

July 03, 2007

Mr. W. H. Brown
Project Manager
J. L. Shepherd & Associates
1010 Arroyo Avenue
San Fernando, CA 91340-1822

SUBJECT: RESPONSE TO J. L. SHEPHERD LETTER DATED MAY 9, 2007

Dear Mr. Brown:

I am writing in response to your letter dated May 9, 2007. In that letter you requested clarification on two items. Your first question was related to physical vibration testing to demonstrate compliance with 10 CFR 71.71(c)(5). You noted that your selected testing facility is limited to testing specimens at frequencies less than 100 hertz. The proposed physical testing is acceptable as long as it is part of the fatigue analysis; see Section 2.5.6.5 of the Standard Review Plan for Transportation Packages for Radioactive Material, NUREG-1609. Also, please note that the staff will accept an analytical demonstration in lieu of physical testing.

Your second question was related to not performing either the reduced external test or increased external pressure test to demonstrate compliance with 10 CFR 71.71(c)(3) and (4) respectively. The stated basis for not performing these tests was that "the package proposed does not include a sealing device or valve system." Based on the presentation you made on August 2, 2006, we understand that the two new proposed packagings will be designed to transport special form material. Therefore, your application needs to demonstrate either there will be no possibility of an internal-external pressure difference caused by the packaging closure barrier or the results of an event caused by such a pressure differences, specified in either 10 CFR 71.71(c)(3) or (4), will not impact the packaging from performing as intended. In the alternative, the staff will accept analytical results in lieu of physical testing to demonstrate the design capability of the packaging to withstand both the prescribed reduced external pressure and increased external pressure tests.

Should you have any other questions please do not hesitate to contact me a (301) 492-3317.

Sincerely,

/RA/

Stewart Brown, Senior Project Manager
Licensing Branch
Division of Spent Fuel Storage and Transportation
Office of Nuclear Material Safety
and Safeguards

Docket No. 71-9327

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