



September 17, 2001
NUH03-01-1725
RMG-01-043

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

Subject: TN West Comments on the Preliminary Certificate of Compliance (CoC) and Safety Evaluation Report (SER) for Amendment No. 4 of NUHOMS[®] Certificate of Compliance (CoC) No. 1004 (TAC No. L23277).

Reference: Timothy Kobetz to Rob Grenier letter dated September 7, 2001; Preliminary Certificate of Compliance and Safety Evaluation Report for Standardized NUHOMS[®] System Low Burn-Up Fuel Amendment (TAC No. L23277).

Dear Mr. Kobetz:

Transnuclear West Inc. (TN West) has reviewed the reference document. Attachment 1 provides a summary of our comments resulting from this review.

Attachment 2 provides a justification for correcting an administrative error in Tables 1-1c and 1-1d of Fuel Specification 1.2.1 for the NUHOMS[®]-61BT DSC. An identical change to correct Tables 1-1a and 1-1b of Fuel Specification 1.2.1 for the 24P and 52B DSCs was implemented during the review of Amendment No. 4 of CoC 1004. At that time, the staff chose not to implement this change to 61BT DSC since Amendment No. 3 was being processed for final rulemaking.

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 black ink, appearing to read "Robert M. Grenier", is written in a cursive style.

Robert M. Grenier
President and Chief Operating Officer

Docket 72-1004

Attachments: As stated.

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TN West Comments on the Preliminary NUHOMS® CoC (Amendment No. 4)

1. Condition 3c, 3d and 4: The term “SAR” needs to be changed to “FSAR” to make it consistent with the first sentence of para 3b.

2. Condition 6: The intent of this paragraph is ambiguous. Revise Condition 6 to read:

“All Standardized NUHOMS® Systems must be fabricated and used in accordance with CoC No. 1004, Amendment No. 4 except:

- a. Previously fabricated Standardized NUHOMS® Systems that were loaded per the original CoC or Amendments 1, 2 or 3 may be used under the appropriate CoC or Amendment,*
- b. Standardized NUHOMS® Systems that were previously fabricated per the original CoC or Amendments 1, 2, or 3 may be used in accordance with Amendment No. 4.”*

Comments on the Preliminary NUHOMS® Technical Specifications (Amendment No. 4)

1. Show revision bar on the extreme right margin for changed page numbers.
2. Table 1-1b: The maximum assembly weight needs to be shown as 725 lbs (instead of .725 lbs).
3. Revise the description of the Physical Parameters as listed in Table 1-1c, sixth row, to say “Nominal Assembly Width (excluding channels)” instead of “Maximum Assembly Width”. The numerical value of the parameter remains unchanged at 5.44 in. See Attachment 2 for justification.
4. Revise the title of Table 1-1d to say “BWR Fuel Assembly Design Characteristics for the NUHOMS 61BT DSC”, since this Table is applicable to 61BT DSC only. Delete the second row of this table, entitled “Max. Width (in) (excluding channels)”, since this information is redundant to that presented in sixth row of Table 1-1c (See comment 4 above). Revise the description of the third row of this table to say “Nominal Channel Internal Width (in)”. See Attachment 2 for justification.
5. TS 1.2.15: Under the action statement, correct a typographical error for the units of boron concentration to say “(gm boron/1x10⁶ gm water)”.
6. Table 1.3.1: Revise line item 11 to say “Transfer Cask Dose Rates” and restore the parameters for this line item to show no change from Amendment 3.

Comments on the Preliminary SER (Amendment No. 4)

1. Revise the first sentence under SUMMARY to say “Certificate of Compliance (CoC) for the Standardized NUHOMS[®]-24P System ...”.
2. On page 2, second para, replace the term “GROUPNDFB5” with “44-GROUP ENDF/B-V Library (44GROUPNDF5)”.
3. Revise page 3, paragraph one of “Administrative Changes”, to include Tables 1-1c and 1-1d. This change corrects the administrative error related to the description of the width parameter of the fuel assembly qualified for 61BT DSC. See Attachment 2 for justification.
4. Revise page 3, paragraph three of “Administrative Changes”, to include fuel assemblies qualified for storage in 52B and 61BT DSCs.

Justification for Correction of an Administrative Error in Tables 1-1c and 1-1d of Fuel Specification 1.2.1 for the NUHOMS[®]-61BT DSC:

The above described change corrects an administrative error in the description of the fuel assembly width and channel internal width parameters in Tables 1-1c and 1-1d of Fuel Specification 1.2.1 for the NUHOMS[®]-61BT DSC. This change is similar to the previously submitted change to Tables 1-1a and 1-1b of Fuel Specification 1.2.1 for the NUHOMS[®]-24P and -52B DSCs respectively during the review of Amendment No. 4 to CoC 1004. In addition, the above change also implements an editorial correction and eliminates certain redundant information between Tables 1-1c and 1-1d.

This change ensures that all the BWR fuel assemblies approved for storage can be loaded into the Standardized NUHOMS[®]-61BT DSCs. This change has no impact on safety. It is important only to ensure that the authorized fuel assembly fits within the stainless steel fuel compartments of the 61BT DSC basket. The change in description of this width parameter does not change the design of the approved fuel assemblies nor are any changes being made to the fuel compartments which accommodate the fuel assemblies. The assembly width dimension is not an input to the criticality evaluation presented in Appendix K.6 of the FSAR. There is no impact on the thermal, shielding or structural analyses presented in FSAR Appendix K, since no change is being implemented to any of the related fuel assembly or 61BT DSC design parameters.