

August 6, 2009

MEMORANDUM TO: Nader Mamish, Deputy Director
Licensing and Inspection Directorate
Division of Spent Fuel Storage and Transportation
Office of Nuclear Material Safety
and Safeguards

FROM: B. Jennifer Davis, Senior Project Manager **/RAI/**
Licensing Branch
Division of Spent Fuel Storage and Transportation
Office of Nuclear Material Safety
and Safeguards

SUBJECT: SUMMARY OF JUNE 25, 2009, MEETING WITH TRANSNUCLEAR,
INC., TO DISCUSS THE SECOND REQUEST FOR ADDITIONAL
INFORMATION FOR AMENDMENT 11 TO THE STANDARDIZED
NUHOMS[®] SYSTEM (TAC NO. L24080)

PURPOSE:

For Transnuclear, Inc. (TN) staff, and U.S. Nuclear Regulatory Commission (NRC) staff to discuss TN's planned path forward for Amendment 1 to the Standardized NUHOMS[®] System, and the proposed responses to the second Request for Additional Information (RAI) for Amendment 11 to the Standardized NUHOMS System, dated March 27, 2009 (ML090540196).

MEETING SUMMARY:

The meeting took place on June 25, 2009, from 9:00 a.m. to 4:00 p.m., at the NRC's Executive Boulevard Building in Rockville, MD. Attendees included TN staff, and NRC's Division of Spent Fuel Storage and Transportation (SFST) staff. No members of the public attended. An attendance list is enclosed (Enclosure 1). The meeting began with introductions, introductory remarks by SFST staff and TN staff, and then moved into a discussion regarding the Amendment 11 review and the associated RAIs.

In TN's opening remarks they reiterated their plans for completing the Amendment 11 review process for a de-rated OS197L cask for use with a 100-ton or greater crane by restricting the maximum total decay heat of the dry storage canister (DSC) to approximately 13 kW/DSC. NRC staff's opening remarks discussed the possibility of a third round of RAIs, given the changes in direction from the original application. Although NRC staff guidance in Office Instruction -15 (SFST-15), "Interactions between Applicants and SFST Staff (A.K.A. – Rules of Engagement)," states that if "...the responses to the second RAI are not sufficient... then [SFST] will... suspend further technical review;" NRC staff made a commitment not to suspend the review for the sole reason that a third round RAI is necessary. NRC staff also indicated that whenever possible, meeting handouts well in advance of the meeting are most helpful.

The discussion then moved on to the proposed RAI responses as presented in Enclosure 2, beginning with the Thermal Review area, questions 3-1 through 3-5. In general, for the Thermal Review, TN clarified that the new analyses based on 13 kW would be presented in the revised Safety Analysis Report (SAR), and that they expect there to be 100°C margin in the calculation of cladding temperatures. NRC staff indicated that they will review the responses, when submitted. NRC staff also requested that TN provide thermal analysis input and output files with the RAI response submittal.

There was also discussion of “Other Changes,” Item #4, on page 40. TN would like to implement an exemption request process for slight variations in sampling and acceptance testing of neutron absorbers, so that they can avoid having to prepare amendments for non-safety significant items. NRC staff indicated that there is at least one other vendor who has made a similar request; and it is important to ensure consistency across TN systems. NRC staff will look at the proposed wording, and response to RAI 7-1, when the official responses are submitted; SFST staff may need to coordinate with the Office of General Counsel to resolve the issue. For “Other Changes,” Item #5, NRC staff not present at the subject meeting will need to review the responses when submitted.

Discussion then moved on to the radiation protection and shielding area, Section 5. For question 5-1, NRC staff reiterated that they would like to see the materials of construction, the basic structure of the OS197 TC, and the nominal loaded weight of the transfer cask (TC), as requested in the RAI. Following discussion, staff indicated that ranges, tables, or something similar would likely be sufficient. Staff will review the response when submitted. Similarly, there was extensive discussion on RAI 5-8, and the proposed responses, primarily regarding NRC staff’s request “that the TS require both remote operations and appropriate ALARA [as low as reasonably achievable] practices,” and staff’s request for dose rate limits. One action item that arose from the discussion of 5-8, was for both TN staff and NRC staff to consider whether the average dose rate, as proposed in the response should be used, or the highest measured dose rate. Other proposed RAI responses discussed in detail included 5-13, 5-15 and 5-26. For the response to 5-26, staff recommended including a sample calculation for evaluating dose from crane hang-ups. The proposed responses to questions 5-35 through 5-58 were not discussed, as they were primarily quality/editorial.

Additional discussion items included the proposed response to 2.2, which involved the basic question – is the TC part of the storage system? NRC staff maintains that the TC is part of the storage system, and referenced NUREG-1745, “Standard Format and Content for Technical Specifications for 10 CFR Part 72 Cask Certificates of Compliance.” TN disagreed. This is an action item for both NRC and TN.

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In their closing comments, NRC staff indicated that they will review the formal responses when submitted. TN committed to informing the NRC staff of the schedule for RAI response submittal, when known, and expressed appreciation for the meeting.

No regulatory decisions were made at the meeting.

If you have any questions or comments, please contact Jennifer Davis at (301) 492-3371 or BJennifer.Davis@nrc.gov.

Docket No.: 72-1004

TAC No.: L24080

Enclosures:

As stated

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Enclosures:
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DISTRIBUTION:

NRC attendees BWhite

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OFC:	SFST	E	SFST		SFST	
NAME:	JDavis		WWheatley		EBenner	
DATE:	08/05/2009		08/05/2009		08/06/2009	

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ENCLOSURE 1

June 25, 2009
ATTENDANCE LIST

<u>Name</u>	<u>Affiliation</u>
Eric Benner	NRC/SFST
Larry Campbell	NRC/SFST
Michael Waters	NRC/SFST
Jennifer Davis	NRC/SFST
Elizabeth Thompson	NRC/SFST
Bob Einziger	NRC/SFST
Bob Tripathi	NRC/SFST
Chris Bajwa	NRC/SFST
Shana Helton	NRC/SFST
Kimberly Ropon	NRC/SFST
Huda Akhavannik	NRC/SFST
Natreon Jordon	NRC/SFST
Bob Grubb	TN
Jayant Bondre	TN
Prakash Narayanan	TN
Slava Guzeyev	TN

**ENCLOSURE 2:
TN SLIDES, "AMENDMENT 11 TO COC 1004 RAI #2**