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TRANSNUCLEAR

July 21, 2003
E-20422

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Mr. E. William Brach, Project Director
U. S. Nuclear Regulatory Commission
Spent Fuel Project Office
One White Flint North
11555 Rockville Pike
Washington, DC 20555

Subject: TN-FSV Safety Analysis Report Revision
Docket No. 71-9253

Dear Mr. Brach:

On behalf of the DOE, Transnuclear is requesting an amendment to the Certificate of Conformance for the TN-FSV Packaging. Page 8-6, section 8.2.2 of the SAR for the TN-FSV Packaging includes the following requirement:

After the third use and every twelve months thereafter, the Containment System Fabrication Verification Test, Section 8.1.3.1, shall be repeated, unless the cask is not in service. Prior to use, the cask shall have been tested within the preceding 12-month period.

The revision being requested by this letter would replace the phrase "After the third use" with the phrase "After the fifth use" in the first sentence of the above paragraph from Section 8.2.2.

The source of the requirement for repeating the Containment System Fabrication Verification Test after the third use of the cask was the 1987 revision of ANSI N14.5, *Radioactive Materials - Leakage Tests on Packages for Shipment*, which was in effect at the time the TN-FSV SAR was prepared and approved. However, Revision No. 5 to the Certificate of Compliance, revised the package identification number to include the "-85" designation. In support of the "-85" designation, the application incorporated the revised ANSI N14.5-1997 by reference. The current 1997 revision of ANSI N14.5 does not include a requirement for testing after the third use.

The Containment System Fabrication Verification Test was most recently performed in June 2003, prior to the first use of the TN-FSV packaging for transport of radioactive materials. Current plans are for the TN-FSV packaging to be use in a campaign of five shipments that will be completed by the end of December, 2003.

The proposed revision would permit the Containment System Fabrication Verification Test to be repeated at the end of that campaign, and still be performed within six months of the previous test. Should the shipment schedule be delayed, Section 8.2.2 would still require that the Containment System Fabrication Verification Test be performed within a 12-month period in accordance with the requirements of ANSI N14.5-1997.

The proposed revised page 8-6 is attached. If you have any questions, please call me.

Sincerely,

A handwritten signature in black ink that reads "Michael Mason". The signature is written in a cursive, flowing style.

Michael Mason
Chief Engineer

attachments: as stated above (3 copies)

cc: Brian DeMonia (DOE) 1 copy

8.2 MAINTENANCE PROGRAM

8.2.1 Structural and Pressure Tests

There are no periodic structural tests required on the TN-FSV.

8.2.2 Leak Tests

After the TN-FSV is loaded and before it is released for transport, a series of pressure rise tests shall be performed on the cask openings to verify proper assembly. See Chapter 7.0 for details of these tests.

No leak tests will be done on the empty cask before it is shipped.

After the fifth use and every twelve months thereafter, the Containment System Fabrication Verification Test, Section 8.1.3.1, shall be repeated, unless the cask is not in service. Prior to use, the cask shall have been tested within the preceding 12-month period.

8.2.3 Subsystems Maintenance

This section does not apply.

8.2.4 Valves, Rupture Discs and Gaskets on Containment Vessel

All gaskets and the Drain port Hansen quick connect plug will be replaced prior to the third use test and annually thereafter unless the cask is not in service. Prior to use, the maintenance shall have been completed within the preceding 12-month period.

No other maintenance is required prior to transport.