

July 19, 2013

U.S. Nuclear Regulatory Commission
11555 Rockville Pike
Rockville, MD 20852-2738

Attn: Document Control Desk

Subject: Submission of a Supplement to the Request for an Amendment of Certificate of Compliance (CoC) No. 9225 for the NAC-LWT Cask to Revise a License Drawing and to Correct a Unit of Measure in the CoC

Docket No. 71-9225 TAC No. L24697

- Reference:
1. Model No. NAC-LWT Package, U.S. Nuclear Regulatory Commission (NRC) Certificate of Compliance (CoC) No. 9225, Revision 58, February 28, 2013
 2. Safety Analysis Report (SAR) for the NAC Legal Weight Truck Cask, Revision 41, NAC International, April 2010
 3. ED20130099, Submission of a Request for an Amendment of Certificate of Compliance (CoC) No. 9225 for the NAC-LWT Cask to Revise a License Drawing to Correct a Unit of Measure in the CoC, NAC International, July 19, 2013
 4. ED20130029, Submission of NAC Responses to NRC's Request for Supplemental Information to NAC Amendment Request for Certificate of Compliance (CoC) No. 9225 for the NAC-LWT Cask to Incorporate Highly Enriched Uranyl Nitrate Liquid (HEUNL) as Authorized Content, NAC International, March 14, 2013

In its response to the NRC's Request for Supplemental Information (Reference 4) for the Highly Enriched Uranyl Nitrate Liquid (HEUNL) amendment request, NAC International (NAC) requested an additional change to the generic MTR fuel height requirement. This request was made in support of the U.S. Department of Energy's (DOE) National Nuclear Security Administration Foreign Research Reactor (FRR) fuel acceptance program.

The additional change described in Reference 4 is being made to the generic MTR fuel height requirement and allows an active fuel height of less than 56 cm. The change to the MTR fuel height requirement is also reflected in the proposed CoC changes submitted with Reference 4, specifically, the addition of Note 3 under Table 5.(b)(1)(iv)(b) "Generic MTR Fuel Content Description". Minimum active fuel heights were determined in SAR Chapter 6, Section 6.4.3.12 as a result of analysis that determined an increase in reactivity for a fixed fuel mass per plate/assembly at reduced active fuel heights (i.e., reduction in H/U ratio for the under-moderated plates was insufficient to overcome reduced neutron leakage). Maintaining the effective fissile material linear density ($g^{235}\text{U}/\text{cm}$ height) in the plates assures that the existing analysis remains

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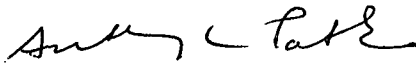
bounding. The proposed changes were submitted on Revision LWT-13B changed pages (6.4.3-12 and 6.4.3-27) with Reference 4.

The change to the MTR fuel height is associated with US origin HEU FRR fuel proposed to be shipped in the NAC-LWT cask to the United States ahead of the Nuclear Security Summit to take place in March of 2014. Due to this anticipated shipping schedule, NAC hereby requests the inclusion of the MTR fuel change submitted with Reference 4 in the NRU/NRX Amendment/CoC correction requested in Reference 3.

In accordance with NAC's administrative practices, upon final acceptance of this application, the LWT-13B and LWT-13C changed pages will be reformatted and incorporated into the next revision of the NAC-LWT SAR.

If you have any comments or questions, please contact me on my direct line at 678-328-1274.

Sincerely,



Anthony L. Patko
Director, Licensing
Engineering