



**Department of Energy**  
Washington, DC 20585

**MAY 30 2007**

Attn: Document Control Desk  
Director, Spent Fuel Project Office  
Office of Nuclear Material Safety and Safeguards  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555-0001

In a letter dated May 9, 2007, the Department of Energy received a Request for Additional Information (RAI) concerning the application for air transport of the ES-3100 shipping package. These RAIs were discussed during a public meeting with the Nuclear Regulatory Commission on May 10, 2007. The attached document, Y/LF-781, prepared by BWXT Y-12, LLC, represents the response to the RAIs on Certificate of Compliance No. 9315, Revision 4 for the Model ES-3100 Package, Docket No. 71-9315, TAC No. L24057

Key issues raised in the RAIs concerned the definition of the TRIGA fuel content and structural integrity of the TRIGA fuel pellets under hypothetical accident conditions. This response includes a specific description of the TRIGA fuel that the applicant wishes to add to the authorized contents of the ES-3100 and a clarification that there is no credit taken for the structural integrity of the ES-3100 or the TRIGA fuel contents under air transport HAC.

This submittal includes three attachments. The first is the RAI response document (Y/LF-781). The second is page changes to the ES-3100 Safety Analysis Report (Document No. Y/LF-717, R1). These affected SAR pages are noted as "Change Page 2" in the footer. A guide to insertion of these change pages in the SAR is included. Third is a mark-up of the latest Certificate of Compliance (Revision 3) with changes directly applicable to this revision for TRIGA fuel contents and air transport.

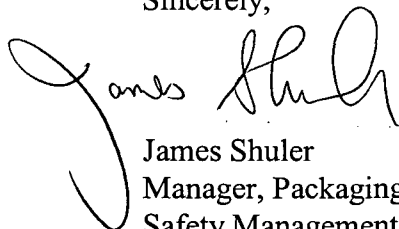
The applicant respectfully requests that these responses be reviewed on an expedited schedule. A revised Certificate of Compliance is needed by mid-June to support a Foreign Research Reactor program shipment of fresh TRIGA fuel in July. The original of this letter with an attachment is being sent to the Document Control Desk. Ten copies of this letter with attachments are being delivered to Kimberly J. Hardin, Project Manager, Licensing Branch, Division of Spent Fuel Storage and Transportation, Office of Nuclear Material Safety and Safeguards.



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If you have any questions, please contact me at 301-903-5513.

Sincerely,

A handwritten signature in black ink, appearing to read "James Shuler". The signature is written in a cursive style with a large, looping initial "J".

James Shuler  
Manager, Packaging Certification Program  
Safety Management and Operations  
Office of Environmental Management

Enclosures

cc:

Kimberly J. Hardin, NRC  
Joe Bozik, NNSA NA-26  
Dana Willaford, DOE ORO  
Jeff Arbital, BWXT Y-12  
Steve Sanders, BWXT Y-12