TRANSNUCLEAR
AN AREVA COMPANY

February 19, 2009
E-27737

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
One White Flint North
11555 Rockville Pike
Rockville, MD 20852

Subject: Revision 2 to Transnuclear, Inc. (TN) Application for Amendment 1 to the NUHOMS® HD System (Docket No. 72-1030; TAC NO. L24153)

References:

1. Letter from B. Jennifer Davis (NRC) to Donis Shaw (TN), "REQUEST FOR ADDITIONAL INFORMATION FOR REVIEW OF AMENDMENT 1 TO THE NUHOMS® HD SYSTEM (TAC NO. L24153), INCLUDING UPDATED REVIEW SCHEDULE," November 14, 2008

2. Letter from Robert Grubb (TN) to Document Control Desk, "Revision 1 to Transnuclear, Inc. (TN) Application for Amendment 1 to the NUHOMS® HD System, Response to Request for Additional Information (Docket No. 72-1030; TAC NO. L24153)," December 15, 2008

Reference 1 forwarded an NRC request for additional information (RAI) regarding Amendment 1 to the NUHOMS® HD System. Reference 2 provided Transnuclear's (TN) response to the RAI. Following submittal of Reference 2, TN discussed the approach to certain responses with the NRC staff. Based on those discussions, this submittal provides proposed changes to the CoC 1030 Technical Specifications (TS) and to the NUHOMS® HD System UFSAR, Chapter 9 concerning neutron absorber qualification and testing.

Enclosure 1 provides discussion regarding the changes. Enclosure 2 provides a list of Amendment 1 Revision 2 TS and UFSAR replacement pages included herein. Enclosure 3 provides the TS and UFSAR Amendment 1 replacement pages.

In both the TS and the UFSAR, Amendment 1 Revision 0 changes, Amendment 1 Revision 1 changes, and Amendment 1 Revision 2 changes are shown using italics for inserted text and revision bars for changed areas; however, Revision 2 changes are shaded to distinguish these new changes from Revision 0 and Revision 1 changes. For the UFSAR, page footers for replacement pages are annotated as "Amendment 1, Rev. 2, 2/09."

Should the NRC staff require additional information to support review of this application, please do not hesitate to contact Mr. Don Shaw at 410-910-6878 or me at 410-910-6881.

Sincerely,

Jayant Bondre
Vice President - Engineering

cc: B. Jennifer Davis (NRC SFST) (six copies, provided in a separate mailing)

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NMSS01

Enclosures:

1. Discussion of Changes
2. List of Changed Pages for CoC 1030 Amendment 1 Application Revision 2
3. NUHOMS® HD Amendment 1 Application Revision 2 Changed Technical Specifications and UFSAR Pages

Discussion of Changes

- Relocated particle size and porosity requirements from Section 9.5.3.1 to 9.1.7.2 to incorporate them into the Technical Specifications.
- Relocated visual inspection requirements from various Technical Specification sections and consolidated them outside of the Technical Specifications in new Section 9.1.7.4, because visual inspections are not the primary means of verifying the absorber's safety function.
- Added key process control Sections 9.5.4.1 and 9.5.4.2 to the Technical Specifications.
- Section 9.5.2 is now split into Subsections 9.5.2.a and 9.5.2.b. Subsection 9.5.2.a is still part of the Technical Specifications. Subsection 9.5.2.b, and Section 9.5.4.3 are re-categorized as outside the Technical Specifications, because these sections are examples only.
- Enlarged the maximum allowable area for neutron attenuation inspection in (new) Section 9.5.2.a, and deleted provision for exceeding the maximum area, including (previous) Section 9.5.3.7. It is Transnuclear's understanding that the NRC staff is moving toward a consensus that the 1.1 square cm limit is more restrictive than is necessary to obtain meaningful B10 areal density statistics.
- Other minor changes for clarification as discussed with the NRC staff.

List of Changed Pages for CoC 1030 Amendment 1 Application Revision 2

(All amendment pages are for direct replacement)

Technical Specification Page 4-2

UFSAR Page 9-3
UFSAR Page 9-4
UFSAR Page 9-5
UFSAR Page 9-6
UFSAR Page 9-7
UFSAR Page 9-8
UFSAR Page 9-9
UFSAR Page 9-10
UFSAR Page 9-11
UFSAR Page 9-12
UFSAR Page 9-13

Enclosure 3 to TN E-27737

NUHOMS® HD Amendment 1 Application Revision 2 Changed Technical Specifications and UFSAR Pages

4.0 Design Features (continued)

4.3 Canister Criticality Control

The NUHOMS®-32PTH is designed for unirradiated fuel with an assembly average initial enrichment of less than or equal to 5.0 wt. % U-235 taking credit for soluble boron in the DSC cavity water during loading operations and the boron content in the poison plates of the DSC basket. The 32PTH DSC has multiple basket configurations, based on the material type and boron content in the poison plates, as listed in Table 6. Table 7 defines the requirements for boron concentration in the DSC cavity water as a function of the DSC basket type for the various intact and damaged fuel classes (most reactive) authorized for storage in the 32PTH DSC.

A Type I basket contains poison plates that are either borated aluminum or MMC while a Type II basket contains Boral® poison plates. The basket types are further defined by the B-10 areal density in the plates, ranging from the lowest, Type A to the highest, Type E.

4.3.1 Neutron Absorber Tests

Borated Aluminum, MMCs, or Boral® shall be supplied in accordance with FSAR Sections 9.1.7.1, 9.1.7.2, 9.1.7.3, 9.5.2.a, 9.5.3.5, 9.5.4.1 and 9.5.4.2, with the minimum B10 areal density specified in Table 6. These sections of the FSAR are hereby incorporated into the NUHOMS® HD CoC.

4.4 Codes and Standards

4.4.1 Horizontal Storage Module (HSM-H)

The reinforced concrete HSM-H is designed to meet the requirements of ACI 349-97. Load combinations specified in ANSI 57.9-1984, Section 6.17.3.1 are used for combining normal operating, off-normal, and accident loads for the HSM-H.

If an independent spent fuel storage installation site is located in a coastal salt water marine atmosphere, then any load-bearing carbon steel DSC support structure rail components of any associated HSM-H shall be procured with a minimum 0.20 percent copper content for corrosion resistance.

4.4.2 Dry Shielded Canister (32PTH DSC)

The 32PTH DSC is designed, fabricated and inspected to the maximum practical extent in accordance with ASME Boiler and Pressure Vessel Code Section III, Division 1, 1998 Edition with Addenda through 2000, Subsections NB, NF, and NG for Class 1 components and supports. Code alternatives are discussed in 4.4.4.

4.4.3 Transfer Cask (OS187H)

The OS187H Transfer Cask is designed, fabricated and inspected to the maximum practical extent in accordance with ASME Boiler and Pressure Vessel Code Section III, 1998 Edition with Addenda through 2000, Subsection NC for Class 2 vessels.

9.1.7 Neutron Absorber Tests

> *CAUTION*
>
> *Sections 9.1.7.1 through 9.1.7.3 below are incorporated by reference into the NUHOMS® CoC 1030 Technical Specifications (paragraph 4.3.1) and shall not be deleted or altered in any way without a CoC amendment approval from the NRC. The text of these sections is shown in bold type to distinguish it from other sections.*

The neutron absorber used for criticality control in the DSC basket may consist any of the following types of material:

(a) Boron-aluminum alloy (borated aluminum)

(b) Boron carbide / Aluminum metal matrix composite (MMC)

(c) Boral®

The 32PTH DSC safety analyses do not rely upon the tensile strength of these materials. The radiation and temperature environment in the cask is not sufficiently severe to damage these metallic/ceramic materials. To assure performance of the neutron absorber's design function only the presence of B10 and the uniformity of its distribution need to be verified, with testing requirements specific to each material. The boron content of these materials is given in Table 9-1.

References to metal matrix composites throughout this chapter are not intended to refer to Boral®.

9.1.7.1 Boron Aluminum Alloy (Borated Aluminum)

See the Caution in Section 9.1.7 before deletion or modification to this section.

The material is produced by direct chill (DC) or permanent mold casting with boron precipitating as a uniform fine dispersion of discrete AlB_2 or TiB_2 particles in the matrix of aluminum or aluminum alloy. For extruded products, the TiB_2 form of the alloy shall be used. For rolled products, either the AlB_2, the TiB_2, or a hybrid may be used.

Boron is added to the aluminum in the quantity necessary to provide the specified minimum B10 areal density in the final product, with sufficient margin to minimize rejection, typically 10 % excess. The amount required to achieve the specified minimum B10 areal density will depend on whether boron with the natural isotopic distribution of the isotopes B10 and B11, or boron enriched in B10 is used. In no case shall the boron content in the aluminum or aluminum alloy exceed 5% by weight.

The criticality calculations take credit for 90% of the minimum specified B10 areal density of borated aluminum. The basis for this credit is the B10 areal density acceptance testing, which shall be as specified in Section 9.5.2. The specified acceptance testing assures that at any location in the material, the minimum specified areal density of B10 will be found with 95% probability and 95% confidence.

9.1.7.2 Boron Carbide / Aluminum Metal Matrix Composites (MMC)

See the Caution in Section 9.1.7 before deletion or modification to this section.

The material is a composite of fine boron carbide particles in an aluminum or aluminum alloy matrix. The material shall be produced by either direct chill casting, permanent mold casting, powder metallurgy, or thermal spray techniques. It is a low-porosity product, with a metallurgically bonded matrix. The boron carbide content shall not exceed 40% by volume. ***The boron carbide content for MMCs with an integral aluminum cladding shall not exceed 50% by volume.***

The final MMC product shall have density greater than 98% of theoretical density demonstrated by qualification testing. For MMC with an integral cladding, the final density of the core shall be greater than 97% of theoretical density demonstrated by qualification testing.

Boron carbide particles for the products considered here typically have an average size in the range 10-40 microns, although the actual specification may be by mesh size, rather than by average particle size. No more than 10% of the particles shall be over 60 microns. The material shall have no more than 0.5 volume % interconnected porosity exposed at the surface or edges.

Prior to use in the 32PTH DSC, MMCs shall pass the qualification testing specified in Section 9.5.3, and shall subsequently be subject to the process controls specified in Section 9.5.4.

The criticality calculations take credit for 90% of the minimum specified B10 areal density of MMCs. The basis for this credit is the B10 areal density acceptance testing, which is specified in Section 9.5.2. The specified acceptance testing assures that at any location in the final product, the minimum specified areal density of B10 will be found with 95% probability and 95% confidence.

9.1.7.3 Boral®

See the Caution in Section 9.1.7 before deletion or modification to this section.

This material consists of a core of aluminum and boron carbide powders between two outer layers of aluminum, mechanically bonded by hot-rolling an "ingot" consisting of an aluminum box filled with blended boron carbide and aluminum powders. The core, which is exposed at the edges of the sheet, is slightly porous. The average size of the boron carbide particles in the finished product is approximately 50 microns after rolling. The nominal boron carbide content shall be limited to 65% (+ 2% tolerance limit) of the core by weight.

The criticality calculations take credit for 75% of the minimum specified B10 areal density of Boral®. B10 areal density will be verified by chemical analysis and by certification of the B10 isotopic fraction for the boron carbide powder, or by neutron transmission testing. Areal density testing is performed on a coupon taken from the sheet produced from each ingot. If the measured areal density is below that specified, all the material produced from that ingot will be either rejected, or accepted only on the basis of alternate verification of B10 areal density for each of the final pieces produced from that ingot.

9.1.7.4 Visual Inspections of Neutron Absorbers

Neutron absorbers shall be 100% visually inspected. Material that does not meet the following acceptance criteria shall be treated as non-conforming, and evaluated for acceptance in accordance with the Certificate Holder's QA procedures.

For borated aluminum and MMCs, visual inspections shall follow the recommendations in Aluminum Standards and Data, Chapter 4 "Quality Control, Visual Inspection of Aluminum Mill Products and Castings" [5]. Local or cosmetic conditions such as scratches, nicks, die lines, inclusions, abrasion, isolated pores, or discoloration are acceptable. Widespread blisters, rough surface, or cracking shall be treated as non-conforming. Inspection of MMCs with an integral aluminum cladding shall also include verification that the matrix is not exposed through the faces of the aluminum cladding and that solid aluminum is not present at the edges.

For Boral, visual inspection shall verify that there are no cracks through the cladding, exposed core on the face of the sheet, or solid aluminum at the edge of the sheet.

9.2 Maintenance Program

The NUHOMS® HD System is designed to be totally passive with minimal maintenance requirements. The 32PTH DSC does not require any maintenance once it is loaded into the HSM-H. The HSM-H does not require any maintenance other than that indicated in off-normal operations, Chapter 11, such as clearing of blocked air inlets. Periodic inspection is therefore limited to the Transfer Cask.

9.2.1 Inspection

The following inspections of the transfer cask should be performed prior to each fuel loading or unloading campaign:

A. Visual inspection of the transfer cask trunnions for damaged bearing surfaces

B. Visual or functional inspection of all taps, threaded inserts, and bolts

C. Functional inspection of all quick-connect fittings

D. Visual inspection of the interior surface of the cask for any indications of excessive wear.

E. Visual inspection of the neutron shield jacket for indications of damage

F. Visual inspection of all Transfer Cask o-rings for indications of damage

Within the year prior to any loading or unloading campaign, the top trunnion bearing surfaces and accessible welds shall be examined by dye penetrant. No linear indications shall be acceptable other than surface scratches and wear.

9.2.2 Tests

The Transfer Cask lid and ram access cover o-rings, vent and drain quick connect fittings, and neutron shield fittings shall be leak tested within the year before the start of any fuel loading or unloading campaign. If bubble leak testing is used, no leak indication is allowed. If pressure drop or helium leak testing is used, the maximum allowable leak for each of the components listed is 10^{-3} ref cm^3/s. If any of the listed components is replaced, that component shall be leak tested before use in fuel loading or unloading operations.

No periodic testing of the 32PTH DSC, HSM-H or routine support equipment is required.

Temperature and radiation monitoring is provided in accordance with the Technical Specifications. Periodic calibration of the monitoring equipment shall be as required by the licensee's quality program.

9.2.3 Repair, Replacement, and Maintenance

Any parts which fail inspections listed in 9.1.2 shall be repaired or replaced. Such parts may also be accepted as-is if determined appropriate by engineering and licensing review.

9.3 Marking

The HSM-H and 32PTH DSC are marked with the model number, unique identification number, and empty weight in accordance with 10 CFR 72.236(k). The 32PTH DSC nameplate is shown in drawing 10494-72-7.

9.4 Pre-Operational Testing and Training Exercise

A dry run training exercise of the loading, closure, handling, unloading, and transfer of the NUHOMS® HD System shall be performed by each licensee prior to their first use of the system to load spent fuel assemblies. The dry run shall be conducted with simulated fuel to match the weight of the actual fuel. The dry run need not be performed in the sequence of operations in Chapter 8. The dry run shall include:

(a) Loading of mock-up fuel
(b) DSC draining, vacuum drying, welding, and backfilling
(c) Loading of the Transfer Cask onto the Transfer Trailer, and transfer to the ISFSI
(d) DSC transfer to the HSM-H
(e) DSC retrieval from the HSM-H
(f) Re-flooding of a sealed 32PTH DSC
(g) Removal of the covers from a sealed 32PTH DSC

The dry run will simulate, as nearly as possible, the detailed written procedures developed by the licensee for NUHOMS® HD System operations. Guidelines for the dry run follow.

A. An actual or a mock-up 32PTH DSC loaded with mock-up fuel is typically utilized. The 32PTH DSC is loaded into the transfer cask; the transfer cask/DSC annulus seal is installed.

B. Functional testing is performed with the transfer cask and lifting equipment. These tests are to ensure that the transfer cask can be safely lifted from the plant's cask receiving area to the cask washdown area. The cask is partially lowered into the spent fuel pool and positioned in the cask loading area to verify clearances and travel path. The inner top cover is installed to verify handling and alignment operations.

C. The transfer cask is placed on the transfer trailer, which is moved to the ISFSI aligned with an HSM-H. Compatibility of the transfer trailer with the transfer cask, verification of the transfer route to the ISFSI, and maneuverability within the confines of the ISFSI are verified.

D. The transfer trailer is aligned and docked with the HSM-H. The hydraulic ram is used to insert the 32PTH DSC loaded with mock-up fuel assemblies into the HSM-H and then to retrieve it. Transfer of the 32PTH DSC to the HSM-H will verify that the support skid positioning system and the hydraulic ram system operate safely for both insertion and retrieval.

E. A weld mockup, typically a shortened 32PTH DSC mockup modeling the top end, covers, and drain tube, is used to demonstrate closure welding, draining, drying, backfill, re-flooding, and canister opening operations.

F. The dry run is deemed successful if the expected results are achieved safely and without damage to any of the components or associated equipment.

G. Should any equipment or components require modification in order to achieve the expected results, it will be retested, as necessary, to confirm that the modification is adequate. Should the dry run indicate that procedures require change in order to achieve the expected results, the changes will be incorporated into the appropriate operating procedures prior to use for fuel transfer.

9.5 Specification for Neutron Absorbers

9.5.1 Specification for Thermal Conductivity Testing of Neutron Absorbers

Testing shall conform to ASTM E1225[1], ASTM E1461[2], or equivalent method, performed at room temperature on coupons taken from the rolled or extruded production material. Previous testing of borated aluminum and metal matrix composite, Table 9-2, shows that thermal conductivity increases slightly with temperature. Initial sampling shall be one test per lot, defined by the heat or ingot, and may be reduced if the first five tests meet the specified minimum thermal conductivity.

If a thermal conductivity test result is below the specified minimum, additional tests may be performed on the material from that lot. If the mean value of those tests falls below the specified minimum, the associated lot shall be rejected.

After twenty five tests of a single type of material, with the same aluminum alloy matrix, the same boron content, and the boron appearing in the same phase, e.g., B_4C, TiB_2, or AlB_2, if the mean value of all the test results less two standard deviations meets the specified thermal conductivity, no further testing of that material is required. This exemption may also be applied to the same type of material if the matrix of the material changes to a more thermally conductive alloy (e.g., from 6000 to 1000 series aluminum), or if the boron content is reduced without changing the boron phase.

[1] ASTM E1225, "Thermal Conductivity of Solids by Means of the Guarded-Comparative-Longitudinal Heat Flow Technique"

[2] ASTM E1461, "Thermal Diffusivity of Solids by the Flash Method"

The thermal analysis in Chapter 4 assumes a 3/16 inch thick neutron absorber paired with a 5/16 inch aluminum 1100 plate. The specified thickness of the neutron absorber may vary, and the thermal conductivity acceptance criterion for the neutron absorber will be based on the nominal thickness specified. The minimum thermal conductivity shall be such that the total thermal conductance (sum of conductivity * thickness) of the neutron absorber and the aluminum 1100 plate shall equal the conductance assumed in the analysis, as shown in Table 9-3, where the acceptance criterion is highlighted.

The aluminum 1100 plate does not need to be tested for thermal conductivity; the material may be credited with the values published in the ASME Code Section II part D. The neutron absorber material need not be tested for thermal conductivity if the nominal thickness of the aluminum 1100 plate is 0.425 inch or greater. This case is examined explicitly in chapter 4, where no credit is taken for the thermal conductivity of Boral®.

9.5.2 Specification for Acceptance Testing of Neutron Absorbers by Neutron Transmission

CAUTION
Section 9.5.2.a is incorporated by reference into the NUHOMS® CoC 1030 Technical Specifications (paragraph 4.3.1) and shall not be deleted or altered in any way without a CoC amendment approval from the NRC. The text of this section is shown in bold type to distinguish it from other sections.

a. **Neutron Transmission acceptance testing procedures shall be subject to approval by the Certificate Holder. Test coupons shall be removed from the rolled or extruded production material at locations that are systematically or probabilistically distributed throughout the lot. Test coupons shall not exhibit physical defects that would not be acceptable in the finished product, or that would preclude an accurate measurement of the coupon's physical thickness.**

A lot is defined as all the pieces produced from a single ingot or heat *or from a group of billets from the same heat*. If this definition results in lot size too small to provide a meaningful statistical analysis of results, an alternate larger lot definition may be used, so long as it results in accumulating material that is uniform for sampling purposes.

The sampling rate for neutron transmission measurements shall be such that there is at least one neutron transmission measurement for each 2000 square inches of final product in each lot.

The B10 areal density is measured using a collimated thermal neutron beam of *no more than 1.5 inch* diameter.

The neutron transmission through the test coupons is converted to B10 areal density by comparison with transmission through calibrated standards. These standards are composed of a homogeneous boron compound without other significant neutron absorbers. For example, boron carbide, zirconium diboride or titanium diboride sheets are acceptable standards. These standards are paired with aluminum shims

sized to match the effect of neutron scattering by aluminum in the test coupons. Uniform but non-homogeneous materials such as metal matrix composites may be used for standards, provided that testing shows them to provide neutron attenuation equivalent to a homogeneous standard.

Alternatively, digital image analysis may be used to compare neutron radioscopic images of the test coupon to images of the standards. The area of image analysis shall be *no more than 1.75 sq. inch*.

The minimum areal density specified shall be verified for each lot at the 95% probability, 95% confidence level or better. *If a goodness-of-fit test demonstrates that the sample comes from a normal population, the one-sided tolerance limit for a normal distribution may be used for this purpose. Otherwise, a non-parametric (distribution-free) method of determining the on-sided tolerance limit may be used.*

b. The following illustrates one acceptable method *and is intended to be utilized as an example. Therefore, the following text is not part of the Technical Specifications.* The acceptance criterion for individual plates is determined from a statistical analysis of the test results for their lot. The B10 areal densities determined by neutron transmission are converted to volume density, i.e., the B10 areal density is divided by the thickness at the location of the neutron transmission measurement or the maximum thickness of the coupon. The lower tolerance limit of B10 volume density is then determined, defined as the mean value of B10 volume density for the sample, less K times the standard deviation, where K is the one-sided tolerance limit factor with 95% probability and 95% confidence [7].

Finally, the minimum specified value of B10 areal density is divided by the lower tolerance limit of B10 volume density to arrive at the minimum plate thickness which provides the specified B10 areal density.

Any plate which is thinner than this minimum or the minimum design thickness, whichever is greater, shall be treated as non-conforming, with the following exception. Local depressions are acceptable, so long as they total no more than 0.5% of the area on any given plate, and the thickness at their location is not less than 90% of the minimum design thickness.

Non-conforming material shall be evaluated for acceptance in accordance with the Certificate Holder's QA procedures.

9.5.3 Specification for Qualification Testing of Metal Matrix Composites

9.5.3.1 Applicability and Scope

Metal matrix composites (MMCs) *acceptable for use in the 32PTH DSC are described in Section 9.1.7.2*.

Prior to initial use in a spent fuel dry storage or transport system, such MMCs shall be subjected to qualification testing that will verify that the product satisfies the design function. Key process controls shall be identified per Section 9.5.4 so that the production material is equivalent to or better than the qualification test material. Changes to key processes shall be subject to qualification before use of such material in a spent fuel dry storage or transport system.

ASTM test methods and practices are referenced below for guidance. Alternative methods may be used with the approval of the certificate holder.

9.5.3.2 Design Requirements

In order to perform its design functions the product must have at a minimum sufficient strength and ductility for manufacturing and for the normal and accident conditions of the storage/ transport system. This is demonstrated by the tests in Section 9.5.3.4. It must have a uniform distribution of boron carbide. This is demonstrated by the tests in Section 9.5.3.5.

9.5.3.3 Durability

There is no need to include accelerated radiation damage testing in the qualification. Such testing has already been performed on MMCs, and the results confirm what would be expected of materials that fall within the limits of applicability cited above. Metals and ceramics do not experience measurable changes in mechanical properties due to fast neutron fluences typical over the lifetime of spent fuel storage, about 10^{15} neutrons/cm^2.

Thermal damage and corrosion (hydrogen generation) testing shall be performed unless such tests on materials of the same chemical composition have already been performed and found acceptable. The following paragraphs illustrate two cases where such testing is not required.

Thermal damage testing is not required for MMCs consisting only of boron carbide in an aluminum 1100 matrix, because there is no reaction between aluminum and boron carbide below 842°F, well above the basket temperature under normal conditions of storage or transport[3].

Corrosion testing is not required for MMCs consisting only of boron carbide in an aluminum 1100 matrix, because testing on one such material has already been performed by Transnuclear[4].

9.5.3.4 Required Qualification Tests and Examinations to Demonstrate Mechanical Integrity

At least three samples, one each from the two ends and middle of the *qualification* material run shall be subject to:

a) room temperature tensile testing (ASTM- B557[5]) demonstrating that the material has the following tensile properties:

[3] Sung, C., "Microstructural Observation of Thermally Aged and Irradiated Aluminum/Boron Carbide (B4C) Metal Matrix Composite by Transmission and Scanning Electron Microscope," 1998

[4] Boralyn testing submitted to the NRC under docket 71-1027, 1998

[5] ASTM B557 Standard Test Methods of Tension Testing Wrought and Cast Aluminum and Magnesium-Alloy Products.

- Minimum yield strength, 0.2% offset: 1.5 ksi
- Minimum ultimate strength: 5 ksi
- Minimum elongation in 2 inches: 0.5%

As an alternative to the elongation requirement, ductility may be demonstrated by bend testing per ASTM E290[10]. The radius of the pin or mandrel shall be no greater than three times the material thickness, and the material shall be bent at least 90 degrees without complete fracture.

and

b) testing (ASTM-B311[6]) to verify more than 98% of theoretical density *for non-clad MMCs and 97% for the matrix of clad MMCs*. Testing or examination for interconnected porosity *on the faces and edges of unclad MMC, and on the edges of clad MMC* shall be performed by a means to be approved by the Certificate Holder. *The maximum interconnected porosity is 0.5 volume %.*

9.5.3.5 Required Tests and Examinations to Demonstrate B10 Uniformity

CAUTION

Section 9.5.3.5 is incorporated by reference into the NUHOMS® CoC 1030 Technical Specifications (paragraph 4.3.1) and shall not be deleted or altered in any way without a CoC amendment approval from the NRC. The text of this section is shown in bold type to distinguish it from other sections.

Uniformity of the boron distribution shall be verified either by:

(a) Neutron radioscopy or radiography (ASTM E94[7], E142[8], and E545[9]) of material from the ends and middle of the test material production run, verifying no more than 10% difference between the minimum and maximum B10 areal density, or

(b) Quantitative testing for the B10 areal density, B10 density, or the boron carbide weight fraction, on locations distributed over the test material production run, verifying that one standard deviation in the sample is less than 10% of the sample mean. Testing may be performed by a neutron transmission method similar to that specified in Section 9.5.2, or by chemical analysis for boron carbide content in the composite.

9.5.3.6 Approval of Procedures

Qualification procedures shall be subject to approval by the Certificate Holder.

6 ASTM B311, Test Method for Density Determination for Powder Metallurgy (P/M) Materials Containing Less Than Two Percent Porosity
7 ASTM E94, Recommended Practice for Radiographic Testing
8 ASTM E142, Controlling Quality of Radiographic Testing
9 ASTM E545, Standard Method for Determining Image Quality in Thermal Neutron Radiographic Testing
10 ASTM E290, Standard Methods for Bend Testing of Materials for Ductility

9.5.4 Specification for Process Controls for Metal Matrix Composites

This section provides process controls to ensure that the material delivered for use is equivalent to the qualification test material.

CAUTION

Sections 9.5.4.1 and 9.5.4.2 are incorporated by reference into the NUHOMS® CoC 1030 Technical Specifications (paragraph 4.3.1) and shall not be deleted or altered in any way without a CoC amendment approval from the NRC. The text of these sections is shown in bold type to distinguish them from other sections.

9.5.4.1 Applicability and Scope

Key processing changes shall be subject to qualification prior to use of the material produced by the revised process. The Certificate Holder shall determine whether a complete or partial re-qualification program per Section 9.5.4 is required, depending on the characteristics of the material that could be affected by the process change.

9.5.4.2 Definition of Key Process Changes

Key process changes are those which could adversely affect the uniform distribution of the boron carbide in the aluminum, reduce density, or reduce the mechanical strength or ductility of the MMC.

9.5.4.3 Identification and Control of Key Process Changes

The manufacturer shall provide the Certificate Holder with a description of materials and process controls used in producing the MMC. The Certificate Holder and manufacturer shall identify key process changes as defined in Section 9.5.4.2.

An increase in nominal boron carbide content over that previously qualified shall always be regarded as a key process change. The following are examples of other changes that may be established as key process changes, as determined by the Certificate Holder's review of the specific applications and production processes:

(a) Changes in the boron carbide particle size specification that increase the average particle size by more than 5 microns or that increase the amount of particles larger than 60 microns from the previously qualified material by more than 5% of the total distribution but less than the 10% limit.

(b) Change of the billet production process, e.g., from vacuum hot pressing to cold isostatic pressing followed by vacuum sintering.

(c) Change in the nominal matrix alloy.

(d) Changes in mechanical processing that could result in reduced density of the final product, e.g., for PM or thermal spray MMCs that were qualified with extruded material, a change to direct rolling from the billet,

(e) For MMCs using a *magnesium-alloyed* aluminum matrix, changes in the billet formation process that could increase the likelihood of magnesium reaction with the boron carbide, such as an increase in the maximum temperature or time at maximum temperature, and

(f) Changes in powder blending or melt stirring processes that could result in less uniform distribution of boron carbide, e.g., change in duration of powder blending.

(g) For MMCs with an integral aluminum cladding, a change greater than 25% in the ratio of the nominal aluminum cladding thickness (sum of two sides of cladding) and the nominal matrix thickness could result in changes in the mechanical properties of the final product.

In no case shall process changes be accepted if they result in a product outside the limits in Sections 9.5.3.1 and 9.5.3.4.