



**B&W FUEL COMPANY**

P.O. Box 11646  
Lynchburg, VA 24506-1646  
Telephone: 804-832-5000  
Telecopy: 804-832-5167

October 27, 1995

William D. Travers, Director  
Spent Fuel Project Office  
Office of Nuclear Material Safety  
and Safeguards, NMSS  
US Nuclear Regulatory Commission  
Washington, D. C. 20555-001

Dear Mr. Travers:

REFERENCE: Docket 71-6206, USA/6206/AF

B&W Fuel Company (BWFC) requested to amend the Certificate of Compliance (C of C) for the above reference shipping container to support higher enriched fresh fuel assemblies. By letter dated September 25, NRC requested that we provide additional information to support the amendment. The information is provided as Attachment I and does not require revisions to the SAR.

A single package with the fuel rod gap as optimally flooded was modeled as requested in item 2 under Criticality and concluded that there is an insignificant reactivity increase. Additionally, the single package criterion results in a net decrease in K-maximum because an infinite array assumption was used in the base analysis.

In response to items 3 under Criticality, we have included the information that you requested. The results indicate that the reactivity differences because of guide tube modeling are very small and need not be considered in future calculations. BWFC contends that this level of detailed information on the fuel assembly design should not be placed in the SAR nor the C of C. In addition, it should be handled as propriety under the provisions of 10 CFR 2.70.

I hope that you find our response satisfactory. Because of contracts needed to be shipped in the Model B, we request that the amendment be approved by December 20, 1995. I may be reached at (804) 832-5202 if you should require any additional information.

*NTA*

Sincerely,

B&W FUEL COMPANY  
Commercial Nuclear Fuel Plant

210099

9512060167 951027  
PDR ADOCK 07106206  
C PDR

*delete: LA*  
*change: NRC PDR 1 0*

Kathryn S. Knapp

**Kathryn S. Knapp**  
**Manager, Safety & Licensing**