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September 30, 2019  
E-55004

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

Subject: Application for Revision 10 to Certificate of Compliance No. 9302 for the Model No. NUHOMS<sup>®</sup>-MP197 Packaging, Docket No. 71-9302

References: [1] Revision 9 to Certificate of Compliance No. 9302 for the Model No. NUHOMS<sup>®</sup>-MP197 Packaging

[2] NUHOMS<sup>®</sup>-MP197 Transportation Package Safety Analysis Report, Revision 19, April 2019

[3] NRC Meeting Notice, Pre-application for Model No. NUHOMS<sup>®</sup>-MP197HB Transportation Package, August 23, 2019

[4] Presentation Files for Pre-Application Meeting for Revision 10 to Certificate of Compliance No. 9302 for the Model No. NUHOMS<sup>®</sup>-MP197 Packaging, Docket No. 71-9302, September 17, 2019

In accordance with 10 CFR 71.31(b) TN Americas LLC submits an application for revision to the Certificate of Compliance (CoC) No. 9302 for the Model No. NUHOMS<sup>®</sup>-MP197 Packaging [1].

Proposed changes to the MP197HB packaging design [2] were presented during a pre-application meeting held on September 5, 2019 [3]. The presentation files were submitted to the NRC Document Control Desk [4].

A revision to the CoC [1] is needed to add optional specifications to the package design that allow for fitment of impact limiter attachment bolts. As-built condition of impact limiters does not allow for required thread engagement of impact limiter bolts. The first use of the cask is scheduled for early January 2020 to ship low-level radioactive waste (LLW).

Should the NRC staff have any questions or require additional information regarding this submittal, please contact Mr. Peter Vescovi by telephone at 336.420.8325 or by e-mail at Peter.Vescovi@orano.goup. For any written correspondence, please include "To the Attention of Peter Vescovi."

Sincerely,



Don Shaw  
Licensing Manager  
TN Americas LLC

cc: Bernard White, Senior Project Manager, U.S. Nuclear Regulatory Commission  
Dennis Lang, Senior Project Manager, Orano TN Americas  
Mike Valenzano, Senior Project Manager, Orano, TN Americas

Enclosures:

1. Summary of Changes to MP197HB SAR
2. NUHOMS®-MP197HB SAR, Revision 20, Replacement Pages and Drawings, Proprietary Version
3. NUHOMS®-MP197HB SAR, Revision 20, Replacement Pages and Drawings, Public Version
4. Listing of Computer Files Contained in Enclosure 5
5. Computer Files Associated with CoC 9302, Revision 10
6. Affidavit Pursuant to 10 CFR 2.390