

November 22, 2011

MEMORANDUM TO: Doug Weaver, Deputy Director
Division of Spent Fuel Storage and Transportation, NMSS

FROM: Pierre Saverot, Project Manager */RA/*
Licensing Branch
Division of Spent Fuel Storage and Transportation, NMSS

SUBJECT: SUMMARY OF NOVEMBER 14, 2011, MEETING WITH
ROBATEL TECHNOLOGIES, LLC

Background

In 2012, Robatel Technologies, LLC (Robatel) will be requesting NRC approval for a new package design, the Model No. RT-100 package, for the transport of spent resins and filters. This meeting was the first of a series of pre-application meetings that will take place over the next three months. Robatel's Quality Assurance Program (QAP) will be submitted in January 2012.

Discussion

Although the Model No. RT-100 package is designed for various types of contents, Robatel will submit an application at this time for only spent resins and filters as authorized contents. The package is designed to hold ten (10) 55-gallon drums and has a payload of 15,000 lbs.

All structural components of the package will be made of ASME/ASTM/A240 304 L stainless steel. Robatel advised staff that the design of the impact limiters is not yet finalized and may include either balsa wood or foam, and that the shielding analysis does not take any credit for the impact limiters. Robatel also said that the package will be shipped "exclusive use" only.

Staff said that it will review an application containing SI units, i.e., Robatel does not have to convert any metric unit into English unit. Staff pointed out to Robatel a number of areas that will be looked at during the acceptance review of this application, including the following:

1. Specifying maximum allowable contents only in multiples of A2 is not sufficient and will not be accepted by staff. Using A2 as a unit to define the quantity limits of the content does not provide a unique description of the content. In particular, the A2 value does not tell the nature of the source nor the energy spectra of the content.
2. Because of the nature of the resins and filters, Robatel cannot reasonably provide a description for the exact constituents of the isotopes, nor the energy spectra of all potential contents. For this reason, staff advised Robatel to develop a shielding approach that can be used by package users to determine the maximum allowable source term of the package contents. Staff referred the applicant to the SER of the Model No. 10-160B package for further details on the expectations of the reviewers.

3. The containment boundary should be clearly defined in the application: Robatel explained a 2 lid concept similar to the one of the Model No. 8-120B package.
4. Proper materials selection for the lifting trunnions.
5. Verification and justification of the proper use of benchmarking data from testing similar packages. Robatel advised that their data will be benchmarked by 10 to 15 drop tests.
6. "Independent review" of design calculations properly captured in QA procedures, procurement practices and a graded approach, Approved Vendors List (AVL) process for Category A items. Applicability of Part 21 for Category A components from a "reportability" standpoint.

Robatel presented a proposed schedule (application submittal on March 31, 2012; issuance of the Certificate of Compliance in August/September 2012) that was judged unrealistic by staff. Staff explained the acceptance review process and timeframe for a high quality application and advised Robatel of our objective of 7.4 months for completing a detailed technical review.

Robatel agreed with staff's suggestion for several pre-application meetings to present (i) the QA Program before its submittal under Part 71, and (ii) more detailed information and results from technical evaluations. The staff did not make any regulatory commitments at the meeting.

Docket No. 71-9365
TAC No. L24587

Enclosure 1: Meeting Attendees
Enclosure 2: Robatel Slides

3. The containment boundary should be clearly defined in the application: Robatel explained a 2 lid concept similar to the one of the Model No. 8-120B package.
4. Proper materials selection for the lifting trunnions.
5. Verification and justification of the proper use of benchmarking data from testing similar packages. Robatel advised that their data will be benchmarked by 10 to 15 drop tests.
6. "Independent review" of design calculations properly captured in QA procedures, procurement practices and a graded approach, Approved Vendors List (AVL) process for Category A items. Applicability of Part 21 for Category A components from a "reportability" standpoint.

Robatel presented a proposed schedule (application submittal on March 31, 2012; issuance of the Certificate of Compliance in August/September 2012) that was judged unrealistic by staff. Staff explained the acceptance review process and timeframe for a high quality application and advised Robatel of our objective of 7.4 months for completing a detailed technical review.

Robatel agreed with staff's suggestion for several pre-application meetings to present (i) the QA Program before its submittal under Part 71, and (ii) more detailed information and results from technical evaluations. The staff did not make any regulatory commitments at the meeting.

Docket No. 71-9365
TAC No. L24587

Enclosure 1: Meeting Attendees
Enclosure 2: Robatel Slides

Distribution: R. Temps, M. Waters, M. Sampson, M. Rahimi, D. Pstrak

G:\SFFT\Saverot\71-9365 Robatel\Robatel meeting November 14, 2011.doc
ADAMS Accession No.: ML113270055 Memo Accession No.: MI113270060

Distrib	SFST	E	SFST	C	SFST			
NAME	PSaverot		MDeBose		MWaters			
DATE	11/21/2011		11/22/11		11/22/11			

C=Without attachment/enclosure E=With attachment/enclosure N=No copy **OFFICIAL RECORD COPY**

**Meeting Between ROBATEL and the
Nuclear Regulatory Commission
November 14, 2011
Meeting Attendees**

NRC/NMSS/SFST

Joseph Borowsky	301-492-3563	joseph.borowsky@nrc.gov
David Tang	301-492-3328	david.tang@nrc.gov
Alexis Sotomayor	301-492-3291	alexis.sotomayor-rivera@nrc.gov
Pierre Saverot	301-492-3408	pierre.saverot@nrc.gov

ROBATEL

Jack Rollins	678-472-6977	jackrollins@hotmail.com
Teo Grochowski	540-989-2878	tgrochowski@robatel.com
Fabien Labergri	33-4-72 22 1026	f.labergri@robatel.fr
Jean-Francois Damon	33-4-72 22 1038	jf.damon@robatel.fr
George Jobson	540-230-6208	gjobson@robateltech.com