



71-6574

August 9, 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: NRC Certificate of Compliance No. 6574, Revision 25, Dated March 4, 1999

Dear Mr. Chappell:

Recent regulatory changes resulted in increased use of the subject package for LSA shipments meeting the definition of LSA but with dose rates of the unshielded material at 3 meters not exceeding 1R/hr. This application has raised the question of applicability of the leak test requirement prior to each shipment as documented in the above referenced C of C. These shipments were previously made in Type A shipping casks with no leak test requirement prior to each shipment.

The above referenced Certificate of Compliance does not include a provision for the above situation. Therefore, ATG, Inc. requests a communication in writing, or revision of the C of C, to address LSA shipments in the 3-82B package excluding them from the leak test requirement prior to each shipment if the 3 meter 1R/hr dose rate is less than 1R/hr. 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.

ATG and all registered users of the above package have been performing the leak tests prior to each shipment and during scheduled yearly maintenance as required by the C of C. It is recognized that this presents a conservative approach until a LSA exemption is incorporated into the C of C or otherwise communicated.

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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