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November 13, 2019
E-55464

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[®]-MP197 Packaging, Docket No. 71-9302

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

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

[3] NRC Meeting Notice, Pre-application for Model No. NUHOMS[®]-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[®]-MP197 Packaging, Docket No. 71-9302, September 17, 2019

[5] TN Americas LLC letter E-55005 dated September 30, 2019, "Subject: Application for Revision 10 to Certificate of Compliance No. 9302 for the Model No. NUHOMS[®]-MP197 Packaging, Docket No. 71-9302"

In accordance with 10 CFR 71.31(b) TN Americas LLC submitted an application dated September 30, 2019, for revision to the Certificate of Compliance (CoC) No. 9302 for the Model No. NUHOMS[®]-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]. The NRC technical review staff held a telephone conference with TN Americas LLC (TN) on October 22, 2019, to discuss the information provided in the application. In response to the telephone conference, the application is supplemented to provide further justification for the packaging design changes. Enclosure 1 provides further explanation and justification for the design change items 1a and 2b, Enclosures 2 and 3 provide change pages for the package design Safety Analysis Report (SAR) Revision 20,

Enclosures transmitted herein contain SUNSI. When separated from enclosures, this transmittal document is decontrolled.

that replace any of the same pages provided in the original application, and Enclosures 4 and 5 provide additional calculation files. The enclosures provided with this letter supplement the Enclosures 1 through 5 submitted with the original application [5].

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. The as-built condition of impact limiters does not allow for required thread engagement of the 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

Document Components:

001 Public Transmittal Letter.pdf, 577,595 bytes
002 SUNSI Encl 01 Summary of Changes.pdf, 341,997 bytes, Proprietary
003 SUNSI Encl 02 SAR P.pdf, 2,359,908 bytes, Proprietary
004 Public Encl 03 SAR NP.pdf, 1,687,699 bytes
005 SUNSI Encl 04 Computer File Listing for Enclosure 05.pdf, 13,150 bytes, Proprietary
006 SUNSI Encl 05 Computer Files, 21,378,626,095 bytes, Proprietary
007 Public Encl 06 Public Affidavit.pdf, 723,441 bytes

OSM#1 (Disk):

001 Public Transmittal Letter.pdf, 577,595 bytes
002 SUNSI Encl 01 Summary of Changes.pdf, 341,997 bytes, Proprietary
003 SUNSI Encl 02 SAR P.pdf, 2,359,908 bytes, Proprietary
004 Public Encl 03 SAR NP.pdf, 1,687,699 bytes
005 SUNSI Encl 04 Computer File Listing for Enclosure 05.pdf, 13,150 bytes, Proprietary
007 Public Encl 06 Public Affidavit.pdf, 723,441 bytes

OSM#2 (Enclosure 5 portable hard drive):

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