

September 19, 2000

Mr. Edward M. Davis, President and CEO
NAC International, Inc.
655 Engineering Drive
Norcross, GA 30092

SUBJECT: TECHNICAL ISSUES CONCERNING THE REVIEW OF THE
NAC-UMS TRANSPORT CASK APPLICATION AND REQUEST
FOR A MEETING WITH NAC MANAGEMENT (TAC NO. L22452)

Dear Mr. Davis:

This letter documents discussions held on September 7 and 13, 2000, between the Nuclear Regulatory Commission (NRC) and NAC International, Inc., (NAC) concerning the restart of our review of your Universal Multi-purpose Canister System (UMS) transport cask application. NRC initiated the discussions as a result of our identification of significant technical issues regarding your June 29, 2000, response to our August 30, 1999, request for additional information (RAI).

As you are aware, continued NRC review of the UMS Universal Transport System had been deferred, at your request, as documented in our letter to you dated September 23, 1999. We subsequently scheduled the restart of the NAC-UMS transport cask review in our letter to you dated July 20, 2000. As we discussed on September 7, 2000, during our acceptance review of your RAI response we identified that your responses to RAI issues regarding the quarter-scale model confirmatory testing program are inadequate. Specifically, you did not provide the appropriate information to conclude that your computer modeling and analysis accurately correlate with the results of the quarter-scale model 30-foot side drop tests that were performed.

By teleconference on September 13, 2000, we had further discussions regarding your plans to respond to the identified issues. NAC stated that it appeared that the internals of the as-built quarter-scale model were not proportioned appropriately for the cask side drops. NAC committed to provide a complete response which comprehensively addresses the technical issues by September 20, 2000. It is our understanding that your response will include: (1) the technical basis for determining the g-load forces experienced, as measured by instrumentation, during the quarter-scale model side drop tests, (2) an assessment of the data provided by all instrumentation associated with the quarter-scale model side drop tests, and (3) justification that the NAC-UMS transport cask has been analyzed for the 30-foot drop test(s) in the configuration for which maximum damage to the package is expected.

The staff's review schedules are based on complete and accurate responses to RAIs. Depending on the extent of changes, timeliness and quality of your response to the identified issues, there may be an impact on the schedule. We will discuss with you, after we receive your response, any need to adjust the schedule.

Additionally, the Spent Fuel Project Office (SFPO) management team would like to meet with NAC management to discuss your dual-purpose (NAC-UMS and NAC-MPC/STC) storage and transportation cask current and projected applications and amendments and key aspects in the performance of NRC regulatory reviews. This meeting will focus on various issues associated with NAC's August 16, 2000, letter to Tim McGinty of my staff, consistent with our September 8, 2000, response. Specific areas that SFPO plans to address with NAC at the meeting include:

- Interactions between staff and applicants during the conduct of reviews
- Expectations on the completeness of engineering and supporting analysis
- Scheduling assumptions for the conduct of reviews
- Times associated with processing storage cask approvals
- SFPO's casework prioritization scheme
- Scheduling and resource impacts resulting from NRC identification of technical issues in applications and RAI responses

I look forward to meeting with you on October 6, 2000. If you have any questions, please call me, or Tim McGinty of my staff, at (301) 415-8500.

Sincerely,
/RA/ original signed by /s/
E. William Brach, Director
Spent Fuel Project Office
Office of Nuclear Material Safety
and Safeguards

Docket Nos. 71-9235
71-9270
72-1015
72-1025

cc: Attached List

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