71-6347

GENERAL ATOMICS

February 24, 1992
SHP-1864

VIA OVERNIGHT EXPRESS SERVICE:

Mr. Charles E. MacDonald, Chief
Transportation Branch
Division of Safeguards and Transportation, NMSS
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Subject: **Certificate of Compliance No. 6347**

Dear Mr. MacDonald:

Thank you for your letter of January 17, 1992, reminding us that Certificate of Compliance No. 6347 for the Model No. FSV-3 shipping package expires this March 31, 1992.

General Atomics anticipates continued need of this package for the transport of radioactive materials during the next several years, pursuant to 10 CFR 71. Accordingly, we hereby request a new expiration date of April 30, 1996.

Enclosed with this letter is a current copy of GA's operating procedures for this package, including our acceptance tests and maintenance program.

Again, thank you for your timely reminder and if you should have any questions, please telephone me at (619) 455-2823 or Mr. Chester L. Wisham at (619) 455-4171.

Very truly yours,

Keith E. Asmussen

Keith E. Asmussen, Director
Licensing, Safety and Nuclear Compliance

KEA:shs

Enclosure - as above

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FSV-3

6. OPERATING PROCEDURES

6.1. LOADING THE PACKAGE

The procedure for loading the package is:

1. Obtain an empty double-barrel shipping assembly and place it in the designated final packaging area.
2. Uniformly distribute the correct amount of vermiculite over the bottom surface of the outer drum and tamp it firmly into place with an approved tamping tool.
3. Center the inner drum within the outer drum and pack the void between the inner and outer drums with vermiculite to a depth of 4 to 6 in. below the top of the inner drum.
4. Uniformly distribute the correct amount of vermiculite over the bottom surface of the inner drum and tamp it firmly into place with an approved tamping tool.
5. Move the prepared double-barrel container to the hoist area.
6. Lift the completed fuel element with an approved lifting tool to enable the Quality Control inspector to perform a complete visual inspection of the element.
7. Enclose the element in a bag(s).
8. Place the inspected and bagged element into the inner drum of the prepared container, taking care to center the element in the drum.
9. Remove the lifting tool from the element.
10. Seal the top(s) of the bag(s) around the element.
11. Pack vermiculite around the sides of the element.
12. Uniformly distribute the correct amount of vermiculite over the top of the element.
13. Insert the plywood disk atop the element.
14. Stencil the inner drum lid with the required information.
15. Install, clamp, and bolt the inner drum lid in place.
16. Distribute vermiculite over the top of the inner drum to fill the remaining void between it and the outer drum.
17. Stencil the outer drum and lid with the required information.
18. Install, clamp, and bolt the outer drum lid in place.
19. Tamper-safe seal the container (two-man rule).

7. ACCEPTANCE TESTS AND MAINTENANCE PROGRAM

The acceptance tests will be performed to verify and document the proper condition of materials, construction technique, and quality of workmanship.

The maintenance program is restricted to the repainting of, and removal of minor dents from, inner or outer drums before their reuse in the construction of a FSV-3 container.

7.1. ACCEPTANCE TESTS

1. Empty containers
   a. Visual inspection
      (1) Inspect surfaces of inner and outer drums for evidence of residues or foreign material; deterioration such as pitting, creases, or corrosion; and for changes in container shape, contour, height, or diameter.
      (2) Inspect clamp rings for defects or deterioration.
      (3) Verify that a new outer seal ring is used.
      (4) Verify that all prior shipping markings have been removed or obliterated.
   b. Dimensional inspection
      (1) Sample, at random, 5% of the containers scheduled for reuse for dimensional inspection.
      (2) Measure the interior dimensions of both the inner and outer drums and compare the dimensions to the requirements of FFE-613.
   c. Record of inspection

      A record will be made in the Fuel Assembly Inspection Record that the container for the assembled element has been inspected.
2. Completed assemblies and shipping containers
   a. Verify by visual inspection the proper container assembly and use of a new outer drum seal.
   b. Spot check vermiculite packing to confirm that all interspaces are firmly packed and that no visible voids exist.
   c. Verify that required shipping labels and data are on the container.

7.2. MAINTENANCE PROGRAM

1. Repaint inner and outer drums and lids as required prior to reuse.
2. Remove dents from inner and outer drums as required to meet Quality Control inspection requirements.

6.2. UNLOADING THE PACKAGE

The procedure for unloading the package is:

1. Remove the tamper-safe seal (two-man rule).
2. Remove the outer drum lid.
3. Remove vermiculite to below inner drum lid.
4. Alternatively remove inner drum and element as a unit or remove the inner drum lid and the plywood disk.
5. Remove vermiculite to below the top of the element.
6. Open the bag(s). Remove any vermiculite dust.
7. Insert the lifting tool and carefully remove the element from the container.

6.3. PREPARATION OF EMPTY PACKAGE FOR TRANSPORT

No specific procedure is needed for the return of the empty packages or package components except for removal or covering of the outer drum warning labels, i.e., transport index, Fissile Class II or III, etc. The packages are typically not contaminated as a result of their use. Individual facility procedures governing materials exiting licensed facilities would control potentially contaminated components.