



**Department of Energy**  
Washington, DC 20585

May 9, 2017

Attention: Document Control Desk  
Michael Layton, Director  
Division of Spent Fuel Storage and Transportation,  
Office of Nuclear Material Safety and Safeguards  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555-0001

Dear Michael Layton:

The U.S. Department of Energy (DOE) is submitting Revision 14 of the Safety Analysis Report (SAR) to correct an error on page 2-27 of the Revision 13 SAR submitted February 27, 2017, with the request for an amendment of U. S. Nuclear Regulatory Commission Certificate of Compliance (CoC) Number 9330, for the Model ATR-FFSC package (NRC Docket 71-9330).

The text on page 2-27 is incorrect and should be changed as follows:

FROM: "The same is true for Cobra fuel. Section 6.13, Appendix E: Criticality Analysis for the Cobra Fuel Element conservatively models the Cobra fuel as a homogeneous mixture of uranium and water. Therefore, a structural evaluation of the Cobra fuel and the Cobra FHE is not required."

TO: "For Cobra fuel, Section 6.13, Appendix E: Criticality Analysis for the Cobra Fuel Element conservatively models the Cobra fuel as follows: for NCT, both the fuel and the FHE are considered as intact, consistent with the approach used for ATR, MURR, and MIT fuel. For HAC, the Cobra fuel is considered as both intact within an intact FHE, as well as conservatively reconfigured in the absence of an FHE. Since the Cobra fuel and the Cobra FHE are modeled as both intact and as fully reconfigured to the most reactive extent (including total absence of the FHE), a structural evaluation of the Cobra fuel and the Cobra FHE is not required."

DOE also requests NRC, for the benefit of the package users, to include on the CoC in the References section the "SAR document number and revision" corresponding to the application date in block 3.b., page 1, of the CoC.

If you have any questions or need more details please call at 301-903-5513 or james.shuler@em.doe.gov.

James M. Shuler

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