



August 11, 1999

Mr. Cass R. Chappell, Chief
Licensing Section
Spent Fuel Project Office, NMSS
US Nuclear Regulatory Commission
Washington, DC 20555

Subject: Model No. 3-82B Package Leak Test Requirements

Reference: 1. NRC Certificate of Compliance No. 6574, Revision 25, Dated
March 4, 1999
2. ATG Letter, Dated August 9, 1999.

Dear Mr. Chappell:

Reference No. 2 above requested written communication for deleting prior-to-shipment leak test requirements for exclusive use LSA shipments in the subject package where the 3 meter reading does not exceed 1R/hr.

Further evaluation of the application of Type B shipping casks for LSA shipments from commercial nuclear facilities revealed that low level waste shipments that meet the definition of LSA but the 3 meter dose rate of the unshielded material exceeds the 1R/hr limit will more commonly occur. Therefore, ATG, Inc. requests the communication to include LSA shipments with 3 meter reading greater than 1R/hr with no leak test required prior to shipment unless other requirements necessitate a leak test such as gasket change or yearly maintenance activities. Again, as a minimum, we request it be left to the shipper's discretion if they choose to perform a leak test prior to each shipment.

Should you require further substantiation for the above request, please feel free to contact me at 423-425-5030.

Sincerely,

Anthony L. Patko
Sr. Technical Specialist
Licensing/Regulatory Affairs

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