

August 5, 2008

U.S. Nuclear Regulatory Commission
11555 Rockville Pike
Rockville, MD 20852-2738

Attn: Document Control Desk

Subject: Acceptance of NRC Planned Revisions to the Certificate of Compliance (CoC) and Technical Specifications (TS) for the NAC MAGNASTOR System

Docket No. 72-1031 (TAC No. L24115)

- Reference:
1. Resubmittal of NAC MAGNASTOR System Application for Approval, NAC International, August 6, 2007
 2. NAC MAGNASTOR System Application – Safety Analysis Report, Revision 2, NAC International, June 16, 2008
 3. Submittal of Supplement to the NAC MAGNASTOR System Safety Analysis Report, Revision 2, NAC International, June 24, 2008
 4. Submittal of Final Draft Certificate of Compliance for the NAC MAGNASTOR System, NAC International, July 9, 2008
 5. E-mail from Randy Hall, NRC, transmitting a list of proposed changes to the MAGNASTOR CoC and Technical Specifications, as well as copies of the revised documents, July 31, 2008

In response to Reference 5, NAC International (NAC) has reviewed the proposed changes to the MAGNASTOR CoC and TS (Appendix A and Appendix B), as well as the revised documents. Attachment 1 to this letter contains the as agreed upon changes to the CoC and TS. NAC has no further comments.

In addition, NAC will make a correction to page 3.8-3 of the MAGNASTOR SAR to incorporate the words that were inadvertently omitted when transferring NAC's March 7, 2008 response (conference call minutes) to Revision 2 of the SAR. "...In all cases, the thickness of the clad was reduced by 120 micros (0.0047 inch). Cases 1 through 4 require a separate ANSYS model and LS-DYNA model to represent unique..." will be included in the MAGNASTOR Final Safety Analysis Report.

Thank you for your continued effort toward timely certification of the MAGNASTOR storage system to support anticipated utility needs.

If you have any comments or questions, please contact me on my direct line at (678) 328-1274.

Sincerely,



Anthony L. Patko
Director, Licensing
Engineering

Attachment

ED20080104



NACSSO1



**Revisions to MAGNASTOR
CoC and Technical Specifications**

CoC:

1. Modify the third sentence of the third paragraph under “Description” to read, “The cylindrical shell plus ... port covers *are stainless steel and constitute the confinement boundary.*” (modification in italics) for consistency with the level of description of the fuel basket and the concrete cask materials.

Technical Specifications:

Modify the text as indicated below.

Appendix A TS:

1. Page A4-2

TS 4.2.2

“Proposed alternatives to ASME Code, Section III, 2001 Edition with Addenda through 2003, other than the alternatives listed in Table 2.1-2 of the FSAR, may be used when authorized by the Director of the Office of Nuclear Material Safety and Safeguards or designee. The request for such alternatives should demonstrate that:

1. The proposed alternatives would provide an acceptable level of quality and safety,
or
2. Compliance with the specified requirements of ASME Code, Section III, Subsections NB and NG, 2001 Edition with Addenda through 2003, would result in hardship or unusual difficulty without a compensating increase in the level of quality and safety.

Requests for alternatives shall be submitted in accordance with 10 CFR 72.4.”

2. Page A4-3

TS 4.3.1.i.

“The maximum design basis earthquake acceleration at the ISFSI pad top surface to prevent cask tip-over is equal to, or less than, 0.37g in the horizontal direction and equal to, or less than, 0.25g in the vertical direction.

Site-specific cask sliding is permitted with validation by the cask user that the cask does not slide off the pad and that the g-load resulting from the collision of two sliding casks remains bounded by the cask tip-over accident condition analysis presented in Chapter 3 of the FSAR.”

3. Page A4-4

TS 4.4.a

“The mobile lifting device shall have a minimum safety factor of two over the allowable load table for the lifting device in accordance with the guidance of NUREG-0612, Section 5.1.6 (1)(a), and shall be capable of stopping and holding the load during a design earthquake event;”

4. New Page A5-4

5.7 Training Program

A training program for the MAGNASTOR system shall be developed under the general licensee’s systematic approach to training (SAT). Training modules shall include comprehensive instructions for the operation and maintenance of the MAGNASTOR system and the independent spent fuel storage installation (ISFSI).

5.8 Preoperational Testing and Training Exercises

A dry run training exercise on loading, closure, handling, unloading, and transfer of the MAGNASTOR system shall be conducted by the licensee prior to the first use of the system to load spent fuel assemblies. The training exercise shall not be conducted with spent fuel in the TSC. The dry run may be performed in an alternate step sequence from the actual procedures, but all steps must be performed. The dry run shall include, but is not limited to, the following:

- a. Moving the CONCRETE CASK into its designated loading area
- b. Moving the TRANSFER CASK containing the empty TSC into the spent fuel pool
- c. Loading one or more dummy fuel assemblies into the TSC, including independent verification
- d. Selection and verification of fuel assemblies to ensure conformance with appropriate loading configuration requirements
- e. Installing the closure lid
- f. Removal of the TRANSFER CASK from the spent fuel pool
- g. Closing and sealing of the TSC to demonstrate pressure testing, vacuum drying, helium backfilling, welding, weld inspection and documentation, and leak testing
- h. TRANSFER CASK movement through the designated load path
- i. TRANSFER CASK installation on the CONCRETE CASK
- j. Transfer of the TSC to the CONCRETE CASK
- k. CONCRETE CASK lid assembly installation
- l. Transport of the CONCRETE CASK to the ISFSI
- m. TSC removal from the CONCRETE CASK
- n. TSC unloading, including reflooding and weld removal or cutting

Attachment 1

Appropriate mockup fixtures may be used to demonstrate and/or to qualify procedures, processes or personnel in welding, weld inspection, vacuum drying, helium backfilling, leak testing and weld removal or cutting.

Appendix B TS:

5. Page B2-3, Table B2-1, Item I.E

Unenriched fuel assemblies are not authorized for loading. Unenriched axial blankets are permitted, provided that the nominal length of the blanket is not greater than six (6) inches.

6. Page B2-9, Table B2-8, Item I.G

Unenriched fuel assemblies are not authorized for loading. Unenriched axial blankets are permitted, provided that the nominal length of the blanket is not greater than six (6) inches.

7. Table B2-19, Pages B2-54 through B2-58

The following fuel type descriptions for PWR fuel will replace the more generic headings listed only in this Table, for consistency with the other similar Tables in TS.

CE	WE	WE	B&W	CE	WE	B&W
14×14	14×14	15×15	15×15	16×16	17×17	17×17