

November 25, 1997

U. S. Nuclear Regulatory Commission
11555 Rockville Pike
Rockville, MD 20555-0001

Attention: Document Control Desk

Subject: Docket No. 71-9023: Model No. NLI 10/24 Package (TAC No. L22420)

- References:
1. USNRC Certificate of Compliance (COC) No. 71-9023, Revision No. 7, Model No. NLI-10/24 Package.
 2. Letter requesting renewal of the NLI 10/24 Package CoC, NAC International to the U.S. NRC, dated February 28, 1997.
 3. Request for Additional Information Regarding the NLI 10/24 Spent Fuel Shipping Cask (TAC No. L22420), U.S. NRC to NAC International, dated October 08, 1997.

NAC International Inc. (NAC) herewith submits the additional information requested by the Request for Additional Information (RAI) regarding the NLI 10/24 Spent Fuel Shipping Cask (TAC No. L22420), U.S. NRC to NAC International, dated October 08, 1997 (Reference 3).

The RAI sets forth the NRC's position, based on 10 CFR 71.13, that packaging components necessary to ensure compliance with the requirements of Part 71 for existing Type B () packaging can no longer be fabricated. The RAI requests that NAC provide either: (1) a positive statement of how the requirements of 10 CFR 71.13(a)(1) are met with respect to the fabrication of the packaging components; (2) NAC's schedule for supplementing the renewal request with an application for an amendment of COC No. 9023, Revision No. 7, seeking approval of a "-85" package identification number in accordance with 10 CFR 71.13(d); or (3) notification withdrawing your request for renewal of COC No. 9023.

NAC understands and accepts the applicability of 10 CFR 71.13(a)(1) to the Model No. NLI 10/24 cask with regard to package and/or packaging component fabrication. NAC commits to the NRC that no NLI 10/24 package and/or packaging component fabrication will occur under this certificate until all regulations applicable to such fabrication are satisfied and NRC approval has been obtained i.e., a "-85" amendment request has been submitted and approved.

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November 25, 1997
U.S. Nuclear Regulatory Commission
Page 2

Based on potential current and future business opportunities, the renewal of COC No. 9023 will provide a sound basis for NAC to sell and/or use the NLI 10/24 in either foreign or domestic applications. Should such a business transaction be completed and warrant it, the option to submit and obtain approval of a "-85" amendment request for the NLI 10/24 would be available, as it is under the current COC. It is important that this option be maintained.

Since NAC has no current plans to seek approval of a "-85" amendment request for the NLI 10/24, no schedule for such activity is provided. Based on the foregoing discussion, NAC requests that the renewal of COC No. 9023 for the NLI 10/24 remain active, so the request for renewal will not be withdrawn.

If you have any comments or questions, please contact me at (770) 447-1144. NAC will be available to meet with you at your convenience to discuss the requested renewal and this RAI response to resolve any questions that you may have.

Sincerely,



Thomas C. Thompson
Manager, Licensing
Engineering & Design Services

Enclosure

cc: C. Haughney (USNRC)
E. Leeds (USNRC)
T. McGinty (USNRC)