

AUG 02 1990

SGTB:DTH
71-6294

MEMORANDUM FOR: Earl P. Easton, SGTB, NMSS
FROM: Daniel T. Huang, SGTB, NMSS
SUBJECT: CERTIFICATE OF COMPLIANCE NO. 6294, REVISION NO. 13,
MODEL NO. UNC-2901 SHIPPING CONTAINER

By letter dated July 25, 1990, Combustion Engineering, Inc. (the licensee) requested an amendment to the subject Certificate of Compliance. The amendment would revise drum specifications to match the original and current drum constructions.

The amendment request addressed discrepancy between the designation of the drum used for the outer shell of the Model No. UNC-2901 shipping container and the drum actually in service. The discrepancy between drums in use and the drum designation in the Certificate of Compliance occurs in two areas. First, the certificate specifies that the drum shall be DOT 17H or equivalent. The drums purchased were not DOT 17H. Second, one of the drawings referenced in the certificate specifies that the drum lid be fabricated from 12 gauge material. The lid were fabricated from 16 gauge material.

The licensee believes that the designation of a DOT 17H drum and 12 gauge lid specified on the drawings are in error. To support this belief, the licensee has submitted documentations with the amendment request indicating that the drums used to fabricate shipping containers in use today are virtually the same as those originally tested. Based on our review of these documentations, the staff agree with the licensee that the drum is mistakenly specified on the drawings. During the course of the review, the staff also noted that "57" gallon drums, instead of the originally tested "55" gallon drums, are used for fabrication of the Model No. UNC-2901 shipping containers. However, the staff agree with the licensee that the small difference in volume (55 versus 57 gallons) would not adversely affect existing criticality analysis results. The ability of the Model No. UNC-2901 shipping container to meet the requirements of 10 CFR Part 71 should not be effected.

Based on the above, it is concluded that the proposed changes are consistent with the subject Certificate of Compliance. Approval is recommended.

15/
Daniel T. Huang

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