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DOCKET NUMBER
PROPOSED RULE ~~71~~
(67FR 21390)

Columbiana Hi Tech Front End, LLC

200 West Railroad Street
Columbiana, Ohio 44408

June 20, 2002

DOCKETED
USNRC

Ms. Patricia K Holahan, Chief
Rulemaking and Guidance Branch
Division of Industrial and Medical Nuclear Safety
Office of Nuclear Materials Safety and Safeguards
United States Nuclear Regulatory Commission
Washington DC, USA 20555

July 15, 2002 (3:18PM)

OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

Re: Comment for the record regarding Proposed Rulemaking

Dear Ms. Holahan:

Columbiana Hi Tech Front End LLC and Columbiana Hi Tech Spent Fuel LLC (collectively "CHT") are manufacturers of nuclear fuel packaging, including without limitation, UF₆, UO₂, Fuel Assembly, Spent Fuel Canisters, Transfer Casks, and related equipment. CHT is the holder of United States Nuclear Regulatory Commission ("NRC") QA Approval Number 0179. CHT is the producer of protective shipping packages known as UX-30 (USA/9196/AF-85) and ESP-30X (USA/9284/B(U)F-85), which are extensively used for the transport of UF₆ in standard ANSI N14.1 Model 30B cylinder.

CHT understands that the Proposed Rulemaking may codify a limitation on the enrichment of UF₆ at no more than 5wt% of U-235. CHT submits that the industry is seriously considering, and moving towards the use of enrichments greater than 5wt%, to achieve more efficient operation of the fuel assemblies. In addition, the Pebble Bed reactor would require enrichments greater than 5wt% of U-235.

CHT requests that the final 10 CFR 71 regulations stipulate that enrichments of UF₆ be limited to 5wt% U-235 for the standard ANSI N14.1 30B cylinder, but further allow for special design features of an alternative cylinder and protective shipping package that clearly demonstrates the ability to remain sub critical at stipulated enrichment levels up to a maximum of 10 wt% U-235, in addition to all other provisions of 10 CFR 71. CHT submits that certain design features such as (i.) moderation control devices, (ii.) mass control (decrease) of the UF₆, and (iii.) cylinder geometry control could allow for enrichments greater than 5wt% U-235. In the opinion of CHT, the foregoing special design features embodied in an alternative UF₆ cylinder could be utilized in the presently approved protective shipping packages. The economic cost of special design features of an alternative UF₆ cylinder are minimal, as compared to the cost of new protective shipping packages. In summary, CHT requests a special provision for an improved UF₆ package with special designs features for enrichments greater than 5wt% U-235, but retain the limitation 5wt% U-235 with respect to the existing ANSI N14.1 Model 30B cylinder.

Respectfully submitted,

Thomas F. Dougherty
Chairman

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