

# JL SHEPHERD & ASSOCIATES

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May 9, 2007

Mr. Stu Brown  
Spent Fuel Project Office  
United States Nuclear Regulatory Commission  
11555 Rockville Pike  
Rockville, MD 20852

Re: New Design Certificate of Compliance Package

Dear Stu:

You will recall that last August, Marty Brownstein and I appeared before a group of NRC Engineers and others and presented a package concept which we are now in process of turning from concept into reality.

Our basic design activities have been accomplished and drawings are being published. In the course of obtaining information (Statements of Qualification) from construction and test facilities, some questions have arisen which require clarification before we continue. They are:

1. Vibration Testing. Due to the size of the proposed package (8,500 lbs) performance of standard transportation vibration testing will be difficult. Southwest Research Institute proposes to perform this testing on uniaxial seismic simulators rather than electrodynamic shakers in order to accommodate the weight of the package, but poses limitations on the upper frequency limit, based upon the existing equipment. For this testing, the assumption is made that the test environment will be based on MIL-Std-810 transportation environments, but limited to testing below 100 Hz. Is this approach acceptable?
2. Reduced External and Increased Internal Pressure Tests. Since the package proposed does not include a sealing device or valve system, can these tests be eliminated, provided the rationale for their elimination (no sealing devices/mechanisms) is explained in the application?

Thank you in advance for your prompt response to these questions.

Sincerely,



W.H. BROWN  
Project Manager

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