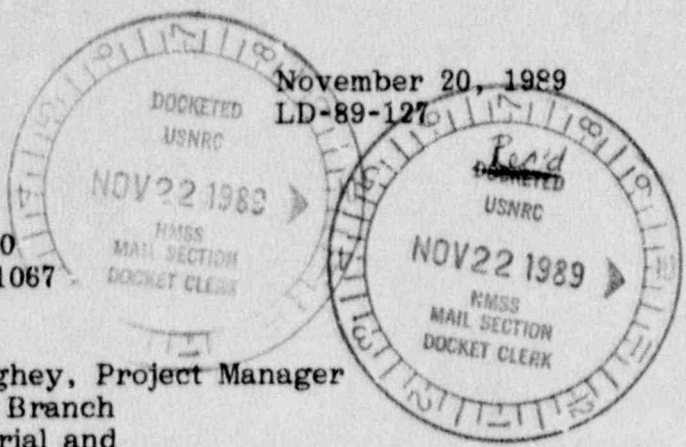


**COMBUSTION ENGINEERING**



November 20, 1989  
LD-89-127

Docket No. 70-1100  
License No. SNM-1067

Mr. D. A. McCaughey, Project Manager  
 Fuel Cycle Safety Branch  
 Division of Industrial and  
 Medical Nuclear Safety  
 Office of Nuclear Material  
 Safety and Safeguards  
 U. S. Nuclear Regulatory Commission  
 Attn: Document Control Desk  
 Washington, D. C. 20555

Subject: License Requirement Interpretation

Dear Mr. McCaughey:

In accordance with your request, this letter confirms a telephone conversation between Mr. C. M. Molnar of my staff and yourself. The subject of the conversation concerned an interpretation of license requirements for our Windsor Nuclear Fuel Manufacturing facility (SNM-1067). Specifically, how to handle an ambiguity concerning storage requirements of special nuclear material in shipping containers that are covered by applicable Certificates of Compliance and the facility license.

Sections 4.3.17, 4.3.18, 4.3.19 and Table 4.2.5 of the facility license application all address storage of shipping containers. Table 4.2.5 addresses storage in the facility warehouse and is not of concern. Sections 4.3.17 and 4.3.18 state the conditions under which shipping containers (CE-250-2 and UNC-2901 shipping containers, respectively) are to be handled. In part these sections allow the storage of shipping containers in the shipper trailers within the facility security fence, and in accordance with the Certificate of Compliance and DOT regulations. Section 4.3.19 includes a requirement, that arrays of shipping containers of different types be separated by twenty feet. The ambiguity is; If we have a number of shipper trailers on-site, having different container types on board, do we need to separate the trailers by twenty feet or do Certificate of Compliance and DOT regulations apply? The latter requirements do not place any restrictions on how many trailers or how close they may be parked.

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Mr. D. A. McCaughey  
November 20, 1989

LD-89-127  
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After several discussions of this subject with you, it is our understanding that:

Although while loaded on the shipper trailers the shipping containers are covered by their Certificates of Compliance and DOT regulations, Combustion Engineering will adhere to certain restrictions on trailer spacing when stored within the facility security fence. Specifically, no more than two trailers will be parked next to one another without regard to spacing. Sets of two trailers will be separated from other trailers or sets of trailers by at least twenty feet.

Because of the limited amount of storage space available at the facility and as a result of our discussions, the above interpretation has been implemented.

If you have any questions concerning this confirmation of license interpretation, please do not hesitate to call me or Mr. C. M. Molnar of my staff at (203) 285-5205.

Very truly yours,

COMBUSTION ENGINEERING, INC.



A. E. Scherer  
Director  
Nuclear Licensing

AES:jeb

cc: J. Roth (NRC - Region I)

DOCKET NO. 70-1100  
CONTROL NO. 26106  
DATE OF DOC. November 20, 1989  
DATE RCVD. November 22, 1989  
FCUF  PDR   
FCAF \_\_\_\_\_ LPDR \_\_\_\_\_  
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SAFEGRANT   
FCTC \_\_\_\_\_ OTHER \_\_\_\_\_  
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