

**CERTIFICATE OF COMPLIANCE
FOR RADIOACTIVE MATERIAL PACKAGES**

1. a. CERTIFICATE NUMBER	b. REVISION NUMBER	c. DOCKET NUMBER	d. PACKAGE IDENTIFICATION NUMBER	PAGE	PAGES
9225	38	71-9225	USA/9225/B(U)F-96	1 OF	19

2. PREAMBLE

- a. This certificate is issued to certify that the package (packaging and contents) described in Item 5 below meets the applicable safety standards set forth in Title 10, Code of Federal Regulations, Part 71, "Packaging and Transportation of Radioactive Material."
- b. This certificate does not relieve the consignor from compliance with any requirement of the regulations of the U.S. Department of Transportation or other applicable regulatory agencies, including the government of any country through or into which the package will be transported.

3. THIS CERTIFICATE IS ISSUED ON THE BASIS OF A SAFETY ANALYSIS REPORT OF THE PACKAGE DESIGN OR APPLICATION

- a. ISSUED TO (*Name and Address*)
- b. TITLE AND IDENTIFICATION OF REPORT OR APPLICATION

NAC International, Inc.
3930 East Jones Bridge Road
Norcross, GA 30092

NAC International, Inc., application
dated December 30, 2004.

4. CONDITIONS

This certificate is conditional upon fulfilling the requirements of 10 CFR Part 71, as applicable, and the conditions specified below.

5.

(a) Packaging

(1) Model No.: NAC-LWT

(2) Description

The LWT is a steel-encased, lead-shielded shipping cask. The cask is designed to transport one PWR assembly, or two BWR assemblies. In addition, the cask may be used to transport metallic fuel rods, MTR and DIDO fuel assemblies and plates, individual PWR rods, high burnup PWR or BWR rods, TRIGA fuel elements, TRIGA fuel cluster rods, or tritium-producing burnable absorber rods (TPBARs). The overall dimensions of the package, with impact limiters, are 232 inches long by 65 inches in diameter. The cask body is approximately 200 inches in length and 44 inches in diameter. The cask cavity is 178 inches long and 13.4 inches in diameter. The volume of the cavity is approximately 14.5 cubic feet.

The cask body consists of a 0.75-inch-thick stainless steel inner shell, a 5.75-inch-thick lead gamma shield, a 1.2-inch-thick stainless steel outer shell, and a neutron shield tank. The inner and outer shells are welded to a 4-inch-thick stainless steel bottom end forging. The cask bottom consists of a 3-inch-thick, 20.75-inch-diameter lead disk enclosed by a 3.5-inch-thick stainless steel plate and bottom end forging. The cask lid is 11.3-inch-thick stainless steel stepped design, secured to a 14.25-inch-thick ring forging with twelve 1-inch diameter bolts. The cask seal is a metallic O-ring. A second teflon O-ring and a test port are provided to leak test the seal. Other penetrations in the cask cavity include the fill and drain ports, which are sealed with port covers and O-rings.

The neutron shield tank consists of a 0.24-inch-thick stainless steel shell with 0.50-inch-thick end plates. The neutron shield region is 164 inches long and 5 inches thick. The neutron shield tank contains an ethylene glycol/water solution that is 1% boron by weight.

**CERTIFICATE OF COMPLIANCE
FOR RADIOACTIVE MATERIAL PACKAGES**

1. a. CERTIFICATE NUMBER	b. REVISION NUMBER	c. DOCKET NUMBER	d. PACKAGE IDENTIFICATION NUMBER	PAGE	PAGES
9225	38	71-9225	USA/9225/B(U)F-96	2	OF 19

5.(a) (2) Description (continued)

The cask is equipped with aluminum honeycomb impact limiters. The top impact limiter has an outside diameter of 65.25 inches and a maximum thickness of 27.8 inches. The bottom impact limiter has an outside diameter of 60.25 inches and maximum thickness of 28.3 inches. Both impact limiters extend 12 inches along the side of the cask body.

The maximum weight of the package is 52,000 pounds and the maximum weight of the contents and basket is 4,000 pounds.

(3) Drawings

- (i) The packaging is constructed in accordance with the following Nuclear Assurance Corporation Drawings:

LWT 315-40-01, Rev. 4	Cask Assembly
LWT 315-40-02, Rev. 16 (Sheets 1-2)	Body Assembly
LWT 315-40-03, Rev. 20 (Sheets 1-6)*	Transport Cask Body
LWT 315-40-04, Rev. 10	Cask Lid Assembly
LWT 315-40-05, Rev. 9	Upper Impact Limiter
LWT 315-40-06, Rev. 9	Lower Impact Limiter
LWT 315-40-08, Rev. 16 (Sheets 1-5)	Cask Parts Detail

* Packaging Unit Nos. 1, 2, 3, 4, and 5 are constructed in accordance with Drawing No. LWT 315-40-03, Rev. 6 (Sheets 1-6).

- (ii) The fuel assembly baskets are constructed in accordance with the following Nuclear Assurance Corporation and NAC International Drawings:

LWT 315-40-09, Rev. 2	PWR Basket Spacer
LWT 315-40-10, Rev. 7 (Sheets 1-2)	PWR Basket
LWT 315-40-11, Rev. 2	BWR Basket Assembly
LWT 315-40-12, Rev. 3	Metal Fuel Basket Assembly
LWT 315-40-045, Rev. 4	42 MTR Element Base Module
LWT 315-40-046, Rev. 4	42 MTR Element Intermediate Module
LWT 315-40-047, Rev. 4	42 MTR Element Top Module
LWT 315-40-048, Rev. 1	42 MTR Element Cask Assembly
LWT 315-40-049, Rev. 4	28 MTR Element Base Module
LWT 315-40-050, Rev. 4	28 MTR Element Intermediate Module
LWT 315-40-051, Rev. 4	28 MTR Element Top Module
LWT 315-40-052, Rev. 1	28 MTR Element Cask Assembly
LWT 315-40-070, Rev. 3	7 Cell Basket TRIGA Base Module
LWT 315-40-071, Rev. 3	7 Cell Basket TRIGA Intermediate Module
LWT 315-40-072, Rev. 3	7 Cell Basket TRIGA Top Module
LWT 315-40-079, Rev. 1	TRIGA Fuel Cask Assembly
LWT 315-40-080, Rev. 2	7 Cell Poison Basket TRIGA Base Module

**CERTIFICATE OF COMPLIANCE
FOR RADIOACTIVE MATERIAL PACKAGES**

1. a. CERTIFICATE NUMBER	b. REVISION NUMBER	c. DOCKET NUMBER	d. PACKAGE IDENTIFICATION NUMBER	PAGE	PAGES
9225	38	71-9225	USA/9225/B(U)F-96	3	OF 19

5.(a)(3)(ii) Drawings (continued)

LWT 315-40-081, Rev. 2	7 Cell Poison Basket TRIGA Intermediate Module
LWT 315-40-082, Rev. 2	7 Cell Poison Basket TRIGA Top Module
LWT 315-40-083, Rev. 0	Spacer, LWT Cask Assembly TRIGA Fuel
LWT 315-40-084, Rev. 2	LWT Transport Cask Assy 140 TRIGA Elements
LWT 315-40-090, Rev. 2	35 MTR Element Base Module
LWT 315-40-091, Rev. 2	35 MTR Element Intermediate Module
LWT 315-40-092, Rev. 2	35 MTR Element Top Module
LWT 315-40-094, Rev. 2	35 MTR Element Cask Assembly
LWT 315-40-096, Rev. 2	Fuel Rod Insert, TRIGA Fuel
LWT 315-40-098, Rev. 2	Can Assembly, LWT Pin Shipment
LWT 315-40-099, Rev. 3 (Sheets 1-3)	Can Weldment, PWR/BWR Transport Canister
LWT 315-40-100, Rev. 2 (Sheets 1-2)	Lids, PWR/BWR Transport Canister
LWT 315-40-101, Rev. 0	4 x 4 Insert, PWR/BWR Transport Canister
LWT 315-40-102, Rev. 1	5 x 5 Insert, PWR/BWR Transport Canister
LWT 315-40-103, Rev. 0	Pin Spacer, PWR Transport Canister
LWT 315-40-104, Rev. 0	LWT Cask Assembly, PWR Transport Canister
LWT 315-40-105, Rev. 3 (Sheets 1-2)	PWR Insert, PWR/BWR Transport Canister
LWT 315-40-106, Rev. 1 (Sheets 1-3)	MTR Plate Canister, LWT Cask
LWT 315-40-108, Rev. 1 (Sheets 1-3)	7 Cell Basket, Top Module, DIDO Fuel
LWT 315-40-109, Rev. 1 (Sheets 1-3)	7 Cell Basket, Intermediate Module, DIDO Fuel
LWT 315-40-110, Rev.1 (Sheets 1-3)	7 Cell Basket, Bottom Module, DIDO Fuel
LWT 315-40-111, Rev. 0	LWT Transport Cask Assy DIDO Fuel
LWT 315-40-113, Rev. 0	Spacer, Top Module DIDO Fuel
LWT 315-40-120, Rev. 2 (Sheets 1-3)	Top Module, General Atomics IFM, LWT Cask
LWT 315-40-123, Rev. 1 (Sheets 1-2)	Spacer, General Atomics IFM, LWT Cask
LWT 315-40-124, Rev. 0	Transport Cask Assembly, General Atomics IFM, LWT Cask
LWT 315-40-125, Rev. 2 (Sheets 1-3)	Transport Cask Assembly, Framatome/EPRI, LWT Cask
LWT 315-40-126, Rev. 2 (Sheets 1-2)	Weldment, Framatome/EPRI, LWT Cask
LWT 315-40-127, Rev. 1 (Sheets 1-2)	Spacer Assembly, TPBAR Shipment

**CERTIFICATE OF COMPLIANCE
FOR RADIOACTIVE MATERIAL PACKAGES**

1. a. CERTIFICATE NUMBER	b. REVISION NUMBER	c. DOCKET NUMBER	d. PACKAGE IDENTIFICATION NUMBER	PAGE	PAGES
9225	38	71-9225	USA/9225/B(U)F-96	4 OF	19

5.(b) Contents

(1) Type and form of material

- (i) Irradiated PWR fuel assemblies. The maximum fuel assembly weight is 1650 pounds, the maximum average burnup is 35,000 MWD/MTU, the minimum cool time is 2 years, and the maximum initial fuel pin pressure at 70EF is 565 psig. The fuel assemblies consist of uranium dioxide pellets within zirconium alloy type cladding, with the specifications listed below, and with fuel rod pitch, rod diameter, clad thickness, and pellet diameter as described in Table 1.2-5, of the application.

Fuel Type	No. Fuel Rods	Max. Initial Uranium Enrichment (w/o U-235)	Max. Initial Uranium Mass (MTU)	Max. Active Fuel Length (in.)
B&W 15x15	208	3.5	0.4750	144.0
B&W 17x17	264	3.5	0.4658	143.0
CE 14x14	176	3.7	0.4037	137.0
CE 16x16	236	3.7	0.4417	150.0
WE 14x14 Std	179	3.7	0.4144	145.2
WE 14x14 OFA	179	3.7	0.3612	144.0
WE 15x15	204	3.5	0.4646	144.0
WE 17x17 Std	264	3.5	0.4671	144.0
WE 17x17 OFA	264	3.5	0.4282	144.0
Ex/ANF 14x14 WE	179	3.7	0.3741	144.0
Ex/ANF 14x14 CE	176	3.7	0.3814	134.0
Ex/ANF 15x15 WE	204	3.7	0.4410	144.0
Ex/ANF 17x17 WE	264	3.5	0.4123	144.0

**CERTIFICATE OF COMPLIANCE
FOR RADIOACTIVE MATERIAL PACKAGES**

1. a. CERTIFICATE NUMBER	b. REVISION NUMBER	c. DOCKET NUMBER	d. PACKAGE IDENTIFICATION NUMBER	PAGE	PAGES
9225	38	71-9225	USA/9225/B(U)F-96	5 OF	19

5.(b)(1) Type and form of material (continued)

- (ii) Irradiated BWR fuel assemblies. The maximum fuel assembly weight is 750 pounds, the maximum average burnup is 30,000 MWD/MTU, the minimum cool time is 2 years, and the maximum initial fuel pin pressure at 70EF is 565 psig. The fuel assemblies consist of uranium dioxide pellets within zirconium alloy type cladding, with the specifications listed below, and with fuel rod pitch, rod diameter, clad thickness, and pellet diameter as described in Table 1.2-6, of the application.

Fuel Type	No. Fuel Rods	No. Water Rods	Max. Initial Uranium Enrichment (w/o U-235)	Max. Initial Uranium Mass (MTU)	Max. Active Fuel Length (in.)
GE 7x7	49	0	4.0	0.1923	146
GE 8x8-1	63	1	4.0	0.1880	146
GE 8x8-2	62	2	4.0	0.1847	150 ⁽¹⁾
GE 8x8-4	60	4	4.0	0.1787	150 ^(1,2)
GE 9x9	74	2	4.0	0.1854	150 ^(1,3,4)
	79	2	4.0	0.1979	150 ^(1,4)
Ex/ANF 7x7	49	0	4.0	0.1960	144
Ex/ANF 8x8-1	63	1	4.0	0.1764	145.2
Ex/ANF 8x8-2	62	2	4.0	0.1793	150
Ex/ANF 9x9	79	2	4.0	0.1779	150
	74	2	4.0	0.1666	150 ⁽³⁾

- (1) Six-inch natural uranium blankets on top and bottom.
- (2) One large water hole - 3.2 cm ID, 0.1 cm thickness.
- (3) Two large water holes occupying seven fuel rod locations - 2.5 cm ID, 0.07 cm thickness.
- (4) Shortened active fuel length in some rods.

- (iii) Irradiated PWR rods, consisting of uranium dioxide pellets within zirconium alloy type cladding. The maximum uranium enrichment is 5 weight percent U-235, the maximum active fuel length is 150 inches, and the maximum pellet diameter is 0.3765 inch. The maximum burnup is 60,000 MWD/MTU and the minimum cool time is 150 days. Up to two rods may have a maximum burnup of 65,000 MWD/MTU.

**CERTIFICATE OF COMPLIANCE
FOR RADIOACTIVE MATERIAL PACKAGES**

1. a. CERTIFICATE NUMBER	b. REVISION NUMBER	c. DOCKET NUMBER	d. PACKAGE IDENTIFICATION NUMBER	PAGE	PAGES
9225	38	71-9225	USA/9225/B(U)F-96	6	OF 19

5.(b)(1) Type and form of material (continued)

- (iv) Irradiated MTR fuel elements composed of U-Al, U₃O₈-Al, or U₃Si₂-Al positioned within the MTR fuel basket specified in 5.(a)(3)(ii). Loose fuel plates must meet the requirements of the MTR fuel element content tables and must be loaded into an MTR plate canister prior to shipment. The fuel elements are composed of aluminum clad plates, with initial uranium enrichment up to 94.0 weight percent U-235. The maximum burnup and the minimum cool time shall be consistent with the decay heat limits in Item 5.(b)(2)(iv) and shall be determined using the operating procedures in Section 7.1.5 of the application.

NISTR MTR fuel elements specifications are listed in Item 5.(b)(1)(iv)(a), generic MTR fuel elements are listed in Item 5.(b)(1)(iv)(b), and expanded fuel specifications applicable to LEU MTR fuel (up to 25.0 wt % ²³⁵U) are listed in Item 5.(b)(1)(iv)(c).

(a) NISTR MTR Fuel Content Description

Parameter	Plate	Plate (cut in half)
Enrichment, wt % ²³⁵ U		#94
Number of fuel plates	#17	#34
²³⁵ U content per plate	#22	#11
Plate thickness (cm)		\$0.115
Clad Thickness (cm)		\$0.02
Active fuel width (cm)		#6.6
Active fuel height (cm)	\$54 cm	27 to 30
Maximum ²³⁵ U content per element (g)		#380

**CERTIFICATE OF COMPLIANCE
FOR RADIOACTIVE MATERIAL PACKAGES**

1. a. CERTIFICATE NUMBER	b. REVISION NUMBER	c. DOCKET NUMBER	d. PACKAGE IDENTIFICATION NUMBER	PAGE	PAGES
9225	38	71-9225	USA/9225/B(U)F-96	7 OF	19

5.(b)(1) Type and form of material (continued)

(iv) (b) Generic MTR Fuel Content Description

Parameter	Limiting Values ²					
Enrichment, wt. % ²³⁵ U	#94					
Number of fuel plates	#23	#19	#23 ¹	#17	#19	#23
²³⁵ U content per plate	#18	#20	#20 ¹	#21	#21	#16.5
Plate thickness (cm)	\$0.115	\$0.115	\$0.123 ¹	\$0.115	\$.200	\$0.115
Clad Thickness (cm)	\$0.02					
Active fuel width (cm)	#6.6	#6.6	#6.6	#6.6	#6.6	#7.3
Active fuel height (cm)	\$56					
²³⁵ U content per element (g)	#380 ²					

Notes:

1. HEU (>90 wt% ²³⁵U enriched) MTR fuel having 23 plates with up to 20 g of ²³⁵U per plate, with a minimum plate thickness of 0.123 cm, must have at least 2.0 cm of non-fuel material at the ends of each element. This fuel may also be loaded up to 460 g ²³⁵U per element.
2. At enrichments #25 wt% ²³⁵U, MTR fuel elements with extended fuel characteristics may be loaded with the specifications defined in 5.(b)(1)(iv)(c).

**CERTIFICATE OF COMPLIANCE
FOR RADIOACTIVE MATERIAL PACKAGES**

1. a. CERTIFICATE NUMBER	b. REVISION NUMBER	c. DOCKET NUMBER	d. PACKAGE IDENTIFICATION NUMBER	PAGE	PAGES
9225	38	71-9225	USA/9225/B(U)F-96	8	OF 19

5.(b)(1) Type and form of material (continued)

(iv) (c) Expanded LEU MTR Fuel Content Description

Parameter	Base	#7.0 cm Active Fuel Width			#7.1 cm Active Fuel Width		#7.15 cm Active Fuel Width		
Enrichment, wt. % ²³⁵ U	#25	#25			#25		#25		
Number of fuel plates	#23	#23			#17	#23	#22	#23	#23
²³⁵ U content per plate	#22	#22	#22	#21.5	#22		#22	#21.5	#22
Plate thickness (cm)	\$0.115	\$0.119	\$0.115	\$0.115	\$0.115	\$0.200	\$0.119		
Clad Thickness (cm)	\$0.02								
Active fuel width (cm)	#6.6	#7.0			#7.1		#7.15		
Active fuel height (cm)	\$56	\$56	\$63	\$56	\$56	\$56	\$56	\$56	\$61
²³⁵ U content per element (g)	#420	#470			#470		#470		

- (v) Metallic fuel rods containing natural enrichment uranium pellets with aluminum cladding 0.080-inches thick. The fuel pellet diameter is 1.36 inches and the maximum fuel rod length is 120.5 inches. The maximum weight of uranium per rod is 54.5 kg with a maximum average burnup of 1,600 MWD/MTU and a minimum cooling time of one year.

**CERTIFICATE OF COMPLIANCE
FOR RADIOACTIVE MATERIAL PACKAGES**

1. a. CERTIFICATE NUMBER	b. REVISION NUMBER	c. DOCKET NUMBER	d. PACKAGE IDENTIFICATION NUMBER	PAGE	PAGES
9225	38	71-9225	USA/9225/B(U)F-96	9 OF	19

5.(b)(1) Type and form of material (continued)

(vi) Irradiated TRIGA fuel elements with a 0.225" diameter zirconium rod in the center and meeting the following specifications:

	TRIGA HEU (Notes 1 & 2)	TRIGA LEU (Notes 1 & 2)	TRIGA LEU (Notes 1 & 2)
Fuel Form	Clad U-ZrH rod	Clad U-ZrH rod	Clad U-ZrH rod
Maximum Element Weight, lbs	13.2	13.2	6.4
Maximum Element Length, in	45	45	28.4
Element Cladding	Stainless Steel	Stainless Steel	Aluminum
Clad Thickness, in	0.02	0.02	0.03
Active Fuel Length, in	15	15	14-15 (Note 4)
Element Diameter, in	1.478 max.	1.478 max.	1.47 max.
Fuel Diameter, in	1.435 max.	1.435 max.	1.41 max.
Maximum Initial U Content/Element, kilograms	0.196	0.845	0.205
Maximum Initial ²³⁵ U Mass, grams	137	169	41
Maximum Initial ²³⁵ U Enrichment, weight percent	70	20	20
Zirconium Mass, grams	2060	1886 - 2300	2300
Hydrogen to Zirconium Ratio, max.	1.6	1.7	1.0
Maximum Average Burnup, MWD/MTU	460,000 (80% ²³⁵ U)	151,100 (80% ²³⁵ U)	151,100 (80% ²³⁵ U)
Minimum Cooling Time	90 days (Note 3)	90 days (Note 3)	90 days (Note 3)

Notes:

- Mixed TRIGA LEU and HEU contents authorized.
- TRIGA Standard, instrumented and fuel follower control rod type elements authorized.
- Maximum decay heat of any element is 7.5 watts.
- Aluminum clad fuel with 14 inch active fuel is solid and has no central hole with a zirconium rod.

**CERTIFICATE OF COMPLIANCE
FOR RADIOACTIVE MATERIAL PACKAGES**

1. a. CERTIFICATE NUMBER	b. REVISION NUMBER	c. DOCKET NUMBER	d. PACKAGE IDENTIFICATION NUMBER	PAGE	PAGES
9225	38	71-9225	USA/9225/B(U)F-96	10 OF	19

5.(b)(1) Type and form of material (continued)

- (vii) Irradiated TRIGA fuel cluster rods with a maximum average burnup of 600,000 MWD/MTU (80% ²³⁵U) and a minimum cooling time of 160 days meeting the following specifications prior to irradiation:

	TRIGA Fuel Cluster Rods
Fuel Form	Clad U-ZrH rod
Maximum Rod Weight, lbs	1.5
Maximum Rod Length, in	31
Rod Cladding	Incoloy 800
Minimum Clad Thickness, in	0.015
Maximum Active Fuel Length, in	22.5
Maximum Fuel Pellet Diameter, in	0.53
Maximum U Content/Rod, grams	48.6
Maximum ²³⁵ U Mass, grams	45.4
Maximum ²³⁵ U Enrichment, weight percent	93.3
Maximum Zirconium Mass, grams	421
Hydrogen to Zirconium Ratio, max.	1.6

- (viii) Irradiated high burnup PWR rods, consisting of uranium dioxide pellets within zirconium alloy type cladding. The maximum uranium enrichment is 5 weight percent U-235, the maximum active fuel length is 150 inches, and the maximum pellet diameter is 0.3765 inches. The maximum burnup is 80,000 MWD/MTU, and the minimum cool time is 150 days.

**CERTIFICATE OF COMPLIANCE
FOR RADIOACTIVE MATERIAL PACKAGES**

1. a. CERTIFICATE NUMBER	b. REVISION NUMBER	c. DOCKET NUMBER	d. PACKAGE IDENTIFICATION NUMBER	PAGE	PAGES
9225	38	71-9225	USA/9225/B(U)F-96	11	OF 19

5.(b)(1) Type and form of Material (continued)

- (ix) Irradiated high burnup BWR rods, consisting of uranium dioxide pellets within zirconium alloy type cladding. The maximum uranium enrichment is 5 weight percent U-235, the maximum active fuel length is 150 inches, and the maximum pellet diameter is 0.490 inch. The maximum burnup is 80,000 MWD/MTU and the minimum cool time is between 150 - 270 days, as specified in the table below:

BWR Fuel Type Array Size	Burnup, b (GWD/MTU)	Minimum Cool Time (days)
7 x 7	b # 60	210
	60 < b # 70	240
	70 < b # 80	270
8 x 8 ¹	b # 80	150

Note 1: Includes rods from all larger BWR assembly arrays (e.g., 9 x 9, 10 x 10)

- (x) Irradiated DIDO fuel elements composed of U-Al, U₃O₈-Al, or U₃Si₂-Al positioned within the DIDO fuel basket specified in 5.(a)(3)(ii). The fuel elements are composed of four concentric tubes of varying diameters. The fuel elements have an initial enrichment up to 94.0 weight percent U-235. The fuel elements shall have the specifications listed below:

Parameter	LEU ⁽¹⁾	MEU ⁽¹⁾	HEU ⁽¹⁾
Maximum ²³⁵ U content per Element	# 190 g	# 190 g	# 190 g
Maximum Uranium content per Element	# 1000 g	# 475.0 g	# 211.1g
Minimum Fuel Tube Thickness	0.130 cm	0.130 cm	0.130 cm
Minimum Clad Thickness	0.0325 cm	0.0325 cm	0.0325 cm
Maximum Outer Diameter	9.535 cm	9.535 cm	9.535 cm
Minimum Nominal Inner Diameter	6.08 cm	6.08 cm	6.08 cm
Minimum Initial Enrichment	19 wt% ²³⁵ U	40 wt% ²³⁵ U	90 wt% ²³⁵ U

¹ The maximum burnup and minimum cool time shall be consistent with the decay heat limits in Item 5.(b)(2)(ix) and shall be determined using the operating procedures in Section 7.1.4 of the application.

**CERTIFICATE OF COMPLIANCE
FOR RADIOACTIVE MATERIAL PACKAGES**

1. a. CERTIFICATE NUMBER	b. REVISION NUMBER	c. DOCKET NUMBER	d. PACKAGE IDENTIFICATION NUMBER	PAGE	PAGES
9225	38	71-9225	USA/9225/B(U)F-96	12 OF	19

5.(b)(1) Type and form of material (continued)

(xi) General Atomics (GA) Irradiated Fuel Material (IFM) consisting of two separate types of fuel materials: (a) High Temperature Gas Cooled Reactor (HTGR); and (b) Reduced-Enrichment Research and Test Reactor (RERTR) type TRIGA fuel entities.

- (a) GA HTGR IFM comprised of four forms: fuel particles (kernels), fuel particles (coatings), fuel compacts (rods), and fuel pebbles. Fuel particles (kernels) are solid, spheridized, high-temperature sintered fully-densified, ceramic kernel substrate, composed of UO_2 , UCO_2 , $(\text{Th,U})\text{C}_2$, or $(\text{Th,U})\text{O}_2$. Fuel particles (coatings) are solid, spheridized, isotropic, discrete multi-layered fuel particle coatings with chemical composition including pyrolytic-carbon (PyC) and silicon carbide (SiC). Fuel compacts (rods) are multi-coated ceramic fuel particles, bound in solid, cylindrical, injection molded, high-temperature heat-treated compacts which are composed of carbonized graphite shim, coke, and graphite powder. Fuel pebbles are multi-coated fuel particles, bound in solid, spherical injection-molded, high-temperature heat-treated pebbles composed of carbonized graphite shim, coke and graphite powder. Initial enrichment of the HTGR IFM varies from 10.0 to 93.15 wt% ^{235}U .
- (b) GA RERTR IFM comprised of irradiated TRIGA fuel elements which contain three distinct mass loadings of uranium of 20, 30, and 45 wt% U. The average mass of the fuel portion of the elements is 551 g with a maximum initial enrichment of 19.7 wt% U-235.

GA IFM content description:

	GA HTGR IFM	GA RERTR IFM
Fuel material	UC_2 , UCO , UO_2 $(\text{Th,U})\text{C}_2$, $(\text{Th,U})\text{O}_2$	U-ZrH metal alloy
Maximum fuel weight, lbs	23.52	23.73
Maximum overall length, in	n/a	29.92
Maximum active fuel length, in	n/a	22.05
Fuel rod cladding	n/a	Incoloy 800
Maximum Uranium, kg U	0.21	3.86
Maximum initial ^{235}U , wt%	93.15	19.7
Maximum Activity, Ci	483	2920

**CERTIFICATE OF COMPLIANCE
FOR RADIOACTIVE MATERIAL PACKAGES**

1.	a. CERTIFICATE NUMBER	b. REVISION NUMBER	c. DOCKET NUMBER	d. PACKAGE IDENTIFICATION NUMBER	PAGE	PAGES
	9225	38	71-9225	USA/9225/B(U)F-96	13 OF	19

5.(b)(1) Type and form of material (continued)

- (xii) Irradiated tritium-producing burnable absorber rods (TPBARs), as described in Section 1.2.3.6 of the application. Each TPBAR is approximately 153 inches in length and 0.381 inches in diameter and is stainless steel clad. The TPBARs contain lithium aluminate annular pellets, with an inner zircaloy liner and an outer nickel-plated zircaloy tube. Each TPBAR contains a maximum of 1.2 grams tritium. The minimum cool time is 30 days.

5.(b)(2) Maximum quantity of material per package

Not to exceed 4,000 pounds, including contents and fuel assembly basket.

- (i) For the contents described in Item 5.(b)(1)(i): one PWR assembly positioned within the PWR fuel assembly basket. Maximum decay heat not to exceed 2.5 kilowatts per PWR assembly.
- (ii) For the contents described in Item 5.(b)(1)(ii): two BWR assemblies positioned with the BWR fuel assembly basket. Maximum decay heat not to exceed 1.1 kilowatts per BWR assembly.
- (iii) For PWR rods as described in Item 5.(b)(1)(iii): up to 25 intact individual rods in a Type 304 stainless steel spacer canister with a wall thickness of at least 0.12 inches positioned within the PWR or BWR basket. Maximum decay heat not to exceed 1.41 kilowatts per package.
- (iv) For MTR fuel elements as described in Item 5.(b)(1)(iv):
- Up to 42 fuel elements positioned within the MTR fuel assembly basket (7 fuel elements per basket module). Each of the MTR basket cell openings may contain a loose plate canister. The contents of each loose plate canister are limited to the number of fuel plates, dimensions, and masses that are equivalent to an intact MTR fuel element, as specified in Item 5.(b)(1)(iv).
- (a) The maximum decay heat is not to exceed 1.26 kilowatts per package, with each MTR fuel assembly basket module not to exceed 210 watts.
- (b) HEU, MEU, and LEU MTR fuel elements with decay heat not exceeding 30 watts per element may be loaded in any basket position.
- (c) Mixed HEU, MEU, and LEU MTR contents, with decay heat limits as specified above, are authorized.
- (d) MTR fuel elements with corrosion and/or mechanically damaged cladding are authorized, provided the total surface area of through-clad corrosion and/or mechanical damage does not exceed 2,775 cm² per package.
- (e) For HEU-MTR fuel elements only, the center fuel element in any basket module is not to exceed 120 watts. The two exterior fuel elements vertically in-line with the center assembly for transport are not to exceed 70 watts.

**CERTIFICATE OF COMPLIANCE
FOR RADIOACTIVE MATERIAL PACKAGES**

1.	a. CERTIFICATE NUMBER	b. REVISION NUMBER	c. DOCKET NUMBER	d. PACKAGE IDENTIFICATION NUMBER	PAGE	PAGES
	9225	38	71-9225	USA/9225/B(U)F-96	14	OF 19

5.(b)(2) Maximum quantity of material per package (continued)

- (v) For the contents described in Item 5.(b)(1)(v): up to 15 intact metallic fuel rods positioned within the appropriate basket. Maximum decay heat not to exceed 0.036 kilowatts per rod. Total weight of all rods not to exceed 1,805 pounds.
- (vi) For failed metallic fuel rods of the type described in Item 5.(b)(1)(v):
- (a) Up to six canisters containing one defective metallic fuel rod per canister. The canisters are 2.75-inch I.D. failed fuel rod canisters as shown on Nuclear Assurance Corporation Drawing No. 340-108-D2, Rev. 10, and are placed in a six-hole liner as shown on Nuclear Assurance Corporation Drawing No. 315-040-43, Rev. 1. The maximum decay heat load for a defective metallic fuel rod is limited to 5 watts; or
- (b) Up to three canisters containing either up to three defective metallic fuel rods per canister or up to 10 failed fuel filters per canister. The canisters are 4.00-inch I.D. failed fuel rod canisters as shown on Nuclear Assurance Corporation Drawing No. 340-108-D1, Rev. 10, and are placed in a three-hole basket as shown on Nuclear Assurance Corporation Drawing No. 315-40-12, Rev. 3. The weight of the filters is limited to 125 pounds per canister. For canisters containing fuel rods, the maximum decay heat load is 15 watts per canister; and for canisters containing filters, the maximum decay heat load is 5 watts per canister.
- (vii) For TRIGA fuel elements as described in Item 5.(b)(1)(vi):
- Maximum decay heat not to exceed 7.5 watts per TRIGA fuel element (or equivalent for failed fuel) and 1050 watts per package. TRIGA fuel elements must be positioned in either the non-poisoned TRIGA fuel basket or in the poisoned TRIGA fuel basket. Fuel may not be loaded in the center cell of the non-poisoned TRIGA fuel basket.
- (a) Up to 120 intact fuel elements in the non-poisoned TRIGA fuel basket, and up to 140 intact fuel elements in the poisoned TRIGA fuel basket (4 fuel elements per basket cell).
- (b) Up to 12 screened canisters in the non-poisoned TRIGA fuel basket, and up to 14 screened canisters in the poisoned TRIGA fuel basket. The screened canisters are in accordance with NAC International Drawing Nos. 315-40-074, Rev. 2, 315-40-075, Rev. 1, and 315-40-076, Rev. 1. Up to four intact TRIGA fuel elements per screened canister.

**CERTIFICATE OF COMPLIANCE
FOR RADIOACTIVE MATERIAL PACKAGES**

1.	a. CERTIFICATE NUMBER	b. REVISION NUMBER	c. DOCKET NUMBER	d. PACKAGE IDENTIFICATION NUMBER	PAGE	PAGES
	9225	38	71-9225	USA/9225/B(U)F-96	15	OF 19

5.(b)(2) Maximum quantity of material per package (continued)

- (vii) (c) Up to 12 sealed canisters in the non-poisoned TRIGA fuel basket, and up to 14 sealed canisters in the poisoned TRIGA fuel basket. The sealed canisters are in accordance with NAC International Drawing Nos. 315-40-086, Rev. 0, 315-40-087, Rev. 5, and 315-40-088, Rev. 2. Up to a maximum equivalent of two fuel elements in the form of intact fuel, failed fuel or fuel debris per sealed canister.
- (d) Mixed intact and failed fuel contents are authorized. Base and top fuel basket modules may contain intact fuel elements, screened canisters, or sealed canisters. Intermediate fuel basket modules may contain only intact TRIGA fuel elements.
- (viii) For TRIGA fuel cluster rods as described in Item 5.(b)(1)(vii):
- Maximum decay heat not to exceed 1.875 watts per TRIGA fuel cluster rod (or equivalent for failed fuel) and 1050 watts per package. TRIGA fuel cluster rods must be positioned in either the non-poisoned TRIGA fuel basket or in the poisoned TRIGA fuel basket. Fuel may not be loaded in the center cell of the non-poisoned TRIGA fuel basket.
- (a) Up to 480 intact rods in the non-poisoned TRIGA fuel basket, and up to 560 intact rods in the poisoned TRIGA fuel basket. TRIGA fuel cluster rods must be positioned within the fuel rod inserts as shown on NAC International Drawing No. 315-40-096, Rev. 2.
- (b) Up to 12 sealed canisters in the non-poisoned TRIGA fuel basket, and up to 14 sealed canisters in the poisoned TRIGA fuel basket. The sealed canisters are in accordance with NAC International Drawing Nos. 315-40-086, Rev. 0, 315-40-087, Rev. 5, and 315-40-088, Rev. 2. Up to a maximum equivalent of six TRIGA fuel cluster rods in the form of intact fuel, failed fuel or fuel debris per sealed canister.
- (c) Mixed intact and failed fuel contents are authorized. Base and top fuel basket modules may contain intact fuel rods or sealed canisters. Intermediate fuel basket modules may contain only intact fuel rods.

**CERTIFICATE OF COMPLIANCE
FOR RADIOACTIVE MATERIAL PACKAGES**

1.	a. CERTIFICATE NUMBER	b. REVISION NUMBER	c. DOCKET NUMBER	d. PACKAGE IDENTIFICATION NUMBER	PAGE	PAGES
	9225	38	71-9225	USA/9225/B(U)F-96	16 OF	19

5.(b)(2) Maximum quantity of material per package (continued)

- (ix) For high burnup PWR fuel rods, as described in Item 5.(b)(1)(viii): up to 25 fuel rods. Maximum decay heat not to exceed 2.3 kilowatts per package.

Intact individual rods may be placed either in an irradiated or unirradiated fuel assembly lattice (skeleton) or in a fuel rod insert. The PWR fuel assembly lattice must be transported in the PWR basket.

Up to 14 of the 25 fuel rods may be classified as damaged. Damaged fuel rods may include fuel debris, particles, loose pellets, and fragmented rods. Damaged fuel rods must be placed in a fuel rod insert. Damaged fuel rods may also be placed in individual failed fuel rod capsules, as shown in Figure 1.2-11 of the application, prior to placement in the fuel rod insert. Irradiated guide tubes and guide tube segments may be placed in the fuel rod insert. The fuel rod insert must be transported in a PWR/BWR transport canister, which is positioned in the PWR insert in the PWR basket.

- (x) For high burnup BWR fuel rods, as described in Item 5.(b)(1)(ix): up to 25 fuel rods. Maximum decay heat not to exceed 2.1 kilowatts per package.

Intact individual rods may be placed either in a fuel assembly lattice or in a fuel rod insert. The BWR fuel assembly lattice must be transported in the PWR insert in the PWR basket.

Up to 14 of the 25 fuel rods may be classified as damaged. Damaged fuel rods may include fuel debris, particles, loose pellets, and fragmented rods. Damaged fuel rods must be placed in a fuel rod insert. Damaged fuel rods may also be placed in individual failed fuel rod capsules, as shown in Figure 1.2-11 of the application, prior to placement in the fuel rod insert. The fuel rod insert must be transported in a PWR/BWR transport canister, which is positioned in the PWR insert in the PWR basket.

- (xi) For DIDO fuel as described in Item 5.(b)(1)(x):

Up to 42 DIDO fuel elements with a maximum decay heat not to exceed 25 watts per DIDO fuel element provided retention spacer is present for top basket. Maximum decay heat is 1.05 kilowatts per package. If retention spacer is not present, then maximum decay heat not to exceed 18 watts per DIDO fuel element and a total of 756 watts per package.

**CERTIFICATE OF COMPLIANCE
FOR RADIOACTIVE MATERIAL PACKAGES**

1. a. CERTIFICATE NUMBER	b. REVISION NUMBER	c. DOCKET NUMBER	d. PACKAGE IDENTIFICATION NUMBER	PAGE	PAGES
9225	38	71-9225	USA/9225/B(U)F-96	17	OF 19

5.(b)(2) Maximum quantity of material per package (continued)

(xii) For GA IFM as described in Item 5.(b)(1)(xi):

- (a) Mixture of fuel particles (kernels and coatings), fuel compacts (rods), and fuel pebbles, packaged in its own Fuel Handling Unit (FHU).

GA HTGR FHU consists of two redundant canisters. GA HTGR IFM is packaged inside a primary canister with welded closure, as shown in General Atomics Drawing No. 032237, Rev. B, "HTGR Primary Enclosure." The primary canister is packaged inside a secondary canister with welded closure, as shown in General Atomics Drawing No. 032231, Rev. A, "HTGR Secondary Enclosure."

GA HTGR FHU total maximum decay heat not to exceed 2.05 watts, and maximum loaded weight not to exceed 71.5 lbs.

- (b) Twenty irradiated TRIGA fuel elements; 13 of the elements are intact, and the remaining 7 are sectioned. GA RERTR IFM is packaged in its own FHU.

GA RERTR FHU consists of two redundant canisters. GA RERTR IFM is packaged inside a primary canister with welded closure, as shown in General Atomics Drawing No. 032236, Rev. B, "RERTR Primary Enclosure." The GA RERTR IFM primary canister is packaged inside a secondary canister with welded closure, as shown in General Atomics Drawing No. 032230, Rev. A, "RERTR Secondary Enclosure."

GA RERTR FHU total maximum decay heat not to exceed 11 watts, and maximum loaded weight not to exceed 76.0 lbs.

(xiii) For TPBARs as described in Item 5.(b)(1)(xii):

300 TPBARs, including a maximum of 2 damaged rods, positioned within a consolidation canister, as shown in Figure 1.2-10 of the application. The maximum decay heat is 2.31 watts per rod and 693 watts per package. The maximum weight of the TPBARs and the consolidation canister is 1,000 pounds.

5.(c) Criticality Safety Index

- | | |
|--|------|
| (1) For TRIGA fuel elements, TRIGA fuel cluster rods, metallic fuel rods, MTR fuel assemblies, up to 25 PWR fuel rods, up to 25 high burnup PWR or BWR rods, and GA IFM: | 0.0 |
| (2) For PWR fuel assemblies: | 100 |
| (3) For BWR fuel assemblies: | 5.0 |
| (4) For DIDO fuel assemblies: | 12.5 |

**CERTIFICATE OF COMPLIANCE
FOR RADIOACTIVE MATERIAL PACKAGES**

1. a. CERTIFICATE NUMBER	b. REVISION NUMBER	c. DOCKET NUMBER	d. PACKAGE IDENTIFICATION NUMBER	PAGE	PAGES
9225	38	71-9225	USA/9225/B(U)F-96	18	OF 19

6. Known or suspected failed fuel assemblies (rods) or elements, and fuel with cladding defects greater than pin holes and hairline cracks are not authorized, except as described in Items 5.(b)(2)(iv)(d), 5.(b)(2)(vi), 5.(b)(2)(vii)(c), 5.(b)(2)(viii)(b), 5.(b)(2)(ix), and 5.(b)(2)(x).
7. The cask must be dry (no free water) when delivered to a carrier for transport.
8. Bolt torque: The cask lids bolts must be torqued to 260 +/- 20 ft-lbs. The bolts used to secure the vent and drain port covers must be torqued to 100 +/- 10 inch-lbs. The bolts used to secure the Alternate B port covers must be torqued to 280 +/- 10 inch-lbs.
9. Prior to each shipment, the package must be leak tested to 1×10^{-3} std cm^3/sec , except that replaced seals must be leak tested to 5.5×10^{-7} std cm^3/sec (He). Prior to first use, after third use, and at least once within the 12-month period prior to each subsequent use, the package must be leak tested to 5.5×10^{-7} std cm^3/sec (He).
10. In addition to the requirements of Subpart G of 10 CFR Part 71:
 - (a) The metallic O-ring seal must be replaced prior to each shipment; and
 - (b) Each package must meet the Acceptance Tests and Maintenance Program of Chapter 8 of the application; and
 - (c) The package shall be prepared for shipment and operated in accordance with the Operating Procedures of Chapter 7 of the application. If the cask is loaded under water or water is introduced into the cask cavity, the cask must be vacuum dried as described in Chapter 7 of the application. The cask cavity must be backfilled with 1.0 atm of helium when shipping PWR or BWR assemblies or TPBARs.
11. When shipping PWR, BWR, MTR, DIDO assemblies, TRIGA fuel elements, TRIGA fuel cluster rods, individual PWR rods, or high burnup PWR or BWR rods, and GA IFM, the neutron shield tank must be filled with a mixture of water and ethylene glycol which will not freeze or precipitate in a temperature range from -40 EF to 250 EF. The water and ethylene glycol mixture must contain at least 1% boron by weight.
12. A personnel barrier must be used when shipping PWR or BWR assemblies. Shipments of MTR, DIDO fuel assemblies, TRIGA fuel elements, TRIGA fuel cluster rods, individual PWR rods, high burnup PWR or BWR rods, or TPBARs, must use the ISO container or a personnel barrier.
13. Packages used to ship metallic fuel rods may be shipped in a closed shipping container provided that the closed container, the cask tie-down and support system and transport vehicle (trailer) meet the applicable requirements of the Department of Transportation. When the cask is shipped in a closed shipping container, the center of gravity of the combined cask, closed shipping container and trailer must not exceed 75 inches.

**CERTIFICATE OF COMPLIANCE
FOR RADIOACTIVE MATERIAL PACKAGES**

1.	a. CERTIFICATE NUMBER	b. REVISION NUMBER	c. DOCKET NUMBER	d. PACKAGE IDENTIFICATION NUMBER	PAGE	PAGES
	9225	38	71-9225	USA/9225/B(U)F-96	19 OF	19

14. For shipment of TPBARs:
- (a) Prior to first use for shipment of TPBARs, each packaging must be hydrostatic pressure tested to 450 +15/-0 psig, as described in Section 8.1.2 of the application;
 - (b) The package must be marked with Package Identification Number USA/9225/B(M)-96;
 - (c) The package must be configured as shown in NAC International Drawing No. 315-40-128, Rev. 1; and
 - (d) Prior to each shipment, after loading, each cask containment seal must be tested to show no leakage greater than 2×10^{-7} std-cm³/s (helium).
15. Except for shipment of TPBARs, packagings may be marked with Package Identification Number USA/9225/B(U)F-85 until December 31, 2005, and must be marked with Package Identification Number USA/9225/B(U)F-96 after December 31, 2005.
16. Transport by air is not authorized.
17. The package authorized by this certificate is hereby approved for use under the general license provisions of 10 CFR 71.17.
18. Expiration Date: February 28, 2010.

REFERENCES

NAC International, Inc., application dated December 30, 2004.

FOR THE U. S. NUCLEAR REGULATORY COMMISSION

/RA/

John D. Monninger, Chief
Licensing Section
Spent Fuel Project Office
Office of Nuclear Material Safety
and Safeguards

Date: January 25, 2005