


72-1004
72-1029
71-9255

TRANSNUCLEAR, INC.
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October 4, 2001

Mr. E. William Brach, Director
Spent Fuel Project Office, NMSS
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001

Subject: Certificate of Compliance for Spent Fuel Storage Casks No. 72-1004
Application for Certificate of Compliance for Spent Fuel Storage Casks and No. 72-1029
Certificate of Compliance for Radioactive Material Packages No. 71-9255

Dear Mr. Brach:

In late 1997 Transnuclear, Inc. purchased certain assets of the former Vectra Technologies, Inc. from the court administering their bankruptcy proceeding. Among those assets were the NUHOMS® technology and associated intellectual property. Subsequent to that purchase, Transnuclear, Inc. created a wholly owned subsidiary company named Transnuclear West Inc., in part to continue implementing the NUHOMS® technology. Today Transnuclear West is the named certificate holder for the standardized NUHOMS® Horizontal Modular Storage System (Docket No.72-1004), the NUHOMS® MP187 Multipurpose Cask (Docket No.71-9255), and the applicant for the Standardized Advanced NUHOMS® System (Docket No. 72-1029).

Transnuclear is in the process of making organizational changes to improve efficiency and better coordinate regulatory matters. It has been decided to hold NRC licenses and certificates at the parent company level which is Transnuclear, Inc. Therefore, with this letter, Transnuclear, Inc. and Transnuclear West, Inc. request that the NRC amend Certificates of Compliance No. 72-1004 and No. 71-9255 to name Transnuclear, Inc. as the certificate holder instead of Transnuclear West Inc. Similarly, it is requested that the soon-to-be issued Certificate of Compliance No. 72-1029 be issued to Transnuclear, Inc. instead of to Transnuclear West Inc.

Transnuclear believes that this request for amendments can be handled as a simple administrative matter for the following reasons:

- Both Transnuclear, Inc and Transnuclear West Inc. have already been judged technically qualified by the NRC to be certificate holders under 10CFR Part 72 and Part 71, and both corporate entities currently hold active certificates.

NMSS01 Public

- Both Transnuclear, Inc. and Transnuclear West Inc. conduct 10 CFR Part 72 and 10CFR Part 71 activities under the same NRC approved QA Program (Docket No. 71-0250, Rev. 10).
- Transnuclear, Inc. already is effectively responsible for the certificates held by Transnuclear West Inc. in that the latter company is a wholly owned subsidiary for which Transnuclear, Inc. is ultimately responsible.

For internal organization purposes it is important that this amendment request be processed and complete before the end of calendar year 2001. Therefore, we respectfully request that the NRC either process this request simultaneously with ongoing licensing activities on both dockets or else process it as an administrative rulemaking effective upon notification.

If you have any questions or require further information, please contact me at Transnuclear, Inc. (914) 347-2345.

Sincerely,



Alan S. Hanson

President & CEO, Transnuclear, Inc.
CEO, Transnuclear West Inc.

Cc: Mr. Timothy Kobetz, SFPO