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An AREVA and Siemens Company

FRAMATOME **ANP,** Inc.

October 8, 2002

Mr. John D. Monninger Chief, Licensing Section Spent Fuel Project Office - NMSS U.S. Nuclear Regulatory Commission One White Flint North 1155 Rockville Pike Rockville, MD 20852-2738

Subject: Submittal of Consolidated Application for Renewal of Certificate of Compliance No. **9251** for the BW-2901 Shipping Package

Enclosure I Justification for Requested Change Attachment I Consolidated application for renewal of BW-2901

Dear Mr. Monninger,

Framatome ANP formally transmits the attached consolidated application for renewal of the Certificate of Compliance (C of C) for the above referenced shipping package. On August 16, Framatome ANP requested timely renewal in accordance with 10 CFR 71.38.

Due to some outstanding questions related to Confirmatory Action Letter (02-8-001), submittal of the consolidated application were delayed until physical testing of the package could be performed. Tests were conducted in early September with the appropriate additional protective measures applied to the package to ensure all concerns related to the CAL were addressed.

The attached transmittal was updated to reflect the most recent revision, corporate name changes, correction of typographical errors, and to include the updated sections on the recent hypothetical accident testing. The significant changes in the documentation include removal of the references to fissile class types and the data supporting fissile class **III** shipments and the inclusion of the new test data. Attempts were made to minimize the changes to other sections to facilitate your review.

Similar to the request made by Framatome ANP for the DHTF certificate, it is requested that the requirements on the gasket on the internal container be changed on the certificate to require replacement if any defect is found during inspection rather than every 12 months, whichever comes first. The technical justification for this request is included in Enclosure I.

It is also requested that the contents listed in Section (b)(I)(i) and (b)(I)(ii) of the certificate of compliance be evaluated since the latter contents bounds the former requirements.

If you have any questions concerning this submittal, please call me at (434) 832-5268.

Sincerely,

Robert S. Freeman Manager, Environmental, Health, Safety and Licensing

EHSLL-02-020 EHSLR-02-036

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 $71 - 9251$

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EHSLL-02-020 EHSLR-02-036

Enclosure **I**

Justification for Requested Change To Docket **71-9251**

Section **7.1** Procedures for Loading the Container

This section cites overly specific requirements for the internal gasket. During normal transportation mode, containment of the solid ceramic **U02** pellets is accomplished by enclosing the pellets within closed cardboard boxes. The boxes, up to six per package, are then contained within the inner container. The inner container is secured using a metal lid with twelve perimeter bolts. Located between the lid and the inner container flange is the silicon rubber gasket.

Since the gasket is assumed not to be available to prevent water intrusion, and was not credited in the criticality safety accident analysis, the requirement to replace the inner container gasket, if during inspection it shows any signs of defect or every 12 month whichever comes first is unnecessary. Based on the reasons stated below, the sentence has been reworded to continue to require inspection and replacement if necessary, but remove the 12 month interval. The specific statement requested in the renewed certificate is: *Prior* to *each shipment the containment vessel gasket must be inspected. The gasket must be replaced if the inspection shows any defects or signs of degradation.*

- 1) Experience and historic data shows no damage or defects due exclusively to time in service.
- 2) The gasket was not credited in the criticality analysis performed as part of the safety demonstration.
- 3) The primary purpose of the gasket is for product quality.
- 4) The gasket is robust in construction and located internal to the package and therefore not as subject to the potential damaging effects of the environment as an external gasket.
- 5) This requirement contributes to an unnecessary addition of contaminated waste generation.

APPLICATION FOR THE

BW-2901

USA/9251/AF

Docket 71-9251

1.0. GENERAL INFORMATION

1.1 INTRODUCTION

The BW-2901 container is designed for shipment of uranium oxide pellets manufactured, inspected and certified in accordance with reactor fuel specifications. It can also be used for the shipment of dry uranium compounds such as uranium oxide powder and rejected pellets and pieces (hard scrap).

The maximum number of containers per shipment shall be limited to:

Fissile Class - Maximum 72 containers

1.2 **PACKAGE** DESCRIPTION

1.2.1 Packaging

The BW-2901 container consists of a standard steel drum (see Drawing 1215599E) with a square inner container centered in the drum. The inner container is centered by hardboard, support rings Asbestos or ceramic sheet, plywood and Fiberlite insulation provide thermal protection to the inner container. The inner container closure is fitted with a gasket capable of withstanding temperatures up to at least 500°F. The BW-2901 containers may be shipped in either the horizontal or vertical orientation, but are usually shipped in the horizontal position.

1.2.1.1 Package for Pellets

U02 fuel pellets are shipped from the selected vendor's manufacturing facility (currently Framatome ANP, Inc. in Richland, WA) to the FRAMATOME ANP Lynchburg, Virginia facility on clean, corrugated stainless steel trays. Trays of pellets are packaged in quantities not exceeding a slab height of 4 inches, in clean polyethylene sheeting and enclosed in cardboard boxes. In cases where the quantity of pellets (end of a lot) is too few to completely fill a box, empty SST trays will be used to maintain tray stack height at 4 inches. Usually, 10 OR 12 trays of pellets are loaded into each box. The boxes are stapled closed and sealed, without the use of adhesives or tape, in plastic film to insure the box integrity during normal handling and storage (nominal box size: 9% x 8¼ x **41/4) .** Pellet

surfaces may contact stainless steel and
polyethylene during shipping. A typical polyethylene during shipping. A typical arrangement is depicted in FRAMATOME ANP Drawing 1215600D.

1.2.1.2 Package for Reject Pellets

Rejected uranium oxide pellets and pieces may be packaged in the pellet shipping package
configuration described above in Section configuration described above in Section
1.2.1.1; sealed in polvethvlene bags and in polyethylene bags and enclosed in a cardboard box, then sealed with tape or staples and wrapped in polyethylene sheeting.

1.2.2 Operational Features

The BW-2901 shipping container is of relatively simple design, and does not incorporate cooling systems, cooling, etc. Operation of the container is typical of 55 gallon drums. The cylindrical drum is an 18gauge steel full open head shipping drum, sealed with a 16-gauge steel lid and secured by a 12-gauge closure ring with a 5/8" bolt and nut through drop forged closure ring lugs. Loading of the BW-2901 is accomplished by placing the package configuration (described in Section 1.2.3) inside the container insert; unloading is accomplished in reverse fashion.

1.2.3 Contents of Packaging

The BW-2901 will carry a payload of up to 6 cardboard boxes of U02 pellets, having **3** boxes per layer and 2 layers per container. Pellets are packed in one of two methods, either neatly stacked on corrugated stainless steel trays, or randomly placed into a polyethylene bag within the cardboard box. If pellets are packed on corrugated trays, the BW-2901 is limited to a total payload of 168 kgs U02 for nuclear safety purposes. No nuclear safety limit exists if pellets are bagged, but physical dimensions of the cardboard box and inner container limit the payload to a similar quantity of pellets.

Uranium dioxide pellets have a maximum theoretical density of 10.70 grams per cubic centimeter. In practice, densities of 10.4 to 10.6 grams per cc are typically achieved. Enrichment is limited administratively to **5.05%** w/o U-235. The BW-2901 will only be used for shipping unirradiated materials, which will not generate heat or cause pressure buildup within the inner container, and do not require radiation shielding.

1.2.3.1 Pellets or Rejected Pellets

Maximum Enrichment 5.05 wt

Type Material: Sintered (high fired) uranium oxide pellets, rejected pellets or pieces.

Maximum quantity per container:

a) Maximum net weight - Maximum net weight of pellets: 370 pounds

Pellets and packaging material (contents of inner container) 427 pounds.

b) Gross Weight- Gross weight of the container as assembled for shipment shall not exceed 660 pounds.

1.2.3.2 Packaging Materials

Exterior plywood or hardwood boards shall be used for materials enclosing the pellet boxes (See Drawing 1215597C). A poison plate shall be placed on bottom of the wood box, one in between the 2 layers of pellets and one on top. See section 1.3 for associated drawings.

Solid pellet box spacers made of aluminum or wood shall be used to replace boxes in less than full containers (less than 6 boxes).

1.3 ASSOCIATED DRAWINGS

Details of construction and assembly are shown on drawings:

- 1.3.1 1215599E, BW-2901 Shipping Drum Assembly **&** Details
- 1.3.2 1215597D, BW-2901 Container Loading Box Packaging Method
- 1.3.3 1283759D, Method of Packaging **U02** Fuel Pellets
- 1.3.4 1215598B, Suggested Assembly of 2901 Plywood Insert

2.0 **STRUCTURAL EVALUATION**

The BW-2901 shipping container was subjected to the hypothetical accident test condition in accordance with **10** CFR 71.36 and 49 CFR 173.398(c). The actual tests and results provided in this section are from the report "Design and Structural Evaluation of a Low Enriched U02 Pellet and Powder Shipping Package, Model **UNC** 2901", dated April 1970.

Structural Evaluation Reference: Combustion Engineering, Inc. Certificate of Compliance No. 6294, NRC Docket No. 71-6294, UNC-2901 Shipping Container, Application Amendment Date: July 27, 1990.

2.1 SUMMARY

A shipping package was designed for shipment of low enriched U02 pellets and powder. The package consisted basically of a square metal inner container supported and insulated inside a 55 gallon steel outer drum. Pellets were packaged inside the inner container on polyethylene coated corrugated trays. The shipping package was subjected to a series of drop, fire, and water tests to evaluate
its structural stability. The results indicated that a its structural stability. The results indicated that a structurally sound, fire-proof, leak resistant package had been developed.

2.2 DESCRIPTION OF SHIPPING **PACKAGE**

Details of the BW-2901 shipping container are illustrated on drawings no. 1215599E. The shipping container is to be identified as a Model BW-2901. The basic components of the shipping package are:

- **1.** A square inner container with a flange and cover.
- 2. Twelve bolts securing the cover to the flange.
- 3. A full-faced gasket on the inner container.
- 4. Three hardboard support rings.
- 5. Angle iron welded completely around inner container for securing the hardboard.
- 6. A high temperature sheet on top and bottom of outer drum.
- 7. Plywood on bottom and on top of drum.
- 8. Fiberlite insulation between inner and outer container.

2.3 STRUCTURAL EVALUATION

2.3.1 Conditions

The shipping package was subjected to the hypothetical accident conditions of the tests specified in **10** CFR 71.36 and 49 CFR 173.398(c). Tests were conducted at two different loading levels. One package of depleted pellets, assembled as shown on drawing number D-5008-8192 Revision 2 (Ref. Certificate of Compliance No. 6294, NRC Docket No. 71-6294), and three lead-filled wood boxes comprised the test load for Test **#1.** The second test was performed at a greater loading, but with only the lead filled boxes. The weight conditions tested were as follows:

*All units are in pounds.

2.3.2 Discussion of Results

Pictures of the package in its various stages of assembly and test are included in the Appendix 2-1 of this report.

2.3.2.1 Thirty Foot Drop Test

Original rests Conditions - The impact of the 30 foot drop was designed to occur at approximately 45° on the top corner of the square inner container. The selected corner for the first test condition was the corner containing the actual pellet package. These conditions were chosen as the most severe for the following reasons:

- **1.** Experience from the same test performed on other packages indicated that maximum damage occurs from angular impact.
- 2. Impact of the top end was most likely to break loose the outer drum lid and expose the inner container during the fire and water tests.
- 3. Impact on the top end subjected the flange of the inner container to the maximum force and the seal on the gasket to the greatest potential for destruction.

- 4. The weld on bottom plate was evaluated to be stronger than the parent metal, therefore, the point of failure from dropping on the bottom would have been the sides of the inner container. By dropping on the top corner, the sides were subjected to the same load and equal conditions existed.
- 5. The corners of the square insert had the least support. Therefore, impact at this point was directly on the weakest member.
- 6. Striking at an angle caused a greater rebounding effect and a minimum degree of support surface. (i.e., the top corner hit first and then the bottom as opposed to a single flat hit on side or end only.) A flat hit would allow an equal support distribution by the hardwood, plywood, cushioning, etc. and eliminate a greater concentrated force on one point.
- 7. The pellet package was subjected to brunt of impact from both the initial hit and the weight of the three simulated packages on top of it.

Results - The damage to the outer drum for Test **#1** (544 lbs.) is depicted in picture 3. The decrease in drum diameter as a result of impact was a maximum of 1-1/2" on the top corner. The small hole just below the lid retainer ring was inflicted by a small bolt which had been tied to a measuring cord used to verify the 30 foot height.

Damage to the plywood and hardboard supports for the inner container was not detrimental. The two **I"** thick plywood disks encasing the inner container flange cracked on the corners but remained in position. The bottom hardboard support broke on three corners and the middle hardboard broke on the corner of impact. However, all pieces stayed in place and there was no warpage or shifting of the inner container. (See pictures **11,** 13, 14, 17 and 18.) The hardboard supports remained bolted to the angle iron and all welds between the inner
container and angle iron were sound. All flange container and angle iron were sound. bolts were in tact and securely tightened. There was no deformation of the flange closure.

The conditions of the drum in Test #2 (655 lbs.) is shown in picture 3A. The outer drum deformed 2" in diameter at the point of contact only, but otherwise showed no significant damage. Since the pellet package proved to uphold its tray-pellet arrangement in the first test, it was not necessary to reevaluate its stability and, therefore, the load was composed solely of the lead-filled boxes.

As was the case for Test #1, a few of the plywood and hardboard supports cracked but no damage occurred to the inner container. (See pictures 5B, **5C, 5D** and 5E). All welds and bolts remained intact and there was no shifting of either the inner container following the drop test.

Supplemental Tests Conditions - As a direct result of concerns raised by the NRC in Confirmatory Action Letter (02-008) related to low angle 30 foot drop tests, supplemental physical testing was performed. The specimen tested was 660 lbs gross weight, loaded with solid blocks of dunnage. The package was oriented 17.5 degrees from horizontal with the initial impact on the lid. The

Results - The

2.3.2.2 Piston Drop Test

conditions - For both loading configurations, the drum was dropped five feet onto a concrete piston. The piston was six inches in diameter by eight inches long. In Test **#1,** the point of impact was approximately midway between the center and upper hardboard support. This location was selected to determine if the outer drum would puncture and permit the piston to penetrate to the inner container. For Test #2, the selected impact point was directly on the center hardboard. This condition was evaluated to determine if the direct impact on the hardboard would drive it inward and deform the inner container.

Results- The condition of the outer drum after the piston drop for Tests **#1** and #2 is shown in pictures **⁵**and **5A.** In Test **#1,** a semi-circular hole was punctured through the outer drum in line with a corner of the inner container. No insulation or

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support material was lost through the hold and no damage was incurred by the inner container.

For Test #2 (Picture 5-A), the piston hit directly on the hardboard and only a small hole, 1/2" in diameter, was punctured in the outer drum. The diameter, was punctured in the outer drum. hardboard was broken and stripped away for approximately a 3" X 2" area, but not completely through to the inner container (pictures 5C and **5D).** The inner container suffered a minor crease 1/32" high and 3" long at the point where the hardboard was supported against the insert. The inner container suffered no major damage and remained in its original position.

2.3.2.3 Fire Test

Conditions - The fire test was conducted using diesel fuel fed through piping manifolds placed lengthwise down each side of the shipping package. The flame was directed upward so it engulfed sides, top, and bottom of the package. The location and condition of the package before, during and after the fire test is shown in pictures 6, 7, and 8. The shipping package was placed with the punctured hole facing upward on a grated metal framework 6" above the ground. The flame temperature as read on an
optical pyrometer was in excess of 1650°F pyrometer was throughout the 30 minute test. It is probable that the flame was well above this, an intense black smoke tended to bias the reading low.

The fire test was conducted only for the Test **#1** loading condition. Since the extra loading had no significant effect on the package condition after drop and piston testing, the parameters of the fire and water test were identical for both cases. Therefore, the fire and water test results of Test **#1** were also applicable for the loading condition of Test #2.

Results - Pictures 9-18 illustrate the condition of the shipping package after all the tests were completed. As shown in picture 9, the 1/8" thick asbestos sheet and top 5/8" thick plywood were completely charred. The remaining plywood disks, pictures **10** and **11,** were charred only around the edges, from 2-4 inches radially inward for the outer most piece and 3/4" to **1"** for the inner disk. The uniform burn completely around the periphery of the plywood indicated an even heat distribution throughout the package. The hardboard was charred 10/04/2002 Rev. 6 Page 2-5

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slightly as indicated in pictures 12-16. original tests (Structural Evaluation Reference: Combustion Engineering, Inc. Certificate of Compliance No. 6294, NRC Docket No. 71-6294, UNC-291 Shipping Container) indicated that no substantial loss in strength resulted. Similar results were found on the bottom.

As shown in picture 13, the Fiberlite insulation was charred radially inward from the outer container for approximately 2 inches. However, the insulation in contact with the inner container was
unimpaired. The temperature template on the The temperature template on the
the container during the test underside of the container during the registered 180'F. A template on the top side during the test showed that portion of the container reached 200*F. (These temperatures verify that heat was well distributed from top to bottom.) This temperature range had no detrimental effect on the Ethafoam cushioning inside the inner container. Pictures 15 and 16 show the undamaged condition of
the cushioning. The asbestos flange gasket and The asbestos flange gasket and pellet package were undamaged by the fire test; which is very apparent in Picture 15.

2.3.2.4 Water Immersion Test

Conditions - The drum was immersed in the horizontal position so that a minimum of three feet of water completely covered the shipping package.

Results - Since the outer container has been punctured in the piston drop, the outer drum was thoroughly flooded. However, the inner container did not show any evidence of leakage after immersion for 8 hours. Some of the Ethafoam cushioning material had been crimped under the asbestos gasket during assembly, but even so, no leakage occurred. Pictures 17 and 18, which were taken immediately after the water test, show no evidence of leakage.

2.3.2.5 Conditions of Pellet Package

The condition of the inner container contents after the completion of the tests is shown in pictures 16-22. Although about 25% of the pellets were cracked or broken, (picture 22), the pellet package remained intact, (Pictures 19 and 20), and less than 1/20 of the pellets became dislodged (picture 21) . Picture 19 shows the ends and center of the trays crimped together where the hardboard supports were located. The general condition of the pellet

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package was "good" with the pellet tray assembled configuration after completion of the tests. All four packages remained in the exact position in which they were loaded (picture 15) and the inside of the inner container was not damaged in any manner.

FRAMATOME ANP BW-2901, USA/9251/AF

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Docket 71-9251

New write-up on recent drop tests

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FRAMATOME ANP Docket 71-9251 BW-2901, USA/9251/AF

FRAMATOME ANP Docket 71-9251 BW-2901, USA/9251/AF

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PICTURE 3 -Condition of outer drum after 30' drop test $(Test 1)$

PICTURE 3A - Condition of outer drum after 30' (Test #2). or outer ar
drop test -

PICTURE 4 -Shipping package in upper position for piston drop.

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PICTURE **5** - Condition of drum after piston drop - (Test $f(1)$)

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PICTURE 5A - Condition of drum after 30' drop and piston drop $-$ (Test #2)

PICTURE 5B Condition of flange after 30' drop and piston test $(Test$ $#2)$

PICTURE 5C Condition of inner container and hardboard after 30' drop and piston test (Test #2).

PICTURE **5D** Condition of inner container after 30' drop and piston test $-$ (Test #2).

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PICTURE 5E - View inside inner container after **30'** drop and piston test (Test #2).

PICTURE 6 -Shipping package in ג package
position for fire test.

PICTURE 7 -Shipping package engulfed in flames during fire test.

PICTURE 8 -Condition of outer drum after fire test.

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PICTURE **9** - Condition of asbestos and top plywood sheet after fire and water test.

> 1> PICTURE **I0** Condition of second plywood sheet after fire and water test.

PICTURE 13 -Condition of bottom of inner and outer containers after completion of all tests.

PICTURE 14 -View of inner container with insulation removed after completion of all tests.

PICTURE 15 -Condition of pellet packages and cushioning material after completion of all tests.

PICTURE 16 - Removal of pellet package after completion of tests-.

PICTURE 17 -Condition of inner container after completion of tests.

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PICTURE 18 - Inner container and broken pellets after completion of tests.

PICTURE 19 - Side of pellet package facing container wall during test.

PICTURE 20 - Side of \vert ritions so - side or p
pellet package facing perrec package racing
other package during test.

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PICTUPE 21 - Amount of pellets dfslodged **fri** ts-t,

PICTURE **22** - Tap row nchange au
of disassembled sackage after test.

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FRAMATOME ANP Docket 71-9251 BW-2901, **USA/9251/AF**

PICTURE 23 - Loaded mellet trays as ;assembled. Before testing.

Figure 25 - Damaged package for supplemental tests specimen #139 with 3 retention clamps attached.

Figure 25 - Damaged package for supplemental tests specimen #139 with 3 retention clamps attached.

Figure 27 - Puncture test on suppplemental test specimen #139 with 3 retention clamps attached.

3.0 THERMAL EVALUATION

The testing and results of the thermal evaluation for the BW-2901 shipping container are discussed in Section 2 of this application.

4.0 **CONTAINMENT**

4.1 Containment Boundary

4. **1. 1** Containment Vessel

Within the BW-2901 shipping container a square inner container provides the containment boundary for the radioactive contents. The top closure is by means of a steel plate bolted to an external flange welded to the square body. A seal is formed by a gasket capable of withstanding temperatures up to at least 500° F.

4.1.2 Containment Penetrations

There are no penetrations into the inner containment vessel.

4.13 Seals and Welds

The seal of the inner container closure is formed by a gasket 0.125 inch thick between the surfaces of a flange welded to the outer surface of the square body and the top closure cover. The gasket is rated for at least 500'F service and since there is no significant heat generated by the package payload, the seal is unaffected by temperatures encountered in normal conditions of transport. Also, testing described in Section 2.0 has shown that the gasket is unaffected by the temperature attained in the Hypothetical Accident Conditions.

All welds are visually inspected to ensure that parent metals are well fused and welds (or heat affected zones) are free of cracks, craters, or burnouts.

4.1.4 Closure

The inner container closure is formed by a 0.5 inch steel plate bolted to an external flange welded to the square inner container. Materials for the plate and the bolts and nuts are listed on Drawing 1215599E. The bolted inner container closure lid with a 0.125 inch thick gasket is sufficient to maintain a positive seal during normal and accident conditions of transport.

4.2 Requirements for Normal Conditions of Transport

Submittal of the BW-2901 shipping container to the tests specified in 10 CFR 71.71.36 and 49 CFR 173.398(C) has shown that there will be no loss or dispersal of radioactive contents, no significant increase in external radiation levels, and no substantial reduction in the effectiveness of the packaging. Fully loaded containers subjected to the full series of spray, free drop and penetration tests showed no degradations of effectiveness of the inner container and no leakage of water into the inner container.

4.3 Containment Requirements for Hypothetical Accident Conditions

The effect on the loaded BW-2901 container of conditions hypothesized to occur in an accident was assessed during the testing as described in Section 2 0. These tests demonstrated that no radioactive material would be released. It was also demonstrated that the package would remain subcritical because the material remains confined to subcritical geometry and the geometric form of the contained material is not altered.

FRAMATOME **ANP** BW-2901, **USA/9251/AF**

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5.0 SHIELDING **EVALUATION**

The BW-2901 shipping containers are used for the shipment of oxides of low enriched uranium (\leq 5.05 wt. U U-235) in pellet or powder form. Thus, shielding is not a consideration in the design and construction of this shipping container.

6.0 CRITCALITY EVALUATION

6.1 Discussion and Results

An analysis has been performed to determine the criticality safety of arrays of the BW2901 shipping container at an increased enrichment of 5.05% utilizing the packaging method for sintered U02 pellets as described in FRAMATOME ANP drawings 1215599E, 1215597D, 1215598B, 1215548C, and 1215600D. Each container contains a maximum of 168 kg (6 boxes with 28 kgs per cardboard box) of 5.05 wt% U235 pellets (370 lbs. U02).

The determination of the subcritical arrays has been made to establish the limits for fissile shipments as required by the regulations.

For fissile shipments, five times the allowable number of undamaged (normal) packages will be subcritical **if** stacked together in any arrangement with full water reflection. Twice the number of packages subjected to the accident conditions stacked in any array with optimum interspersed moderation and full water reflection will also be subcritical.

The limiting package evaluated is for 0.2 inch diameter fuel pellets (which simulate broken pellets) in the scrap container. The scrap container is most limiting because the fuel pellets are assumed optimally moderated and there are no stainless-steel pellet trays (which act as neutron absorbers) in the scrap boxes. The scrap container contains the same number of fuel boxes (6 boxes) as the
pellet-tray configuration. The borated plates in the pellet-tray configuration. The borated plates in container are assumed off-center shifted by the maximum amount and 1285 gms of additional polyethylene (1435 gms total) scrap is modeled in the container. The total polyethylene limit is 1000 gms.

Minimum tolerances are assumed on all wooden dimensions of the loading box and the borated aluminum plates which maximizes the available fuel volume. An internal cavity width of 11.15 inches is assumed and bounds any as-built dimensional deviations of the internal cavity. A maximum conservative bias of 0.02 delta k was assumed. Based on the original analysis maximum reactivity occurs for the internal cavity fully flooded and all other regions in the drum and external to the drum were assumed to be dry.

The drums were loaded into a close-packed hexagonal array four drums deep (37x4 array) . All drums are assumed to be deformed by the maximum amount determined from droptest results. All cardboard was assumed crushed to a minimum thickness of 0.06 inches to maximize fuel volume. The -borated aluminum plates (AIB4C) have a minimum thickness of 0.365 inches and minimum areal density of 83.823 **Mg/** cm2. This areal density corresponds to a 25 volume **%** B4C content 23.702 wt%) . ^A**25%** penalty factor was applied to B1 density per NRC requirement. The center cross-sectional view of the final model is shown in Figure 6-6.

Using this exact model the final maximum K-effective with the bias and uncertainty applied is 0.94803 for the scrap container, which satisfies the criticality limit of 0.95. Pellet diameters of 0.315 and 0.375 inches were also evaluated with the previously discussed conditions. The maximum K-effective values for these cases are 0.94720 and 0.94409, respectively.

The revised results are shown in Table 6.1-2 along with the original calculations for less limiting cases. It should be noted that the original calculations did not include borated plates or optimized fuel volumes for the pellet-tray configurations. However, the revised scrap container contents conservatively bound all other content configurations.

Both pellet and scrap package arrangements are safe for shipment. These packaging arrangements must conform to the descriptions and assumptions in this analysis and in the Certificate of Compliance. In addition to the shipping specifications already authorized, the Certificate of Compliance should contain the following specifications:

- **1)** Weight limit will remain at 370 pounds (167.83 Kg) of **UOZ** with the U-235 content not to exceed 7.47 kg $U23s$,
- 2) The enrichment limit will be 5.05'.
- 3) The maximum allowed pellet density is 97.6% of the UOZ theoretical density (10.96%).
- 4) A minimum pellet diameter of 0.315" and maximum pellet diameter of .375" OD for shipments utilizing trays.

- 5) The pellet trays should normally be fully loaded and the boxes may have up to 10 trays for larger diameter pellets and up to 12 trays for smaller diameter pellets. There is no criticality requirement that unoccupied space in the box or on a tray of pellets contain stainless-steel or a volume displacement device since optimized fuel was used in the analysis. The use of stainless-steel trays or spacers is recommended to prevent damage to pellets.
- 6) For partial shipments with less than 6 boxes of fuel, the remaining space must be occupied with aluminum or wood blocks of equal volume to prevent shifting of the fuel boxes or borated aluminum plates.
- 7) The wood box shall contain three borated aluminum plates with a minimum of 25 volume **%** B4C (23.702 wt%) . The minimum areal density of BI0 shall be 83.823 mg/sq cm per plate. The minimum dimensions of the borated aluminum plate shall be 24.98" x 9.24" x 0.365-'. One plate shall be located on the box bottom, the second on top of the first layer of fuel (middle plate), and the third on top of the second layer of fuel (top plate). See Figures 6-5 and 6-6 and Section 1 drawings for the arrangement.
- 8) The scrap and pellet-tray containers shall contain no more than 1000 gms of polyethylene.

 \overline{a}

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Table **6.1-2** BW **2901** Shipping Container Results

6.2 Package Fuel Loading2

The BW2901 shipping container drawings are contained in Section 1 of this document. The BW2901 shipping container \cdot consists of a nominal 10.875 x 10.875 x 29 inch high inner container constructed with a minimum of 14-gauge (.0747 inches) stainless-steel or carbon steel. The top **1/2** inch thick steel flange (or lid) is bolted and incorporates a gasket. The inner container is centered and supported in a 22.5 inch ID (smooth wall) x 34 inch high steel drum made of 18 gauge steel with a 16 gauge head. The inner container is supported and protected by asbestos or ceramic sheet, plywood, hardwood, and insulating material. Framatome ANP uses two different packaging arrangements with the container for the shipment of uranium dioxide fuel. These are described in the separate sections covering the evaluation of that packaging arrangement. Any packaging arrangements which vary from or alter the packages described below will require further evaluation. Table 6.2-1 describes the maximum fuel loadings and parameters for these loadings.

Material	Maximum	Restrictions	Form
	Weight, 1bm/Kg		
	UO_2 ; 1bm/ Kg U^{235}		
$\overline{11}^{235}$	370/167.83	Max Enrichment	UO ₂ Pellets
	16.47/7.47	$= 5.05$ wt? U	Pellet-tray
		1000 gms Poly Pellet	Configuration
		Diameters From	
		$0.315" -0.375"$	
7735	370/167.83	Max Enrichment	UO Pellets
	16.47/7.47	$= 5.05$ wt% U-	Scrap
		1000 qms Poly	Configuration
		Scrap	

Table **6.2-1** Package Fuel Loading

6.2.1 AlB4C Plate Specifications and Melting Point

The BW2901 shipping container contains three borated aluminum plates made from a melt of aluminum and B4C. The boron carbide content is assumed to have boron at 19.8 atom % B1^o in B natural. The minimum B1[°] areal density of the borated plates is 83.823 mg/cm2 (without 25% transportation penalty factor applied). The borated plates must have minimum dimensions of 9.24 inches x 24.98 inches x 0.365 inches.

Model-R2 assumes a minimum of 25 vol% B4C (23.702 wt% B4C).

Of concern in the use of borated aluminum is the potential for a fire to melt the aluminum and cause a change in the geometry of the internal container. According to the fire test conducted on the UNC2901 the internal temperature did not exceed 200 °F 6. The melting point of aluminum is 1220 'F. Therefore, the internal temperature of the cavity did not reach the melting point of aluminum nor did it reach temperatures high enough to char the cardboard or wood box

6.3 Model specification

6.3.1 Description of Calculational Model

The analysis for both packagings was performed originally using the SCALE 3 CSAS2 module with revised calculations using the SCALE4.2 CSAS2X computer code 5. SCALE 3 CSAS2 calls BON-AMI, NITWAL (to calculate the Dancoff correction factor), XSDRNPM (for flux and volume weighing of the cross-sections) and KENO IV. SCALE 4.2 CSAS2X calls BONAMI-S, NITWALII (to calculate the Dancoff correction factor), XSDRNPM-S (for flux and volume weighing of the cross-sections) and KENOVa. The 123 group cross- section library was used in the original analysis and the 27 group cross-section library in the revised calculations.

The SCALE Package was prepared by the Oak Ridge National Laboratory for the U.S. Nuclear Regulatory Commission and is widely used in criticality evaluations. The 123 group cross section set was used because more accurate results have been obtained from benchmark calculations
using Low-Enriched-Uranium (LEU) critical using Low-Enriched-Uranium experiments. The revised calculations used the newer 27 group cross-section library to eliminate
any concerns pertaining to pretreated U235 any concerns pertaining to pretreated U235
resonances associated with the 123 group resonances associated cross-section set. A description of the bias is provided in Section 6.5.

The input data containing the atomic number densities and geometry are contained in the Section 6.6 appendix. The theoretical density was used in calculating the fuel atomic number densities in the original calculations and 97.6% TD in the Model-R2 calculations. No credit was taken for dish or chamfer factors. The measured density of the cardboard was used in calculating their atomic number densities except for the revised scrap container calculations which assumed the cardboard was compressed and the composition of wood was assumed.

According to the current Certificate of Compliance the limits for both packagings is 370 lbs U02. This limit was used as an upper limit in this analysis.

6.3.1.1 Criticality Models

Dimensioned sketches of the models used in the criticality evaluation are provided as Figures 6-1, 6-2, 6-3, 6-3A, 6-4, 6-4A, 6-5, and 6-6. Figure **6-1** shows a typical fuel pellet box. Figures 6-2 shows a combination
of three fuel boxes used in various of three fuel boxes used in various
criticality models. The cardboard between criticality models. The cardboard boxes of fuel have been removed for conservatism. Figures 6-3 and 6-4 show the original pellet-tray model and wood spacer configuration used in the original analysis. Figures 6-3A and 6-4A reflect revisions in the wood box structure and internal cavity dimensions used in the first revised model (Model-Ri) of the BW2901 container. Figures 6-3A and 6-4A reflect typical dimensions. An isometric view of Model R1 details is shown

in Figure 6-5. This model used dimensions that were based on conserving the masses of
fuel, wood and other materials in the fuel, wood and other materials in the internal cavity of the drum. Therefore, minor deviations from actual minimum wood thickness exist compared to the Section 1 drawings (i.e., 0.44017 inch wall thickness versus 0.4375 inch toleranced value, a difference of 0.0026 inches). Additionally, Model-Rl is based on a average cavity dimension of 11.019 inches which was subsequently revised. Model-Rl was used in this analysis to identify limiting plate configurations and fuel parameters.

Figure 6-6 is a cross-section of the internal cavity midway along the axial length of the drum and reflects the exact dimensions of internal components less applicable tolerances. This model is referred to a Model-R2 and reflects a maximum cavity width of 11.15 inches and borated aluminum plates 0.365 inches thick (minimum) . The shifting of the top borated aluminum plate is also exactly modeled. Model-R2 was used for all final scrap container calculations.

The scrap container model bounds the pellet-tray configuration since optimized fuel is assumed and no stainless-steel pellet trays are present. The following assumptions apply to the original analysis:

A. In the original analysis the computer model has two long boxes instead of the actual six smaller boxes. This is due to modeling limitations in the KENO IV computer code. The same amount of fuel is included in each long box as would be in the three smaller boxes it represents. The minute amount of moderating material(cardboard between the boxes) omitted by this model is more than adequately compensated for by the flooding of the inner container. This flooding **did** not occur in the tests performed per **10** CFR 71.73, therefore this is extremely conservative assumption.

- B. For the accident conditions, the stainless steel trays were not included. This is very conservative for the pellet-tray containers since after the tests (referenced above) the pellet packages remained intact and the trays and pellets remained in position with no water inside the inner container.
- C. All limiting calculations in the original analysis assumed fuel at 100% TD. This assumption is very conservative since FRAMATOME ANP does not fabricate fuel in excess of 97.5% TD.
- D. The insulating material surrounding the inner container was not included in the computer model. This was shown to be conservative in the original evaluation by reducing cask-to-cask neutron transfer. The tests referenced above showed that the support materials **did** remain inside and that water might fill the outer part of the drum but that the inner container would remain dry, as opposed to the conservative assumptions made in the evaluation.
- E. All fuel was assumed to be at 5.1 wt% U235 in the original analysis.

The revised scrap container computer Model-R2 contains the following conservative assumptions:

A. Limiting cases were reevaluated with the maximum internal cavity dimensions and the optimum fuel volume fraction to maximize reactivity. The optimum fuel volume fractions were determined for each geometry configuration (i.e., with and without additional polyethylene, etc.).

- B. The maximum theoretical density of 97.6% was assumed. FRAMATOME ANP does not manufacture pellets above 97.5% including tolerances.
- C. A maximum fuel enrichment of 5.05 wt% U235 was assumed. Therefore, the license certificate reflects a slightly reduced enrichment limit.
- D. All wood box surfaces assumed an appropriate tolerances as reflected by the section 1 drawings. Application of
these tolerances bound the actual these tolerances measured board thicknesses. Minimum wood thickness were assumed to maximize available fuel space.
- E. All wood end pieces assumed minimum wood thicknesses to maximize available fuel space in the axial direction. The Type A container was chosen since it has the largest internal cavity depth.
- F. Only one bag of polyethylene was assumed in a box to maximize the available fuel volume. The normal thickness of polyethylene used is 0.006". Normally the scrap boxes have two or three bags per box. In the scrap container each box is normally wrapped with an external layer of polyethylene. Polyethylene placed near the absorber plates (other than the internal box bags) was not modeled for conservatism. The volume of the polyethylene due to a single bag was computed using dimensions of the cardboard box prior to it being crushed in the accident. Therefore, the polyethylene bag volume and weight is minimized and fuel volume is maximized. For the limiting accident scrap container case 2000 gms of additional polyethylene was placed midway in each of three major fuel volumes in Model-Rl and away from the borated plates (see Figure 6-5). For
Model-R2 1285 grams of additional Model-R2 1285 grams of additional polyethylene was placed in two major fuel areas (see Figure 6-6). This model

resulted in an approximate **1%** Ak reactivity increase. The actual limit of polyethylene per container is 1000 gms and is conservative.

- G. The cardboard boxes were assumed to be entirely crushed. The nominal thickness
of cardboard is 0.17" thick. The of cardboard is $0.17"$ thick. cardboard was crushed at CNFP and measured with a caliper and found to have a minimum crushed thickness of 0.06". Therefore, the crushed cardboard was modeled as wood and placed adjacent to the wood box surfaces maximizing the available fuel volume. The volume of the cardboard was computed using the crushed post-accident thickness for conservatism. In an actual accident not all cardboard surfaces would be crushed.
- H. For Model-Rl the wood box volume was computed using outer box dimensions of 10.75 square inches. The length was inferred by subtracting the end spacers (with effective thicknesses that conserve wood volume) from the 29-3/8" total length of the box plus spacers for the Type A container. In this model the wood box length was assumed to be 25.625" long and
the balance of wood structures had the balance of wood structures dimensions adjusted to conserve the total wood volume. Model-R2 modeled the exact minimum wood thicknesses, heights, and lengths.

The boards that make up the wood bottom, ends, and sides have a 1/16" tolerance and
bound the thicknesses of the boards bound the thicknesses of the actually measured by CNFP. Therefore, the wood box volume was minimized by using the thinnest individual wood dimensions. The end wood spacer pieces each have a 1/16" tolerance applied to the each wood piece to maximize the fuel cavity volume. For Model-Rl the wood end spacers and the wood sides use toleranced dimensions that have been adjusted to conserve the total volume of wood box material.

- I. The wood support ribs in the drum were modeled only at both ends of the drum. The Z inch steel flange that covers the
front-end of the internal cavity was front-end of the internal cavity was modeled. Other intervening materials that would reduce cask-to-cask neutron transfer (such as ceramic disks and fiberglass insulation in the drum, etc.) were eliminated for conservatism.
- J. The borated aluminum plates (AlB4C) have exact minimum dimensions of 24.98" X 9.24" X 0.365" which were assumed in Model-R2. The dimensions assumed in Model-Ri are 24.98" X 9.2" X 0.365". The final model assumes 25 volt B4C (23.702 wt% B4C -areal density of 83.823 mg/sq. cm.).
- K. A 25% reduction in the Bl° density was made per standard NRC transportation requirement. This penalty originates with the Boral product. The borated aluminum plates (Boralyn) used in the BW2901 container are very homogeneous and do not have the problems attributed to Boral.
- L. The borated plates could shift off center if the wood box walls break apart. The top plate could shift above the wood walls and above the 1-1/4" front spacer or the 3/4" back wood box wall. The top borated plate cannot shift over the back wood spacer. A forward shifted plate offers the greatest axial movement. The off-center shifted plates in Model-Rl were conservatively modeled by truncating all three borated plates, cardboard, and polyethylene by one-half the distance that the top plate alone could shift in the Y and Z directions. This is a conservative model because all three plates are truncated when only the top plate can shift over the wood box walls and the borated plates would remain in the cavity displacing optimized fuel. The remaining area of the cavity is filled with the optimized fuel mixture. The top shifted plate is modeled exactly in Model-R2.

- M. The previous analysis assumed a 1.5" reduction in the diameter of the container (from the outer hoop diameter) based on drop test results. The drop test results are for a container dropped at a 45 degree angle on the cask rim. The resulting maximum localized denting of the rim was assumed for the entire container and is very conservative since a rim dent will not influence the pitch between drums.
- N. In the event the drums assumed a triangular pitch a slightly more compacted fuel volume between drums is possible. This effect was simulated by reducing the diameter of the drums by an amount in a square array that conserved
the fuel volume fraction from a the fuel volume fraction from a triangular pitched array. This model is conservative because the total mass of steel in the outer drum was reduced by reducing the diameter (the 18 gauge thickness was maintained).

To verify the above model a triangular pitch was used to develop a hexagonal close-packed lattice of drums. The lattice requires a total of 37 drums in each of 4 planes. Therefore, the hexagonal lattice models 4 drums more than the 6x6x4 square array. The hexagonal lattice (37X4) was surrounded by 12 inches of water on all sides. The results indicated that the reduced square pitch model was overly conservative by 0.005 **Lk.**

6.3.1.2 Package Regional Densities

The region densities and number densities for the final Model-R2 are provided in Table 6.3.1.2-1. Table 6.3.1.2-1 lists the values for non-fuel and materials. The limiting fuel enrichment is 5.05 wt% U235. Since a variety of fuel volume fractions were evaluated homogenized fuel and water densities are not provided. The CSAS2X module does not require input in this form.

Table **6.3.1.2-1** Material Number Densities

^AB¹⁰ density Avagadro' does not have 25% penalty factor applied. number **=** 0.6022138 x 102' atoms/gaw.

6.4 Criticality Calculation

6.4.1 Calculational Method

The revised criticality analysis was performed with the KENOVa Monte-Carlo code **.** NITAWL-II processes the 27 group cross-section set to provide cross-sections for the analysis. Cell weighting calculations are performed by the XSDRNPM-S code. The SCALE 4.2 CSAS modules are used to automate the computation of resonance treated and cell weighted crosssections and number density input. A series of benchmark cases for low enriched **U""** arrays is described in section 6.5. The bias from these cases is conservatively bounded by the 0.02 bias assumed in this analysis.

Box type geometry options were used in the analysis for normal and accident conditions of transport. Optimization of the fuel loading within the inner cavity and moderation between packages have been examined. Input listings for several bounding cases are provided in Section 6.6.

6.4.2 Fuel Loading Optimization

The first packaging arrangement is for the shipment of fresh fuel pellets. The pellets are placed on 26 gauge (.017" thick) corrugated stainless steel trays. Each box contains either ten trays or twelve trays of pellets plus one extra tray on top **(11** or 13 trays) . The stack of trays is wrapped in 6 mil poly and the approximate 1/8 inch thick cardboard box (actual nominal thickness is 0.17") is constructed around the stack. In the original analysis the stack of boxes is created by placing three boxes on a 3/4 inch hardwood board, then covering them with another board, placing three more boxes and then the top board and strapping the stack together.

In the revised analysis (Models Ri and R2) for fuel in the scrap container, fuel is placed in a hardwood box with a nominal 3/4 inch bottom. A nominal 3/8 inch borated aluminum plate is placed on the wood bottom board followed by three boxes of fuel, another 3/8 inch borated plate, three more boxes of fuel, and a final 3 / 8 inch top borated plate. For the Type A container the back-end construction consists of the 3/4 inch box back, an additional nominal 3/4 inch board 10/04/2002 Rev. 6

followed by 1/4 inch neoprene padding and another 1 inch board. The Type B container has a similar back-end construction as the Type A container except that the 1 inch board is not necessary due to the smaller depth of the cavity. The front end spacer boards are the same for both cask types and consist of a nominal **1** inch board followed by 1/4 inch neoprene. The neoprene on both ends faces the outside of the cask.

In the revised analysis only the scrap container is modeled. The scrap container results bound the pellet-tray configuration for the following reasons:

- **1)** The fuel boxes contain stainless-steel trays which hold a specific number of pellets in an orderly array. The presence of the stainless-steel trays reduces K-effective by approximately 2.6% Ak.
- 2) The pellet-tray fuel configurations allows higher loadings of uranium than for the scrap container. Fuel redistributed within the internal cavity cannot achieve the optimum fuel volume fraction modeled in the scrap container and results in a significant decrease in K-effective.

For the reevaluation of the scrap container it was not necessary to evaluate interspersed moderator cases because the initial analysis demonstrated that the internal cavity filled with 100% dense moderator with the external regions dry resulted in the maximum Keffective.

The tray of fuel pellets in the original analysis was modeled as a slab, each slab containing an equal share of the fuel (except where noted the 370 **lb** limit was used). In the accident scenarios any void spaces were filled with water. Each tier of three boxes was modeled as one long box with a volume equal to the three boxes. The inner container was originally modeled per drawing 1215599E. The reanalysis evaluated 13 and 14 gauge steel. Both carbon steel and stainless steel were also evaluated. The most reactive combination was found to be 14 gauge carbon steel. The space between the inner container and the outer drum was left void with the exception of the front- and

back-end wood support structure. For the accident condition, the inner diameter of the drum was reduced from 22.6 inches (O.D.) to 21.2 inches $(0.D.)$ based on the results of the drop tests³. The drop tests were performed by UNC according to the requirements in the Federal regulations.

This is a conservative model because the drum area was voided (as discussed later the addition of any insulation/moderator into the area outside of the inner container reduces the drum reactivity), optimum moderation conditions were used, and the theoretical density of U02 was used (in the original model only) rather than the actual density (94-96% nominal theoretical density). The most reactive array shape was used - one with a shape factor as close to unity as possible. Also, the most restrictive pitch was used in the XSDRN calculations. The pitch is .406" between pellets on the same tray with a smaller pitch between pellets on different trays. The 406" is more conservative and was used in the evaluation.

The first step of the evaluation was to determine the most reactive drum and then to use this model to determine the size of subcritical normal and accident arrays. The names of the computer runs are listed in the Tables and are indicated by parentheses in the text for identification.

6.4.2.1 Moderator Optimization

An interspersed moderation study was performed to determine the optimum amount
of moderator both inside the inner of moderator both inside the inner container and outside of the inner container. Table 6.4.2.1-1 demonstrates the flooding of the inner container with the outer container somehow voided is the most
reactive case, with a k-effective of reactive case, with a k-effective 0.856±.006 (UNCA2). Use of this case adds
to the conservatism since accidental to the conservatism since flooding of the sealed inner container without getting any moisture in the insulation is so improbable as to be impossible. A more realistic case, one with the outer drum flooded and the inner container dry (IMS11), shows a significant drop in k-effective.

Table 6.4.2.1-1

Results of Interspersed Moderation Study **¹⁰**Tray Model - **6X6X6** Array

6.4.2.2 Pellet Size Evaluation

Early in the evaluation the effect of the pellet size was examined. Two sizes of pellets are used by CNFP depending on what fuel is to be manufactured. These fuel pellets are approximately 37 or .32" **OD.** The box of larger sized pellets **will** physically only hold ten trays, but the box of smaller sized pellets could contain twelve trays of fuel. Therefore a ten tray and a twelve tray model with each tray holding the maximum amount of fuel were run. As shown in Table 6.4.2.2-1 there is no difference in the reactivity. Next a model was created to reflect the actual pellet diameter. In this model, it was necessary to smear the void area and fuel together since this slab of fuel at actual fuel density would exceed the 370 **lb** limit and would not allow moderation in the void areas. This model turned out to be the most reactive model turned out to be the most reactive with a k-effective of 0.891±.006.

Table 6.4.2.2-1

Effect of Pellet Size on K-effective of a Flooded BW2901

6.4.2.3 Wood Box Evaluation

Wood boxes are used to support and contain the packages containing the Uo2 fuel pellets in the inner container. The effect of the wood density was investigated. The results in Table 6.4.2.3-1 show that the k-effective of a flooded container increases with the increasing wood density. Therefore, hard wood was assumed to maximize K-effective. In this analysis a conservative bounding hard wood density of 0.84 g/cc was used.

Table 6.4.2.3-1

Effect of Wood Density on K-effective

6.4.2.4 Normal Shipments

Normal drums are undamaged drums, with no other moderation except the normal amounts of polyethylene and cardboard, loaded with up to 168 kgs of U02 (6 boxes at 28 kgs per cardboard box), and have an outer diameter of 22.6 inches. For the original computer model the outer portion of the drum was left voided. Both a single normal drum and normal array of drums were calculated. The k -effective for a single drum is $.452 \pm 0.005$ (NORM1). For a 15x15x15 array (3,375 drums) the k-effective for the .37 inch OD pellets in the original analysis is .908 ± 0.006 (NORML) and for the .32 inch pellets is .879 ± 0.006 (NORMS).

6.4.2.5 Limiting Arrays for Fissile Shipments

In the original analysis the accident array was composed of drums with a reduced radius (reduces spacing in the array), voided outer container, flooded inner container (limiting case shown by the interspersed moderator study), and all the cardboard replaced by water. These assumptions are conservative. A single flooded drum containing the 0.37 inch pellets has a k-effective of .681 ± 0.006 (FLDlL), and for the 0.32 inch pellets a k-effective of $.725 \pm 0.007$ (FLD1S).

Originally, the accident array was computed with fully loaded and overloaded containers. However, since the arranqement of fuel is under moderated, lesser loadings of fuel allow space for more moderator. It was determined that drums of the smaller pellets contain 144 kgs of fuel.

Ten trays of the normal size pellets (168 kgs UOZ) or twelve trays of smaller pellets (144 kgs U02, plus one additional steel tray fill a box. For boxes of pellets that are not completely full the remaining space is normally filled with empty stainless-steel trays or a steel spacer to prevent damage to the pellets (this is no longer a requirement for reactivity control with the revised and
bounding scrap container evaluation in bounding scrap container evaluation Section 6.4.2.6). A pellet tray may be
partially full of pellets since the partially full of pellets since

optimized full study performed for the scrap container (to be discussed later) bounds the
pellet-trav configuration. The computer pellet-tray configuration. model was altered to represent ten fuel layers of smaller size pellets, with the trays and spacer trays neglected. The 6x6x4 array of drums filled with the smaller fuel pellet (120 kgs) has a k-effective of .906 **[±]** 0.006 (ALND2). The subcritical array for the .37 inch pellets in the accident conditions is 144 drums in a 6x6x4 cubic array, and has a k-effective of $.874 \pm 0.006$ (ACCLP). This model had 168 kgs of UO..

The array of undamaged drums, as noted above, contains 3,375 drums. The limiting subcritical accident array of damaged drums is 144 (6x6x4) with 72 drums being the allowable limit for shipment, (one-half the subcritical accident array).

6.4.2.6 Scrap Pellet Shipment Evaluation

In the packaging arrangement for the shipment of scrap pellets, the pellets are placed in polyethylene bags and the bags placed in the cardboard boxes. Up to six boxes of scrap may be placed in the container. If less than six boxes are used the remaining space must be occupied by an aluminum or wooden spacer to maintain acceptable accident geometry. Three borated plates at a minimum of 25 vol percent B4C in aluminum are used to control reactivity. An additional 2000 **gms** of polyethylene was evaluated using Model-Rl in the container in addition to the single bag of polyethylene in each box. The borated plates were shifted offcenter to model movement in the box and the width and length of the plates were shortened in Model-Rl and replaced with fuel to simulate the top plate shifting over the top of the box walls. The scrap container was evaluated with the optimized fuel volume fraction to maximize reactivity of the system. The center cavity was flooded and the external regions of the cavity and regions outside the drum were dry. This moderator configuration was shown to maximize K-effective in section 6.4.2.1 and the results are shown in Table 6.4.2.1-1. The conservatism contained in the revised

Model-Rl scrap container analysis are described further in Section 6.3.1.1.

The results of the original scrap container analysis are shown in Table 6.4.2.6-1. These results indicated that maximum K-effective for a 0.2 inch pellet occurred for a fuel volume fraction of 0.28. With larger pellet diameters the optimum volume fraction increased slightly to 0.31 for a 0.375 inch diameter pellet.

The results of the scrap container reanalysis using Model-Rl calculations confirm previous findings. The results for a 6x6x4 accident array with 20 volt B.C plates are shown in Table 6.4.2.6-2. If case 1 and case 3 are compared from Table 6.4.2.6-2 it is apparent that offcenter shifted borated plates cause Keffective to increase by approximately 0.011 Ak. Therefore, all subsequent cases were run with the borated plates shifted. Cases 2 through **10** evaluate the optimum fuel volume fraction for pellet diameters of 0.2, 0.315, and 0.375 inches, respectively. A pellet diameter of 0.2 inches was chosen to simulate a pellet fragment. For pellet diameters of 0.2, 0.315, and 0.375 inches, the optimum volume fractions are 0.26, 0.28, and 0.30, respectively. Note that the difference in maximum K-effective for different pellet diameters at the optimum volume fraction is decreasing as the pellet diameter is reduced. These results indicate that a 0.2 inch diameter pellet is near optimum for
maximizing Keffective. The maximum maximizing Keffective. K-effective occurred for a pellet diameter of 0.2 inches with a 0.26 fuel volume fraction.

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Table 6.4.2.6-1

Determination of Optimum Fuel/Water Ratio for Scrap Pellet Shipments 9x9x6 Array

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Table 6.4.2.6-2 Scrap Container Volume Fraction Results With Borated Plates At 20 Volt B4C In Aluminum

6.4.2.7 Limiting Arrays

From the original analysis the normal subcritical array of drums with a 65% packing fraction has 3375 drums in a 15x15x15 array (NORM2) . The k-effective for this array is 0.774 ± 0.005 . A single flooded drum has a k -effective of $0.792 \pm$ 0.007 (SCRP1).

In the original analysis the accident array was composed of drums with a reduced radius, voided outer container, flooded inner container and all the cardboard replaced by water, and the optimum pitch was used. The subcritical array for the accident conditions is 144 drums in a 6x6x4 array (HTODC) . The k-effective for such an array was originally calculated to be 0.912 **[±]** 0.007 for the scrap container. The revised scrap container was evaluated with offcenter shifted plates and an optimum fuel volume fraction for the 6x6x4 accident configuration in Table 6.4.2.6-2 and results in a maximum K-effective of 0.93680 (b16512).

The array of undamaged drums, as noted above, contains 3,375 drums. The limiting subcritical accident array of damaged drums is 144 (6x6x4) with 72 drums being the allowable limit for shipment, (one-half the subcritical accident array)

6.4.2.8 Effects of Increased Polyethylene Content

There was a 600 gram limit on polyethylene for the scrap shipments and an H/X limit of 1.3 for shipments utilizing the trays. A study was originally performed to determine if these limits are still necessary.

Scrap shipments have an upper packing fraction of 65%. In the original study, the remaining area was filled with various amounts of polyethylene. The Original results are shown in Table 6.4.2.8-1.

Table 6.4.2.8-1

Effect of Polyethylene on Scrap Pellet Shipments

The above results show for the scrap shipments that the limit for the amount of polyethylene should be kept under 2000 grams. The bags normally used weigh approximately 50 grams apiece, so it would take more than 40 bags to exceed this mass. There are normally 8 bags at approximately 50 grams per bag, so a "normal" container would have 400 grams of polyethylene, well below the prior 600 gram limit.

For shipments utilizing the pellet trays, extra polyethylene wrap was inserted into the void area inside the polyethylene wrap. An additional 380 grams of polyethylene inside the wrapper (504 grams total) gives a k-effective of .923±.006 (POLL4). Add itionally, the wrap was doubled and tripled. The k-effective for the tripled wrap was .921±.006 (WRAPI). This shows that the polyethylene should not exceed three layers nor should more than 380 grams of polyethylene be allowed inside the wrap.

In the revised scrap container analysis using Model-Rl 2000 additional grams of polyethylene were placed in the fuel volume and away from the borated aluminum plates. The results of this analysis are shown in Table $6.4.2.8-2$ (cases 1-11). Preliminary calculations (not shown) demonstrated that additional polyethylene adjacent to the borated plates increased the worth of the borated plates causing K-effective to decrease. Therefore, the additional polyethylene was placed in the middle of

three fuel layers (see Figure 6-5) and away from the borated plates. This arrangement caused K-maximum to increase by approximately 0.01 Ak. The revised scrap container polyethylene cases indicate that the optimum fuel volume fraction is affected
by the presence of the additional the presence of the additional polyethylene. Pellet diameters of 0.2, 0.315, and 0.375 inches were evaluated and the optimum fuel volume fraction increased by 0.02 for each pellet diameter. With 2000 grams of additional polyethylene K maximum was determined for the 0.2 inch diameter pellet to be 0.94506 (b16750) . Note that case 3 models the container **lid** with 16 gauge steel while the other cases erroneously assumed 12 gauge steel. The difference in K-maximum is less than the combined uncertainty from case 2 and case 3. For conservatism the polyethylene limit for the scrap and pellet-tray configuration is 1000 gms.

Table 6.4.2.8-2 Scrap Container Criticality Results With 2000 Additional Grams Polyethylene and 20 Volt B4C Plates

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6.4.2.9 Triangular Pitch Results

The results thus far have evaluated a 6x6x4 array of drums on a square pitch with the outer radius of the drum reduced to reflect drop test results. If a triangular pitch is assumed it is possible to place the fuel regions in separate drums closer together than with a square pitch. To simulate a triangular pitch the radius of the accident drum was further reduced by approximately 0.736 inches using Model-Ri to conserve the fuel volume fraction associated with the triangular pitch. This model is conservative because it allows neutrons to traverse between drums without intersecting a borated aluminum plate in two planes. Additionally, reducing the diameter of the drum reduced the steel in the outer shell since the same thickness was maintained. This result is shown in Table 6.4.2.9-1 and indicates that the triangular pitch assumption results in a 0.014 Ak reactivity increase. The increase in K-effective results in K maximum of 0.95928 (b16742 - case **1)** and exceeds the 0.95 criticality criterion. Case 1 and previous cases modeled a plate thickness
of 0.355 inches with 20 yolt B4C. The of 0.355 inches with 20 volt B4C. tolerances on the plate allow a minimum plate thickness of 0.365 inches so credit was taken in subsequent cases for the slightly thicker plate. The B4C concentration was increased from 20 to 25 Vol% in aluminum to provide the additional needed reactivity control. Case 2 is a repeat of case 1 with the previously discussed modifications and K maximum becomes 0.94698 (b16742).

To verify the validity of the square pitch model, a hexagonal triangular pitch array was constructed four drums deep. The hexagonal array contains 37 drums per plane. Therefore, there are 4 more drums being modeled than the 6x6x4 array. The array is surrounded by a 12
inch water reflector on all sides. The inch water reflector on all sides. results of case 3 demonstrate that the reduced pitch square lattice model is conservative and the maximum final K-effective using Model-Rl from the triangular pitch result is 0.94208 (b16780).
Table 6.4.2.9-1. Scrap Container Triangular Pitch Results With 2000 gms Polyethylene, Shifted Plates, 11.019" Cavity Dimension 0.365 in. Thick Plates @ 25 Vol% B4C

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6.4.2.10 Model-R2 Development and Bulge Analysis

A revised model to be referred to as Model-R2 was developed for the following reasons:

- **1)** Model-Rl was developed based on conserving total volumes of materials and used a geometry. Model-R2 was developed to exactly model the toleranced dimensions of materials inside the internal cavity to ensure strict correspondence to the design drawings in section **1.**
- 2) Examination of the as-built containers indicated a slight bulge in the internal cavity wall with a maximum cavity width of 11.15 inches. The bulge extends over a small region between two angle iron pieces and is not more than 9 inches in length with the worst dimension (11.15 inches) at the middle between the two angle iron pieces. The bulge is a consequence of the welding process used to attach the internal cavity to the angle iron. Because of this localized bulge the entire cavity length was modeled as having an 11.15 inch square crosssection. This assumption is very conservative because it adds more fuel to the drum than is actually allowed by the actual as-built BW2901 containers.
- 3) To offset the reactivity increase associated with the increase in cavity volume it was necessary to reduce the maximum enrichment from 5. 1 wt% U2 **11** to 5.05 wt% U 23 , reduce the maximum theoretical density of the fuel to 0.976 (97.5% is the maximum allowed density 'in the pellet specification for any FRAMATOME ANP fuel assembly design), and model the AlB4C plates exactly to take credit for the actual volume of the plates (Model-Rl conservatively truncated plates). The borated aluminum Plates were modeled with exact toleranced dimensions of 9.24" x 24.98" x 0.365". Note that assuming the

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11.15 inch maximum cavity dimension along the entire length results in greater off-center shifting of the top plate and the remainder of the fuel than is actually possible with the as-built containers. Since a 1000 gm limit of polyethylene applies to the container the total mass of polyethylene was reduced to approximately 1435 gms. Therefore, the amount of polyethylene modeled remains conservative relative to the actual limit. With the
previously mentioned changes from previously mentioned changes from Model-Rl, Model-R2 remains inherently conservative relative to the existing fabricated containers and conforms precisely to the drawings in Section **1.**

A cross-sectional cut of the internal cavity at the mid-plane is shown in Figure 6-6. A more complete isometric view was not drawn due to the complexity of the KENOVa model (12 axial slices are required to define all of
the internal cavity detail). Without the the internal cavity detail). dimensional detail Figure 6-5 is adequate for a general understanding of the cavity contents and arrangement. Figure 6-6 shows the wood box broken apart to maximize fuel regions that are not shielded by any borated plates in the X,Y, and Z planes. The configuration maximizes K-effective and neutron transport between drums for unshielded fuel regions.

Table 6.4.2.10-1 shows the Model-R2 results. Model-R2 utilizes a triangular pitch. Cases 1-4 identify an optimum fuel volume fraction of 0.28 for the 0.200 inch diameter pellet. These results are completely consistent with Model-Rl results. Therefore, there is no shift in the optimum fuel volume fraction as a consequence of using the exact geometry. Cases 5 and 6 are the limiting cases for pellet diameters of 0.315 inches and 0.375 inches, respectively. Cases 5 and 6 were computed with their respective optimum fuel volume fractions of 0.30 and 0.32. The Model-R2 results indicate that maximum
K-effective occurs for the 0.200 inch K -effective occurs for the 0.200 diameter pellet for a fuel volume fraction of 0.28.

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The maximum K-effective for the system is 0.94803 with a 0.02 bias and 2a uncertainty applied. Therefore, with the use of optimized fuel the scrap container configuration bounds the pellet-tray configuration and satisfies the 0.95 criticality criterion.

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Table 6.4.2.10-1

Scrap container Triangular Pitch Results With 1435 Total Gms Polyethylene, Shifted Plates, **11.15"** Cavity Dimension, Exact Toleranced Dimensions, **5.05** wt% **U235** With 25 Vol% B4C in Aluminum Plates

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6.4.3 Criticality Results

The results of the criticality safety analysis for the BW2901 shipping container analysis are
summarized in Tables 6.4.2.6-2, 6.4.2.8-2, Tables $6.4.2.6-2,$ 6.4.2.9-1, and 6.4.2.10-1. The maximum Keffective values were computed from the following formula:

K-maximum = K -effective + Bias +2 σ .

where K-effective is calculated by KENOVa, σ is the uncertainty in the KENOVa calculation, and, Bias is 0.02 as described in Section 6.5.

With the number of generations equal to 500 a one-sided tolerance factor of 1.763 could be
iustified. However, a conservative 2-sided justified. However, a conservative tolerance factor of 2.0 was maintained for conservatism. Table 6.4.3-1 shows the allowable number of drums to be shipped under the fissile classification.

Table 6.4.3-1 Summary of Limits for the BW2901 Shipping Container

Both packaging arrangements are safe for shipment from a nuclear criticality safety viewpoint. These packaging arrangements must conform to the descriptions and assumptions in this analysis and in the Certificate of Compliance. In addition to the shipping specifications already authorized, the Certificate of Compliance should contain the following specifications:

- **1)** Weight limit will remain at 370 pounds (167.83 Kg) of **UO,** with the U-235 content not to exceed 7.47 kg U^{23}
- 2) The enrichment limit will be 5.05%.
- 3) The maximum allowed pellet density is 97.6% of the UOZ theoretical density (10.96%).

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- 4) A minimum pellet diameter of 0.315" and maximum pellet diameter of .375" OD for shipments utilizing trays.
- 5) The pellet trays should normally be fully loaded and the boxes may have up to **10** trays for larger diameter pellets and up to 12 trays for smaller diameter pellets. There is no criticality requirement that unoccupied space in the box or on a tray of pellets contain stainless-steel or a volume displacement device since optimized fuel was used in the analysis. The use of stainless-steel trays or spacers is recommended to prevent damage to pellets.
- 6) For partial shipments with less than 6 boxes of fuel, the remaining space must be occupied with aluminum or wood blocks of equal volume to prevent shifting of The fuel boxes or borated aluminum plates.
- 7) The wood box shall contain three borated aluminum plates with a minimum of 25 volume % B4C (23.702 wt%) **.** The minimum areal density of B10 shall be 83.823 mg/sq cm per plate. The minimum dimensions of the borated aluminum plate shall be 24.98" x 9.24" x 0.365". One plate shall be located on the box bottom, the second on top of the first layer of fuel (middle plate), and the third on top of the second layer of fuel (top plate). See Figures 6-5 and 6-6 and Section 1 drawings for the arrangement.
- 8) The scrap and pellet-tray containers shall contain no more than 1000 gms of polyethylene.

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6.4.4 Selected Input File Listings

This section contains a listing of the input decks that represent the limiting cases performed in both the original and revised analyses. They are in order:

- **1)** 1 flooded drum with .37" OD pellets on pellet trays
- 2) 1 flooded drum with .32" OD pellets on pellet trays
- 3) 1 flooded drum with scrap pellets
- 4) 15x15x15 normal array with .37" OD pellets on pellet trays
- 5) 15x15x15 normal array with .32" OD pellets on pellet trays
- 6) 15x15x15 normal array with scrap pellets
- 7) 6x6x4 accident array with .37" OD pellets on pellet trays
- 8) 6x6x4 accident array with .32" OD pellets on pellet trays
- 9) Rev. Model-R2 37x4 hexagonal accident array with scrap pellets

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6.5 Critical Benchmark Experiments

6.5.1 Benchmark Experiments and Applicability

Twenty-one Lynchburg Research Center (LRC) critical experiments were examined to quantify the KENOVa bias using both KENO-IV and KENOVa results for low-enriched uranium systems. The experiments involved three dimensional arrays of uranium fuel rods with intervening regions of either water, borated isolation sheets, or B4C pins.

The 21 LRC critical configurations were chosen for the benchmark calculations and have the following similarities to the container configuration:

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- 1) low-enriched systems,
2) interspersed hydrogenous moderator 2) interspersed hydrogenous moderator
- 3) borated aluminumisolation sheets,
- 4) fissile material size and shape.

Thus, the criticality experiments chosen for the benchmark calculations are directly applicable for this analysis.

6.5.2 Details of the Benchmark Calculations

The approach to defining an applicable bias is to perform benchmark calculations using the KENO-IV code with the 27 group cross-section library. Since KENOVa was used in the analysis of the BW2901, comparison cases were run between KENO-IV and KENOVa using cases from the original BW2901 license which demonstrate excellent agreement between both KENO versions. It was necessary to use KENOVa in the BW2901 analysis for several reasons:

- **1)** The detailed geometry of the inner cavity would be very difficult to model using KENO-IV and KENO-IV does not allow modeling of a hexagonal array,
- 2) Use of the CSAS modules reduces the chance of errors in the treatment of resonance absorbers and in the preparation of number density input,

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6.5.2.1 LRS Critical Benchmark Results

The 21 critical LRC benchmark calculations were evaluated using the 27 group SCALE 4.2 cross-section library in Reference 5. The KENO-IV calculations in Table 6.5.2.1-1 were performed using 625 neutrons per generation and 600 generations. The first 102 generations were skipped yielding a total of 311,250 neutron histories. Examination of Table 6.5.2.1-1 results indicates that the SCALE 27 group cross-section library with the CSASN (BONAMI-S/NITAWL-II) cross section treatment results in a maximum non conservative bias of -0.01429 +0.00148 for core IX.

To test the adequacy of the neutron density per generation, core VI was rerun with a total of 850 generations and 2000 neutrons per generation. This case results in k-effective of 0.99781 ±0.00053 with only the first 3 generations skipped. This case is shown in Table 6.5.2.1-2 along with other core VI results and indicates that larger neutron densities and generations are required to obtain meaningful results and statistics.

Table 6.5.2.1-3 shows the calculated bias For the eight most limiting core configurations identified from Table 6.5.2.1-1 using 2000 neutrons/generation and 847 generations. The maximum calculated bias with uncertainty was - 0.01335 ± 0.00197 for core XVI and represents a core with a water gap of 1.288 inches with borated aluminum isolation sheets in the water gap region. With the exception of core I and IX the

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other cases contained B4C pins or borated aluminum isolation sheets. There is no apparent trend of the bias with separation distance or intervening materials. Therefore, the same 27 group bias and uncertainty is used for all problem types
represented by these critical by these critical configurations.

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Table 6.5.2.1-1

RENO-IV LRC Critical Results With CSASN 27 Group Library (Neutrons per Generation = 625; Number of Active Generations = 498)

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Table 6.5.2.1-2 RENO-IV LRC Core VI Results Using Variable Generations and Densities With CSASN 27 Group Library

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Table 6.5.2.1-3 KENO-IV LRC Critical Results Using CSASN 27 Group Library For Worst Eight Core Configurations (Neutrons per Generation = 2000; Number of Active Generations = 847)

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6.5.2.2 Statistically, Calculated Maximum Bias

The previous calculations defined the maximum 27 group bias plus uncertainty from using the worst single core configuration. A more precise understanding of the bias is to view it in a statistical sense. It is possible that any single measured or calculated core configuration could have included larger errors than those that would actually occur **if** the experiment were repeated. To state the case another way, is it appropriate to penalize all future criticality results because one of twenty-one core configurations appears to indicate a larger bias which could be the result of random measurement error? This type of problem is addressed in statistical analysis by considering the determination of the expected sample mean and is a valid approach to use when groups of calculations are done at different conditions (as is the case for the different core configurations) . The sample mean approach would view the core critical experiments as separate entities. If each core configuration experiment (and KENO-IV analysis were repeated a very large number of times, all core configurations would converge on the true sample mean. Furthermore, the true sample mean would be the same for
each of the experiments. The true or each of the experiments. expected sample mean is defined as:

$$
E (x) = \sum_{i=1}^{n=M} w_{i} x_{i} / \sum_{i=1}^{n=M} w_{i}
$$

where wi and xi are the weighting factors and the core bias values, respectively. $E(x)$ is the expected sample mean. The weighting factors are defined as:

$$
w = n_1/\sigma^2
$$

where n; and 61 are the number of KENO-IV

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generations (sample size) and the combined measured and KENO-IV calculated standard deviation, respectively.

The expected sample mean of the bias was conservatively computed to be -0.01159 using only the worst eight core configurations while for comparison the average bias of the eight worst core configurations was computed to be -0.01189. Both values are very close. The standard deviation for the expected sample mean method is the maximum standard deviation computed for any individual core. In this case the la value is ±0.00197 from core XVI. The one-sided upper tolerance factor at the 95/95 confidence level is assumed to be the same as for the KENO-IV results or 1.763. For the average bias method the standard deviation is computed directly from the worst eight core configurations to be ±0.0009093 with a one-sided upper tolerance factor at the 95/95 confidence level of 3.188. To summarize; the expected sample mean method results in a bias of -0.01159 ±0.00347 (1.763o). The average bias method results in a bias of -0.01189 $±0.00290$ (3.188 σ). For this analysis a bias of 0.02 was used (with no uncertainty) to conservatively bound any reasonable expected bias and to be consistent with the original licensed analysis.

6.5.2.3 Benchmark Comparisons Using KENO-IV and KENOVa

Benchmark cases were run for the container using both the 123 group and the 27 group cross-section libraries using the SCALE4.2 code package. The CSAS2X module was used which uses the BONAMI-S/NITAWL-II/XSDRNPM-S/KENOVa code sequence. Since, the Reference 1 analysis used the 123 group library with KENO-IV, a benchmark case was run with KENOVa for comparison.

The most limiting case identified in the original license analysis was for a 6x6x4 accident array of containers with the center region of the drum filled with water and uranium scrap and all external regions of the drum (and outside the drums) were void. A 2c uncertainty and 0.02 bias was maintained as in the original license.

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Table **6.5.2.3-1** Benchmark R-effectives For The 6x6x4 Accident Array

Table 6.5.2.3-1 results indicate that the 27 group and 123 group base K-effective results agree quite well with the base accident calculation results (compare original license base case, b11825 and b11850). K-maximum values were different because the reanalysis considered 847 active generations with 2000 neutrons per generation. Therefore, the total number of neutron histories is many more than the referenced base accident case.

6.5.3 Results of Benchmark Calculations

The results of the benchmark calculations and the KENOVa comparison cases suggest that a KENOVa bias of 0.01159 + 0.00347 (1.763o) is 3ustifiable. However, to ensure conservatism of the bias with KENOVa the original SAR bias of 0.02 was maintained. The use of this bias implies 0.005 Ak conservatism.

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Input decks were manually cut and pasted into pages 6-51 - 6-77 due to the age and lack of availability.

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1 Flooded Drum With 0.37" OD Pellets on Pellet Trays (Original Scale3 Deck)

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1 Flooded Drum With 0.32" OD Pellets on Pellet Trays (Original Scale3 Deck) $\sim 10^{-11}$

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1 Flooded Drum With Scrap Pellets
(Original Scale3 Deck)

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15x15x15 Normal Array With Scrap Pellets (Original Scale3 Deck)

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6x6x4 Accident Array With .37" OD Pellets on Pellet Trays
(Original Scale3 Deck)

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37x4 Hexagonal Accident Array With Scrap Pellets

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6.6 REFERENCES

- 1) Title 10 Code of Federal Regulations Part 71 (1OCFR71)
- 2) Certificate of Compliance 6294, Rev. 13 for Package USA/6294/AF
- 3) "Design and Structural Evaluation of a Low Enriched U02 Pellet and Powder Shipping Package - Model UNC 2901," W. L. Hoffman, United Nuclear Corp.; April 1979
- 3) Deleted
- 5) "SCALE 4.2 Modular Code System for Performing Standardized Computer Analyses For Licensing Evaluation," ORNL CCC-545, Oak Ridge National Laboratory, Oak Ridge, Tenn., 1993.
- 6) FRAMATOME ANP Document No. 38-1210275-00, "Application For Use Of Shipping Container Model No. UNC-2901 For The Transport of Special Nuclear Material," Certificate Of Compliance No. 6294, Combustion Engineering, Inc., NRC Docket No. 71-6294.

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Model box (top) is created from three real boxes wvthout cardboard or polyethylene bet ween box ends Inside length delermined by length of three stoel tlvs - 3 X **7.75^** = *23,25"*

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Figure 6-3 Original Pellet Tray Model

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BW 2901 Top View

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Figure 6-3A Typical Container Model

BW 2901 Top View

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Figure 6-4 Original Pellet Tray Model

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18 Guage Carbon Steel

BW2901 Side View

B&W FUEL COMPANY
APPLICATION FOR THE USE OF THE BW-2901 SHIPPING CONTAINER REV: 5

Figure 6-4A Typical Container Modet

FIGURE WITHHELD UNDER 10 CFR 2.390

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Figure 6-5 Scrap Container Accident Model (Model-Ri)

FIGURE WITHHELD UNDER 10 CFR 2.390

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B&W FUEL COMPANY APPLICATION FOR **THE** USE OF THE BW-2901 SHIPPING CONTAINER

REV: **5**

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7.0 OPERATING PROCEDURES

Loading and unloading of the package is a relatively simple, straight forward operation, however, to ensure proper and safe packaging, detailed procedures are employed. New fuel pellets, reject pellets and/or hard scrap are shipped in the BW-2901 shipping container. The following generalized description provides a brief overview of the detailed procedures for loading and unloading the containers. Typically, fuel pellets and UOZ powder are manufactured at the selected pellet vendor's manufacturing facility (currently Framatome ANP, Inc. in Richland, WA) and fuel pellets are shipped to the FRAMATOME ANP, Lynchburg, Virginia facility for fabrication into completed fuel assemblies. Shipments from Lynchburg to the pellet vendor are usually of excess material or scrap generated during handling. In general, the information provided below for loading and unloading pellets also applies, except for the point of origin as noted above, to reject pellets and/or hard scrap.

7.1 PROCEDURES FOR LOADING THE CONTAINER

The following loading steps apply to all shipping configurations and pellet contents. Pellet trays are filled and packaged within cardboard boxes. Next, the boxes are transferred to a scale area where they are weighed and verified to be within the loading limits established by the criticality analyses (see Section 6). From the scale area the pellet boxes are brought to the BW-2901 loading area or they are placed in storage to await shipment.

Prior to loading the pellet boxes into the shipping container, the closure ring, outer drum lid, circular insert, inner container cover and cover gasket are removed from the shipping container. The outer shell is inspected to assure that there are no cracks, holes or tears in the drum. The shipping cradle, upon which the shipping containers rest, is also inspected to assure it is in reasonable condition prior to use, i.e., no bent legs, straps in place, etc. Once the shipping container and shipping cradle, are determined to be acceptable for use, the pellet boxes can be loaded.

Whether shipping in the horizontal or vertical position, the same BW-2901 shipping container loading configuration is employed. Pellet boxes are loaded into the inner container, using the separator discussed in Section 7.1.1 or limiting pellet box payload discussed Section 7.1.2.

Before reinstalling the inner container cover and cover gasket, the gasket is inspected for acceptability.

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Gaskets shall be replaced at signs of visual degradation. After the gasket and inner container cover are installed over the inner container studs, the nuts are installed and torqued to 35 **±** 5 ft - lbs. The circular wooden top spacer is replaced, the outer lid of the drum secured with the ring clamp and the closure ring bolt is torqued to 45 ± 4.5 ft - lbs using a calibrated torque wrench. Finally, the shipping container is appropriately labeled and a tamper-proof seal is applied. The shipping container is then ready for shipment.

7.1.1 Inner Container Loading With Borated Al Plates

Pellet boxes are placed into the inner container in two layers of three boxes each as shown on drawing 1215597D. Three borated aluminum absorber plates, 3/8" thick and having a minimum BIO areal density of 83.823 mg /cm2, are shipped within each BW-2901 container. The absorber plates are located below the bottom layer of pellet boxes, between the two layers of pellet boxes and above the top layer of pellet boxes in each container. All absorber plates have a unique symbol and serial number stamped into at least one end of each plate. Verification of the plate stamp is performed as part of the container loading process. In containers having less than six boxes, solid aluminum or wood spacers are used to occupy the void areas.

7.1.2 Inner Container Loading Without Borated **Al** Plates

7.1.2.1 Pellets **<** 4.03 **%**

When not using borated Aluminum **(Al)** absorber plates, the maximum number of pellet boxes for fuel < 4.03\$ that can be shipped is \bar{f} our (4) container with the remaining space being filled by **Al** or wood spacer blocks in any configuration.

7.1.2.2 Pellets **<** 4.97 **%**

When not using borated Aluminum **(Al)** absorber plates, the maximum number of pellet boxes for fuel _< 4.97% that can be shipped is three (3) container with the remaining space

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being filled by **Al** spacer blocks. Pellet boxes and **Al** spacer blocks are placed into the inner container in two layers of three, alternating the pellet boxes and the **Al** spacer blocks. Each layer should alternate a pellet box and an **Al** spacer block. For the bottom layer the loading arrangement should be pellet box, AI spacer, pellet box. For the top layer the loading arrangement should be **Al** spacer, pellet box, **Al** spacer. All fuel pellet boxes are required to be completely full. For partial loads, the void space may be filled with empty trays. The maximum number of shipping containers per truck when not using the borated aluminum absorber plates is 56.

7.2 PROCEDURES FOR UNLOADING THE CONTAINER

A generalized package unloading discussion is provided below since unloading is, for the most part, just a reverse of the loading process described above in detail. Upon arrival the shipping containers are inspected for potential shipping or handling damage and to verify the integrity of the tamper-proof seals. If the container is found to be damaged and/or the seal has been tampered with, management is informed. If each container is undamaged and each tamper-proof seal is intact, the BW2901 shipping containers are transferred, if necessary, to an unloading area.

Once located in the unloading area appropriate for the shipping configuration (i.e., horizontal or vertical), the closure ring, outer drum lid, circular wooden top spacer, and the inner container nuts, cover and gasket are removed from the shipping container. The pellet boxes are transferred to a temporary storage area, then to a receiving scale station and weighed. After completing receipt inspection, the pellet boxes are transferred to a storage area or into the manufacturing process, as necessary.

Once the inner container has been unloaded, the container is re-loaded, or the packaging materials are replaced, the wooden insert is replaced, then the inner container cover secured. The outer drum lid is secured with the ring clamp and an "EMPTY" label attached to the outside of the container. The empty shipping containers are moved to a transport vehicle or to a storage area to await return to the applicable fuel vendor.

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8.0 ACCEPTANCE TESTS AND MAINTENANCE PROGRAM

- 8.1 Acceptance Tests
	- 8.1.1 Containers

Containers will be fabricated in accordance with the design drawings referenced in the Certificate of Compliance. The approved Quality Assurance Manual will be used to ensure compliance. Any changes in the drawings shall be submitted to the NRC for approval.

As a minimum, the outer shell of each container shall be conspicuously and durably marked with the owner, package model number, gross weight and package identification number assigned by the NRC.

8.1.2 Boralyn Plates

The Boralyn plates that are to be placed inside the container are a mixture of Aluminum and Boron Carbide. To ensure these poison plates meet the requirements of this package the following inspections/tests will be performed:

- **1)** The length, width, and thickness of the plates will be verified using inspection plan prior to being placed in service to ensure the validity of the dimensions and tolerances.
- 2) The minimum B^{10} areal density of 83.823 g/cm2 for the plates will be verified with neutron attenuation tests on plate and coupon samples using an inspection plan. If the material is so black that the uncertainty of the measurement can not confirm minimum areal density, the minimal **B10** areal density will be confirmed using the chemical samples described below.
- 3) Chemical samples will be taken to measure the boron content of the plate material and the amount of B¹⁰ in the boron to independently verify the minimum B^{10} areal
density of 83.823 σ/cm^2 using an density of 83.823 g/cm² using inspection plan.

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8.2 Maintenance Program

Repair and maintenance will also be performed only in accordance with approved drawings and procedures. The shipping containers have no moving parts which require -periodic maintenance. Inspections of the container assembly are performed as specified in Section 7. Any unacceptable condition discovered during these inspections is noted and the container appropriately tagged for maintenance.