



CONVERSATION RECORD

05/03/2018

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| NAME OF PERSON(S) CONTACTED OR IN CONTACT WITH YOU See below. | | DATE OF CONTACT 04/24/2018 | TYPE OF CONVERSATION <input type="checkbox"/> E-MAIL <input checked="" type="checkbox"/> TELEPHONE <input type="checkbox"/> INCOMING <input checked="" type="checkbox"/> OUTGOING |
| E-MAIL ADDRESS | | TELEPHONE NUMBER (888) 447-9153 | |

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| ORGANIZATION Global Nuclear Fuels - America, LLC (GNF-A) | DOCKET NUMBER(S) 71-9294 |
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| LICENSE NUMBER(S) | CONTROL NUMBER(S) |
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SUBJECT
NPC Request for Additional Information (RAI) Discussion - Part II

SUMMARY
NRC participants: Chris Allen, Zhian Li, Christina Leggett, John McKirgan and Travis Tate
GNF-A participants: Lon Paulson, Christopher Kmiec, Jonathan Rohner and Scott Murray

The discussion of the RAIs, which can be found using ADAMS Accession No. ML18107A753, began at approximately 4 P.M. For RAI 1.1, the applicant began by explaining that safety analysis report (SAR) Table 1.1 summarized the contents listed in SAR Table 6.21. The NRC responded that the summary provided in SAR Table 1.1 appeared ambiguous and that it was necessary to clearly identify the contents being offered for transport. The NRC offered that the applicant could accomplish this by either replicating SAR Table 6.21 in SAR Chapter 1, adding a statement in Chapter 1 which pointed to SAR Table 6.21 or another method chosen by the applicant. The NRC also expressed uncertainty that SAR Table 6.21 was an exhaustive list of the contents proposed for transport. After explaining that they had sought to expand the previously approved contents and to broaden the definition of approved contents, the applicant affirmed their commitment to better define the contents proposed for transport in SAR Table 1.1. RAI 1.2 had been discussed on April 20, 2018 and no discussion of RAI 6.1 occurred. In discussing RAI 6.2, the applicant pointed to previous analytical models which incorporated plastic and which demonstrated that the reactivity values generated by these models were

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ACTION REQUIRED (IF ANY)

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NAME OF PERSON DOCUMENTING CONVERSATION
Chris Allen

SIGNATURE
Christopher C. Allen

CONVERSATION RECORD (continued)

SUMMARY: (Continued from page 1)

similar to those generated by analytical models which did not incorporate plastic. This discussion turned the conversation to the history of a limitation of the amount of plastic which could be transported in the Model No. NPC. When asked why the plastic limitation of 3.7 kilograms in the certificate of compliance was not shown in SAR Table 1.1, the applicant responded that it was most likely a typographical error and committed to adding it to SAR Table 1.1. When the conversation moved to RAI 6.3, the NRC stated that authorizing the previous payload limits for uranium oxide pellets would require further analysis. The applicant then outlined the history associated with the decreased uranium oxide payload limit. The applicant also explained that their analyses for the previous uranium oxide payload limit utilized an optimum particle size and didn't include plastics. When the NRC asked where in the SAR this information was presented, the applicant pointed to SAR section 6.3.5.2 which discussed the analytical model, SAR section 6.6.2.2 which discussed the damaged package array, and SAR figures 6.14(a) through 6.14(f). The NRC committed to review this information to determine if it addressed the question. There was no discussion of RAI 6.4. For RAI 6.5, when the applicant inquired what the NRC did not understand about SAR Table 6.21, the NRC explained that the notation used for some of the compounds needed clarifying. The NRC also explained that some of the references provided were either unavailable for review, or in the case of the Wikipedia references, were not considered reliable. The applicant committed to improving the references cited in SAR Table 6.21. Next, the applicant asked the NRC to elaborate on RAI 6.6. After the NRC explained that the information communicated by the graphs was unclear, the applicant provided clarifying information with which the NRC disagreed. Following further discussion, the applicant stated they would try to improve the figures. For RAI 7.1(a), the applicant committed to clarifying the number of plastic bottles used to ship the contents. For RAI 7.1(b), the applicant provided historical details on the cutoff size for shipping homogeneous and heterogeneous compounds in the Model No. NPC package, and asked why the question was being asked. The NRC stated the information would help define how the contents were classified for loading purposes. After the applicant said they would evaluate how to proceed, the call concluded at approximately 5:15 P.M.