



April 6, 2001  
NUH03-01-1685  
RMG-01-017

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

Subject: Transnuclear West Inc. (TN West) Implementation Schedule of the New 72.48 Rule

- References:
1. Amendment No. 2, NUHOMS® Certificate of Compliance (CoC) No. 1004
  2. NRC Regulatory Issue Summary 2001-03, "Changes, Test, and Experiments"

Dear Mr. Kobetz:

TN West has been authorized to implement changes to the NUHOMS® Cask design and procedures as described in the FSAR without prior NRC approval under the provisions of Condition 9 of Reference 1. The maintenance requirements of the records of such changes and the resulting reporting requirements to the NRC are controlled by Conditions 10 and 11 respectively of Reference 1.

TN West plans to transition from the Condition 9 of Reference 1 to the new 72.48 rule effective August 5, 2001 using the guidance provided in Reference 2. The criteria of our CoC Condition 9 to make changes without prior NRC approval are identical to the old 50.59 rule which is more restrictive than the new rule and thus provides an acceptable level of safety during the transition period.

The reporting requirements of the new 72.48(d)(6) rule represent a change from the terms and conditions stated in Reference 1. Accordingly, TN West has addressed these requirements by amending the related procedures and is in full compliance with the reporting requirements of the new rule effective April 5, 2001.

With regards to implementation of the remaining requirements of the new 72.48 rule, TN West plans to revise its procedures and train affected personnel in the next 120 days. This

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allows for the required flexibility necessary to implement an orderly transition to the new rule.

Finally, TN West understands that the Conditions 9, 10 and 11 of the Reference 1 remain in effect until deleted by the NRC via an amendment and thus override the corresponding requirements of the new 72.48 rule. This is based on a recent telephone conversation between our Mr. U. B. Chopra (TN West), Mr. Chester Poslusny (SFPO) and yourself.

Please contact Mr. U. B. Chopra (510-744-6053) or me (510-744-6020) if you require any additional information in support of this submittal.

Sincerely,

A handwritten signature in cursive script, reading "Robert M. Grenier".

Robert M. Grenier  
President and Chief Operating Officer

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