

FEB 09 1983

Docket No. 99900768/82-01

Hittman Nuclear & Development Corporation
ATTN: Mr. Barry Koh
Vice President and General Manager,
9190 Red Branch Road
Columbia, MD 21045

Gentlemen:

Thank you for your letter of September 30, 1982, in response to our letter dated August 6, 1982.

In regard to your request for withdrawal of Item B of the Notice of Violation, we do not believe such an action is warranted and have the following response. The HN-200 Safety Analysis Report described the energy absorption characteristics of Urethane 66-11 foam based on test data obtained from Atlantis Unidur 66-11 foam. The actual Urethane 66-11 formulation used by Hittman in the present HN-200 cask was supplied, however, by Flextron.

An internal Hittman engineering memorandum dated March 18, 1981, stated that the foam which failed during the testing in question was claimed by Flextron to be the same as that installed in the HN-200 cask. When the NRC inspector raised the question of what was the implication of these test failures, with respect to the adequacy of the foam presently installed in the HN-200 cask, he was informed that an informal and undocumented 10 CFR Part 21 review had been performed by Hittman. This is noted in paragraph 4 of the Inspection Report.

A violation was issued with respect to the failure to prepare evaluation records, in regard to the February through June 1981 test failures. It remains our position that this citation was proper, in that the only available test information for the Flextron formulation raised questions concerning the HN-200 cask foam adequacy. We have no further questions or concerns in regard to these violations, in that your subsequent testing of the cask foam has established its adequacy for use, and the adoption of a procedure for implementing 10 CFR Part 21 should provide for future evaluations in a manner consistent with the requirements of the regulation. You should also be aware that both the Inspection Report and correspondence will be placed in the Public Document Room. This will identify your stated objection to the referenced violation.

RIV
CI: R&CPS *WMC*
WMMcNeill/jkh
11/2/82

IB
SC: R&CPS
IBarnes
11/2/82

BC: VPB *UP*
UPotapovs
1/3/82

RLB
AD: V&TP
RLBangart
11/03/82

D: IES *EW*
EHJohnson
2/7/83

60:21

Should you have any further questions in regard to this matter, we will be pleased to discuss them with you.

Sincerely,

~~Official signed by~~
Uldis Potapovs, Chief
Vendor Program Branch

bcc:
NRC:PDR
JTCollins
EHJohnson
RLBangart
JAMarshall
WMMcNeill