



CONVERSATION RECORD

12/22/2017

NAME OF PERSON(S) CONTACTED OR IN CONTACT WITH YOU

Don Shaw, Peter Shih, Venkata Venigalla, Prakash Narayanan

DATE OF CONTACT

12/22/2017

TYPE OF CONVERSATION

E-MAIL

TELEPHONE

INCOMING

OUTGOING

E-MAIL ADDRESS

don.shaw@areva.com

TELEPHONE NUMBER

ORGANIZATION

TN America's LLC

DOCKET NUMBER(S)

07201004

LICENSE NUMBER(S)

CONTROL NUMBER(S)

SUBJECT

A telecom was held with TN Americas LLC (TN) to discuss the inspection conducted July 19, 2017 in which the staff identified an apparent violation related to 10 CFR 72.146. Staff conducted a re-exit .

SUMMARY

The staff informed TN that our evaluation process regarding the inspection finding has not been completed, and would like to consider the additional information that TN provided as the staff determines what action may be appropriate. However, since the information that TN has provided has been submitted piecemeal, and is fragmented, the staff proposed to pause our evaluation until January 31, 2018 to allow TN the opportunity to resubmit that information formally in a coherent package. In addition, the staff noted that there was a confounding factor related to confusion regarding the applicability of the 2006 NRC approval of the analysis due to NRC subsequently removing a written limitation in the SER leading TN to assume that the restriction was lifted. Note that the NRC's enforcement policy still requires the noncompliance to be corrected. But NRC's enforcement policy allows us to consider enforcement discretion in cases where there is such a confounding factor contributing to the noncompliance, and potentially allows NRC to use discretion to not cite the violation under certain circumstances. Given this, NRC is considering whether enforcement discretion might be appropriate for this situation. One item in considering enforcement discretion is whether corrective actions have been completed to restore compliance. The staff noted to TN that if they choose to submit any additional information, to include any information that you would like us to consider regarding the actions you have already taken to restore immediate compliance, and any actions you have taken or are planning to take to prevent recurrence of the violation.

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ACTION REQUIRED (IF ANY)

The staff is considering an apparent violation of 10 CFR 72.146. The staff will pause our review until January 31, 2018, to allow TN time to provide any additional information that you want us to consider as the staff is making its determination. The staff will use the information that the staff have at that point to make our determination of proposed action, and TN will receive a letter from us per the normal enforcement process.

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NAME OF PERSON DOCUMENTING CONVERSATION

Earl Love, Sr. Transportation & Storage Safety Inspector

SIGNATURE

Earl Love 12/22/2017

CONVERSATION RECORD (continued)

SUMMARY: (Continued from page 1)

It is up to TN to evaluate the cause and implement corrective actions that are appropriate, however examples of corrective actions that could be likely in a case such as this could include immediate action to institute directives and procedures so that the operation of DSC's are limited to decay heat below 27.75kW, which is below allowable design basis heats loads for the current NUHOMS 32PTH1, Type 2-W Cask System, and long term actions to revise and resubmit the analysis for NRC approval by a certain committed date with the action placed in your CAP.

The purpose of the Staffs technical review and inspection of TN 10 CFR 72.48 Evaluation No. LR721004-1586, Revision 0. Specifically, to evaluate the thermal performance of the new basket using a MOE which consists in ANSYS finite element analysis (FEA) in order to determine whether TNs thermal analysis adequately demonstrated that the storage cask provides adequate heat removal capacity needed to preserve fuel cladding integrity. To evaluate the thermal performance of a new basket (32PTH1 Type 2-W), TN used a MOE in accordance with ANSYS finite element analysis and first principle calculations. Using this MOE, the evaluation indicated PCT was below the design basis limit by 3°F under storage conditions and by 5°F under transfer conditions. The staff noted the MOE was validated based on comparison of predicted temperatures to thermal test, as previously reported (ADAMS Accession No. ML050680080) and that the comparison of the MOE predicted values with the results from the previous thermal test did not constitute an acceptable validation. Based on the lack of proper validation and adequate quantification of conservatisms, uncertainties, and errors, the MOE used to evaluate the cask heat removal capability could not be validated in order to demonstrate that the PCT does not exceed the recommended 752°F, as predicted by TN in LR721004-1586.