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June 13, 2019
FS-19-0143

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: BRR Package Amendment Request (SAR Revision 15)

Dear Mr. White:

Orano Federal Services LLC (Orano FS) hereby submits Revision 15 of the Safety Analysis Report (SAR) for the BRR Package, Docket No. 71-9341. The purpose of this amendment is to change the thickness of the inner shell from a dimension of 1.0 MIN to a dimension of 1.00 ± 0.06 inches.

Drawing 1910-01-01-SAR, Revision 7, Sheet 4, Zone B-6 shows a dimension of the inner shell of 1.0 MIN as currently authorized. Revision 15 of the SAR includes Revision 8 of this drawing, which changes the thickness callout from 1.0 MIN to 1.00. With reference to the standard tolerance block on Sheet 1 of the drawing, the tolerance on a two-place decimal (machined) is ± 0.06 inches. This change is made necessary due to an error in machining the inner diameter of one of the two BRR packages currently being fabricated. The inner diameter has been partially machined such that part of the inner shell has a thickness less of than 1.0 inches. The revised callout (1.00 ± 0.06 inches) allows a minimum thickness of 0.94 inches. The BRR package with the machining error can meet this dimension. The machining error does not affect any other SAR drawing dimensions, including the inner diameter. There are no other changes to the SAR drawings.

The revised SAR includes an evaluation of the consequences of this change on the free drop stress analysis and on the shielding analysis. These evaluations demonstrate that the effect of the change is minor, and that the BRR package will comply with all of the applicable requirements of 10 CFR 71. All changes are marked with a revision bar in the right margin.

The affected cask is currently in fabrication and is proceeding to completion. In order to achieve a sufficient level of confidence of meeting our delivery commitments, Orano would need to have a revised Certificate of Compliance for this amendment no later than August 16, 2019. Please let me know if this is



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possible at your earliest convenience. We understand that our response to RAIs, if any, will affect the achievement of this milestone.

Included with this letter is one paper copy of the revised SAR drawing and SAR pages, and one CD containing the PDF file "BRR SAR Complete Rev. 15.pdf" (37,043 kb, 779 pages). The table below gives guidance to update a paper copy of the SAR. An extra cover sheet and spine sheet are provided to update the binder.

Should you have any questions regarding this submittal, please contact me at (233) 552-1321 or via email (phil.noss@orano.group).

Yours Truly,

Philip Noss
Licensing Manager
Orano Federal Services LLC

Delete Rev. 14	Insert Rev. 15	Contents/Remarks
Cover and Spine	Cover and Spine	---
Cover sht/blank pg	Cover sht/blank pg	---
Table of Contents	Table of Contents	---
Drawing 1910-01-01-SAR, Rev. 7	Drawing 1910-01-01-SAR, Rev. 8	Revised inner wall thickness callout, Sheet 4 Zone B-6
2.6-1 thru 2.12-1 (Section 2.0 through Section 2.12, entire)	2.6-1 thru 2.12-1 (Section 2.0 through Section 2.12, entire)	<ul style="list-style-type: none"> Added Section 2.6.7.3 presents stress evaluation of reduced wall thickness (HAC evaluation included here for continuity). Reference added to Section 2.7.1.2 and Section 2.7.1.3 to refer to Section 2.6.7.3 for HAC results.
Page 5.1-1 to 5.1-2	Page 5.1-1 to 5.1-2	Added shielding evaluation of reduced wall thickness to Section 5.0.



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Copies:

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Donald Darrington, Idaho National Laboratory (incl. changed pages and CD)

John Coody, Project Manager, Orano Federal Services LLC