

February 14, 1997

Ms. Susan Frant Shankman  
Chief, Transportation Safety and Inspection Branch  
Spent Fuel Project Office, NMSS  
United States Nuclear Regulatory Commission  
Washington, DC 20555

SUBJECT: Updated Corrective Action Completion Dates

REFERENCE: NAC International Letter RHS 96219, Reply to a Notice of Nonconformance,  
Docket Nos. 71-0015, 72-1018

Dear Ms. Shankman:

NAC International (NAC) committed to a series of corrective actions to resolve the issues contained within the referenced Notice of Nonconformance. Completion of each of the committed actions is being controlled in accordance with the applicable provisions of our Quality Assurance program.

NAC continues to make good progress toward resolution of all noted noncompliances. The overwhelming majority of our committed actions are being completed as specified and in accordance with the established schedule. Moreover, the results of our corrective actions are very encouraging as, to date, we have not found any instances where noted anomalies negatively affected the safety of our packaging or the analytical conclusions of related analyses.

For a small quantity of our committed actions, we have determined that more meaningful corrective action will be accomplished by expanding the scope of certain specified commitments and by revising our schedule to accommodate the expanded scope. This modification will have a positive impact on quality as our corrective actions will take advantage of "lessons learned" from previously completed actions.

Following are the rescheduled corrective actions, along with the logic used to justify the new completion dates. To aid your review, we have used the same "Issue Numbers" from the referenced letter and included a brief issue description.

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- **NRC Issue Numbers 3B, 3C, 3D, 3E, 3G, 4B, 9A, 10B, 10C, and 11E Description:**

Numerous errors were noted in various NAC historical calculation packages used as the basis to support amendments to several currently licensed transportation/storage packagings. Examples included improper format, missing signatures, incorrect changes and design verification deficiencies.

**Specified Corrective Actions and Schedule:**

NAC committed to assembling an experienced, special Design Review Team (DRT) to review and confirm the accuracy and completeness of analytical documents used as the basis to support basic designs and changes for all transportation packages and dry storage systems from 1990 to present.

For the review of those packagings which were not completed as of 12/18/96, NAC committed to dates of 2/15/97 for the NAC-NLI 1/2 and 3/15/97 for the transportation portion of the NAC-STC, with the storage portion immediately thereafter, or prior to authorizing the first use of the cask.

**Updated Corrective Actions and Schedule:**

During our review of the NAC-NLI 1/2 documentation, we determined that all of the licensing actions during the period of interest represent changes to the authorized payloads (all within the design bases), administrative issues or minor operating procedure changes. The preliminary DRT assessment, reached January 30, 1997, is that the licensing actions are technically acceptable but the supporting documentation should be enhanced. In order to effectively address this recommendation, some of the existing calculations are being reperfomed. We anticipate that reperformance of these documents will delay completion by approximately 30 days. Therefore, our new completion schedule for the DRT effort on this packaging is March 15, 1997.

The only other NAC packaging planned for review is the NAC-STC. The review schedule for this packing will be impacted by the extended review of the NAC-NLI 1/2. To facilitate an enhanced review, we intend to factor the results of previously completed package reviews (including the NAC-NLI 1/2) into our review plan and checklist. Additionally, as some of the same personnel will be involved in both reviews, we will provide a revised schedule within two weeks after completion of the NAC-NLI 1/2 review, by April 1, 1997.

- **NRC Issue Numbers 11A , 11C and Description:**

Anomalies were noted regarding documentation of NAC software verification and the related user manuals. As examples, a modification to an existing computer program verification/validation was not controlled in accordance with the applicable procedure which existed at that time; also, a software manual (for RBCUBED) was not updated to include some necessary information.

**Specified Corrective Actions and Schedule:**

Computer program verification documentation for active programs was to be reviewed and augmented as necessary by 1/15/97 to be in compliance with the requirements of the recently issued Quality Procedures. Historical software was to be evaluated by the DRT team and in accordance with the schedule as discussed above. The RBCUBED manual was to be updated by 1/31/97.

**Updated Corrective Actions and Schedule:**

Assigned engineering personnel performed their review and augmentation of existing verification documentation and the RBCUBED user manual and presented the results to NAC Quality Assurance personnel on January 31, 1997. As a result of the Quality Assurance review, it was determined that, while the verification and user manual was technically sound, the related documentation packages could be enhanced. It was subsequently decided to develop new documentation packages for each of our currently used programs and the RBCUBED manual. Accordingly, the completion date of these actions has been rescheduled for February 28, 1997.

In summary, we believe completion of this updated approach constitutes an enhancement of our previously submitted plan. In the absence of any dissenting opinion from the Nuclear Regulatory Commission, we will proceed with this approach. Please contact me should you desire any additional information.

Sincerely,



R. Howard Smith  
Vice President, Quality

cc: NRC Document Control Desk