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То:	<kjh4@nrc.gov></kjh4@nrc.gov>
Date:	4/21/06 2:06PM
Subject:	GNF-A's Response to RAJ-II 4/18/06 Telephone Call

Kim,

My manager, Charlie Vaughan, asked that I e-mail this letter to you. Please let me know if I should also mail a hard copy.

Best recards,

Rick Foleck

Global Nuclear Fuel - Americas, LLC Program Manager, Facility Licensing PO Box 780 M/C: K84, Wilmington, NC 28402-0780 910-675-6299 fax: 910-362-6299 Richard Foleck@gnf.com

CC: "Vaughan, Charles M. (GNF)" <Charles.Vaughan@gnf.com>

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Subject:	GNF-A's Response to RAJ-II 4/18/06 Telephone Call
<b>Creation Date:</b>	4/21/06 2:05PM
From:	"Foleck, Richard H. (GNF)" < <u>Richard.Foleck@gnf.com</u> >

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Concealed Subject:	No		
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Charles M. Vaughan Manager Facility Licensing

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Global Nuclear Fuel – Americas, LLC Mail Code K-84 3901 Castle Hayne Road, Wilmington, NC 28401, USA (910) 875-5656, Fax (910) 675-362-5656;

April 21, 2006

US Nuclear Regulatory Commission Office of Nuclear Materials Safety and Safeguards Spent Fuel Projects Office Attention: Ms. Kimberly J. Hardin, Project Manager Licensing Section Washington DC

Subject: RAJ-II Review Telephone Call 4/18/2006

Reference: Docket 71-9309

Dear Ms. Hardin:

Global Nuclear Fuel-Americas, LLC (GNF-A) provides the following information to clarify points discussed in the subject telephone conversation and your subsequent 4/19/06 letter.

## Drawing

With regard to the clarification on the thickness of Part No. 15 on Drawing No. 105E3745, the thickness of the part is correct as 3 mm that is shown in the parts list. The 5 mm value on the drawing refers to the radius of the bend in the part. We believe the drawing to be correct even though it is a bit difficult to interpret.

## **Chapter 6 Criticality Evaluation**

1. Questions the meaning and call out for water rods Table 6-1. The table entries are highly abbreviated and tend to imply both the number and the geometry of their location relative to the fuel rods displaced. A more detailed explanation is as follows:

In the case of  $8 \times 8$  designs, there can be either 0 or 1 water rod, and the water rod location occupies a space equivalent to 2x2 fuel rods. This is designated as 0, 2x2 in the table.

In the case of the 9 x 9 and 10 x 10 designs, there can be either 0, 1, or 2 water rods in the assembly, and the water rod location occupies a space equivalent to two 2 x 2 fuel rod equivalent spaces on a diagonal at the center of the assembly or one 3 x 3 fuel rod equivalent space (9 fuel

K. J. Hardin April 21, 2006 Page 2 of 2

rods space) in the center of the assembly. These configurations are designated as 0, 2-2x2 offcenter diagonal, 3x3 in the table.

We believe that Table 6-1 as proposed is accurate to the degree of granular detail included in the table.

2. Question regarding the use of protective material used during shipment of rods not contained in assemblies.

When rods are not shipped as part of an assembly, they are typically sleeved in polyethylene material for protection during transport. The criticality analysis included this polyethylene as a 0.0152 cm thickness. This call out had not been included in previous certificates. GNF-A requests that the application be modified to include the addition of the authorization for polyethylene sleeves of 0.0152 cm thickness to be used when transporting fuel rods not contained in fuel assemblies.

We recommend the contents section 5.(b)(1)(iv) of the certificate be modified to include the following:

When fuel rods are placed in polyethylene sleeves, each polyethylene sleeve shall not exceed 0.0152 cm (6 mil) in thickness.

You may contact me at (910) 675-5656 if you have any questions regarding these clarifications to our application

Sincerely,

Global Nuclear Fuel – Americas, LLC

(Thanks MI. Facoghan-

Charles M. Vaughan Manager Facility Licensing

cc: CMV-06-035