

71-9102

NEUTRON PRODUCTS inc

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February 16, 2007

Ms. Nancy Osgood
Senior Project Manager
Spent Fuel Project Office
Office of Nuclear Material Safety
and Safeguards
U.S. Nuclear Regulatory Commission
Two White Flint North
11545 Rockville Pike
Rockville, MD 20852-2738

VIA FAX: 301-415-5370 Original via UPS

Re: Certificates of Compliance USA/9102/B(U) and USA/9102/B()

Dear Ms. Osgood:

Per our telephone conversation of January 30, 2007, Neutron has elected to request an amendment to the referenced CoCs rather than revise drawing 240116 Revision G. Accordingly, please add the following note, or equivalent, to the referenced CoCs:

“The two permanent package identification labels, and the single temporary package identification holder are attached with 3/16 inch aluminum pop rivets. The two manufacturer’s stamped name and date labels are attached with 1/8 inch aluminum pop-rivets. The temporary identification labels are held in their holder with a single 1/4-20 stainless steel screw.

The eight one-quarter inch holes remaining from previous permanent package identification labels and the twelve half inch vent holes are covered by waterproof tape.”

The creation of the eight one-quarter inch holes when the original labels were replaced with larger permanent labels for compliance with harmonization does not reduce the safety of the package based on the following:

- The half inch vent holes are intended for preventing of the build-up of pressure in the

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Ms. Nancy Osgood, Certificate of Compliance USA/9102/B() and USA/9215/B(U)
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package by gases which may be created by the heating of the wood under accident conditions, and are covered by waterproof tape to keep the weather from entering the packages during normal shipments;

- The area of each quarter-inch hole is less than 25% of the area of each half inch vent hole;
- The force on the tape covering the quarter-inch holes from any gases which would be created in the package by heating the wood would be less than 25% of that on the tape covering the half inch holes;
- The size of the pieces of waterproof tape and, therefore, the adhesive area and force holding each tape to the steel shell is approximately the same for the tape covering the quarter and half inch holes; therefore,
- The pieces of tape covering the half inch holes are expected to allow venting before venting, if any, occurs through the quarter-inch holes; and, in any event,
- Venting through both the additional eight quarter-inch holes and the half inch holes would not add significant area for venting (less than 17%) to the total area available.

If there are any questions or problems, please let me know.

As I told you, I now primarily telecommute. I can always be reached by telephone through my office and often at home or on my cell phone. E-mails should be sent to my home and I will forward them to my office.

Sincerely



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