

January 25, 2002

U.S. Nuclear Regulatory Commission
11555 Rockville Pike
Rockville, MD 20852-2738

Attn: Document Control Desk

Subject: Request for an Amendment of the Certificate of Compliance (CoC) for the NAC-UMS[®] Universal Storage System to Incorporate Advanced Design Features

Docket No. 72-1015

Reference: 1. Certificate of Compliance (CoC) No. 1015, Amendment 2, for the NAC International UMS[®] Universal Storage System, U. S. Nuclear Regulatory Commission (NRC), December 31, 2001
2. Final Safety Analysis Report (FSAR) for the UMS[®] Universal Storage System, Amendment 2, NAC International, January 2002

NAC International (NAC) herewith requests that Reference 1 (CoC Amendment 2 for the UMS[®] Universal Storage System) be amended to incorporate advanced design features, as described herein and documented in the enclosed proposed FSAR. This amendment is being requested to support implementation of these advanced design features of the UMS[®] Universal Storage System at the Palo Verde Nuclear Plant, the McGuire Nuclear Plant and other sites where dry storage may be implemented.

In accordance with my discussion with Becky Karas last week, NAC is submitting eight copies of this amendment request. Each copy includes the proposed SAR changed pages (identified as Revision UMSS-02A) appropriately inserted into a copy of the UMS[®] FSAR Amendment 2 to provide a complete FSAR (proposed Amendment 3) in each binder.

The Revision UMSS-02A changed pages, which incorporate the requested amendment, have been prepared in accordance with the following conventions:

- The changed pages for this submittal are designated as Revision UMSS-02A to provide a unique identification of the pages and changes.
- Revision bars are used in the page margin to indicate changes. All previous revision bars on the Revision UMSS-02A pages have been deleted, so that only the revisions associated with this amendment request are marked on those pages. Revision bars are not used to indicate text flow.
- All of the pages in the List of Effective Pages are designated Revision UMSS-02A, but no revision bars are used on those pages.

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In developing this submittal NAC has adopted the terminology "Standard NAC-UMS[®] Universal Storage System" to refer to the currently licensed configuration with a capacity of 24 PWR or 56 BWR fuel assemblies to differentiate it from the Advanced configuration. This amendment requests approval of the Advanced NAC-UMS[®] Universal Storage System, which has a capacity of 32 PWR fuel assemblies. The most important change implemented in the Advanced configuration is the development of the tab and slot fuel basket design, which is significantly different than the tube and disk basket design for the Standard fuel baskets. The Advanced canister is essentially identical to the Standard canister, except that the bottom plate thickness is increased. The Advanced and Standard transfer casks are identical, except that the Advanced transfer cask has a support plate (gusset) above each trunnion that is welded to the inner and outer shells. The Advanced and Standard concrete casks differ only in that the Advanced cask has a thicker base (pedestal) plate and liner channel weldments for structural support of the canister.

This amendment request also includes a 100-Ton Transfer Cask design with horizontal handling capabilities to accommodate lifting and low-clearance limitations at some sites. Also, an alternate neutron absorber material is added and a maximum fuel enrichment of up to 5 w/o ²³⁵U is evaluated. It should also be noted that the ANSWERS computer program package is used to perform the shielding and criticality analyses for the Advanced configuration of the NAC-UMS[®] Universal Storage System (the SCALE package was used for the shielding and criticality analyses of the Standard UMS[®] System).

This submittal includes 22 new license drawings that present the Advanced configuration of the NAC-UMS[®] transfer cask, canister and basket, and vertical concrete cask (VCC). Also, included is one new license drawing that provides the details of a 100-Ton Transfer Cask. In addition, this submittal includes three revised NAC-UMS[®] license drawings to incorporate the Standard and Advanced Transfer Cask terminology, to delete the alternate baffle design from the VCC Weldment Structure and to incorporate alternate neutron absorber material in the Standard NAC-UMS[®] basket. The drawing changes do not affect the form, fit or function of the components, and they are consistent with the component designs analyzed in the revised FSAR. The detailed descriptions of the drawing revisions are provided in Attachment A.

Some of the proposed FSAR changed pages being submitted as part of this amendment request contain NAC Proprietary Information, specifically, Section 4.4.7.2 and the associated figures and tables. The full-text pages containing the NAC Proprietary Information are provided in appropriately marked separate packaging. The required Proprietary Information Affidavit is executed and included as a part of this letter. Redacted (NAC Proprietary Information removed) pages are included in the body of the proposed FSAR to provide a complete nonproprietary version of the amendment request.



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As previously discussed between the NRC and NAC, implementation of the Advanced NAC-UMS[®] Universal Storage System is very important for more efficient and economical dry spent fuel storage at the Palo Verde and McGuire nuclear generating stations, as well as other sites that will implement dry fuel storage in the near future. Therefore, NAC requests that the NRC establish a priority review schedule for this requested amendment and complete the regulatory review and approval on that basis.

If you have any comments or questions, please contact me directly at (678) 328-1321.

Sincerely,

A handwritten signature in cursive script that reads 'T.C. Thompson'.

Thomas C. Thompson
Director, Licensing
Engineering & Design Services

Attachment A: List of Drawing Changes

Enclosures

cc: (w/o enclosures)

Brian Hansen (APS)
Glenn Michael (APS)
David Jones (DE)
Keith Waldrop (DE)

NAC INTERNATIONAL AFFIDAVIT PURSUANT TO 10 CFR 2.790

Willington J. Lee (Affiant), Vice President & Chief Engineer of NAC International, 655 Engineering Drive, Norcross, Georgia 30092, being duly sworn, deposes and says that:

1. Affiant has reviewed the information described in Item 2 and is personally familiar with the trade secrets and privileged information contained therein, and is authorized to request its withholding.
2. The information sought to be withheld is the following NAC International proposed changed pages for the NAC-UMS[®] Universal Storage System Final Safety Analysis Report, which are transmitted with NAC Letter No. ED20020043:

- FSAR Section 4.4.7.2 and associated figures and tables.

NAC International is the owner of this information; the information is considered proprietary to NAC International.

3. NAC International makes this application for withholding of proprietary information based upon the exemption from disclosure set forth in: the Freedom of Information Act ("FOIA"), 5 USC Sec. 552(b)(4) and the Trade Secrets Act, 18 USC Sec. 1905, and NRC Regulations 10 CFR Part 9.17(a)(4), 2.790(a)(4), and 2.790(b)(1) for "trade secrets and commercial financial information obtained from a person, and privileged or confidential" (Exemption 4). The information for which exemption from disclosure is here sought is all "confidential commercial information," and some portions may also qualify under the narrower definition of "trade secret," within the meaning assigned to those terms for purposes of FOIA Exemption 4.
4. Examples of categories of information that fit into the definition of proprietary information are:
 - a. Information which discloses a process, method, or apparatus, including supporting data and analyses, where prevention of its use by NAC's competitors without license from NAC International constitutes a competitive economic advantage over other companies.
 - b. Information which, if used by a competitor, would reduce their expenditure of resources or improve their competitive position in the design, manufacture, shipment, installation, assurance of quality or licensing of a similar product.

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(continued)

- c. Information which reveals cost or price information, production capacities, budget levels or commercial strategies of NAC International, its customers, or its suppliers.
- d. Information which reveals aspects of past, present or future NAC International customer-funded development plans and programs of potential commercial value to NAC International.
- e. Information that discloses patentable subject matter for which it may be desirable to obtain patent protection.

The information sought to be withheld is considered to be proprietary for the reasons set forth in Items 4a, 4b, 4d and 4e.

- 5. The information sought to be withheld is being transmitted to the United States Nuclear Regulatory Commission (NRC) in confidence.
- 6. The information sought to be withheld, including that compiled from many sources, is of a sort customarily held in confidence by NAC International, and is, in fact, so held. This information has, to the best of my knowledge and belief, consistently been held in confidence by NAC International. No public disclosure has been made, and it is not available in public sources. All disclosures to third parties, including any required transmittals to the NRC, have been made, or must be made, pursuant to regulatory provisions or proprietary agreements which provide for maintenance of the information in confidence. Its initial designation as proprietary information, and the subsequent steps taken to prevent its unauthorized disclosure, are as set forth in Items 7 and 8 following.
- 7. Initial approval of proprietary treatment of a document is made by the Project Manager and/or the Director of Licensing, the persons most likely to know the value and sensitivity of the information in relation to industry knowledge. Access to proprietary documents within NAC International is limited via "controlled distribution" to individuals on a "need to know" basis. The procedure for external release of NAC proprietary documents typically requires the approval of the Project Manager based on a review of the documents for technical content, competitive effect and accuracy of the proprietary designation. Disclosures of proprietary documents outside of NAC International are limited to regulatory agencies, customers and potential customers and their agents, suppliers, licensees and contractors with a legitimate need for the information, and then only in accordance with appropriate regulatory provisions or proprietary agreements.

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AFFIDAVIT PURSUANT TO 10 CFR 2.790
(continued)

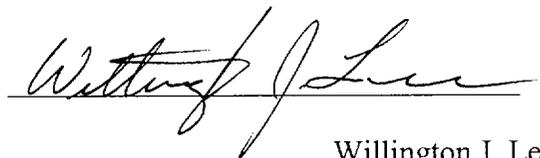
8. NAC International has invested a significant amount of time and money in the research, development, engineering and analytical costs to develop the information that is sought to be withheld as proprietary. This information is considered to be proprietary because it contains detailed descriptions of analytical approaches, methodologies, technical data and evaluation results not available elsewhere. The precise value of the expertise required to develop the proprietary information is difficult to quantify, but it is clearly substantial.
9. Public disclosure of the information that is sought to be withheld is likely to cause substantial harm to the competitive position of NAC International, as the owner of the information, and reduce or eliminate the availability of profit-making opportunities. The proprietary information is part of NAC International's comprehensive spent fuel storage and transport technology base, and its commercial value extends beyond the original development cost to include the development of the expertise to determine and apply the appropriate evaluation process. The value of this proprietary information and the competitive advantage that it provides to NAC International would be lost if the information were disclosed to the public. Making such information available to other parties, including competitors, without their having to make similar investments of time, labor and money would provide competitors with an unfair advantage and deprive NAC International of the opportunity to seek an adequate return on its large investment.

STATE OF GEORGIA, COUNTY OF GWINNETT

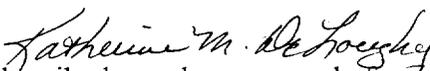
Mr. Willington J. Lee, being duly sworn, deposes and says:

That he has read the foregoing affidavit and the matters stated therein are true and correct to the best of his knowledge, information and belief.

Executed at Norcross, Georgia, this 25th day of January 2002.



Willington J. Lee
Vice President & Chief Engineer
NAC International


Subscribed and sworn before me this 25th day of January, 2002.

 MY COMMISSION EXPIRES MAY 15, 2005