



July 9, 1996

LD-96-025

Docket No.: 71-6078

Mr. Carl J. Paperiello, Director
Office of Nuclear Material Safety and Safeguards
U.S. Nuclear Regulatory Commission
Washington DC 20555

Subject: Amendment Request for Model Nos. 927A1 and 927C1 Shipping
Containers Certificate of Compliance

Reference: CE Letter LD-96-016, I. Rickard to NRC, dated May 15, 1996

Dear Mr. Paperiello:

Combustion Engineering, Inc. (CE) submits the enclosed information in support of a Certificate of Compliance (CoC) amendment request for its Model Nos. 927A1 and 927C1 shipping containers. The amendment request seeks approval of:

- 1) Various changes to the shipping container engineering drawings;
- 2) A consolidated version of the Certificate of Compliance application; and
- 3) Various editorial/typographical corrections.

The changes to the engineering drawings include the corrections discussed in the Reference, i.e., correcting the 2"x2" dimension of a component to 2"x4" and showing the location of various holes in the strongback.

The consolidated application is intended to replace the existing application in its entirety. The principal purpose of the consolidated application is to reset all pages to Revision 0 with a date of July 9, 1996. Submission of a consolidated application is being made as part of an informal agreement with NRC staff as a followup to the recent renewal approval for this container. The revised engineering drawings are being incorporated into the consolidated application to correct non-safety related discrepancies between the actual container configuration and the old drawings, as well as to incorporate several optional features regarding fastener selection. Changes made to the text of the CoC application

1/1
NT 101

120039

ABB Combustion Engineering Nuclear Systems

Combustion Engineering, Inc.

2000 Day Hill Road
P.O. Box 500
Windsor, CT 06095-0500

Telephone (860) 688-1911
Fax (860) 285-5203

9607120150 960709
PDR ADOCK 07106078
C PDR

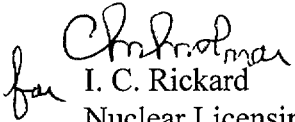
are strictly editorial, not substantive with respect to safety aspects of the container performance during transportation.

Enclosure 1 describes the changes proposed by this amendment request, and Enclosure 2 provides the changed pages themselves. Six copies of the enclosures are provided for your use. CE requests approval of this amendment request by August 14, 1996 to support fuel shipments scheduled to begin at that time.

If there are questions or comments on this submittal, please do not hesitate to call me or George Hess at (860) 285-5218.

Very truly yours,

COMBUSTION ENGINEERING, INC


for I. C. Rickard
Nuclear Licensing

cc: C. R. Chappell (NRC)
N. L. Osgood (NRC)
W. D. Travers (NRC, w/o enclosure)

Enclosure 1

Description of Proposed Changes

Changes Related to Shipping Container Engineering Drawing Revisions

The following changes to Figure 1A-1 (previously numbered Figure 1.1) are proposed.

1. Changes to Sheet 1:

- The drawing number has been changed from NFW-E-4108, Rev. 11 to E-5202-8051, REV. 0.
- The note on item 24 was simplified because it implied special fastening. This support is not part of the container structure.
- Note 1 has been deleted because it is no longer appropriate on the new Revision 0 drawing. Notes 2, 3, and 4 have been renumbered as notes 1, 2, and 3, respectively. Where notes are referenced on the drawing, the note numbers have been changed accordingly.
- Note 3 (old note 4) has been reworded to reflect the optional nature of the lifting trunion which was used only for handling certain types of fuel. The optional trunion is not a 927 container feature that is relevant to fuel transportation.
- Items 63 through 68 were added to the Bill of Materials and are discussed individually in various items below.
- Item 64, a self-locking nut, was added as an option for closure bolt nuts. The nylon insert locknuts are steel and have the same thread length and strength as the nuts they would replace.
- A note was added to item 15. These locator pins are positioned differently on the different containers.

2. Changes to Sheet 2:

- The drawing number has been changed from NFW-E-4108, Rev. 11 to E-5205-8051, Rev. 0.
- View D was rearranged to clarify what the different independent holddown brackets look like.
- For Section G-G, a note was added to allow special coatings to be used on those surfaces.
- For Section F-F, bolt and spacer callouts were added for clarification.
- For Section H-H and view B, the tubing in the center of the bracket was shown as 2x2 inch square, but has now been corrected to its actual dimensions of 2x4 inches.
- In view B, an existing nut (part 66) and an optional self-locking nut (part 64) have been added. The nylon insert locknut is steel and has the same thread length and strength as the nut it would replace.

- In views A and C, the proper nut callouts (part 68) were added as well as optional locking nuts (parts 63 and 65). The nylon insert locknuts are steel and have the same thread length and strength as the nuts they would replace. In view C, the existing bolt to which parts 65 (optional) or 68 attach has been added to the drawing.
- An optional tapered trunion (part 67) was added to the strongback lower end. A note was added to clarify that the trunions and pins may be shipped separately. These are only used to upright the strongback, and are not engaged during shipment.

3. Changes to Sheet 3.

- The drawing number has been changed from NFW-E-4108, Rev. 11 to E-5205-8051, Rev. 0.

4. Changes to Sheet 4:

- The drawing number has been changed from NFW-E-4108, Rev. 11 to E-5205-8051, Rev. 0.
- The hole pattern in the strongback was added. These holes allow the upper and lower end fitting brackets to be positioned for different fuel assembly types. The holes were not shown on the previous drawing.

Editorial Changes Related to Consolidating the Certificate of Compliance Application

This consolidated application resets the revision number of all application pages to Revision 0 with a date of July 9, 1996.

In addition to applying the same revision number and date to each page of the application, the following editorial changes and corrections were made:

- The page format has been changed to remove the border and the rectangular enclosures for header and footer entries. The font and text heading styles have been revised.
- References to Fissile Class III have been removed throughout since the recently revised 10CFR71 no longer refers to Fissile Class.
- Appendices 1.3, 2.10.1, and 2.10.2 have been redesignated as Appendices 1A, 2A, and 2B, respectively, and figure numbers, table numbers, and section references have been revised accordingly. These changes make the appendices more distinct from the text and reduce confusion concerning section numbering.
- The degree symbol has been added where temperatures are stated.
- In Section 1.1, second from the last line, "10CRF71" has been corrected to "10CFR71."
- In Section 2.7.2, the last sentence had read, "Examination of the inside of the container indicated no damage to the simulated damage to the suspension

frame.” That sentence has been corrected to read, “Examination of the inside of the container indicated no damage to the simulated loads, no relative movement of the simulated loads, and no damage to the suspension frame.” This corrected wording was originally provided to the NRC in Attachments A and B to Combustion Engineering’s letter of January 4, 1988 from R. Sheeran (CE) to C. MacDonald (NRC) which submitted the results of container drop tests. This revision simply reestablishes correct wording that was previously reviewed by the NRC in the course of issuing an earlier revision to the Certificate of Compliance.

- In Appendix 2B (old Appendix number 2.10.2), Section 3.2, fifth paragraph, last word of the first sentence, “mechanism” has been changed to “mechanisms.”
- In Section 6.1, two lines from the end of the section, the number of packages per shipment for normal transportation conditions has been corrected from infinite to 16.
- In Section 7.1, fourth paragraph, at the colon in the seventh sentence, an asterisk has been added to designate the text to which the footnote on the page applies.

LD-96-025

Enclosure 2

Revised Certificate of Compliance Application