

June 7, 2013

Dr. James M. Shuler
Manager, DOE Packaging Certification Program
U.S. Department of Energy
Office of Packaging and Transportation
EM-33, CLV-2047
1000 Independence Avenue, S.W.
Washington, DC 20585

SUBJECT: AUTHORIZATION FOR REVISION NO. 11 OF CERTIFICATE OF
COMPLIANCE NO. 9315 FOR THE MODEL NO. ES-3100

Dear Dr. Shuler:

As requested by letter dated May 15, 2013, pursuant to Title 10 of the *Code of Federal Regulations* Part 71, the Certificate of Compliance (CoC) No. 9315 for the Model No. ES-3100 package is amended as follows:

The CV Bottom Pad, CV Flange Pad, and Plug Pad shown on Drawing No. M2E801580A037, sheet 2, Rev. C, "Consolidated Assembly Drawing," as referenced in Condition No. 5.(a)(3)(i) of the CoC, are not important to safety, as Quality Category C items. The two hundred (200) already manufactured parts can be used with slight variations in their Shore A hardness.

All other conditions of CoC No. 9315 shall remain the same. This authorization shall expire on April 30, 2016. If you have any questions regarding this authorization, please contact Pierre Saverot at (301) 287-0759.

FOR THE U.S. NUCLEAR REGULATORY COMMISSION

/RA/

Michele Sampson, Acting Chief
Licensing Branch
Division of Spent Fuel Storage and Transportation
Office of Nuclear Material Safety
and Safeguards

Docket No. 71-9315
TAC No. L24747

Enclosure: Safety Evaluation Report

Dr. James M. Shuler
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SAFETY EVALUATION REPORT
Docket No. 71-9315
Model No. ES-3100
Certificate of Compliance No. 9315

SUMMARY

By letter dated May 15, 2013, the National Nuclear Safety Administration (NNSA) Office of Fissile Materials Disposition requested the use of two hundred (200) out of tolerance rubber parts in the Model No. ES-3100 package. The Certificate of Compliance (CoC) No. 9315 for the Model No. ES-3100 package has been amended. The staff agrees that the change does not affect the ability of the package to meet the requirements of 10 CFR Part 71.

EVALUATION

The drum assembly of the Model No. ES-3100 package contains three silicone rubber pads: (i) the first pad, the CV bottom pad, is placed on the bottom of the innermost liner to support the containment vessel bottom during transport, (ii) the second pad, the CV flange pad, is placed on top of the containment vessel lid during transport, and (iii) the third pad, the plug pad, is placed on the top shelf of the mid-liner to cushion the top plug during transport. The locations of these three pads are shown on Drawings M2E801580A001 and the dimensions of the pads are shown on Drawing M2E801580A009.

Table No. 9-2 of the application shows the quality category of the Model No. ES-3100 packaging components and these silicone rubber pads are of Quality Category C, thus not important to safety.

About 200 of such parts were fabricated with a Shore A hardness test result of 30-35 instead of the hardness requirement of 22+/- 5. The evaluation of such parts is always visual: the visual inspection shows no defects while it is also impossible to detect any differences between these 200 out of tolerance parts and the in tolerance parts.

Staff has reviewed this application, and determined that the silicone rubber pads are appropriately categorized as Category C, consistent with Section 5.5.3 of NUREG/CR-6407, for dunnage items. Staff also determined that the proposed use of out-of tolerance pads does not affect the intended form, fit, or function of the CV Bottom Pad, Flange Pad, and Plug Pad components. Therefore there are no significant adverse effects in using those out-of tolerance silicone rubber pads while maintaining safety, and staff determined that the use of such pads does not affect the ability of the package to meet the requirements of 10 CFR Part 71.

CONDITIONS

The CV Bottom Pad, CV Flange Pad and Plug Pad shown on Drawing No. M2E801580A037, sheet 2, Rev. C, "Consolidated Assembly Drawing," as referenced in Condition No. 5.(a)(3)(i) of the CoC, are not important to safety items, are graded as Quality Category C, and the 200 silicon rubber parts that are already fabricated can be used with slight variations in their Shore A hardness.

All other conditions of CoC No. 9315 shall remain the same.

CONCLUSION

CoC No. 9315 has been amended. This authorization expires April 30, 2016.

Based on the statements and representations in the application, and with the condition listed above, the staff agrees that this change does not affect the ability of the package to meet the requirements of 10 CFR Part 71.

Issued on June 7, 2013.