



PaR Systems Corp.

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U.S. NRC

April 16, 1979

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U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

EXPORT/IMPORT
AND
INTERNAT'L SFGDRS

Attn: Mrs Elaine Hemby - Components

Subj: Potential Export, Neutron Absorber Tubes

Ref.: Brochure - High Density Fuel Storage Racks
(Illustrates tubes)

Gentlemen:

PaR has entered a formal technical proposal and price quotation covering neutron absorber tubes for use in Santa Maria de Go. ona Spent Fuel Storage Racks. This negotiation is with:

SENER
TECNICA Industrial Y Naval, S.A.
Apartado 8, Las Arenas (Vizcaya)
SPAIN

Which is an Architect - Engineering firm under contract to:

NUCLENOR
Centrales Nucleares del Norte, S.A.
Herman Carter, 26 - Santander - España

NUCLENOR is the owner of the plant which is equipped with a G.E. boiling water reactor rated at 1480 Mwth, electrical output 460 Mwe, which has been in commercial operation since 1971.

PaR's proposal deals with enlargement of the spent fuel pool necessitated by delays in reprocessing. The rack is to be designed and constructed in Spain using imported (into Spain) tubes on which PaR has bid. Although PaR has not been awarded a contract, advance exploration of the export license situation is considered warranted.

While the undersigned does not have a detailed list of equipment which the NNPT has placed within the licensing cognizance of your agency, it is considered highly likely that the product PaR may wish to export falls within your purview as an essential component of a nuclear reactor facility. In review of the existing Agreement for Cooperation between the United States and Spain, and the emphasis on storage of spent fuel as opposed to reprocessing; there should be strong support for approval of a license application. You can assist by providing answers to the following questions:

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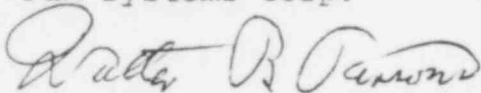
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1. Is an export license required?
2. Is NRC the cognizant agency to which application should be made (as opposed to Dept. of Commerce)?
3. Is there a facility license in effect pursuant to Sec. 126 of Atomic Energy Act such that Sec. 109 a (as amended by NNPT) eliminates need for licensing the specific component in question?
4. Assuming answers yes, yes and no to the above questions respectively, has there been a recent determination of "no material changed circumstances" since the last previous license for export to Spain - perhaps for the GORONA facility itself?
5. What, if anything, could PaR do in the pre-award phase to minimize the time which will be required to obtain a license following award?
6. Do you foresee any possibility that a license application may be denied?

Thank you for your assistance in this matter.

Sincerely,

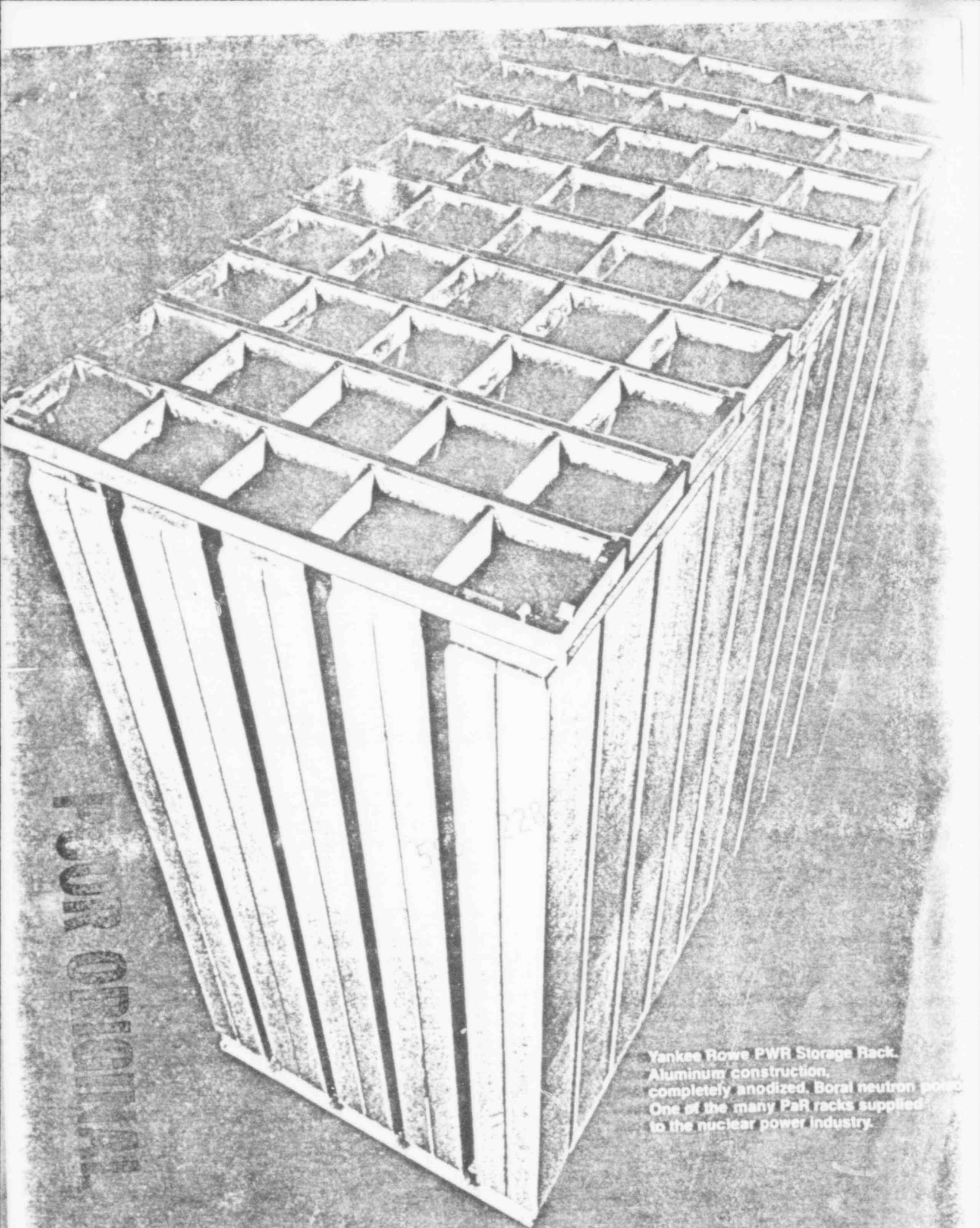
PaR Systems Corp.



Walter B. Parsons
Attorney

WBP/jk
encl:

cc: D.F. Melton
R.W. Wiesener



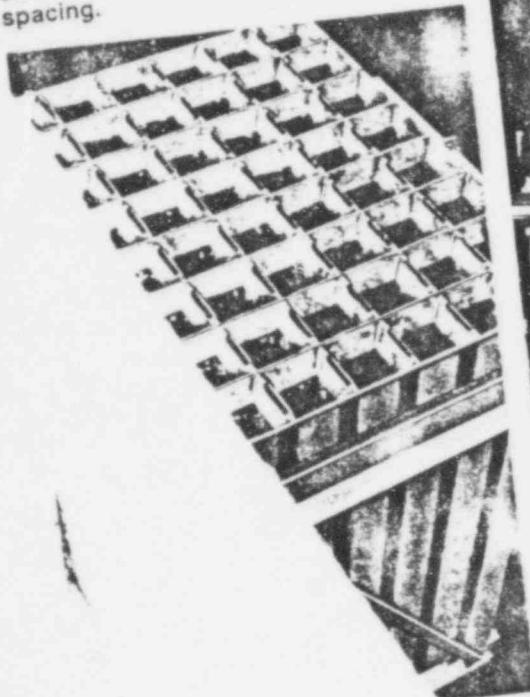
FOR OPTIMUM

Yankee Rowe PWR Storage Rack. Aluminum construction, completely anodized. Boral neutron ports. One of the many PaR racks supplied to the nuclear power industry.

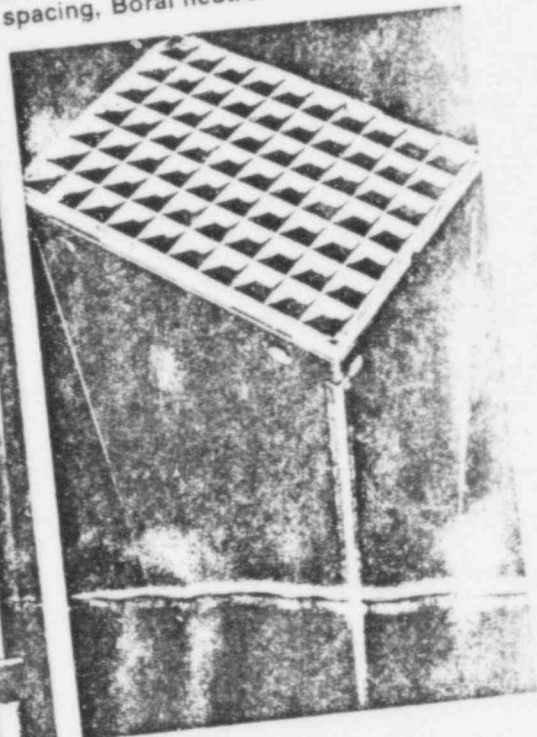
Assembly fixture, BWR Fuel Storage Rack.



PWR Fuel Storage Rack. Stainless steel construction, 13.3" center spacing.



BWR Fuel Storage Rack. Anodized aluminum construction, 6.625" center spacing, Boral neutron absorber.



The nuclear power industry comes to PaR for high density fuel storage racks to significantly increase the storage capability of existing or new installations. The reason is PaR's experience and total service capability.

Manufacturing. All manufacturing is done at the PaR Plant. Our Quality Assurance Program meets the requirements of ANSI N 45.2 and 10 CFR 50.

Support. PaR provides licensing support, installation supervision, and continuing field service as required.

Quality Product. Designed for precision and rigidity, racks are available in stainless steel or aluminum, with or without neutron absorbers. They are designed to maximize storage capacity and simplify installation for either dry or wet storage.

Experience. PaR fuel storage racks have been supplied or are on order for the following typical installations: Milestone II; Calvert Cliffs I & II; Yankee Rowe; Maine Yankee; H.B. Robinson; Indian Point II; Trojan; Prairie Island I & II; St. Lucie I & II; Vermont Yankee; Pilgrim I; Peach Bottom I & II; Duane Arnold; Fitzpatrick; Morris Operation; Arkansas II.

For each rack, PaR provides detailed design, including structural, thermal, and criticality analysis.

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