



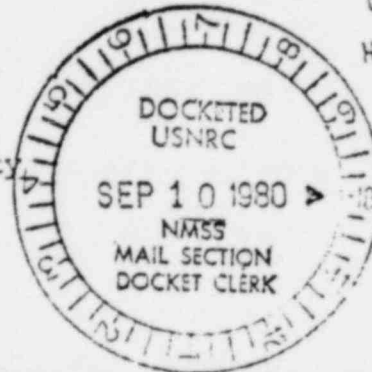
Nuclear Engineering Company, Inc.

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LOUISVILLE, KENTUCKY 40207 PHONE (502) 426-7160

May 30, 1980

Mr. Charles MacDonald, Chief
U.S. Nuclear Regulatory Commission
Transportation Branch
Division of Fuel Cycle & Materials Safety
Washington, DC 20555

Docket 71-6058



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U.S. NUCLEAR REG. COMMISSION
MAIL SECTION

Dear Mr. MacDonald:

Revision 6 of the Certificate of Compliance No. 6058 for the model B-3 shipping cask contained some amendments which were not requested or anticipated by the users of the package. One of the changes is expected to result in increased radiation exposure to users of the package and to burial site operators.

Paragraphs 5(b)(1)(i) and (iii) now restrict the inner container to a DOT Specification 17H steel drum. Previously, packages equivalent to Specification 17H were permitted. The equivalency provision was used by the industry to either construct equivalent packages with lifting devices or to modify standard 17H drums to incorporate lifting devices. Without the lifting devices it is extremely difficult to remove a Specification 17H drum from the cask. The difficulty in unloading results in increased radiation exposure to disposal site operators. The limitation of the inner container to 17H drums only is clearly in conflict with the NRC policy of ALARA. It is requested, therefore, that the words "or equivalent" be added following "17H" in paragraphs where the inner package is described.

Paragraph 8 of the Certificate requires replacement of the lid O-ring at least every 12 months. This appears to be an unnecessary requirement since under the quality assurance procedures required for use of the package, the O-ring must be inspected prior to each use. Such inspection will result in the detection of any defects which would require replacement of the O-ring. It is therefore requested that the requirement for annual replacement of the O-ring be deleted.

Our check in the amount of \$150 is enclosed in accordance with the provisions of 10 CFR Part 170.

Sincerely,

NUCLEAR ENGINEERING COMPANY, INC.

T. S. Baer
T. S. Baer
Vice President

TSB/bt

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Applicant.....	
Check No. 24376	25375
Amount Fee Category	150-118
Type of Fee	Payment
Date Check Rec'd.	6/24/80
Received By	<i>[Signature]</i>

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2650
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