



CHEM-NUCLEAR SYSTEMS INC.

P.O. Box 1866 • Bellevue, Washington 98009 • (206) 827-0711

PDR

71-9080

71-9113

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August 14, 1980

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



Dear Mr. MacDonald:

We have received Revision No. 4 to Certificate of Compliance No. 9080 which incorporates C of C 9113 and 9080 into a single package approval. We wish to go on record as objecting to this action since the packages are not identical.

Specifically the Model HN-600 (9080) has a carbon steel inner shell, a 20 inch secondary lid opening and a primary lid and gasket arrangement which does not provide for a metal to metal contact between the lid and cask body. The Model CNS 7-100 (9113) has a stainless steel inner shell, a 29 1/2 inch secondary lid opening and a primary lid and gasket arrangement which does provide for a metal to metal contact between the lid and cask body.

If these outlined differences are considered significant, we feel that two certificates are required. In any case, however, we feel that Nuclear Packaging, the designer of both packages, should be named in 3(a) of the Certificate. In our opinion, Chem-Nuclear's financial position could be seriously jeopardized if this matter is not resolved.

Your consideration of this matter will be appreciated.

Sincerely,

CHEM-NUCLEAR SYSTEMS, INC.

J. Stewart Corbett

J. Stewart Corbett
Manager, Licensing & Safety

TEL EXEMPT

JSC/cm

cc: Larry Hansen
NUPAC