72-1029

TRANSNUCLEAR WEST

October 16, 2001
DCS-TNW0110-16
RMG-01-046

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 Chapter 15 of the Safety Evaluation Report for the Standardized Advanced NUHOMS® System (TAC No. L23203).

Reference: Timothy Kobetz to Rob Grenier letter dated October 12, 2001; Schedules for Review of the Standardized NUHOMS® System Low Burn-Up Fuel Amendment (TAC No. L23277) and the Advanced NUHOMS® System (TAC No. L23203).

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.

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,

Robert M. Grenier

Robert M. Grenier
President and Chief Operating Officer

Docket 72-1029

Attachment: As stated.

cc: File: SCE-01-0007.01

Transnuclear West Inc.
39300 Civic Center Drive, Suite 280, Fremont, CA 94538
Phone: 510-795-9800 • Fax: 510-744-6002

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TN West Comments on Chapter 15 of the Safety Evaluation Report for the Standardized Advanced NUHOMS® System:

1. Revise the last sentence of the second paragraph of Section 15.2.1, to say "A 2-D shielding model analysis that has been validated against actual data may also be used."

   Basis: If the 2-D shielding analysis model is validated against actual data, then TN West believes that it is not necessary to demonstrate it is conservative with respect to a 3-D analysis model. The validation of the model against actual data demonstrates the conservatism of the 2-D shielding analysis model.

2. Comment on Section 15.2.2.2, first bullet: The results reported by TN West in the SAR are the maximum cladding temperature for the fuel region rather than a "maximum average temperature". The effective thermal conductivity for the fuel assembly region has been correlated to the maximum measured cladding temperature from the E-MAD tests. Use of this effective thermal conductivity results in a predicted maximum temperature of the homogenized region consistent with the maximum clad temperature measured in the test.

3. Revise the first sentence of the third bullet, Section 15.2.2.2, to replace the word "thermal code" with "DSC thermal model".

   Comment on Section 15.2.2, third bullet: TNW believes that the analyses provided by TN West in the SAR are conservative with respect to actual test data, including E-MAD test data previously provided to the NRC and EPRI/PNL test data for a NUHOMS®-7P system.

4. Comment on Section 15.2.3.2: The TN West analysis modeled the outer aluminum on the boral sheets as part of a B4C/Aluminum mixture, not as B4C alone.

5. Add Registered Mark to "NUHOMS" in sections 15.2 and 15.2.1.