



DuratekTM

140 Stoneridge Drive
Columbia, South Carolina 29210
803-256-0450
www.duratekinc.com

71-9001

COMPLETE SUBMITTAL
W/COMPUTER INPUT
FILES

4 February, 2002
E&L-015-02

Mr. E. William Brach, Director
Licensing Section
Spent Fuel Project Office
Office of Nuclear Material Safety and Safeguards, NMSS
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Dear Mr. Brach:

SUBJECT: CONSOLIDATED SAFETY ANALYSIS REPORT FOR THE IF-300, C OF C 9001

Enclosed is our application for the revision to the Consolidated Safety Analysis Report (CSAR) for the IF-300, Certificate of Compliance No. 9001. We request that you approve the revision to the CSAR and revise the Certificate for IF-300 to reflect the following changes:

1. We are revising the CSAR to increase the maximum assembly average burnup of Group III PWR fuel to 50,000 MWd/MTU. The analyses demonstrating that this fuel type meets regulatory requirements are contained in Appendix E, which is included in Volume IV of the CSAR. Appendix E is provided as a non-proprietary document. Replacement pages for Appendix E, which contain proprietary data, are also provided as a separate attachment.
2. We are revising several pages in Volume I of the CSAR to correct grammatical and typographical errors recently identified.
3. We are revising the description in Chapter 9 and Chapter 10 of the tamper indicating seals applied to the cask for transport to clarify their purpose.
4. We are revising several steps of the Procedures in Volume I, Chapter 10 to reflect operational improvements identified through cask use. (Due to the numerous changes in Chapter 10, it is entirely replaced.)
5. We are requesting three changes to the CoC to correct two typographical errors and to revise the cask description to match the approved description in the CSAR.

There are several attachments to this letter, including the CSAR revision pages themselves. The following is a discussion of the content and purpose of each attachment.

Attachment 1: A directory of changes to the CSAR showing which pages should be replaced from the current revision and the pages to be added.

Attachment 2: The replacement pages for Volume I. (Non-proprietary)

Attachment 3: Discussion and justification of the changes from Items 2, 3, 4, and 5, above.

NMSSO1 PROP

Attachment 4: Appendix E, Volume IV (Non-proprietary)

Attachment 5: Draft revised C of C.

Attachment 6: Proprietary Data Pages – replacement pages for Appendix E of the CSAR that contain proprietary data.

Attachment 7: Affidavits on the basis for withholding data from public disclosure.

We request completion of action on this request by June 2002 to allow appropriate management of Group III PWR fuel. One user of the cask needs to ship Group III fuel with greater than 45 GWd/MTU assembly average burnup by early 2003 to maintain prudent operating margin. Timely action on this application is requested to allow sufficient time for initiation of alternative storage capacity options should the requested revision be denied. This need stems from the U.S. Department of Energy's failure to begin taking spent fuel in 1998 as required by the Nuclear Waste Policy Act of 1982, as amended, and by its contracts with the nuclear utilities.

Should you or members of your staff have any questions about the application, please feel free to contact me at (803)758-1898.

Sincerely,

A handwritten signature in black ink, appearing to read "P. C. Whittaker / CHP". The signature is written in a cursive style.

Mark S. Whittaker, CHP
Senior Project Analyst