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AFS-11-0562

September 20, 2011

Mr. Michael Waters, Chief
Licensing Branch
Division of Spent Fuel Storage and Transportation
Office of Nuclear Material Safety and Safeguards
U.S. Nuclear Regulatory Commission
EBB-3D-D2M
11555 Rockville Pike
Rockville, MD 20852

Subject: Discrepant Dimension on TRUPACT-III Unit 1 (NRC Docket 71-9305)

Dear Mr. Waters:

AREVA Federal Services LLC (AFS), under contract with Washington TRU Solutions (WTS) has designed and is fabricating six TRUPACT-III packagings at ABW Technologies, Inc., in Arlington, Washington. The Unit 1 packaging was delivered to WTS and put into use in late August.

During fabrication and inspection activities on TRUPACT-III Unit 2, it came to our attention that a dimension on Unit 1 is not in compliance with the SAR drawing. The dimension is the width of the closure lid shear lip, shown on Detail Y, zone C-3, sheet 14, of drawing 51199-SAR, Rev. 3. The width of the shear lip should be nominally 20 mm. The actual width of the lip is a minimum of 18.1 mm and a maximum of 31.7 mm. Since the width dimension is affected by the weld located adjacent to it (as shown to be just below the lip in Detail Y), the width tolerance is the "welded construction" tolerance of ±3 mm. The range of acceptable shear lip width is therefore 20 ±3 or 17 – 23 mm. It is evident that the actual maximum width of the shear lip on Unit 1 is up to 8.7 mm in excess of this value. Note that this package complies with the maximum 6–mm gap between the shear lip and the body flange per Flag Note 40 of drawing 51199-SAR.

The purpose of the shear lip is to locate the lid laterally by interfacing with the opening in the packaging body. As its name implies, the shear lip supports lateral inertia loading from the closure lid which could occur from a side drop under hypothetical accident conditions. This potential loading, which is the only loading which could be applied to the shear lip, is in a direction parallel to the width of the lip. Because the width is oversize, any stress developed in the lip will be lower than would occur with a properly dimensioned shear lip. Thus the discrepant condition is conservative, and there is no impact on public health or safety as a consequence of it.

AFS has requested the DOE to ship Unit 1 to ABW Technologies, Inc., for further evaluation. When that occurs, the stated dimensions will be verified and an extent-of-condition analysis relative to all SAR drawing requirements will be performed. When that is complete, a plan of action will be formulated to address this issue. In the meantime, Unit 1 has been removed from service until the issue is resolved.

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We would like to schedule a phone call following your review of this letter. Please let me know the best time for you and your staff. You may contact me at (253) 552-1321 or by email at phil.noss@areva.com.

Very Truly Yours,

AREVA Federal Services LLC

Phil Noss

Phil Noss
Licensing Manager

Cc: Document Control Desk
Jennine Rankin, NRC