72-1004

TRANSNUCLEAR WEST

April 10, 2001
NUH61B-TNW0104-01

Mr. Timothy Kobetz
Project Manager, Spent Fuel Project Office
U.S. Nuclear Regulatory Commission
11555 Rockville Pike
Rockville, MD 20852

Subject: TN West Review Comments of the Preliminary Certificate of Compliance and Safety Evaluation Report for Standardized NUHOMS® System 61BT DSC Amendment

References: Timothy Kobetz to Rob Grenier letter dated April 5, 2001; "Preliminary Certificate of Compliance and Safety Evaluation Report for Standardized NUHOMS® System 61BT DSC Amendment (TAC No. L23137).

Dear Mr. Kobetz:

Transnuclear West Inc. (TN West) has reviewed the reference documents and the resulting comments are attached herewith.

Please contact Mr. U. B. Chopra (510-744-6053) or me (510-744-6033) if you require any additional information in support of this submittal.

Sincerely,

R. Grubb
Vice President, Engineering

Docket 72-1004

Attachments: 1. TN West Review Comments of the Preliminary Certificate of Compliance and Safety Evaluation Report for Standardized NUHOMS® System 61BT DSC Amendment.
2. Revised SAR Figure K.1-1.

cc: File NUH61B.0003.01

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NMSS01 Public

Comments on the Preliminary NUHOMS® CoC (61BT DSC Amendment)

1. Para 3b: Revise the first sentence which reads "..as described in the safety analysis report (SAR)..." to say "as described in the *Final Safety Analysis Report (FSAR)...*"

2. Para 3b: Revise the second subparagraph which provides a description of the internal basket assembly to say: "The internal basket assembly is composed of guide sleeves, support rods, and spacer discs. The internal basket assembly is designed to hold 24PWR fuel assemblies and 52 BWR fuel assemblies. *An alternate basket assembly configuration consisting of assemblies of stainless steel fuel compartments held in place by basket rails and a holddown ring is designed to hold 61 BWR assemblies. The basket assembly* aids in ..."

Comments on the Preliminary NUHOMS® Technical Specifications (61BT DSC Amendment)

1. Pages A-1, A-2, and A-3: Delete references to SER Sections 2.4.1, 11.0, 11.1, SER Tables, Reference 8 etc. which were associated with Revision 0 version of the SER.

2. Page A-6: Revise last para to say "The radiological design criterion is that fuel stored in the NUHOMS® system must not increase the average calculated HSM or transfer cask surface dose rates beyond those calculated for *the 24P, 52B, or 61BT* canister full of design basis assemblies. *The calculated surface dose rates for the 61BT DSC are bounding and are determined to be 118 mrem/hr and 1156 mrem/hr for the HSM and transfer cask respectively.* The design value average HSM and cask surface dose rates for the 24P and 52B canisters were calculated to be 48.6 mrem/hr and 591.8 mrem/hr respectively ....."

3. The revision bar shown needs to be shifted to be consistent with the change shown in the fourth paragraph on this page.

4. Revise Table 1-1d to delete Note 2 and revise the sequence numbers of Notes 3, and 4 accordingly. Also, delete the entire row in this Table entitled "Maximum MTU/assembly", since the design basis maximum initial uranium content of 198 kg/assembly is currently shown in Table 1-1c. The analysis presented in Chapter K.5 is based on this design basis value.

5. Revise Table 1-1d to correct a typographical error in footnote No. 3. The correct units for maximum Co-59 content are *gm per assembly* (instead of Kg per assembly).

6. Page A-18: Delete a superfluous numeral 2 below "Objective".

Comments on the SER (61BT DSC Amendment)

Chapter 1:

1. Revise Figure 1 to change the term "Vent Port Plug" to "*Test Port Plug*" to be consistent with the drawings included in Chapter K.1.5 of the SAR. A revised version of SAR Figure K.1-1 showing the correct description is included with this submittal.

2. Page 1-1, para 1.1: Revise second sentence to say "*Boral*®, borated aluminum or boron carbide/aluminum metal matrix composite plates provide criticality control .."

Chapter 3:

1. Page 3-2: Delete the last sentence of the first paragraph, which says "For transport, the positive closure of the OS 197 TC will be used". Part 72 does not address transport requirements.

2. Page 3-2, second paragraph: Revise the term "vent port plug" to say "*test port plug*" to be consistent with the drawings included in Chapter K.1.5 of the SAR.

3. Page 3-3, Para 3.1.2.1.4: Replace the words "Section K.3.3.4" in the second last sentence to say "*Section K.3.4.4*".

4. Page 3-7: Revise the first sentence to say "*Weld symbol presentation on drawings is per* ANSI/AWS 2.4-98" or delete this sentence in its entirety. The suggested change is consistent with Note 5 shown on DSC drawing NUH-61B-1060.

Chapter 4:

1. Pages 4-2 and 4-3: Replace the maximum allowable fuel temperature value of 1048 degrees F with the correct value of *1058* degrees (5 places).

Chapter 6:

1. Page 6-3, second para: Revise the second sentence to say "The assembly types are intact 7x7, 8x8, ...by General Electric".

Chapter 7:

1. Page 7-1, fourth para: Revise the last sentence to say "Maintaining a stable pressure of *3 mm Hg* for 30 minutes *during vacuum drying*, assures that an acceptable low quantity of water remains in the NUHOMS® -61BT DSC".

Chapter 8:

1. Page 8-2, first para: Revise first sentence to say that ".. provide reasonable assurance that *minimal* moisture remains in the cask..."

2. Page 8-2, second para: Revise the second last sentence to say that "...NUHOMS® - 61BT DSC demonstrate that the *inner* top cover plate is leak tight as defined ..."

Chapter 9:

1. Paragraph 9.1.3.3: The intent of the second last sentence of this paragraph is entirely unclear.

2. Para 9.1.3.3, last paragraph should read, "...using measurements taken on area *corresponding* to one centimeter in diameter..."

3. Para 9.1.3.5: Revise the title and the contents of this paragraph to allow the use of "Boralyn®" or a product equivalent to "Boralyn®" that becomes available commercially in the near future.

4. Either add a new finding F9.6 or revise section 9.1.3.3 of the SER (last para) to address a misstatement on page K.9-4 of the SAR related to acceptance tests for B10 areal density. The fourth para of page K.9-4 should say that "In the event that a coupon fails the single neutron measurement, *either the plate may be rejected or alternately be subjected to* four additional measurements made on *coupons* obtained from that plate *prior to acceptance of the plate.*

Chapter 10:

1. Page 10-2, para 10.2: Revise the second sentence to say "Table K.10-1 of the amendment request .....the estimated time, *the tasks involved and the total estimated dose for one canister load*".

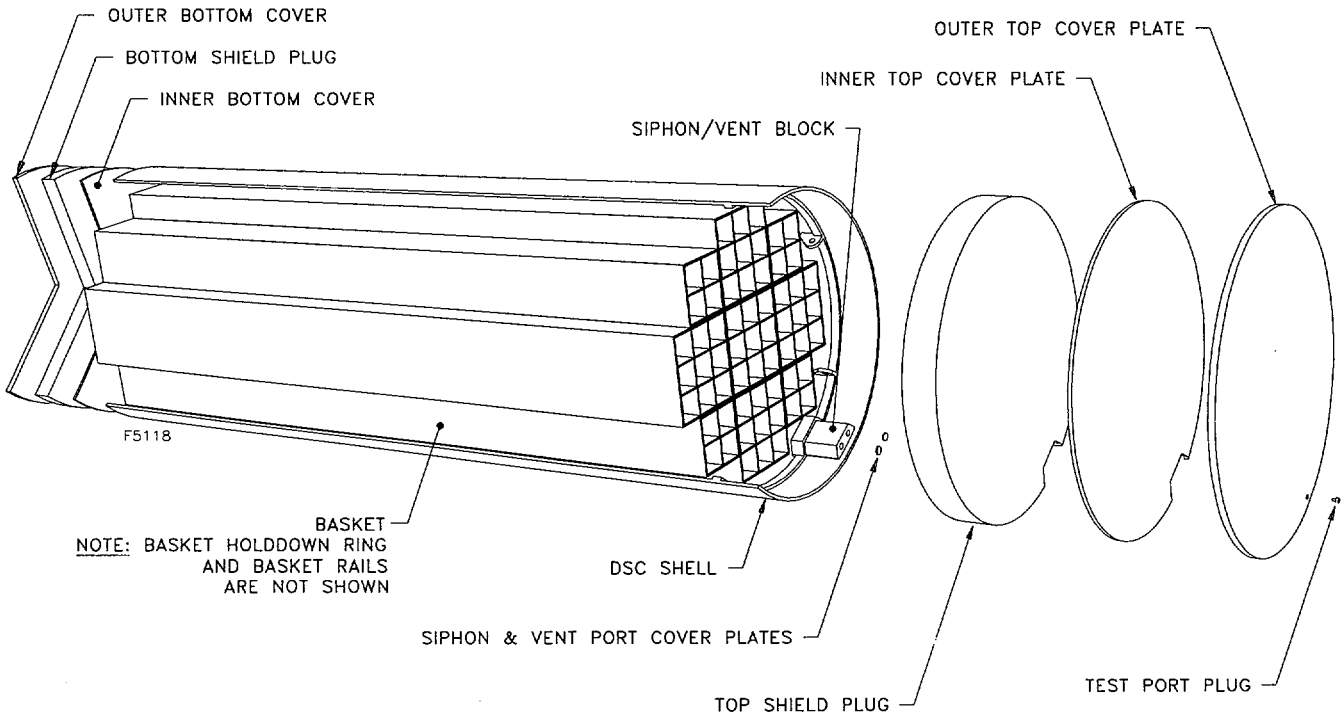

Figure K.1-1
NUHOMS® -61BT DSC Components