



A URS-led partnership with B&W and AREVA

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December 17, 2015

ATTN: Document Control Desk
Director, Spent Fuel Project Office
Office of Nuclear Material Safety and Safeguards
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Subject: CLARIFICATION OF DETERMINATION OF ACCEPTABLE ACTIVITY LIMITS
FOR REVISION 7 OF THE RH-TRU 72-B SHIPPING PACKAGE APPLICATION,
DOCKET NO. 71-9212, TAC NO. L24965

- References:
1. Letter from T. E. Sellmer to Document Control Desk, dated November 10, 2014; subject: Revision 7 of the RH-TRU 72-B Shipping Package Application, Docket No. 71-9212
 2. Letter from H. Akhavannik (NRC) to T. E. Sellmer, dated December 19, 2014; subject: Application for Revision No. 8 of Certificate of Compliance No. 9212 for the Model No. RH-TRU 72-B Package – Supplemental Information Needed, TAC No. L24965
 3. Letter from T. E. Sellmer to Document Control Desk, dated February 18, 2015; subject: Supplemental Information Regarding Revision 7 of the RH-TRU 72-B Shipping Package Application, Docket No. 71-9212
 4. Letter from H. Akhavannik (NRC) to T. E. Sellmer, dated May 8, 2015; subject: Request for Additional Information for Review of the Model No. RH-TRU 72-B
 5. Letter from T. E. Sellmer to Document Control Desk, dated July 31, 2015; subject: Response to Request for Additional Information Regarding Revision 7 of the RH-TRU 72-B Shipping Package Application, Docket No. 71-9212, TAC No. L24965
 6. Letter from H. Akhavannik (NRC) to T. E. Sellmer, dated September 23, 2015; subject: Application for Model No. RH-TRU 72B Transportation Package - Second Round Request for Additional Information
 7. Letter from T. E. Sellmer to Document Control Desk, dated October 22, 2015; subject: Response to Second Round Request for Additional Information Regarding Revision 7 of the RH-TRU 72-B Shipping Package Application, Docket No. 71-9212, TAC No. L24965
 8. E-mail from H. Akhavannik (NRC) to T. E. Sellmer forwarding an e-mail from V. Wilson (NRC), dated November 19, 2015; subject: excerpt from SER on RH-TRU in discussing the source distribution; and subsequent teleconference between NWP and NRC on December 2, 2015

Dear Ms. Akhavannik:

Nuclear Waste Partnership LLC (NWP), on behalf of the U.S. Department of Energy, hereby submits revised SAR documents to clarify the determination of acceptable activity limits for Revision 7 of the RH-TRU 72-B Shipping Package Application, U.S. Nuclear Regulatory Commission (NRC) Docket No. 71-9212. This information supplements the content of References 1, 3, 5, and 7.

Based on Reference 8, Section 5.5.4 of the RH-TRU 72-B SAR has been revised to clarify the determination of acceptable activity limits for overpacked drums in a waste canister and a direct-loaded waste canister. Specifically, Step 2 in Section 5.5.4 has been revised to allow the use of the distributed source model activity limits for drums overpacked in the payload canister (Case A) only if the contents of each drum meet the definition of "distributed throughout" per NUREG-1608. Step 10 has been revised to reduce the allowable activity based on the volume fraction of the waste for direct-load payload canisters meeting the definition of "distributed throughout" per NUREG-1608. Step 11 has been revised to eliminate redundantly stated requirements.

All SAR page margin redline marks are retained from the original November 2014, Revision 7, submittal, the July 2015 response to the original NRC RAI, and the October 2015 response to the second-round NRC RAI; new margin redline marks have been added to indicate changes made based on the discussion provided above. No changes were necessary for the RH-TRAMPAC or RH-TRU Payload Appendices documents as a result of the aforementioned discussion. The headers for all documents now reflect a date of December 2015.

If you have any questions regarding this submittal, please contact Mr. S. A. Porter of my staff at (253) 858-6690, or myself at (575) 234-7396.

Sincerely,



T. E. Sellmer, Manager
Packaging and Information Systems

TES:clm

cc: H. Akhavannik, USNRC
J. C. Rhoades, CBFO
J. R. Stroble, CBFO

The following table summarizes the components of this submittal. No deviations occur from the NRC-prescribed PDF formatting for the submitted files. Please contact Ms. C. L. Morrison at (505) 878-1353 or cindy.morrison@wipp.ws to resolve any discrepancies in this submittal.

File Name	File Size (KB)	Sensitivity Level	Submittal Type
001 RH-TRU 72-B R7 12-2015 Transmittal Letter.pdf	834	Publicly Available	EIE
002 RH-TRU 72-B SAR R7 – Dec 2015.pdf	36,635	Publicly Available	EIE
003 RH-TRAMPAC R3 – Dec 2015.pdf	1,064	Publicly Available	EIE
004 RH-TRU Payload Appendices R3 – Dec 2015.pdf	9,313	Publicly Available	EIE