

-SAFEGUARDS---

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OTOOBOLOHTOR

#215

July 14, 2004

Mrs. Gloria Bennington U. S. Nuclear Regulatory Commission Office of Nuclear Security Mail Stop T-4, D-8 Two White Flint 11545 Rockville Pike Rockville, MD 20852-2738 Telephone (301) 415-8183

Dear Mrs. Bennington,

NAC International (NAC) is acting as the transportation contractor for a shipment irradiated MTR fuel assemblies. This shipment is originating in Lowell, Massachusetts, at the University of Massachusetts (UMass), destine for the Savannah River Site (SRS) near Aiken, South Carolina, and meets the NRC definition of Spent Nuclear Fuel.

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Per 10CFR 73.37(b)(7), NAC is hereby requesting NRC approval of the spent fuel route for truck movement between Lowell, MA and SRS. The shipment is presently scheduled for August of 2004.

This route includes section of the Brookhaven Medical Research Reactor route that was submitted for review in December 2002, with the new portion driven by NAC employees Norm Meinert and Nick Jenkins on July 9th, 2004. The originally submitted Brookhaven portion was driven by the undersigned in December 2002. The new portion of this proposed route has been reviewed with each states governors designee.

Cargo Description:

The cargo to be moved on this route will consist of sixty (60) HUE MTR plate fuel assemblies in two (2) NAC-LWT casks (USA/9225/B(U)F-85). Each LWT cask will be in its own dedicated 20' ISO shipping container, transported by truck, with full escorts. The GVW of the tractor, trailer and cargo will not exceed 105,000 pounds.

Schedule:

This single shipment is scheduled for mid August, 2004. Massachusetts officials will perform an enhanced CVSA inspection 24-48 hours prior to departure from UMass, with South Carolina performing another inspection at the destination. The entire trip is expected to take 22-28 hours.

WARNING: Violation of Section 147 of the Atomic Energy Act, "Safeguards Information" is subject to Civil and Criminal Penalties.

When separated from Attachment 2 this document is DECONTROLLED.

SISP Review Complete

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Proposed Route:

The proposed route, and miles comprising each route segment, is provided as Attachment 1. The NRC has previously reviewed the majority of this route.

The urbanized areas along the proposed routes that we have identified are as follows:

- 1. Lowell, MA
- 2. Worcester, MA
- 3. Hartford, CT
- 4. Waterbury, CT
- 5. Charlotte, NC
- 6. Columbia, SC

This route is not the most direct route from Lowell, MA to SRS, however, the most direct route would use the very heavily populated I-95 corridor and the this slightly longer route is the most practical based on it's population density.

Each states governor's designee was contacted and concurred with the route being submitted herein.

Physical Protection Arrangements:

- 1. The following agencies will be involved in the development of security and transportation plans, and will be made aware of the shipment through the required state notifications.
 - Massachusetts State Police
 - Connecticut State Police
 - New York State Police
 - Pennsylvania State Police
 - Maryland State Patrol
 - West Virginia State Patrol
 - Virginia State Pólice
 - North Carolina Highway Patrol
 - South Carolina Highway Patrol
 - SRS Security Division
- 2. The communications center will be at NAC's corporate office in Norcross, GA. The 24-hour number is 678-328-1333 during all shipments.
- 3. TRANSCOM or QUALCOM will be utilized to track the shipment from origin to destination.
- 4. All NRC and state notifications will be made in accordance with 10CFR73, by NAC.
- 5. Requirements of the NRC's Interim Compensatory Measures, dated December 6th, 2002, will be met, as described below.

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ICM Compliance:

ST20040114

1a. The affected states have been contacted and listed below. Their input is reflected in the security plan and they will receive a copy of security plan along with their shipment notification. All states have agreed to provide armed escorts.

1b. TRANSCOM or QUALCOM will be utilized during the shipment and in-transit states will have access during the shipment.

1c. Safe havens have been identified in this request as part of the Attachment 2.

1d. Escort information is included in NAC's Security Plan, which is treated as Safe Guards Information.

2a. NAC's Security Plan will address NRC notification requirements.

2b. NAC's Communication Center procedures require NRC Operations Center notification two (2) days prior notification, and notification at departure.

3a. Tri-State Motor Transit will be the motor carrier used for this shipment. Their trucks are equipped with TRANSCOM/QUALCOM compatible satellite tracking systems. The unit will be set to transmit position reports at least every five (5) minutes.

3b. NAC's Communication Center is manned by operations personnel qualified in the use of TRANSCOM's and QUALCOM's tracking system. In addition, the communication center will establish and maintain telephone communications with the transport vehicle. The communication center is manned by a minimum of two (2) qualified operators at all time during fuel movements and has generic and shipment specific procedures which all operators review prior to the shipment.

3c. NAC's Communication Center will have telecommunications capability between the center and the transport vehicle, escort vehicles, and LLEA along the route.

3d. In addition to satellite communications, the transport vehicle will have at least one cell phone and one CB radio.

3e. NAC's Communication Center procedures outline notification requirements in the event of extraordinary conditions.

4a. NAC provides the drivers and escorts with a "Shipment Briefing" booklet. This booklet contains driver and escort instructions, and route information. The route information includes all intersections and planned stops, each identified with a unique code. Communications between the communication center and the transport vehicle use these reference codes. The briefing booklet also includes protocols for notifications in the event of an extraordinary condition, with the first call being to NAC's Communication Center. The communication centers procedures outline contingency procedures.

4b. Qualified NAC personnel personally brief the drivers and escorts prior to shipment. NAC's communication center personnel are trained, tested and annually re-tested in the communication center procedures.

4c. NAC and its subcontractor, Tri-State Motor Transit Company, have performed background checks on all personnel involved in the shipment.

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5a. For this shipment, in-transit states have agreed to provided armed escorts except for Wyoming and Idaho where a licensed private security firm will be used. During all stops, the shipment will remain "escorted" as required.

5b. Not applicable.

5c. Not applicable.

Affected States and Contact information

614-429-29-3

Massachusetts-	Robert Walker, Governors Designee	617-427-2944	2415
Connecticut-	Dr, Edward Wilds, Governors Designee	860-424-3029	
New York-	Edward Jacoby, Governors Designee	518-457-2222	
Pennsylvania-	John Bahnweg, Governors Designee	717-651-2001	
Maryland-	Michael Bennett, Governors Designee	410-653-4229	
West Virginia-	Col. C. E. Hill, Governors Designee	304-746-2111	
Virginia-	Brett Burdick, Governors Designee	804-897 - 6500	
North Carolina-	1 st Sgt. Dalton, Governors Designee	919-733-5282	
South Carolina-	Henry J. Porter, Governors Designee	803-253-6488	

Please contact Norm Meinert (678-328-1324) or me with any questions or comments.

Sincerely,

Michael Wosh

Michael J. Mosley Transportation Coordinator Site and Transportation Services 678-328-1302 mmosley@nacintl.com

Attachment 1- UMass Route Summary Attachment 2- UMass Route Safe Havens Attachment 3- UMass Route Maps Enclosure 1- Submittal letter and Attachments 1 and 2 in word perfect format Enclosure 2- Route maps on CD-R

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