

71-9235



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July 30, 2002

U.S. Nuclear Regulatory Commission
11555 Rockville Pike
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Attn: Document Control Desk

Subject: Submittal of NAC International Response to a Conference Call Request for Correction of Section 8.1.6 of the NAC-STC SAR Amendment Request for Connecticut Yankee

Docket No. 71-9235

- References:
1. Certificate of Compliance No. 9235 for the Model No. NAC-STC, Revision 3, United States Nuclear Regulatory Commission (NRC), August 8, 2001
 2. Conference Call between NAC and the NRC Regarding an Additional SAR Clarification (SAR Section 8.1.6), July 18, 2002

NAC International (NAC) herewith submits eight copies of the response to the requested clarification (Reference 2) resulting from the NRC review of the NAC-STC Amendment Application. The requested amendment incorporates Connecticut Yankee Nuclear Power Plant spent fuel and GTCC waste as approved contents.

This submittal provides the revised Section 8.1.6, Thermal Test, on Pages 8.1-12 and 8.1-13 of the NAC-STC Safety Analysis Report (SAR) as changed pages, which are designated as Revision STC-02D. Note: The enclosed SAR changed pages are to be inserted as replacement pages into the existing CY-STC SAR binder.

The changed pages have been prepared in accordance with the following conventions:

- Revision indicators (revision bars) are used to indicate changes. Revision bars are not used to indicate text flow.
- The changed pages for this submittal are designated as Revision STC-02D to provide a unique identification of the page and changes.
- All of the pages in the List of Effective Pages are designated Revision STC-02D and no revision bars are used on those pages.

If you have any further questions, please contact me on my direct line at 678-328-1321.

Sincerely,
TC Thompson / bml

Thomas C. Thompson
Director, Licensing
Engineering & Design Services

Enclosure

cc: E. Glasbergen, Bechtel

NMSSol Public

Revision **STC-02D**

July 2002

NAC-STC

NAC Storable Transport Cask

SAFETY ANALYSIS REPORT

Volume 1 of 2

Amendment for
CONNECTICUT YANKEE ATOMIC POWER COMPANY



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July 2002

NAC-STC

NAC Storable Transport Cask

SAFETY ANALYSIS REPORT

Volume 2 of 2

Amendment for
CONNECTICUT YANKEE ATOMIC POWER COMPANY



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The installation of NS-4-FR material in the fabrication of the cask is a special process and, as such, procedures will be prepared and qualified to ensure that the mix ratios, mixing method, degassing, pouring, and curing of the material is properly performed. The NS-4-FR raw material is provided in the form of a 3-part mixing kit. The material content of the raw material is tested and certified at the time of kit preparation. The neutron shielding material is installed into the annulus between the outer shell and the neutron shield shell by pouring it with the cask in an inverted vertical position. Prior to installation, samples from each mix of the actual material being poured into the annulus are wet density tested to ensure that the material is properly mixed. Mixes that do not meet the wet density acceptance criteria are rejected. Procedures used for installation of the material are validated prior to use by destructive examination of a full scale mock-up of the neutron shield cavity. Qualification of the installation procedure verifies material homogeneous properties and minimizes the potential deleterious voids.

8.1.5.3 Neutron Shielding Material Testing

The neutron shield properties of NS-4-FR are provided in Chapters 1 and 3. Each lot (mixed batch) of neutron shield material shall be tested to verify that the material composition (aluminum and hydrogen), boron concentration, and neutron shield density meet the requirements specified in Chapters 1 and 3 and the License Drawings. Testing shall be performed by qualified laboratories in accordance with written and approved procedures. Material composition, boron concentration, and density data for each lot of neutron shield material shall become part of the quality record documentation package.

Dimensional inspection of the cavities containing the neutron shielding material shall ensure that the required thickness specified in the License Drawings is incorporated into the cask.

The installation of the neutron shielding material shall be performed in accordance with written, approved, and qualified procedures. The procedures shall ensure that mix ratios and mixing methods are controlled in order to achieve proper material composition, boron concentration and distribution, and that pours are controlled in order to prevent gaps or unacceptable voids from occurring in the material. Procedures shall be qualified by the use of mock-ups to ensure that the NS-4-FR installation does not result in the creation of unacceptable voids. Samples of each lot of neutron shield material shall be maintained as part of the quality record documentation package.

8.1.5.4 Neutron and Gamma Shield Effectiveness Tests

Following first fuel loading, a neutron and gamma shield effectiveness test shall be performed for each cask prior to transport. The test shall be performed with the cask loaded with fuel, drained, vacuum dried and backfilled with helium. The purpose of the test is to document the effectiveness of the neutron and gamma shielding materials. The test shall be performed in accordance with detailed, approved written test procedures.

Calibrated neutron and gamma dose rate meters shall be used to measure the neutron and gamma dose rate at contact with the outer shell of the neutron shield and at 2.3 meters from the surface (equivalent to 2 meters from the sides of the railcar). Dose measurement points shall be established on the external surface of the shell at 30° intervals and at five points along the height of the shield (a total of 60 measuring points). In addition, neutron and gamma dose rate measurements shall be made of the trunnion areas above the neutron shield, at four points below the neutron shield, and at the edges and center of the cask top (outer lid) and cask bottom surfaces. Dose rates at the top and bottom of the cask shall be measured with the transport impact limiters installed. The dose rates measured at contact and at 2.3 meters shall be recorded on the test data sheet, along with the total power of the loaded fuel assemblies; date, time and location of test; identification and calibration of instrumentation; and identification of test engineer and operators.

To allow an evaluation of the measured dose rates to be completed, the burnup and cool time for the actual fuel assemblies loaded into the cask will be determined and recorded. From this fuel history data, the total actual neutron and gamma source terms will be estimated using ORIGEN or similar calculations. These source terms will be used to calculate dose rates at contact and at 2.3 meters.

If the measured dose rates exceed the calculated dose rates, appropriate corrective measures will be taken. Following corrective actions, the test will be reperformed to the original acceptance criteria prior to final acceptance.

8.1.6 Thermal Test

A thermal test using electric heaters shall be performed on each fabricated packaging to confirm and verify that the fabricated and assembled cask possesses the heat rejection capabilities predicted by the thermal analyses. The thermal test shall be performed in accordance with

approved written procedures. The thermal test demonstrates the ability of the cask body to reject heat to the environment with the thermal gradient across the cask body wall less than or equal to that predicted by the thermal analysis.

The test is performed for the applicable design basis heat load. This bounds any lower heat load.

8.1.6.1 Thermal Test Set-up

The thermal test shall be performed with the cask positioned horizontally on a test frame. The transport impact limiter or equivalent insulating material shall be installed on each end of the cask to simulate the transport configuration. The cask will be located in a covered building in a still environment. A thermal test lid with connections for thermocouple leads and electric heater power cables shall be installed in place of the inner lid. The outer lid will not be installed for the test. The thermal test lid will be provided with an o-ring seal capable of containing the containment cavity helium atmosphere.

Electric heaters shall be installed in a suitable frame inserted into the cask cavity. The electric heaters will have an active length of between 120 and 150 inches and be capable of generating a minimum of 22.1 kW. The heaters shall not be in contact with the cask cavity wall. The power supplied to the heaters will be recorded throughout the test duration.

Calibrated test thermocouples will be installed on the inner shell and outer neutron shield shell surfaces. The location of the test thermocouples shall coincide with regular intervals along the circumference and length of the cask body to provide direct correlation between inner shell and outer surface temperatures at a number of locations. The location and placement of thermocouples shall be specified in the thermal test plan and in the thermal analysis that supports the thermal test configuration.

The output of the test thermocouples will be recorded throughout the test by a strip chart recorder.

8.1.6.2 Test Procedure

With the cask assembled and instrumented, the cask cavity is evacuated and backfilled to 1.0 atmosphere absolute (14.6 psia) with helium. Power will be applied to the heaters to simulate the cask content heat load. After initiation of power to the heaters, the temperatures of all

thermocouples and heater power levels will be monitored and recorded on data sheets. Power will be maintained to the electrical heaters until the cask has reached thermal equilibrium.

For the purpose of the test, thermal equilibrium is defined as being achieved when, for over two consecutive hours, the temperature recorded at a single set of inner shell and outer surface thermocouples does not vary by more than 2°F. Based upon the thermal heat-up evaluation, thermal equilibrium should be achieved in approximately five days.

After verification of thermal equilibrium, final temperature measurements will be recorded for all test thermocouples. The final power readings for the electric heaters will also be recorded. The strip chart will be marked to indicate the time of the final cask measurements. The printout of the strip chart recorder and the completed test data sheets will be incorporated into an approved final thermal test report. The test will be determined to be acceptable if the acceptance criteria of Section 8.1.6.3 are met.

If the acceptance criteria are not met, the cask will not be accepted until appropriate corrective actions are completed. Upon completion of corrective actions, the cask shall be retested to the original test requirements and acceptance criteria.

8.1.6.3 Acceptance Criteria

The purpose of the thermal test is to confirm that the heat rejection capability of the as-built cask is acceptable and that the measured temperatures are bounded by the temperatures calculated in the thermal analyses that define and support the test configurations.

Package heat dissipation acceptance testing assures that the maximum material temperatures do not exceed material allowables and that the measured temperature gradients are less than the thermal gradients calculated in the test configuration thermal analyses.

The thermal acceptance test shall be specified in the test plan and shall be based on the calculated values determined in the test configuration thermal analysis. At a minimum, the test acceptance criteria shall specify the maximum cask body surface temperature at any measured location (thermocouple location) and shall specify the maximum temperature gradient for the measured locations.