

71-9255



TRANSNUCLEAR, INC.

November 29, 2001
NUH05-01-889

Mr. Steven Baggett
Spent Fuel Project Office, NMSS
U. S. Nuclear Regulatory Commission
11555 Rockville Pike
Rockville, MD 20852

Subject: Supplement to Application for Amendment of the NUHOMS[®] MP187
Multi-Purpose Cask, 10 CFR71 Certificate of Compliance No. 9255,
Amendment No. 7

References: [1] Certificate of Compliance (CoC) No. 9255 Rev. No. 6, dated November 16,
2001
[2] TNW Letter NUH05-01-852a, R. Grenier to T. Kobetz, "Application for
Amendment of the NUHOMS[®] MP187 Multi-Purpose Cask, 10 CFR71
Certificate of Compliance No. 9255, Amendment No. 7", dated October 3,
2001

Dear Mr. Baggett:

Transnuclear, Inc. herewith submits a supplemental application to amend Reference [1]. This transmittal supplements the application previously submitted by Reference [2], which revised our Safety Analysis Report (SAR) for the NUHOMS[®] MP187 Multi-Purpose Cask. The previous application submitted Revision 14 of the SAR. This Supplement, Revision 15 of the SAR, provides documentation to support elimination of hydrogen monitoring for the MP187 design that uses carbon steel plated with electroless nickel. Additional editorial corrections or minor modifications to improve fabricability are also included in the Supplement.

This submittal is organized in the following format to facilitate your staff's review:

- Affidavit Pursuant to the Requirements of 10 CFR 2.790 (Attachment A),
- Description, Justification and Evaluation of Amendment Supplement (Attachment B),
- Suggested Changes to CoC 71-9255 Revision No. 6 to Incorporate this Supplement (Attachment C),
- Ten Copies of Proprietary MP187 SAR Changes, Revision 15 (Attachment D),
- Four Copies of Non-Proprietary MP187 SAR Changes, Revision 15 (Attachment E), and

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NMSS01 PROP

- Supporting Documentation for Eliminating Hydrogen Monitoring for the Electroless Nickel Plating Option (Attachment F).

The changed MP187 SAR pages, enclosed in Attachment D, are consistent with the SAR format in use since Revision 12.

This submittal includes proprietary information, which may not be used for any purpose other than to support your staff's review of the application. In accordance with 10 CFR 2.790, Transnuclear, Inc. is providing an affidavit (Attachment A) specifically requesting that you withhold this proprietary information from public disclosure.

Should you or your staff require additional information to support review of this application, please do not hesitate to contact Mr. U. B. Chopra (510-744-6053).

Sincerely,



Alan Hanson
President and Chief Executive Officer

Docket 71-9255

Enclosures: Ten (10) Proprietary copies of MP187 SAR, Revision 15 – Changed Pages
Three (3) Non-Proprietary copies of MP187 SAR, Revision 15 – Changed Pages

ATTACHMENT A

AFFIDAVIT PURSUANT TO THE REQUIREMENTS OF 10 CFR 2.790

AFFIDAVIT PURSUANT
TO 10 CFR 2.790

Transnuclear, Inc.)
State of New York)SS.
County of Westchester)

I, Alan Hanson, depose and say that I am President and Chief Executive Officer of Transnuclear, Inc., duly authorized to make this affidavit, and have reviewed or caused to have reviewed the information, which is identified as proprietary and referenced in the paragraph immediately below. I am submitting this affidavit in conformance with the provisions of 10 CFR 2.790 of the Commission's regulations for withholding this information.

The information for which proprietary treatment is sought is contained in the drawings included in Attachment D of this submittal and as listed below:

- Safety Analysis Report for the NUHOMS[®]-MP187 Cask, Revision 15

This section of the document has been appropriately designated as proprietary.

I have personal knowledge of the criteria and procedures utilized by Transnuclear, Inc. in designating information as a trade secret, privileged or as confidential commercial or financial information.

Pursuant to the provisions of paragraph (b)(4) of Section 2.790 of the Commission's regulations, the following is furnished for consideration by the Commission in determining whether the information sought to be withheld from public disclosure, included in the above referenced document, should be withheld.

The information sought to be withheld from public disclosure are licensing drawings and calculations of a concrete modular storage and transportation system, which is owned and has been held in confidence by Transnuclear, Inc.

- 1) The information is of a type customarily held in confidence by Transnuclear, Inc. and not customarily disclosed to the public. Transnuclear, Inc. has a rational basis for determining the types of information customarily held in confidence by it.
- 2) The information is being transmitted to the Commission in confidence under the provisions of 10 CFR 2.790 with the understanding that it is to be received in confidence by the Commission.
- 3) The information, to the best of my knowledge and belief, is not available in public sources, and any disclosure to third parties has been made pursuant to regulatory provisions or proprietary agreements which provide for maintenance of the information in confidence.
- 4) Public disclosure of the information is likely to cause substantial harm to the competitive position of Transnuclear, Inc. because:
 - a) A similar product is manufactured and sold by competitors of Transnuclear, Inc.

- b) Development of this information by Transnuclear, Inc. required thousands of man-hours and hundreds of thousands of dollars. To the best of my knowledge and belief, a competitor would have to undergo similar expense in generating equivalent information.
- c) In order to acquire such information, a competitor would also require considerable time and inconvenience related to the development of a design and analysis of a dry spent fuel storage system.
- d) The information required significant effort and expense to obtain the licensing approvals necessary for application of the information. Avoidance of this expense would decrease a competitor's cost in applying the information and marketing the product to which the information is applicable.
- e) The information consists of description of the design and analysis of a dry spent fuel storage and transportation system, the application of which provides a competitive economic advantage. The availability of such information to competitors would enable them to modify their product to better compete with Transnuclear, Inc., take marketing or other actions to improve their product's position or impair the position of Transnuclear, Inc.'s product, and avoid developing similar data and analyses in support of their processes, methods or apparatus.
- f) In pricing Transnuclear, Inc.'s products and services, significant research, development, engineering, analytical, licensing, quality assurance and other costs and expenses must be included. The ability of Transnuclear, Inc.'s competitors to utilize such information without similar expenditure of resources may enable them to sell at prices reflecting significantly lower costs.

Further the deponent sayeth not.



Alan Hanson
President and Chief Executive Officer
Transnuclear, Inc.

Subscribed and sworn to me before this 29th day of November, 2001, by Alan Hanson.



Notary Public

FREDRICK P. SWINT
Notary Public, State of New York
No. 01SW6040195
Qualified in Westchester County
Commission Expires 4-17-2002

ATTACHMENT B

DESCRIPTION, JUSTIFICATION AND EVALUATION OF AMENDMENT

1.0 INTRODUCTION

The purpose of this amendment application is provide alternate design details for various NUHOMS® MP187 Multi-Purpose Cask components.

This section of the application provides (1) a brief description of the changes, (2) justification for the changes, and (3) a safety evaluation for these changes.

2.0 BRIEF DESCRIPTION OF THE CHANGES

2.1 Suggested Changes to NUHOMS® Certificate of Compliance (CoC) 71-9255, Revision 6 (Draft)

The change listed below is relative to the draft Revision 6 of the CoC submitted November 16, 2001:

- Revise Section 5.a.(3), Drawings, to reference the new revision level of the drawings shown in Attachment D of this letter.

2.2 Changes to NUHOMS® MP187 SAR Revision 14

The SAR changes consist of minor modifications or corrections to the SAR drawings to improve fabricability or to correct inconsistencies. Text changes include updating the revision level of the affected drawings and allowing equivalent product forms to be used for fabrication of the FF DSC fuel can.

Attachment D to this submittal contains the revised SAR pages and drawings. These changes are listed below:

DRAWING NUH-05-4004:

- a. Sheet 2: Add Note 35 to allow for thread inserts in lieu of tapped holes.
- b. Sheet 4: Revise the minimum overall thickness for the top covers, including TSPA, in Detail 1 (For FC-DSC) to 6.73 inches.
- c. Sheet 4: Clarify the weld presentation shown for Item 34 (posts) to Item 33 (top casing) and extend the tapped holes up to the surface of Item 33 in Section N.

DRAWING NUH-05-4005:

- a. Sheet 1: Revise the nomenclature for Item 27 in the Parts List to “Top Plug Post” and increase the quantity to 8. Revise View A.
- b. Sheet 1: Allow for ASME SA-479 Type 304 material as an option for Item 20 (Support Ring).
- c. Sheet 1: Delete the 3.75-inch grapple ring dimension shown in the Main Assembly detail.
- d. Sheet 2: Revise Flag Note 22 to add “stress criteria” between “N14.6” and “for”.
- e. Sheet 2: Revise Flag Note 32 to replace “increased” and “12.50” with “decreased” and “6.50”, respectively.
- f. Sheet 2: Add Note 36 to allow for thread inserts in lieu of tapped holes.
- g. Sheet 2: Revise Section X to clarify that the weld specified for the lifting lug-to-shell and to support ring is the effective throat.
- h. Sheet 3: Revise Section G to specify a restriction not to seal the bottom of the siphon and vent block-to-shell weld.
- i. Sheet 3: Revise the minimum overall thickness for the top covers, including TSPA, in Detail 1 to 6.73 inches. Delete the support ring dimensions and radial gaps for the top covers and TSPA shown in Detail 1.
- j. Sheet 3: Delete the reference to Item 43 on the 14.25-inch minimum dimension shown in Detail 2.
- k. Sheet 4: Revise the fuel liner inside dimension from 9.00 min to 9.00 nom./9.15 max and make the inside radius a referenced dimension shown in “Item 29” detail.
- l. Sheet 4: Make the liner top lid subassembly height shown in Section M a reference dimension.
- m. Sheet 5: Reference the .06-inch dimension for the taper of the TSPA side casing shown in Section K.
- n. Sheet 5: Revise the TSPA outer plate to side casing weld from 1/8-inch fillet to .18-inch effective throat shown in Section K and clarify the weld presentation (plugged optional) for the post (Item 27) to top casing (Item 25). Also, extend the tapped holes up to the surface of Item 25.
- o. Sheet 5: Add Section Q to show 4 additional top plug posts.

3.0 JUSTIFICATION OF CHANGE

MP187 canisters are being fabricated by Transnuclear and are being loaded at this time by a Transnuclear customer under a 10CFR Part 72 site license.

These minor design changes have been fully evaluated for their impact on structural, thermal, shielding and criticality. All changes comply with the existing design basis methods and acceptance criteria.

4.0 EVALUATION OF CHANGE

Transnuclear has evaluated the proposed minor drawing changes for structural, thermal, shielding and criticality adequacy and has concluded that the changes have no significant effect on safety. These changes can be implemented with no revision to the evaluations documented in the MP187 SAR.

ATTACHMENT C

**SUGGESTED CHANGES TO
CERTIFICATE OF COMPLIANCE 71-9255 REVISION NO. 6**

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(8-2000)
10 CFR 71**CERTIFICATE OF COMPLIANCE
FOR RADIOACTIVE MATERIAL PACKAGES**

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2. PREAMBLE

- a. This certificate is issued to certify that the package (packaging and contents) described in Item 5 below meets the applicable safety standards set forth in Title 10, Code of Federal Regulations, Part 71, "Packaging and Transportation of Radioactive Material."
- b. This certificate does not relieve the consignor from compliance with any requirement of the regulations of the U.S. Department of Transportation or other applicable regulatory agencies, including the government of any country through or into which the package will be transported.

3. THIS CERTIFICATE IS ISSUED ON THE BASIS OF A SAFETY ANALYSIS REPORT OF THE PACKAGE DESIGN OR APPLICATION

- a. ISSUED TO (*Name and Address*)
Transnuclear, Inc.
Four Skyline Drive
Hawthorne, NY 10532
- b. TITLE AND IDENTIFICATION OF REPORT OR APPLICATION
Transnuclear West Inc., consolidated application dated
December 13, 2000, as supplemented.

4. CONDITIONS

This certificate is conditional upon fulfilling the requirements of 10 CFR Part 71, as applicable, and the conditions specified below.

5.

a. PACKAGING:

- (1) Model No.: NUHOMS® MP187 Multi-Purpose Cask
- (2) Description:

The NUHOMS® MP187 Multi-Purpose Cask (package) consists of an outer cask, into which one of the four different dry shielded canisters (DSC) is placed. During shipment, energy-absorbing impact limiters are utilized for additional package protection.

Cask

The purpose of the cask is to provide containment and shielding of the radioactive materials contained within the DSC during shipment. The cask is constructed of stainless steel and lead with a neutron shield of cementitious material. The inside cavity of the cask is a nominal 68 inches in diameter and 187 inches long. The bottom access closure is approximately 5 inches thick and 17 inches in diameter, secured by 12 1-inch diameter bolts. The top closure is approximately 6.5 inches thick and is secured by 36 2-inch diameter bolts. Both closures are sealed by redundant O-rings.

Containment is provided by a stainless steel closure lid bolted to the stainless steel cask. The containment system of the NUHOMS® MP187 transportation cask consists of (a) the inner shell, (b) the bottom end closure plate, (c) the top closure plate, (d) the top closure inner O-ring seal, (e) the ram closure plate, (f) the ram closure inner O-ring seal, (g) the vent port screw, (h) the vent port O-ring seal, (i) the drain port screw, and (j) the drain port O-ring seal. No credit is given to the DSC as a containment boundary.

Shielding is provided by 4 inches of stainless steel, 4 inches of lead, and approximately 4.3 inches of neutron shielding. The overall length of the cask is approximately 200 inches; the outer diameter is approximately 93 inches. The maximum gross weight of the package, with impact

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limiters, is approximately 282,000 lbs. The total length of the package with the impact limiters attached is approximately 308 inches. Four removable trunnions (two upper and two lower) are provided for handling and lifting.

Dry Shielded Canisters (DSCs)

The purpose of the DSC, which is placed within the transport cask, is to permit the transfer of spent fuel assemblies, into or out of a storage module, a dry transfer facility, or a pool as a unit. The DSC also provides additional axial biological shielding during handling and transport. The DSC consists of a stainless steel shell and a basket assembly. The approximately 5/8-inch thick shell has an outside diameter of about 67 inches and an external length of about 186 inches. The DSC basket assembly provides criticality control and contains a storage position for each fuel assembly. The basket is composed of circular spacer discs machined from thick carbon steel plates. Axial support for the DSC basket is provided by four high strength steel support rod assemblies. Carbon steel components of each DSC basket assembly are electrolytically coated with a thin layer of nickel to inhibit corrosion.

On the bottom of each DSC is a grapple ring, which is used to transfer a DSC horizontally from the cask into and out of dry storage modules. Because of the nature of the fuel that is to be transported, four different types of DSCs are designed for the package. Variations in the DSC configurations are summarized below:

- Fuel-Only Dry Shielded Canister (FO-DSC)

The FO-DSC has a cavity length of approximately 167 inches and has solid carbon steel shield plugs at each end. The FO-DSC is designed to contain up to 24 intact Babcock and Wilcox (B&W) pressurized water reactor (PWR) spent fuel assemblies. The FO-DSC basket assembly consists of 24 guide sleeve assemblies with integral borated neutron absorbing plates, 26 spacer discs, and 4 support rod assemblies.

- Fuel/Control Components Dry Shielded Canister (FC-DSC)

The FC-DSC has an internal cavity length of approximately 173 inches to accommodate fuel with the B&W control components installed. To obtain the increased cavity length, the shield plugs are fabricated from a composite of lead and steel. The FC basket is similar to the FO-DSC except that the support rod assemblies and guide sleeves are approximately 6-inches longer. The FC-DSC is also designed to contain up to 24 intact B&W PWR spent fuel assemblies with control components.

- Failed Fuel Dry Shielded Canister (FF-DSC)

The FF-DSC has an internal cavity length of approximately 173 inches to accommodate 13 damaged B&W PWR spent fuel assemblies. Because the cladding has been locally degraded, individual (screened) fuel cans are provided to confine any gross loose material, maintain the geometry for criticality control, and facilitate loading and unloading operations. The FF-DSC is similar to FC-DSC in most respects with the exception of the basket assembly. *The FF-DSC basket may be fabricated from austenitic stainless steel.*

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- 24PT1 Dry Shielded Canister (24PT1-DSC)

The 24PT1-DSC has an internal cavity length of approximately 167 inches with a solid carbon steel shield plug at each end. The 24PT1-DSC will accommodate 22 to 24 Westinghouse (WE) 14x14 PWR spent fuel assemblies, including control components. Control components authorized that are integral to WE 14x14 fuel assemblies include rod cluster control assemblies, thimble plug assemblies, and neutron source assemblies only. Fuel assemblies may be damaged or intact as described in 5.b(2)(a). The 24PT1-DSC basket assembly consists of 24 guides sleeve assemblies with integral borated neutron absorbing plates, 26 spacer discs, and 4 support rod assemblies. Up to four screened individual failed fuel cans are provided for storage of damaged fuel within the guidesleeve assemblies. These failed fuel cans are similar in configuration to the FF-DSC failed fuel cans.

Impact Limiters

The impact limiter shells are fabricated from stainless steel. Within that shell are closed-cell polyurethane foam and aluminum honeycomb material. The impact limiter is attached to the cask by carbon steel bolts. Each impact limiter is bolted to the cask body through the neutron shield top and bottom support rings. The weight of each impact limiter is approximately 15,800 lbs.

(3) Drawings

The package shall be constructed and assembled in accordance with the following Transnuclear West Drawing Numbers:

NUH-05-4000NP, Revision 8,
Sheets 1 through 2
MP187 Multi-Purpose Cask
General Arrangement

NUH-05-4001, Revision 14,
Sheets 1 through 6
MP187 Multi-Purpose Cask
Main Assembly

NUH-05-4002, Revision 4,
Sheets 1 and 2
MP187 Multi-Purpose Cask
Impact Limiters

NUH-05-4003, Revision 9,
Sheets 1 and 2
NUHOMS®-MP187 Multi-Purpose
Cask On-Site Transfer Arrangement

NUH-05-4004, Revision 15,
Sheets 1 through 5
NUHOMS® FO-DSC & FC-DSC PWR
Fuel Main Assembly

NUH-05-4005, Revision 13,
Sheets 1 through 5
NUHOMS® FF-DSC PWR Fuel
Main Assembly

NUH-05-4006NP, Revision 6,
Sheets 1 and 2
NUHOMS®-MP187 Multi-Purpose
Transportation Skid/Personnel Barrier

NUH-05-4010, Revision 2
Sheets 1 through 6
NUHOMS®-24PT1-DSC
Main Assembly

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5.b Contents of Packaging:

(1) Type and Form of Material:

- (a) Intact fuel assemblies - Assemblies containing fuel rods with no known or suspected cladding defects greater than hairline cracks or pinhole leaks are authorized when contained in the FO-DSC, FC-DSC or 24PT1-DSC.
- (b) Damaged fuel assemblies - Assemblies containing fuel rods with known or suspected cladding defects greater than hairline cracks or pinhole leaks or with cracked, bulging, or discolored cladding are authorized when contained in a failed fuel can in the FF-DSC or the 24PT1-DSC. Spent fuel, with plutonium in excess of 20 curies per package, in the form of debris, particles, loose pellets, and fragmented rods or assemblies are not authorized. Damaged fuel assemblies may be shipped with or without control components.
- (c) (i) The fuel authorized for shipment in the NUHOMS[®]-MP187 FO, FC or FF DSC is B&W 15x15 uranium oxide PWR fuel assemblies with a maximum initial pellet enrichment of 3.43% by weight of U235, and a total uranium content not to exceed 466 Kg per assembly.
- (ii) The fuel authorized for shipment in the NUHOMS[®]-MP187 24PT1-DSC is WE 14x14 stainless steel clad (SC) or zircaloy clad mixed oxide (MOX) PWR fuel assemblies as described in Table 2.
- (d) Intact B&W 15x15 fuel assemblies without control components shall be shipped only in the FO-DSC. Intact B&W 15X15 fuel assemblies with control components shall be shipped only in the FC-DSC.
- (e) Intact WE 14x14 fuel assemblies with or without control components shall be shipped only in the 24PT1-DSC. Control components authorized are integral to WE 14x14 assemblies include rod cluster control assemblies, thimble plug assemblies and neutron source assemblies only.
- (f) (i) The maximum burnup and minimum cooling times for the individual B&W 15x15 assemblies shall meet the requirements of Table 1. In addition, the fuel shall have been decayed for a time sufficient to meet the thermal criteria of 5.b(1)(g) and (h). The maximum total allowable cask heat load is 13.5 kW.
- (ii) The maximum enrichment, burnup and minimum cooling times for the individual WE 14x14 fuel assemblies shall meet the requirements of Table 2. In addition, the fuel shall have been decayed for a time sufficient to meet the thermal criteria of 5.b(1)(g) and (h). The maximum total allowable cask heat load for the 24PT1-DSC is per Table 2.
- (g) (i) The maximum assembly decay heat (including control components when present) of B&W 15x15 individual fuel assembly is 0.764 kW, referred to as Type I, or 0.563 kW, referred to as Type II.
- (ii) The maximum assembly decay heat (including control components when present) of WE 14x14 individual fuel assembly is per Table 2.

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5.b Contents of Packaging:

(1) Type and Form of Material Continued:

- (h) (i) Control components for B&W 15x15 fuel assemblies stored in the FO, FC and FF-DSCs shall be cooled for at least 8 years.
- (ii) Control components for WE 14x14 fuel assemblies stored in the 24PT1-DSC shall be cooled for at least 10 years.

(2) Maximum quantity of material per package:

- (a) (i) For material described in 5.b(1) to be stored in the FO, FC or FF-DSCs: 24 PWR intact fuel assemblies or 13 damaged fuel assemblies, with no more than 15 damaged fuel rods per assembly. Where a DSC is to be loaded with fewer fuel assemblies than the DSC capacity, dummy fuel assemblies with the same nominal weight as a standard fuel assembly shall be installed in the unoccupied spaces.
- (ii) For material described in 5.b(1) to be stored in the 24PT1-DSC: 22 to 24 PWR fuel assemblies of which up to four may be damaged WE 14x14 SC fuel assemblies with the balance intact WE 14x14 SC or MOX fuel assemblies. No more than one damaged WE 14x14 MOX fuel assembly can be stored per 24PT1-DSC with the balance intact WE 14x14 SC fuel assemblies. The damaged fuel assemblies shall have no more than 14 damaged fuel rods per assembly and shall be stored in the four outer corner fuel assembly locations along the 45°, 135°, 225°, 315° azimuth of the 24PT1-DSC. A DSC may include two empty slots if they are located on symmetrically opposite locations with respect to the 0°-180° and 90°-270° DSC axes. Any additional empty fuel slots shall be loaded with dummy fuel assemblies that displace the same or greater amount of volume and with the same nominal weight as a standard fuel assembly. Fuel spacers shall be located at the bottom and top of each fuel assembly to center the fuel assemblies within the DSC. Failed fuel cans require only bottom spacers since a top spacer is integral to each failed fuel can.
- (b) For material described in 5.b(1): the approximate maximum payload (including control components when present) is 81,100 lbs.

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Table 1 – FO, FC and FF-DSC Fuel Assembly Burnup vs. Cooling Time

Maximum Burn-up (MWD/MTIHM) *	Minimum Enrichment in the Active Fuel Region (w/o U-235)	Minimum Required Type I Cooling Time (years)	Minimum Required Type II Cooling Time (years)	Maximum Burn-up (MWD/MTIHM) *	Minimum Enrichment in the Active Fuel Region (w/o U-235)	Minimum Required Type I Cooling Time (years)	Minimum Required Type II Cooling Time (years)
<23,200	n/a	5	5	33,000	2.90	7	10
23,200	2.38	5	5	34,000	2.95	7	11
24,000	2.43	5	6	35,000	2.67	7	14
25,000	2.49	5	6	35,000	2.99	7	11
26,000	2.55	5	7	36,000	3.03	8	13
27,000	2.61	5	7	37,000	3.00	8	14
28,000	2.66	5	8	37,000	3.07	8	14
29,000	2.00	6	10	38,000	3.11	9	15
29,000	2.71	5	8	39,000	3.15	9	16
30,000	2.76	5	8	40,000	3.19	9	17
31,000	2.81	6	9				
32,000	2.86	6	10	* Megawatt Days per Metric Ton of Initial Heavy Metal			

Table 2 - 24PT1-DSC Fuel Assembly Burnup vs. Cooling Time

Fuel Type	Maximum Enrichment (Weight %)	Minimum Enrichment (Weight %)	Maximum Burnup (MWD/ MTU)	Minimum Cooling Time / Max Heat Load Per Cask / Max Assembly Heat Load (Incl. Control Components ¹)
WE 14x14 Stainless Steel Clad (SC) (May include Integral Fuel Burnable Absorber, boron coated fuel pellets)	4.05 ²³⁵ U	3.76 ²³⁵ U	45,000	38 years/14 kW/ 0.583 kW
		3.36 ²³⁵ U	40,000	
		3.12 ²³⁵ U	35,000	
WE 14x14 MOX	0.71 ²³⁵ U 2.84 fissile Pu (64 rods) 3.10 fissile Pu (92 rods) 3.31 fissile Pu (24 rods)	2.78 fissile Pu (64 rods) 3.05 fissile Pu (92 rods) 3.25 fissile Pu (24 rods)	25,000	30 years/13.706 kW/ 0.294 kW

Notes:

- Control component cooling time must be a minimum of 10 years.

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5.c. Transport Index for Criticality Control

Minimum transport index to be shown on the label for nuclear criticality control: "0"

6. Type I fuel assemblies shall be loaded only into the four innermost cells of a DSC, while Type II assemblies may be loaded into any cell when using the FO-DSC or the FC-DSC. The FF-DSC has no Type I or II placement restrictions. The 24PT1-DSC has restrictions on the location of damaged fuel assemblies per Section 5.b.(2).
7. For operating controls and procedures, in addition to the requirements of Subpart G of 10 CFR Part 71:
- a. Each package shall be both prepared for shipment and operated in accordance with detailed written operating procedures. Procedures for both preparation and operation shall be developed using the specifications contained within the application. At a minimum, those procedures shall include the following provisions:
- (1) a loading plan which has been independently verified and approved by a qualified individual other than the developer(s) which shall include:
 - (a) hold points to verify that all fuel movements are performed under strict verbatim compliance with the fuel movement schedule;
 - (b) videotaping and independent verification by ID number of each fuel assembly loaded; and
 - (c) a final independent verification of the fuel placement and fuel spacers.
 - (2) procedures requiring that before shipment the licensee shall:
 - (a) perform a measured radiation survey to assure compliance with 49 CFR 173.441 and 10 CFR 71.47 and assure that the neutron measurement instruments are calibrated for the energy spectrum of neutrons being emitted from the package;
 - (b) verify that the surface removable contamination levels meet the requirements of 49 CFR 173.443 and 10 CFR 71.87; and
 - (c) leak test containment vessel seals to verify a leak rate of less than 1×10^{-7} standard cubic centimeters per second of helium (std-cc/sec). The leak test shall have a test sensitivity of at least 5×10^{-8} std-cc/sec and shall be conducted:
 - 1) before first use of each package,
 - 2) within the 12-month period prior to each shipment, and
 - 3) after seal replacement.

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FOR RADIOACTIVE MATERIAL PACKAGES**

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- (3) procedures that require that the package metallic seals be replaced after each use.
- b. All fabrication acceptance tests and maintenance shall be performed in accordance with detailed written procedures. Procedures for fabrication, acceptance testing, and maintenance shall be developed using the specifications contained within the application, and shall include the following provisions:
- (1) With the exception of the weld between the inner shell and top forging, all longitudinal and circumferential inner shell welds, which form the containment boundary of the cask, shall be radiographically inspected (RT) with acceptance standards in accordance with the ASME Code, Section III, Division 1, NB-5320. The weld between the inner shell and top forging shall be verified by RT or ultrasonically inspected (UT). The substitution of UT for the examination of the completed weld may be made provided the examination is performed using detailed written procedures, proven by actual demonstration to the satisfaction of the inspector as capable of detecting and locating defects described in ASME Code, Section III, Division 1 Subsection NB-5000.
 - (2) The DSC outer top cover plate weld shall be verified by either volumetric or multilayer PT examination. If PT is used, at a minimum, it must include the root, each successive 1/4 inch weld thickness, and the final layer. The inspection of the weld must be performed by qualified personnel and shall meet the acceptance requirements of ASME B&PVC Section III, NB-5350. The inspection process, including findings (indications) shall be made a permanent part of the licensee's records by video, photographic, or other means providing an equivalent retrievable record of weld integrity.
 - (3) Before joining the structural shell to the inner shell, the upper lifting trunnions shall be load tested to 150% of their maximum working load or 188,000 lbs. minimum per trunnion, in accordance with the requirements of ANSI N14.6-1986.
 - (4) The cask containment boundary shall be pressure tested to 150% of the design pressure per 10 CFR 71.85(b). The minimum test pressure shall be 75 psig.
 - (5) The fabrication verification leak test for the inner shell shall be performed after initial fabrication, but before the lead pour, to verify that the leak rate from the cylindrical containment shell is less than 1×10^{-7} std-cc/sec. A second fabrication verification leak test shall be performed on the finished cask to demonstrate a leak rate of less than 1×10^{-7} std-cc/sec for the package. The results of both tests shall have at least, a sensitivity of 5×10^{-8} std-cc/sec.
 - (6) The poured-lead shielding integrity of the MP187 cask body shall be confirmed via gamma scanning prior to installation of the neutron shield. The scan shall utilize, at a maximum, a 6x6-inch test grid. The minimum lead thickness in the main cask body, away from the trunnions and the top and bottom forgings, shall be 3.90 inches
 - (7) The neutron shield shall have a minimum thickness of 4.31 inches. Its integrity shall be confirmed through a strict combination of fabrication process control and

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verification by measurement. This may be done either at first use or with a check source using, at a maximum, a 6x6-inch test grid.

- (8) The complete cask shall be subjected to a thermal heat rejection test to demonstrate satisfactory operation of the as-built shells, top lid, and shielding materials. This test may be performed without the ram closure installed. Acceptance criteria shall be calculated for the change in temperature across the cask wall based on the applied heat load and existing environmental conditions using the same analytical methods used to predict the cask performance for the normal and accident conditions.
- (9) Foam shall be installed within the cask impact limiters and tested to ensure conformance with the required foam material properties.
- (10) The neutron absorber plate's minimum acceptable areal boron content loading is 0.025 g/cm^2 Boron 10. The minimum Boron 10 content per unit area and the uniformity of dispersion within the sandwiched material shall be verified by testing each sheet with a sufficient sensitivity (at least to the 95/95 confidence level) to assure compliance with the drawings.
- (11) The impact limiters shall be visually inspected within 1 year of use for water absorption or degradation. Each impact limiter shall also be weighed at the time of inspection. If the weight has increased more than 3%, the impact limiter shall be repaired or replaced.
9. This package is approved for exclusive use rail, truck or marine transport.
10. The package authorized by this certificate is hereby approved for use under the general license provisions of 10CFR71.12.
11. Expiration Date: September 10, 2003.

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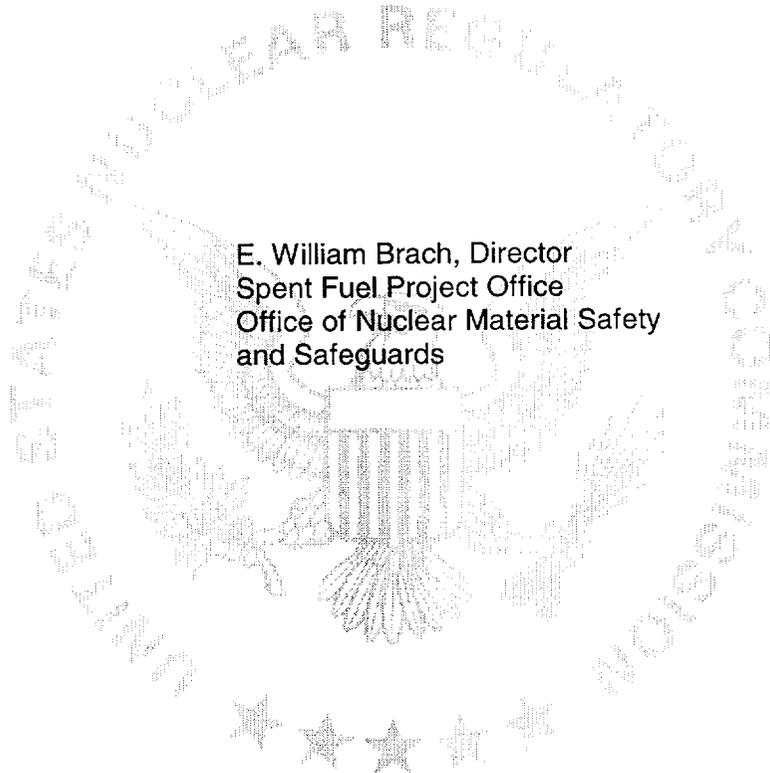
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REFERENCES

Transnuclear West Inc., consolidated Safety Analysis Report for the NUHOMS® MP187 Multi-Purpose Cask, dated December 13, 2000.

Transnuclear West Inc., letters dated January 30, 2001, August 24, 2001, September 21, 2001, October 4, 2001, and November 29, 2001 supplement.

FOR THE U.S. NUCLEAR REGULATORY COMMISSION



Date:

ATTACHMENT D

CHANGED MP187 SAFETY ANALYSIS REPORT PAGES,

DOCUMENT NUH-05-151, REVISION 15

[PROPRIETARY]

(10 copies)