5 wt%.

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**Table A.4**

**FUEL ASSEMBLY COOLING, AVERAGE BURNUP, AND INITIAL ENRICHMENT  
MPC-24/24E/24EF PWR FUEL WITH ZIRCALOY CLAD AND  
WITH NON-ZIRCALOY IN-CORE GRID SPACERS**

<b>Post-irradiation Cooling Time (years)</b>	<b>Assembly Burnup (MWD/MTU)</b>	<b>Assembly Initial Enrichment (wt. % U-235)</b>
≥ 9	≤ 24,500	≥ 2.3
≥ 11	≤ 29,500	≥ 2.6
≥ 13	≤ 34,500	≥ 2.9
≥ 15	≤ 39,500	≥ 3.2
≥ 18	≤ 44,500	≥ 3.4

**Table A.5**

**FUEL ASSEMBLY COOLING, AVERAGE BURNUP, AND INITIAL ENRICHMENT  
MPC-24/24E/24EF PWR FUEL WITH ZIRCALOY CLAD AND  
WITH ZIRCALOY IN-CORE GRID SPACERS**

<b>Post-irradiation Cooling Time (years)</b>	<b>Assembly Burnup (MWD/MTU)</b>	<b>Assembly Initial Enrichment (wt. % U-235)</b>
≥ 6	≤ 24,500	≥ 2.3
≥ 7	≤ 29,500	≥ 2.6
≥ 9	≤ 34,500	≥ 2.9
≥ 11	≤ 39,500	≥ 3.2
≥ 14	≤ 44,500	≥ 3.4

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Table A.6

FUEL ASSEMBLY COOLING, AVERAGE BURNUP, AND INITIAL ENRICHMENT  
MPC-24/24E/24EF PWR FUEL WITH STAINLESS STEEL CLAD

Post-irradiation Cooling Time (years)	Assembly Burnup (MWD/MTU)	Assembly Initial Enrichment (wt. % U-235)
≥ 19	≤ 30,000	≥ 3.1
≥ 24	≤ 40,000	≥ 3.1

Table A.7

FUEL ASSEMBLY COOLING, AVERAGE BURNUP, AND INITIAL ENRICHMENT  
MPC-68

Post-irradiation Cooling Time (years)	Assembly Burnup (MWD/MTU)	Assembly Initial Enrichment (wt. % U-235)
≥ 5	≤ 10,000	≥ 0.7
≥ 7	≤ 20,000	≥ 1.35
≥ 8	≤ 24,500	≥ 2.1
≥ 9	≤ 29,500	≥ 2.4
≥ 11	≤ 34,500	≥ 2.6
≥ 14	≤ 39,500	≥ 2.9
≥ 19	≤ 44,500	≥ 3.0

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Table A.8

**TROJAN PLANT FUEL ASSEMBLY COOLING, AVERAGE BURNUP,  
AND INITIAL ENRICHMENT LIMITS (Note 1)**

Post-irradiation Cooling Time (years)	Assembly Burnup (MWD/MTU)	Assembly Initial Enrichment (wt.% <sup>235</sup> U)
≥16	≤42,000	≥3.09
≥16	≤37,500	≥2.6
≥16	≤30,000	≥2.1

NOTES:

1. Each fuel assembly must only meet one set of limits (i.e., one row)

Table A.9

**TROJAN PLANT NON-FUEL HARDWARE AND NEUTRON SOURCES  
COOLING AND BURNUP LIMITS**

Type of Hardware or Neutron Source	Burnup (MWD/MTU)	Post-irradiation Cooling Time (Years)
BPRAs	≤15,998	≥24
TPDs	≤118,674	≥11
RCCAs	≤125,515	≥9
Cf neutron source	≤15,998	≥24
Sb-Be neutron source with 4 source rods, 16 burnable poison rods, and 4 thimble plug rods	≤45,361	≥19
Sb-Be neutron source with 4 source rods, 20 thimble plug rods	≤88,547	≥9

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Table A.10

FUEL ASSEMBLY COOLING, AVERAGE BURNUP, AND MINIMUM ENRICHMENT MPC-32 PWR FUEL WITH ZIRCALOY CLAD AND WITH NON-ZIRCALOY IN-CORE GRID SPACERS

Post-irradiation cooling time (years)	Assembly burnup (MWD/MTU)	Assembly Initial Enrichment (wt. % U-235)
≥12	≤24,500	≥2.3
≥14	≤29,500	≥2.6
≥16	≤34,500	≥2.9
≥19	≤39,500	≥3.2
≥20	≤42,500	≥3.4

Table A.11

FUEL ASSEMBLY COOLING, AVERAGE BURNUP, AND MINIMUM ENRICHMENT MPC-32 PWR FUEL WITH ZIRCALOY CLAD AND WITH ZIRCALOY IN-CORE GRID SPACERS

Post-irradiation cooling time (years)	Assembly burnup (MWD/MTU)	Assembly Initial Enrichment (wt. % U-235)
≥8	≤24,500	≥2.3
≥9	≤29,500	≥2.6
≥12	≤34,500	≥2.9
≥14	≤39,500	≥3.2
≥19	≤44,500	≥3.4

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Table A.12

**FUEL ASSEMBLY MAXIMUM ENRICHMENT AND MINIMUM BURNUP REQUIREMENTS FOR TRANSPORTATION IN MPC-32**

Fuel Assembly Array/Class	Configuration (Note 2)	Maximum Enrichment (wt.% U-235)	Minimum Burnup (B) as a Function of Initial Enrichment (E) (Note 1) (GWD/MTU)
15x15D, E, F, H	A	4.65	$B = (1.6733)*E^3 - (18.72)*E^2 + (80.5967)*E - 88.3$
	B	4.38	$B = (2.175)*E^3 - (23.355)*E^2 + (94.77)*E - 99.95$
	C	4.48	$B = (1.9517)*E^3 - (21.45)*E^2 + (89.1783)*E - 94.6$
	D	4.45	$B = (1.93)*E^3 - (21.095)*E^2 + (87.785)*E - 93.06$
17x17A,B,C	A	4.49	$B = (1.08)*E^3 - (12.25)*E^2 + (60.13)*E - 70.86$
	B	4.04	$B = (1.1)*E^3 - (11.56)*E^2 + (56.6)*E - 62.59$
	C	4.28	$B = (1.36)*E^3 - (14.83)*E^2 + (67.27)*E - 72.93$
	D	4.16	$B = (1.4917)*E^3 - (16.26)*E^2 + (72.9883)*E - 79.7$

NOTES:

1. E = Initial enrichment (e.g., for 4.05 wt.% , E = 4.05).
2. See Table A.13.
3. Fuel Assemblies must be cooled 5 years or more.

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Table A.13

LOADING CONFIGURATIONS FOR THE MPC-32

CONFIGURATION	ASSEMBLY SPECIFICATIONS
A	<ul style="list-style-type: none"> <li>• Assemblies that have not been located in any cycle under a control rod bank that was permitted to be inserted during full power operation (per plant operating procedures); or</li> <li>• Assemblies that have been located under a control rod bank that was permitted to be inserted during full power operation (per plant operating procedures), but where it can be demonstrated, based on operating records, that the insertion never exceeded 8 inches from the top of the active length during full power operation.</li> </ul>
B	<ul style="list-style-type: none"> <li>• Of the 32 assemblies in a basket, up to 8 assemblies can be from core locations where they were located under a control rod bank that was permitted to be inserted more than 8 inches during full power operation. There is no limit on the duration (in terms of burnup) under this bank.</li> <li>• The remaining assemblies in the basket must satisfy the same conditions as specified for configuration A.</li> </ul>
C	<ul style="list-style-type: none"> <li>• Of the 32 assemblies in a basket, up to 8 assemblies can be from core locations where they were located under a control rod bank, that was permitted to be inserted more than 8 inches during full power operation. Location under such a control rod bank is limited to 20 GWD/MTU of the assembly.</li> <li>• The remaining assemblies in the basket must satisfy the same conditions as specified for configuration A.</li> </ul>
D	<ul style="list-style-type: none"> <li>• Of the 32 assemblies in a basket, up to 8 assemblies can be from core locations where they were located under a control rod bank, that was permitted to be inserted more than 8 inches during full power operation. Location under such a control rod bank is limited to 30 GWD/MTU of the assembly.</li> <li>• The remaining assemblies in the basket must satisfy the same conditions as specified for configuration A.</li> </ul>

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**REFERENCES:**

Holtec International Report No. HI-951251, *Safety Analysis Report on the HI-STAR 100 Cask System*, Revision 15, dated October 11, 2010.





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

SAFETY EVALUATION REPORT

Docket No. 71-9261  
Model No. HI-STAR 100 Package  
Certificate of Compliance No. 9261  
Revision No. 8

**SUMMARY**

By letter dated February 5, 2010, supplemented on August 11 and September 30, 2010, the applicant submitted an amendment request to the U.S. Nuclear Regulatory Commission for Certificate of Compliance No. 9261. The applicant requested significant changes to the Model No. HI-STAR 100 package, namely the incorporation of Metamic as an approved neutron absorber material for all currently approved generic MPC models, and the redesign of the AL-STAR impact limiter non-backbone components.

NRC staff reviewed the application using the guidance in NUREG-1617, "Standard Review Plan for Transportation Packages for Spent Nuclear Fuel." Based on the statements and representation in the application, as supplemented, the staff concludes that these changes do not affect the ability of the package to meet the requirements of 10 CFR Part 71.

**EVALUATION**

The applicant updated licensing drawings with various proposed design changes and one-time manufacturing deviations for both generic and Humboldt Bay (HB) specific licensed equipment. The applicant incorporated Metamic® as an approved neutron absorber material option to Boral® for all currently approved generic Multi Purpose Canister (MPC) models and specified a minimum B-10 loading.

The applicant also redesigned the AL-STAR impact limiter non-backbone components and corrected an error in the call-out of the thread patterns for the impact limiter attachment bolt and the attachment holes in the HI-STAR 100 overpacks.

The applicant presented five proposed changes relevant to the structural performance of the Model No. HI-STAR 100 package and its variant the HI-STAR 100 HB. The five proposed changes are as follows:

- (1) Change the arrangement of the impact limiter crush material to support the use of a single type of aluminum honeycomb material rather than the currently licensed arrangement which requires four types of aluminum honeycomb.

This change, which does not apply to the HB variant, is summarized in (i) the licensing drawings by showing the new arrangement of crush material in the impact limiter (this change is not applicable to HI-STAR HB Impact Limiters), (ii) in Section No. 2.3.1.5 of the application which has been modified and Table 2.3.7 has been

added to reflect the revised minimum crush strengths for the HI-STAR 100 Impact Limiters (the minimum crush strength values for HB impact limiters remain unchanged but are also reflected in Table No. 2.3.7 of the application), and (iii) is evaluated in a new Appendix 2.C of the application which includes an LS-DYNA evaluation of the modified HI-STAR 100 impact limiter in accordance with previously approved USNRC methodology and approach (namely Model No. HI-STAR 60 package, Docket No. 71-9336 and Model No. HI-STAR 180 package, Docket No. 71-9325).

The reason for such changes is that using impact limiter sections made of materials with uniform crush strength removes complexity from the design and also allows for more flexibility during fabrication resulting in enhanced product quality. The required technical justifications and acceptance criteria are provided in the application.

Staff requested that the applicant clarify the licensing drawings which depict the layout and crush orientation for the single type of aluminum honeycomb (bi-directional). The applicant made the requested changes to the drawings to include both the HI-STAR 100 impact limiters as well as the HI-STAR HB impact limiters. Staff finds these clarifications adequate.

Staff also requested that the applicant provide (i) representative input and output files for the 9-meter end drop and the 9-meter slapdown, (ii) overlay plots of the deceleration time histories for the original impact limiter design and the updated impact limiter design, and (iii) additional justification that the change in impact limiter aluminum honeycomb will not adversely affect the performance of the impact limiter or ancillary structures.

Staff reviewed the representative input files as well as the deceleration time history overlay plots and found them credible. Specifically, the overlay plots showed that the revised impact limiter aluminum honeycomb arrangement reasonably predicted both the shape and the peak deceleration of the deceleration time history.

Staff also found that the additional justification for this change provided by the applicant reasonably demonstrated that this change will have no discernable effect on the ability of the impact limiter to perform its safety function. Specifically, the applicant demonstrated that the fundamental design, including the steel backbone, of the impact limiter is unchanged and the shimming requirements are the same as those for the previous version of the design.

The requirements of 10 CFR 71.33, and 10 CFR 71.73(c)(1) are satisfied.

(2) Addition of optional basket supports.

This change is evaluated in Section No. 2.6.1.3.1 of the application and is justified for fabrication flexibility for enhanced product quality. Optional basket supports and optional fuel spacers are added to the design of the MPC. These options are shown in more detail on the licensing drawings, are discussed in Section No. 2.6.1.3.1, and the evaluations summarized in Table No. 2.6.8 of the application show that the safety factors for the optional design of the basket supports are above 1.0 under normal conditions. Table No. 2.7.4 also shows the safety factors for the optional design of the basket supports are above 1.0 under accident conditions.

The optional fuel spacer design, using I-beam construction, is stronger than the tubing construction; therefore the safety factors for the tubing design bound the I-beam design.

Staff has reviewed this change, including verification of supplemental calculations, and finds the applicant's conclusions credible. The requirements of 10 CFR 71.71(c)(7) and 10 CFR 71.73(c)(1) are satisfied.

- (3) Removal of HB Damaged Fuel Can (DFC) lifting evaluation from Appendix 2.B (Table 2.B.1) and addition of a revised lifting evaluation of the HB DFC to Section No. 2.1.5.4 of the application. The reason for this change is that the DFC for Humboldt Bay is specifically designed for use at Humboldt Bay and is not the same as the DFC for Dresden. The lifting of the loaded DFC for Humboldt Bay is performed with a special tool that engages the slots on the top ring of the DFC (slots only accessible with DFC lid removed). Therefore the safety evaluation has been updated to support the actual operation/method implemented to lift the DFC for Humboldt Bay.

Staff has reviewed this change, including verification of supplemental calculations, and finds the applicant's conclusions credible. The requirements of 10 CFR 71.45(a) are satisfied.

- (4) Addition of Section 2.1.6.1.1 – Manufacturing Deviations.

The applicant added this section in Supplement 2.1 of the application to address manufacturing deviations with respect to 5 of a total of 54 closure bolt lids for the Model No. HI-STAR HB package. The applicant found that the usable thread length provided by these 5 bolts is less than the minimum specified length on the licensing drawing.

The applicant reanalyzed the in service condition limiting the torque values to a maximum of 750 ft-lbs on the 5 non-conforming bolts and torqued the remaining 49 bolts per the original design requirements (Table No. 7.1.1 of the application). The applicant concluded that:

- (i) The preload associated with the 49 conforming (fully threaded) bolt hole locations was sufficient to maintain the seal function for both Normal Conditions and Accident Conditions.
- (ii) The thread engagement for the 5 non-conforming hole locations is sufficient to meet ASME, Section III, Subsection NB stress limits for a torque of 750 ft-lbs.

Staff has reviewed this change, including verification of supplemental calculations, and finds the applicant's conclusions credible. The requirements of 10 CFR 71.71 and 10 CFR 71.73 are satisfied.

- (5) Addition of accident evaluation results from the analysis of the HB DFC when subjected to a 60 g loading.

The applicant performed an analysis of the HB DFC as summarized in Supplement 2.I of the application for a 60g end drop under accident conditions to demonstrate that the structural performance was consistent with that described in Appendix 2.B of the application.

Staff has reviewed this change, including verification of supplemental calculations, and finds the applicant's conclusions credible. The requirements of 10 CFR 71.73 are satisfied.

The applicant made a modification on the lid of the Multi-Purpose Canister (MPC). Note 1 on sheet 4 of licensing drawing No. 3923 states that the MPC lid may be fabricated from one or two pieces, where the bottom piece may be made either of stainless steel or carbon steel, where the carbon steel will be coated with stainless steel. A structural evaluation determined that this change to the MPC lid is acceptable and in compliance with the requirements of 10 CFR 71.73(c)(1).

The amendment permits the use of a cross core aluminum honeycomb, with no uni-directional material in the impact limiters. The cross core aluminum honeycomb is made of epoxy-bonded 5052 aluminum alloy. The highest temperature of the honeycomb material under normal conditions of transport is 179°F. Testing of the impact limiting materials was performed in 1998 by Holtec to verify the performance of the material up to 80°C (176°F). 179°F is the highest temperature of the honeycomb in the impact limiter, not the average temperature. In light of the marginal difference in peak temperatures indicated, the staff considered that a three-degree difference in Fahrenheit will have a negligible effect on the average properties of the epoxy-bonded aluminum honeycomb. The thermal properties of 5052 aluminum alloy used in the honeycomb were linearly extrapolated above 400°F. The thermal analysis, however assumes that under accident conditions the impact limiting honeycomb will have the thermal conductivity of 5052 alloy, with no void space, which is extremely conservative. Therefore the staff finds that the thermal properties of 5052 alloy above 400°F used in the application are acceptable and that the thermal analysis conducted to demonstrate compliance with 10 CFR 71.73(c)(1) will not be affected. No changes were made to the acceptance program listed in Section 8.1.5.3 for the honeycomb material. The acceptance program for the honeycomb was previously approved.

The applicant incorporated Metamic aluminum / boron carbide composites as neutron absorber material for all currently approved generic MPC models. The staff has previously approved the use of Metamic® in the Model No. HI-STAR 60 package described in the application, Revision 2, dated May 15, 2009. The qualification program for Metamic is detailed in EPRI Document 1003137, "Qualification of METAMIC® for Spent-Fuel Storage Application," and in Holtec Report, "HI-2043215, Revision 2, "Sourcebook for Metamic Performance." The staff considers that the acceptance program for the Metamic neutron absorbers was adequately described in Section 8 of the application, and is consistent with the acceptance program for the Model No. HI-STAR 60 package, with minor editorial changes. The licensing drawings permit minor deviations (1/32" over a length of no more than 12") from the design width of the panels. The criticality analysis provided to the staff demonstrates that these deviations will have a minimal affect on  $k_{eff}$ , therefore the staff finds there is no safety issue regarding these deviations with regards to 10 CFR 71.55(d)(1) and 71.55(e). The thermal conductivity of Metamic bounds that of Boral and will not have a significant effect on the overall thermal performance of the package.

The amendment clarifies the procedure steps to mitigate hydrogen burn/ignition during welding/cutting of the MPC lid to shell weld. Hydrogen monitoring of combustible gas prior to and during these operations is required.

The amendment specifies that the area beneath the MPC lid will be vented/exhausted or purged with inert gas prior to and during welding. This is to minimize the amount of combustible gas underneath the MPC lid before and during welding. The staff finds this clarification acceptable as required by 10 CFR 71.43(c).

The staff has reviewed the packaging materials and structural performance under the normal conditions of transport as well as hypothetical accident conditions, and concludes that there will be no substantial reduction in the effectiveness of the package. Specifically, the staff concludes that the packaging has adequate structural integrity to satisfy the subcriticality, containment, shielding, and temperature requirements of 10 CFR Part 71.

The staff reviewed the package application dated February 5, 2010, supplemented August 11 and September 30, 2010, in support of the amendment request and determined that the documentation was available and complete.

#### Changes to Certificate of Compliance

The following changes have been made to the Certificate:

Condition No. 5.(a)(3) was updated to include the latest revisions of all licensing drawings.

Condition No. 12 was revised to authorize use of the previous revision of the certificate for a period of approximately one year.

No new Condition was added to the Certificate. The expiration date of the Certificate was not changed. The consolidated application Revision No. 15, dated October 11, 2010, which consists of the February 5, 2010, application and its supplements, supersedes all previous revisions of the application and was included in the References Section.

#### **CONCLUSION**

Based on the statements and representations contained in the application, as supplemented, and the conditions listed above, the staff concludes that the design of the Model No. HI-STAR 100 package has been adequately described and evaluated. The staff concludes that the changes indicated do not affect the ability of the package to meet the requirements of 10 CFR Part 71.

Issued with Certificate of Compliance No. 9261, Revision No. 8,  
on October 12, 2010.