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U.S. MUCLE AREG

715 Horizon Drive Grand Junction, Colorado 81501 (303) 245-4320 TWX: 9109296334

Nuclear Assurance Corporation 24 Executive Park West Atlanta, Georgia 30329 (404) 325-4200

71-6698

Weinbergstrasse 9 8001 Zurich, Switzerland (01) 470844 Telex: 57275

Telex: 549567, 542703

March 3, 1980 CRJ/80/16/ETS

Mr. C. E. MacDonald, Chief Transportation Branch Division of Fuel Cycle and Material Safety Nuclear Regulatory Commission Washington, D. C. 20555

Dear Mr. MacDonald:

NFS-4, Spent Fuel Shipping Cask (NAC-1 Cask); Docket No. 71-6698

Applicant.

Check No. 6636. &

Amount/Fee Category

Type of Fae. www.

Nuclear Assurance Corporation hereby requests that Certificate of Compliance No. 6698, Revision 9, dated December 12, 1979, be revised to authorize the shipment of reconstituted PWR uranium oxide fuel assemblies which may contain more or less than the design number of fuel rods. Specifically, it is requested that:

Item 5(b)(1)(vii) be revised to read as follows:

- (vii) Reconstituted PWR uranium oxide fuel assemblies with
 - (1) Less than the original number of fuel rods
 - (2) Additional fuel rods secured in guide tube thimbles or
 - (3) Combinations of both cases (1) and (2) above.

Fuel assemblies described above shall conform to the maximum active dimensions given in item 5(b)(1)(i).

Any fuel assembly shipped without one or both end fittings shall be equipped with an assembly carrier as shown in Battelle Drawing No. 00-001-676 or equivalent.

Nuclear Assurance Corporation has been asked by Babcock & Wilcox to prepare for shipping an irradiated fuel assembly which will contain less than the design number of fuel rods for the assembly. In addition, the modified assembly may contain fuel rods inserted and secured in the guide thimble.

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Criticality analysis has been performed to verify the safety of transporting reconstituted assemblies, using the KENO IV, NULIF and PDQ codes for various configurations. Fully reflected configurations, ranging from 36 rods removed to 17 rods added, were analyzed. In all cases, the K-effective value was within 2σ (.02) of a normal assembly value.

In accordance with the schedule of fees published on page 7223 of the Federal Register, Volume 4, Number 35, dated February 21, 1978, enclosed is a check in the amount of \$2,800.00.

If there are any questions, or if further information is desired, please contact me at your earliest convenience.

Very truly yours,

NUCLEAR ASSURANCE CORPORATION

Charles R. Johnson Vice President

CRJ:nkc Enclosure