

July 28, 2005

File Copy DWT-2005-19

Robert J. Lewis, Chief
Licensing Section
Spent Fuel Project Office
Office of Nuclear Material and Safeguards
Washington, D.C. 20555-0001

Attention: Nancy Osgood
Document Control Desk

References: USNRC Certificate of Compliance No. 9228, Docket Number 71-9228, Rev. 21.

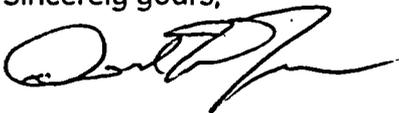
Dear Mr. Lewis:

GE Nuclear Energy ("GE") request that Certificate of Compliance (CoC) No. 9228 be revised to allow the transport of by product material in solid form with an assigned Criticality Safety Index (CSI) of 0. The referenced CoC currently mandates per Section 5.(c) that a CSI of 100 be assigned to package contents categorized under 5.(b)(1)(ii), including byproduct material with no source or special nuclear material constituents. The CSI assignment for byproduct material contents should be 0.

GE respectfully requests the Department's prompt attention in processing this request being that GE is in the process of arranging the return shipment of byproduct material from Switzerland to the GE Vallecitos Nuclear Center, Sunol, California. The attached table lists the radionuclides, activity, and decay heat for the irradiated material.

Aside from the abovementioned request, all other requirements delineated in Certificate of Compliance No. 9228 remain in-effect for the Model 2000 Package. Please contact Mr. Raul J. Pomares at 925-862-4578 or the undersigned if you or your staff requires additional information.

Sincerely yours,



David W. Turner
Manager, Regulatory Compliance & EHS

NIMSSO1



KKM Nuclear Site to GE VNC Model 2000 Shipment

Contents: One (1) irradiated stainless steel test coupon and sample holder, 22 lbs (10 kg)

Radionuclide/Activity:

<u>Nuclide</u>	<u>(Ci)</u>	<u>(Bq)</u>
Cr-51	305.59	1.13E+13
Mn-54	39.91	1.48E+12
Fe-55	237.14	8.77E+12
Fe-59	8.36	3.09E+11
Co-58	69.22	2.56E+12
Co-60	68.64	2.54E+12
Ni-63	4.95	1.83E+11
P-32	0.27	1.05E+09

Total Shipment Activity: 734.1 Ci (2.72E+13 Bq)

Shipment (Gamma) Decay Heat: 4.1 Watts

Transport Form: Normal

Physical Form: Solid

Chemical Form: Metal