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DOCKET NUMBER
PROPOSED RULE **PR 72**
(65FR 42647)

100 11 11 11 11

October 4, 2000
BFS/NRC 00-073
Docket No. 72-1026
File No. CMPC.0006.2

Secretary
US Nuclear Regulatory Commission
Washington, D.C. 20555-0001

Attention: Rulemakings and Adjudications Staff

Subject: Rulemaking Comments on the FuelSolutions™ Spent Fuel Storage System

- References:
1. Proposed Rule: List of Approved Spent Fuel Storage Casks: FuelSolutions™ Addition, Federal Register 65FR42647, dated July 11, 2000
 2. Safety Analysis Reports for the FuelSolutions™ System, Revision 4 (Docket No. 72-1026)

The purpose of this letter is to provide two additional comments from BNFL Fuel Solutions (BFS) and our FuelSolutions™ utility customer, Consumers Energy, on the Reference 1 Proposed Rulemaking for the FuelSolutions™ Storage System.

The comments provided in the attachment request changes to the draft Technical Specifications.

It is understood that the public comment period has closed and that these comments will only be considered if it is practical to do so. However, we request that they be considered if possible.

Should the NRC Staff have any questions, please contact the undersigned at (831) 430-5220.

Sincerely,

Robert D. Quinn
Manager of Operations

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cc: Ms. Mary Jane Ross-Lee, NMSS
Mr. John Broschak – Consumers Energy
Ms. Suzanne Leblang – Consumers Energy (Palisades)
Mr. Michael Bourassa – Consumers Energy (Big Rock Point)

Attachment

Additional Comments on FuelSolutions™ Technical Specifications

Technical Specification for the FuelSolutions™ Storage System

1. It is requested that Section 4.2.2.1 (Storage Cask) be revised to add a note clarifying the requirements for site-specific pad designs that have different values from those listed. The following is requested to be added at the end of Section 4.2.2.1: “Any site-specific pad design with parameters that differ from those listed must be evaluated by the licensee to confirm that the design basis deceleration loads for the storage cask and canister are not exceeded. This evaluation must be performed using the same methodology as described in WSNF-200 SAR Section 3.7.3.1.”
2. It is requested that Section 4.2.2.2 (Transfer Cask) be revised to add a note clarifying the requirements for site-specific pad designs that have different values from those listed. The following is requested to be added at the end of Section 4.2.2.2: “Any site-specific pad design with parameters that differ from those listed must be evaluated by the licensee to confirm that the design basis deceleration loads for the transfer cask and canister are not exceeded. This evaluation must be performed using the same methodology as described in WSNF-200 SAR Section 3.7.5.1.”