

December 4, 2008

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

Attn: Document Control Desk

Subject: Record of Teleconference and Commitment to Add Clarification to the NAC-LWT SAR Supplementing the NAC Request for an Amendment of Certificate of Compliance (CoC) No. 9225 for the NAC-LWT Cask to Incorporate ANSTO HIFAR Spent Fuel as Authorized Contents

Docket No. 71-9225, TAC No. L24181

- Reference:
1. Model No. NAC-LWT Package, U.S. Nuclear Regulatory Commission (NRC) Certificate of Compliance (CoC) No. 9225, Revision 49, October 2008
 2. Safety Analysis Report (SAR) for the NAC Legal Weight Truck Cask, Revision 38, NAC International, November 2007 – as Supplemented
 3. Submittal of a Request for an Amendment of Certificate of Compliance (CoC) No. 9225 for the NAC-LWT Cask to Incorporate ANSTO HIFAR Spent Fuel as Authorized Contents, NAC International, August 12, 2008
 4. Submittal of a Supplement to the Request for an Amendment of Certificate of Compliance (CoC) No. 9225 for the NAC-LWT Cask to Incorporate ANSTO HIFAR Spent Fuel as Authorized Contents, NAC International, August 27, 2008
 5. Request for Additional Information for Review of the Certificate of Compliance No. 9225, Revision for the Model No. NAC-LWT Package, NRC, October 31, 2008
 6. Submittal of NAC Responses to the NRC Request for Additional Information (RAI) and Supplement to the Request for an Amendment of Certificate of Compliance (CoC) No. 9225 for the NAC-LWT Cask to Incorporate ANSTO HIFAR Spent Fuel as Authorized Contents, NAC International, November 18, 2008

Documenting the NRC/NAC teleconference of December 3, 2008 with the participation of Kim Hardin and Jason Piotter from the NRC and Tom Danner, Mike Yaksh and Tony Patko from NAC International (NAC), NAC hereby commits to incorporate the following text into Section 2.9.4 of Reference 2 at the next scheduled amendment request:



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“Table 1.1-1 defines the condition of the ANSTO degraded fuel (and for undamaged aluminum clad fuel elements) as fuel with a maximum damaged or degraded area of 5% of the total cross sectional area. The calculations presented in this Section on ANSTO fuel integrity use methodologies that evaluate the overall cross section of the fuel. This is based on the requirement that localized stresses are not required to be evaluated under accident conditions. Localized damage or degradation is defined as being limited to 5% or less, which can only result in stresses in the structure of a localized nature. Small through holes in the active fuel region (for removed PIE samples) would represent the bounding condition of damage/degradation, and these would generate stress concentrations only locally around the hole. These local stresses would not affect the overall performance of the cross section in consideration of primary stresses which are the stresses that would challenge the integrity of the fuel.”

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