

EXXON NUCLEAR COMPANY, Inc.
RESEARCH AND TECHNOLOGY CENTER
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PDR

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April 4, 1980

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

- References:
- 1) Docket 71-6581
 - 2) Letter, W. S. Nechodom to C. E. MacDonald, dated June 15, 1979.
 - 3) Letter, C. E. MacDonald to W. S. Nechodom, dated October 18, 1979.
 - 4) Letter, L. E. Hansen to C. E. MacDonald, dated November 30, 1979.
 - 5) Letter, L. E. Hansen to C. E. MacDonald, dated December 19, 1979.

Dear Mr. MacDonald:

A consolidated license renewal application for our Model 51032-1 and -1a package, with some amendments to the authorized contents and packaging methods, was submitted for review on June 15, 1979 (see Reference 2). Questions with respect to that application were provided to Exxon Nuclear on October 18, 1979 and responses to those questions were provided to you on November 30, 1979 (see References 3 and 4). A recent review of fuel design revisions which could affect our transportation licensing efforts revealed a need to modify the license renewal application for the single remaining discrete uranium fuel type (Type AA) to increase the licensed enrichment from 3.3 to 3.5 wt.% 235-U. In addition, it is becoming increasingly important to obtain the license covering generic fuel types prior to the current expiration date (July 31, 1980) of Certificate of Compliance No. 6581.

For the purpose of amending Certificate of Compliance No. 6581 to include the Type AA fuel design revision, enclosed are eight copies of amended pages to be inserted in your copies of the consolidated license amendment application (XN-52, Revision 1). Each set of revised pages is accompanied by a guide for insertion of the pages in your copies of the document and with a description of the changes made on the respective pages being submitted.

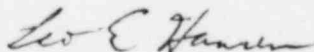
April 4, 1980

Multiplication factors presented via these revised pages were calculated assuming an enrichment of 3.5 wt.% 235-U. As can be seen, the change in multiplication factors resulting from the increase in enrichment of Type AA fuel from 3.3 to 3.5 wt.% 235-U is quite small and the continued safety of the package for the higher enrichment value is clearly demonstrated.

This application for an amendment of Certificate of Compliance No. 6581 includes revision of appropriate pages of the previously submitted consolidated license application since it is anticipated that the review and license renewal process can be completed prior to expiration of the current license. Delivery of the modified Type AA fuel elements is scheduled to begin in mid-July and USA and appropriate foreign IAEA Competent Authority review and approval of the Certificate is necessary prior to transport. It is requested, therefore, that the amended Certificate of Compliance be issued for the increased 235-U enrichment of Type AA fuel elements and, if possible, for other changes in fuel type descriptions and packaging methods covered in our June 15, 1979 consolidated renewal application not later than June 1, 1980. Delays in issuance of the amendment beyond the June 1 date would jeopardize completion of the IAEA Competent Authority review and approval process prior to the scheduled delivery dates.

If you have any questions with respect to this amendment application or if additional information is needed please contact me on (509) 375-7288.

Sincerely,



Leo E. Hansen, Senior Specialist
Criticality Safety and Physical Security

LEH:slr

Attachment