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The **Nuclear Regulatory Commission** (NRC) Proposed Rule: [List of Approved Spent Fuel Storage Transnuclear, Inc. Standardized Advanced NUHOMS Horizontal Modular Storage System](#)

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There are significant changes that should require a UFSAR. Just the definition of Damage Fuel has been changed just for the 32PTH2. More time is needed list the rest of the issues.

New definition of "Damaged Fuel" for 32PTH2 DSC  
(Page 1-1 of Technical Specifications ML13290A182)

"DAMAGED FUEL ASSEMBLY (for 32PTH2 DSC only)  
A DAMAGED FUEL ASSEMBLY is a fuel assembly with known or suspected cladding defects greater than pinhole leaks or hairline cracks or an assembly with partial or missing rods. The extent of damage in the fuel assembly is to be limited such that a fuel assembly is able to be handled by normal means. (Page 1-1 of Technical Specifications ML13290A182)

"DAMAGED FUEL ASSEMBLY (FOR 24PT1-DSC and 24PT4-DSC only)  
A DAMAGED FUEL ASSEMBLY is a fuel assembly with known or suspected cladding defects greater than pinhole leaks or hairline cracks or an assembly with partial or missing rods. (Page 1-1 of Technical Specifications ML13290A182)"

The 32PTH1 DSC which is the only other 32PTH DSC, uses the following definition. (Page A-15 of Amendment 10 of the Technical Specifications ML09040021)

“Cladding damage in excess of pinhole leaks or hairline cracks is not authorized to be stored as “Intact PWR Fuel.”

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