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December 4, 2018  
E-53202

U. S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
One White Flint North  
11555 Rockville Pike  
Rockville, MD 20852

Subject: Application for Revision 17 to Certificate of Compliance No. 9233 for the Model No. TN-RAM, Docket No. 71-9233

References: [1] Revision 16 to Certificate of Compliance No. 9233 for the Model No. TN-RAM, 2017

[2] Document E-10621, Safety Analysis Report for the TN-RAM, Revision 17

In accordance with 10 CFR 71.31(b), TN Americas LLC submits its application for revision to Certificate of Compliance (CoC) No. 9233 for the Model No. TN-RAM.

There is one change in this application and this change is to Safety Analysis Report (SAR) drawing number 990-708. This change is to item 19 on SAR drawing 990-708, "FUSIBLE PLUG," to allow the use of an alternative material, nylon, in lieu of RILSAN BMN G8, for the impact limiter's fusible plugs. The impact limiters for TN-RAM Number 2 are nearing completion and there is an urgent need for the fusible plugs for the impact limiters. As discussed in the next paragraph, this change has no impact on safety. This change is being requested because obtaining RILSAN BMN G8 material to fabricate the fusible plugs is much less desirable in that it takes longer and is relatively more expensive. Nylon material is easy to find, with nylon bolts readily available at a reasonable price from a wide variety of suppliers.

This change has no detrimental impact on the design or on the performance of the TN-RAM cask and its impact limiters. The purpose of this fusible plug is to melt during a fire event to prevent pressure build-up within the impact limiter shell. Using a material with a melting temperature below approximately 300°C fulfills this design intent. The melting temperature of RILSAN BMN G8 material is in the 186°C range. The most common nylon types are Nylon 6(PA6) and Nylon 6,6 (PA66). Typical melting temperatures for these materials is in the 210-270°C range, which is slightly higher than RILSAN, but still low enough by a large margin to fulfill the design intent.

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This submittal contains the following enclosures:

- Enclosure 1 provides a copy of the TN-RAM SAR Revision 18 for the SAR Cover Page, Revision Log (changed pages only), Chapter 1 (changed pages only) and Drawing 990-708, Revision 11. This enclosure is proprietary.
- Enclosure 2 provides a public version of Enclosure 1. This enclosure does not include Drawing 990-708, Revision 11, as it contains security related information. The drawing is being withheld from public disclosure in accordance with RIS 2005-31.
- Enclosure 3 provides a markup of Revision 16 of CoC No. 9233 for the proposed change discussed in this letter.

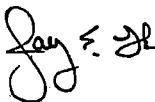
The changed areas in the SAR are marked as follows:

- New or changed pages show "Revision 18" in the header.
- Changed areas are indicated using revision bars in the right-hand margin. Newly inserted or changed text is shown by italics.

TN Americas LLC respectfully requests that Revision 17 to the Certificate of Compliance No. 9233 for the Model No. TN-RAM be issued on or about January 8, 2019 to support the completion of the fabrication of the impact limiters for TN-RAM Number 2.

Should NRC staff have any questions or require additional information regarding this submittal, please do not hesitate to contact Mr. Glenn Mathues at 410-910-6538. For any written correspondence please include "To the Attention of Glenn A. Mathues."

Sincerely,

  
for S. Edwards  
per delegation

W. Scott Edwards  
Director of Transportation

Enclosure:

1. TN-RAM SAR Revision 18 Changed Pages (Proprietary)
2. TN-RAM SAR Revision 18 Changed Pages (Public Version)
3. Proposed Changes to CoC 9233 Revision 16

cc: Bernie White, U.S. Nuclear Regulatory Commission

- One copy of this letter and Enclosure 1 and Enclosure 3)