

"Designated Original"

71-9315



**Department of Energy**  
Washington, DC 20585

October 15, 2014

Attention: Document Control Desk  
Pierre Saverot  
Project Manager  
Spent Fuel Licensing Branch  
Division of Spent Fuel Management,  
Office of Nuclear Material Safety and Safeguards  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555-0001

Dear Pierre Saverot:

The Department of Energy Packaging Certification Program (PCP) requests a minor revision to NRC Certificate of Compliance 9315, Revision 11, Docket Number 71-9315, to clarify one item and allow flexibility in a second item. The first item addresses the use of Teflon bottles with respect to the maximum mass of off-gassing material in the containment. The second item addresses the application and number of Tamper Indicating Devices (TIDs) required for shipment. The bases for these changes are below.

TEFLON

Ref 5.(b), page 2 of the CoC, 2nd paragraph - The maximum mass of off-gassing materials is 500g. When Teflon bottles are used, an additional 990g of off-gassing materials is authorized. Some package users have interpreted the CoC to mean that when Teflon bottles are used, the maximum mass of off-gassing material is 1490 grams, and the additional 990g can be any off-gassing material. This interpretation is incorrect. The additional 990g must be Teflon, to account for up to three Teflon bottles, 330g each. DOE requests the following change in the CoC to clarify this user misinterpretation:

From:

With the use of Teflon bottles as convenience containers, an additional 990 g of off-gassing material is authorized in the containment vessel. Off-gassing materials may be any type of hydrogenous material, except in the case of shipping uranium in the form of broken metal, in which case the hydrogenous material must have a hydrogen atom density less than or equal to that of water.

To:

With the use of Teflon bottles as convenience containers, an additional 990 g of off-gassing materials is authorized in the containment vessel. The additional 990 g must be Teflon (e.g. three Teflon bottles weighing 330 g each). With Teflon bottles, the maximum mass of off-gassing material is 1490 g: 990 g Teflon and 500 g of any type of hydrogenous material, except in the case of shipping uranium in the form of broken

metal, in which case the hydrogenous material must have a hydrogen density less than or equal to that of water.

TAMPER INDICATING DEVICES

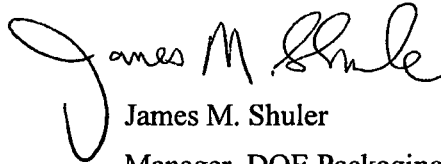
Ref Application dated March 3, 2011 (i.e., SAR), Section 7, Page 7-6, Item 12 - The SAR states, "The TIDs are attached through both TID lugs." The SAR assumes the use of two TIDS, since there are two TID lugs. However, some users would prefer to use a single TID that attaches through both TID lugs. The use of a single TID does not affect the ability of the package to meet 10 CFR 71.43(b); therefore, DOE requests the following change in the CoC, Condition 13, to allow a single TID option:

Add:

- (c) Either one or two Tamper Indicating Devices (TIDs) may be used for compliance with 10 CFR 71.43(b), as long as the TID(s) attach through both TID lugs.

A copy of this letter will be emailed to you.

If you have any questions or need more information please contact me at (301) 903-5513, james.shuler@doe.em.gov



James M. Shuler

Manager, DOE Packaging Certification Program  
U.S. Department of Energy  
Office of Packaging and Transportation  
EM-33, CLOV-2047  
1000 Independence Ave, SW  
Washington, DC 20585

Distribution:

Virginia Kay, NNSA NA-261  
Emory Hogan, NNSA NPO-70  
Jim Anderson, CNS Y-12  
Walter North, CNS Y-12  
Jeff Arbital, CNS Y-12  
Gary Person, CNS Y-12