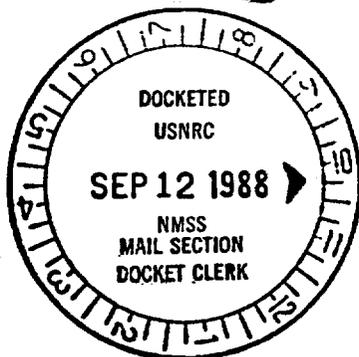


RETURN TO ^{P1-137} 396-S

71-9102



NEUTRON PRODUCTS inc

22301 Mt. Ephraim Road, P.O. Box 68
Dickerson, Maryland 20842 USA
301/349-5001 TWX: 710-828-0542

September 7, 1988



Mr. Charles E. MacDonald, Chief
Transportation Branch
Division of Safeguards and Transportation, NMSS
US Nuclear Regulatory Commission
Washington, DC 20555

Docket No. 71-9102

Dear Mr. MacDonald:

This is in response to your letter dated August 25, 1988, which identified discrepancies between our drawing D-240160 and the requirements for a 20WC-6 overpack, as stated in 49 CFR 178.194.

The dimensions of the wooden shell of one of the overpacks (OP #3) were checked on August 31 and it was found that the "as-built drawing", D-240160, was in error. The dimension shown to be 37-1/2 inches is actually 38-1/4 inches. The thickness of the bottom is therefore 8-1/4 inches, which satisfies 49 CFR 178.194-2(e)(5). A search through manufacturing records also found documentation showing that the bottom thickness of this class of overpacks is 8-1/4 inches.

The inspection confirmed that there are a total of 60 sheets of nominally 3/4-inch plywood in a total height of 45-3/4 inches. The average thickness per sheet is therefore 0.7625 inch, or 0.0125 greater than 3/4 inch.

The inspection determined that the original lag screws are recessed 3/4 inch on the top of the lid and on the bottom of the overpack. Although the lag screws do not capture the end sheets, the end sheets are securely attached by glue and nails and there is no evidence of any tendency for the end sheets to separate from the overpack. In order to bring the overpack into compliance with 49 CFR 178.194-2(d)(3), 16 new lag screws, recessed 3/8 inch and on a bolt circle of 31 inches, have been installed in the top of the lid and 16 new lag screws have been installed similarly in the bottom.

At the bottom of the overpack, the ends of the tie rods are secured by washers and ordinary nuts, tack welded to the tie rods. At the top of the overpack, the ends of the tie rods are secured by washers and lock nuts. To ensure that the rods terminate 1.5 inches below the surfaces of the plywood, the lid of the OP #3 has been reworked to recess the steel cups approximately 3/4 inch deeper and the tie rods have been shortened about 3/4 inch. The requirements of 49 CFR 178.194-2(d)(3) are satisfied.

FEE NOT REQUIRED

supplemental info

*OP #3 Drawing
11 To: Reg Files*

24720

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C PNU

Mr. Charles E. MacDonald
September 7, 1988
Page No. 2

Drawing D-240160 has been revised in accordance with the inspection findings and modifications described above. Ten copies of the revised drawing are enclosed, as are ten copies of this letter. We hereby authorize you to put copies of the drawing in the public document room.

We will inspect and modify, as necessary, other overpacks to which this drawing applies at our earliest opportunity. Overpacks at our facility will be inspected and modified, as necessary, before their next use.

Very truly yours,

NEUTRON PRODUCTS, INC.



Frank Schwoerer, Vice President

FS:mvc:8
Enclosures

NEUTRON PRODUCTS inc

DOCKET NO. 71-9102

CONTROL NO. 24720

DATE OF DOC. Sept. 7, 1988

DATE RCVD. Sept. 12, 1988

FCUF _____ PDR

FCAF _____ LPDR _____

I & E REF.

SAFEGUARDS _____

FCTC OTHER _____

DATE 9/12/88 INITIAL AW

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D-1

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**DWG. NO. 240160, REV. A
"OVERPAKCS OP-3 & OP-4"**

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240160, REV. A

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