June 25, 2013

MEMORANDUM TO: Anthony H. Hsia, 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 JUNE 19, 2013, MEETING WITH ROBATEL TECHNOLOGIES, LLC

Background

Robatel Technologies, LLC (Robatel) received a request for additional information (RAI) letter dated March 28, 2013, for the Model No. RT-100 package application. The meeting was requested by the applicant to discuss their proposed RAI responses.

The meeting was noticed on May 15, 2013. The list of attendees and Robatel presentation are included in Enclosures Nos. 1 and 2, respectively.

Discussion

Robatel presented a summary of proposed responses to thermal, containment, and shielding RAIs to verify if their interpretation of the RAIs was correct.

The proposed responses to the thermal RAIs were generally acceptable for staff except for RAI 3-4. The applicant had revised the fire accident analysis and utilized a steady-state pre-fire analysis for the normal conditions of transport hot case with an ambient temperature of 38°C, but had not included the solar heat when performing the steady state analysis as the initial condition of the fire. Staff said that the solar heat should be included in the steady state run, and that this is a long-standing staff's position supported by 10 CFR 71.71(c). Staff also asked the applicant to provide excerpts of reference papers cited in responding to RAI 3-3.

Regarding the containment RAIs, staff said that (i) RAIs 4-1 and 4-9 would "go away" if the package was "leaktight," (ii) the applicant should completely understand the test procedure to minimize the test time period as much as possible, (iii) present complete calculations, e.g., for the leakage rate of helium, for the conversion of the allowable leak rate to air standard conditions or to demonstrate that release calculations are bounding, and (iv) include operating procedures with a liner in Chapter 7 since "all contents will be packaged in a secondary container (liner)." Clarifications regarding the package containment boundary and the leak test procedure should be included in Chapter 8.

The lack of cross references between Chapters 1 (definition of contents), 5, and 7 is a weakness of the current application. Also, the application does not include a clear guidance, through its proposed operating procedures, for the appropriate determination of authorized contents.

Robatel said in particular that it will (i) provide additional examples of procedures to guide the user in completing the loading table and demonstrate compliance with the individual nuclide activity density limits, and (ii) clarify the “uniform distribution” of the waste throughout the cavity of the package and at the maximum activity density, for the purpose of the shielding evaluations.

Staff stated that a resolution is now in sight regarding manufacturing tolerances and the lead slump assumption. Robatel agreed on additional language in Chapter 8 of the application to provide information on the manufacturing process and the verifications of the inner shell and outer shell dimensions before pouring lead, and Robatel confirmed that the shielding analysis had always been performed assuming a minimum lead thickness at all locations. However, staff did not agree with the assertion that the volumes of foam in the rings of the outer edges of each impact limiter can be ignored to simplify the analytical model because such locations can be right at the streaming path. Staff said the applicant must clarify how much lower doses are in this region, and use a smaller ring to do tallies.

Staff made no regulatory commitments during the meeting.

Docket No. 71-9365
TAC No. L24587

Enclosure 1: Meeting Attendees
Enclosure 2: Robatel Presentation

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Enclosure 2: Robatel Presentation

Distribution: Attendees, M. Sampson, M. Rahimi, C. Araguas, J. Piotter

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Meeting Between ROBATEL and the
Nuclear Regulatory Commission
June 19, 2013
Meeting Attendees

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Enclosure 1