

71-9295



AFS-10-0117

April 12, 2010

Mr. Eric Benner, Chief
Licensing Branch
Division of Spent Fuel Storage and Transportation
Office of Nuclear Material Safety and Safeguards
Nuclear Regulatory Commission
Washington D.C. 20555-0001

RE: CERTIFICATE OF COMPLIANCE NO. 9295 (MFFP)

Dear Mr. Benner:

Thank you for your notification of expiration of CoC No. 9295, for the MOX Fresh Fuel Transportation Package (MFFP) of April 6. This letter is to inform you that AFS is planning an amendment to be submitted before May 31, 2010. The primary purpose of the amendment is to revise the thermal analysis. The existing safety analysis uses an equivalent hypothetical fire heat flux based on a flame emissivity of 1.0 and a flame temperature of 1,425 °F. The revised analysis will use a flame emissivity of 1.0 and the full fire temperature of 1,475 °F. Since emissivity will be equal to 1.0 instead of the required value of 0.9, the resulting package temperatures will be somewhat conservative. The issue of flame emissivity and temperature was discussed with NRC staff in May of 2009, at which time it was agreed that, since the MFFP had not yet been fabricated, action could be deferred until certificate renewal.

In addition to the fire analysis, several changes to the SAR drawings, operations, and acceptance test sections will be made. These changes reflect the experience gained in the fabrication of the essentially identical Hanford Irradiated Fuel Package (HUFP) for the DOE in 2009. Each change will be detailed in the amendment cover letter, and it will be demonstrated that there are no safety consequences.

If you have any questions, please do not hesitate to contact me at (253)-552-1321, or by email at phil.noss@areva.com.

Sincerely,

Philip W. Noss
Licensing Manager
AREVA Federal Services LLC

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