

Allen, William

From: Adams, Glenn D. <Glenn.Adams@xenuclear.com>
Sent: Friday, March 14, 2014 4:36 PM
To: Allen, William
Cc: Nelson, Oley
Subject: Review of Amendment 8 - Comments
Attachments: NSPM Comments on Thermal Conductivity - Amendment 8.docx

Chris,

Oley Nelson and I have reviewed Amendment 8 and provide the attached list of comments. Please look them over next week (while I am on vacation). We would be glad to discuss them with you sometime during the following week (week of 3/24). If you want to discuss them next week, Oley will be at work after Wednesday. His phone number is 651-388-1121 x5039.

Thank you,
Glenn Adams
612-330-6777

Page #	Location	Comment
Cover Letter	3 rd paragraph, 2 nd sentence	The sentence says that “the amended license supersedes, in its entirety , Special Nuclear Materials License No. SNM-2506 dated August 28, 2009”. However, while it does supersede the four page body of the license, it does not supersede the entire Appendix A of the license.
Page 3 of 4 of the license	License condition 15	The indentations of the subparts of license condition 15 have changed without reflecting it via side bar.
Page 3 of 4 of the license	License condition 15.A.i	The paragraph formatting of this condition is not consistent with the rest of the license.
Page 4.0-5	The continuation of the header for section 4.3.2.	The indentation of the header has changed but is not reflected with a side bar. Note that the indentation of the header in Amendment 7 was inconsistent with the rest of the TS. Amendment 8 fixes this inconsistency.
SER Pg 4	Sec 3.3, last sentence	It is unclear why the staff’s evaluation finding includes the phrase “for a certified life of 20 years”. First of all there is not “certified life” associated with the TN-40HT cask design of our license. Second nothing in the LAR involves the duration that the cask is in storage.
SER Pg 4	Sec 4.1, 2 nd sentence	There is no Table 4-1 in the SAR. The correct reference should Table 4-1 of the LAR.
SER Pg 4	Sec 4.1, 5 th sentence	The units for conductance “BTU/hr-in-F” are not correct (two locations). It should be “BTU/hr-F”.
SER Pg 5	Sec 5.1, 2 nd sentence	There is no Table 4-1 in the SAR. The correct reference should Table 4-1 of the LAR.
SER Pg 5	Sec 5.1, last sentence	The units for conductance “BTU/hr-in-F” are not correct (two locations). It should be “BTU/hr-F”.
SER Pg 5	Sec 5.2, last sentence	The LAR does not propose a reduction in allowable thickness. The LAR requests a reduction in the required conductance and any combination of thicknesses that achieve this allowed conductance is acceptable.