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February 27, 1996

Dr. William Travers, Director  
Spent Fuel Program Office, NMSS  
U.S. Nuclear Regulatory Commission  
11545 Rockville Pike  
Rockville, MD 20852

Subject: Renewal of NLI-1/2 Certificate of Compliance No. 9010

Dear Dr. Travers:

NAC International Inc. (NAC) hereby requests renewal of U.S. Nuclear Regulatory Commission Certificate of Compliance (COC) No. 9010 for the Model No. NLI-1/2 packaging in accordance with the timely renewal provisions of 10CFR2.109.

Enclosed for your information and retention are eight (8) copies of the NLI-1/2 Safety Analysis Report (SAR) dated February, 1996. This revision to the SAR has been prepared to consolidate the report to incorporate all changes to the application subsequent to the last COC renewal. Specifically, the pages affected by the October 9, 1995 request for a change in content conditions have been revised and incorporated. A "List of Effective Pages" dated February 1996 has been prepared and is included following the Revision Log.

As part of the COC renewal process, NAC also requests that the application dated December 14, 1995 regarding changes to the NLI-1/2 Maintenance Program (Section XVI of the SAR) be considered for approval. The requested changes to the program include deletion of the annual hydrostatic tests for the inner and outer closure heads and inner cavity, and for the external water jacket and expansion tank. These changes to the maintenance program are justified for the following reasons:

- a. The leak tightness capability of the inner and outer head seals is confirmed by an annual helium leak test to a minimum sensitivity of  $1 \times 10^{-6}$  atm cm<sup>3</sup>/sec, and confirmed prior to each shipment by an assembly verification test.
- b. The deletion of the containment hydrostatic tests meets ALARA goals as testing generates in excess of 60 ft<sup>3</sup> of water which must be processed and controlled as radioactive waste due to residual contamination in the cask. Additional solid radioactive

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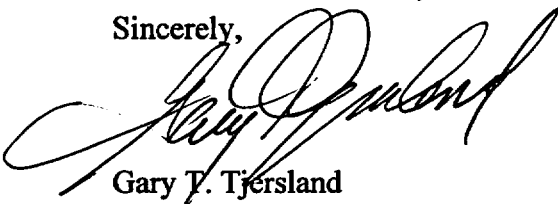
waste is generated in performing the test and processing the water. The deletion of the test will also eliminate unnecessary personnel exposure.

- c. The fluid level in the water jacket is verified by operating procedure prior to each shipment. Therefore any leakage from the water jacket would be identified prior to shipment.
- d. The containment cavity and water jacket were originally hydrostatically tested during fabrication to confirm the acceptability of the fabrication processes. There are no normal operating condition loadings which would cause a loss of integrity of these components which would not be identified by other tests (e.g., lid seal helium leak tests, and fluid level verifications). In addition, an overall visual inspection of the packaging is performed prior to each use to detect operational or shipping damage.

It should also be noted that the maintenance program for the NAC-LWT packaging (COC No. 9225) was similarly revised and approved during the certificate renewal process in 1995.

If you have any questions or comments on the enclosed SAR, please do not hesitate to contact me at (770) 447-1144.

Sincerely,



Gary T. Tjersland  
Manager, Cask Design and Licensing

GTT/dah

Enclosure: NLI-1/2 Spent Fuel Cask Safety Analysis Report, T-95001, February 1995 Revision,  
8 copies