



# AAR Manufacturing Group

Mark A. Denton, Senior Sales Manager – Nuclear Products  
2515 Caspian Drive, Knoxville, TN 37932-1817, USA  
Phone: (865) 386-6403  
FAX: (865) 694-4257  
E-mail: mark.denton@aarcorp.com

July 28, 2006

Mr. Christopher Regan  
United States Nuclear Regulatory Commission  
11555 Rockville Pike  
Mail Stop O13D13  
Rockville, MD 20852

**Subject: Request for Extension of RAI Due Date**  
**Reference: RAI on AAR Topical Report (TAC No.L23782), Docket No. 72-57**

Dear Mr. Regan:

On June 30, 2006, AAR Manufacturing sold the BORAL® product line to Ceradyne, Inc. as an asset sell. However, Ceradyne, Inc. has contracted AAR Manufacturing as Ceradyne, Inc.'s agent to continue the production of BORAL® at AAR Manufacturing's Livonia Facility – the same location where BORAL® has been manufactured continuously for the last thirty-plus years. During the next year a planned transition to a new Ceradyne-owned production facility in Chicoutimi, Quebec, Canada will occur for future BORAL® manufacturing. There are no changes in the production process planned or anticipated at this time, but some new production equipment will be installed to modernize production capabilities. The new facility is already acquired and the acquisition of the new equipment is underway while some current production equipment is planned for refurbishment and relocation. Pilot production for BORAL® is anticipated to start in January 2007 at the new facility.

Based on this recent acquisition, AAR requests that the response due date for the Request for Additional Information for the review of AAR's Topical Report (TAC No. L23782) once again be extended from the previously extended due date of July 31, 2006 to a revised due date of May 31, 2007. This request is based on the following reasons:

1. From a financial decision, it would make little sense for Ceradyne and AAR to incur the cost and ask the USNRC to expend the effort for review of the responses to the RAI when qualification for the BORAL® product will have to be repeated for the new production facility in the near future. It is Ceradyne's intent to directly address all RAI questions during the future qualification of BORAL® at the new production facility.
2. In the last few days it has been determined that a new rolling mill will be acquired for the new BORAL® production facility. Therefore, current RAI responses to questions regarding B<sub>4</sub>C particle size would be uncertain as B<sub>4</sub>C particle size reduction may be different with a new rolling mill.
3. Although there are no changes to BORAL® production techniques anticipated, this cannot be addressed completely until the new equipment is in place and the new production facility is performing pilot lot BORAL® production runs. Therefore, responses to RAI questions regarding the distinction between production techniques of today and those used in the past may still be subject to change.
4. Extensive samples from the current Livonia production facility were tested for durability, neutron attenuation and performance in a simulated dry storage cask loading/drying condition. Although these testing results will help in providing a baseline for comparison at the new facility, it would be prudent and customer-required to repeat the tests and use data from BORAL® manufactured at the new facility for the qualification of that facility, and the submittal and review of current test data and RAI responses would not provide any real benefit.

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5. BORAL® scheduled for the remaining production efforts at AAR's Livonia's facility only requires credit for 75% of the <sup>10</sup>B in BORAL®. Therefore there is no distinct advantage to AAR and its customers for receiving credit for 90% credit of the <sup>10</sup>B present in BORAL® at this time. Qualification for the new BORAL® production facility will seek credit for 90% of the <sup>10</sup>B present in BORAL®.

In summary, Ceradyne, Inc. and AAR Manufacturing believe that currently responding to the RAI for the Topical Report entitled "Credit for 90% of the 10B in BORAL®" would be a waste of USNRC time and money considering the upcoming relocation of the BORAL® production facility and the necessity that the qualification be repeated. Therefore, an extension of the current due date until May 31, 2007 will allow for responses to the RAI and supporting data which will reflect the new BORAL® manufacturing facility.

Please respond as to the acceptability of this request. Finally, please continue to address related correspondence to:

Mark A. Denton  
AAR Manufacturing  
12633 Inkster Road  
Livonia, MI 48150-2272

I can be contracted at (865)386-6403 or at [mark.denton@aarcorp.com](mailto:mark.denton@aarcorp.com) regarding any aspect of this request and future qualification concerns. Thank you for your cooperation.

Sincerely,

Mark A. Denton  
AAR Manufacturing  
Acting as an agent for Ceradyne, Inc.