PDR 71-9144

CHEM-NUCLEAR SYSTEMS INC.

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

January 19, 1981

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



Reference: Docket No. 71-9144 - NRC Letter of 12-18-80

Dear Mr. MacDonald:

The following is in response to your letter of December 12, 1980 in which you have requested additional information in support of our application dated July 22, 1980 for approval of the Model No. SGC-1 packaging.

In developing our response to your December 12, 1980 letter we determined that a rather major revision of the July 22, 1980 application was in order. For this reason we are submitting a totally revised application, rather than in the form of revised pages as you requested. Pursuant to the suggestion in Regulatory Guide 7.9, we have identified all revisions to our original submittal using the vertical lines in the right margin. Please include text in original binders.

In this submittal we request certain exemptions from:

- 1) Section 71.4 (g) of 10 CFR 71
- Section 71.31 (d) of 10 CFR 71
- 3) Appendix A of 10 CFR 71

Our justification for the requests are documented as follows:

- 1) Section 71.4 (g) of 10 CFR is detailed in Sections 1.2.3, 5.0 and Appendix 1.3.1 to the Safety Analysis Report (SAR).
- 2) Section 71.31 (d) of 10 CFR 71 is detailed in Sections 2.1.2, 2.4.4, 7.4 and Appendix 2.10.1 to the SAR.
- 3) Appendix A of 10 CFR 71 is detailed in Sections 2.1.2, 2.6.6, 7.4 and Appendix 2.10.1 to the SAR.

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Responses to the questions in your December 18, 1980 letter are detailed in Appendix A to the Safety Analysis Report (SAR).

We are confident that this revised submittal is responsive to the questions you have raised. We trust that this will permit you to complete your review of this application in timely fashion such that we may proceed with our committments. Please contact this office if you have any questions.

Sincerely,

CHEM-NUCLEAR SYSTEMS INC.

Stewart Corbett

J. Stewart Corbett Manager, Licensing and Safety

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