

July 10, 2008

MEMORANDUM TO: Mark S. Delligatti, Chief
Rulemaking Branch B
Division of Intergovernmental Liaison and Rulemaking, FSME

FROM: Eric J. Benner, Chief /RA/
Licensing Branch
Division of Spent Fuel Storage and Transportation, NMSS

SUBJECT: NAC-UMS® UNIVERSAL STORAGE SYSTEM - AMENDMENT 5
RULEMAKING (TAC NO. L24032)

We have completed our technical review of the proposed Certificate of Compliance (CoC) No. 1015, Amendment No. 5, and the proposed Technical Specifications (TS), Appendices A and B, for the NAC-UMS® Universal Storage System in accordance with 10 CFR Part 72. The staff has prepared a preliminary Safety Evaluation Report (SER) documenting our review. The proposed changes to the CoC, including the TS, are indicated by vertical lines in the margins. The changes proposed for Amendment No. 5 are discussed in the staff's preliminary SER. We are forwarding these documents to you for inclusion in the proposed rulemaking package for this storage system.

The changes proposed for Amendment No. 5 would allow the storage of high burnup PWR fuel assemblies (up to 60 GWd/MTU assembly average burnup). Other proposed changes include: 1) elimination of the requirement for the use of a tamper-indicating seal on the concrete cask lid bolts; 2) revision of the Technical Specification Section B2.1 written reporting requirement from 30 to 60 days for deviations from fuel loading conditions; 3) elimination of the requirement for Charpy V-notch impact testing of the 0.625-inch nominal thickness BWR support disk material; 4) revision to Delta note 8 on license drawing 790-585 to make the use of the structural lid and shield lid threaded plugs and dowel pins optional; 5) revision of the TS definitions of intact and damaged fuel to conform with the NRC guidance of Interim Staff Guidance (ISG) ISG-1, Revision 2; and 6) revision to the TS requirements to limit potential thermal cycling of the fuel cladding, to conform with the NRC staff's position in ISG-11, Revision 3. NAC originally proposed the elimination of the Technical Specification requirement (Limiting Condition for Operation A 3.1.5) for the helium leakage test of the canister shield lid to canister shell weld; however, in its September 6, 2007, letter, NAC supplemented its application to reinstate the helium leak testing requirements.

The proposed CoC and TS, and preliminary SER have been placed in ADAMS (see reference below) and are available for your use in the rulemaking package. The Division of Spent Fuel Storage and Transportation, NMSS, will designate these documents as Official Agency Records after the Executive Director for Operations has approved the package (ADAMS Package No. ML081620083).

Docket No. 72-1015

ADAMS References: 1. Proposed CoC No. 1015, Amendment 5 (ML081890228)
2. Proposed TS, Appendix A (ML081620554)
3. Proposed TS, Appendix B (ML081620551)
4. Preliminary SER (ML081840661)

Contacts: James R. Hall, NMSS/SFST, (301) 492-3319
Daniel T. Huang, NMSS/SFST, (301) 492-3315

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