



FACSIMILE TRANSMISSION  
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71-9036

April 11, 2001

Mr. Steve Baggett, Project Manager  
Licensing Section, Mail Stop 013D13  
Spent Fuel Project Office  
U.S. Nuclear Regulatory Commission  
One white Flint North  
11155 Rockville Pike  
Rockville, MD 20852

Fax Number: 301-415-8555

Subject: Docket 71-9036  
Consolidated Application for Certificate of Compliance  
SPEC Model C-1 Transportation Package  
Package Identification Number USA/9036/B(U)

Dear Mr. Baggett:

Confirming the phone conversation on 04/10/01 between yourself and Dan Huang of the USNRC and Donny Dicharry, George Moran and Kelley Richardt of SPEC, this letter is provided to clarify the conditions chosen for the free drop hypothetical accident testing of the SPEC Model C-1 Transportation Package and to justify our request to maintain the maximum gross weight of 100 pounds.

In accordance with 10 CFR 71.73, the hypothetical accident free drop tests were conducted to cause maximum damage. Numerous tests over many years have conclusively shown that the most damaging point of impact and orientation is directly on the top (lid) of the package when dropped upside down. The tests conducted in 1997 highlight this fact. It is important to note that ancillary equipment was not included for those tests since it would have cushioned the impact to the C-1 inner package, in which case the test would have failed to meet the requirement to cause maximum damage. Photograph G-2 clearly shows the imprint of the C-1 inner package on the lid of the drum proving that the C-1 inner package bore the full brunt of the impact. This explains why the test package weighed 89 pounds instead of the maximum gross weight of 100 pounds that is reflected in the package drawings and the current Certificate of Compliance.

Please do not hesitate contact me or my staff if you need further assistance or clarification.

Sincerely,

Kelley Richardt  
Quality Assurance and Regulatory Manager

04-11-01.GC1

*NMSSol Public*