GE Nuclear Energy



General Electric Company Vullectics Nuclear Conte F. Box 460, Vallectos Road Plessanton, CA 94555

February 5, 1991

Mr. C. E. NacDonald, Chief Transportation Branch Office of Nuclear Material Safety & Safeguards U.S. Nuclear Regulatory Commission Washington, DC 20555

Reference: Certificate of Compliance No. 9044, Docket 71-9044

Dear Mr. MacDonald:

Certificate of Compliance No. 9044 permits the shipment of nonfissile irradiated metal hardware with a maximum heat load of 600 watts. This hardware is shipped to the Vallecitos Nuclear Center (VNC) usually for examination in the shielded cell facility.

Occasionally, it will be necessary to ship irradiated hardware which, while within the 600-watt heat load limit, will require additional shielding to meet the DOT external dose rate requirements. To provide this shielding, VNC proposes the use of an inner steel liner for the Model 1600 shipping container. The liner will be fabricated as follows:

Material: 10-inch-diameter carbon steel rod approximately 53 inches in length.

Cavity: 1-1/4-inch cavity drilled down the center axis of the rod. The cavity will run the length of the rod.

Weight: Maximum 1,200 lb. (within the weight limits of Certificate of Compliance No. 9044).

The liner is shown on Certification Drawing No. 166D8032, Rev. O, attached.

As the height of the cask cavity is 54 inches, the length of the liner (approximately 53 inches) precludes any hardware from escaping into the cavity during normal conditions of shipment. Shoring will be provided as required by Certificate of Compliance No. 9044. The form of the shoring is not specified as the location of the liner in the cask cavity is immaterial (see dose rate analysis below).

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9102140073 910205 PDR ADOCK 07109064 C PDR The liner will be provided with a lifting device to permit its insertion and removal from the cask. This device has not been classified as safety related as: (1) it will be used only for insertion/removal of the liner prior to and after shipment and serves no function during transport, and (2) it cannot be used to lift other components of the packaging.

Shielding calculations were made using a Radiation Shielding Information Center (RSIC) provided computer code, ISOSHLD. The quantities of Co-60 necessary to meet the maximum permitted radiation levels during transport of the Model 1000 were calculated using the following assumptions:

Isotope: Co-60 was chosen as it is the limiting isotope for the activation products in most irradiated hardware

Liner ocation: Directly against the cask cavity wall. This is the worst configuration as it allows no credit for spacing within the cavity.

Accident Condition: No credit was taken for any shielding by the liner in the accident condition.

Using ISOSHLD, the following results were obtained:

Mode	Maximum Dose Rate	Ci Co-60 to Produce Maximum Dose Rate
Exclusive Use*	Surface of Package - 200 mRem/hr 2 m from Vehicle - 10 mRem/hr	51,000 23,000
Exclusive Use * Clased Vehicle	Surface of Package - 1,000 mRem/or Surface of Vehicle - 200 mRem/hr 2 m from Vehicle - 10 mRem/hr	257,000 107,000 23,000
Arcident Condition	1 m from Package Surface - 1,000 mRem/hr	33,000

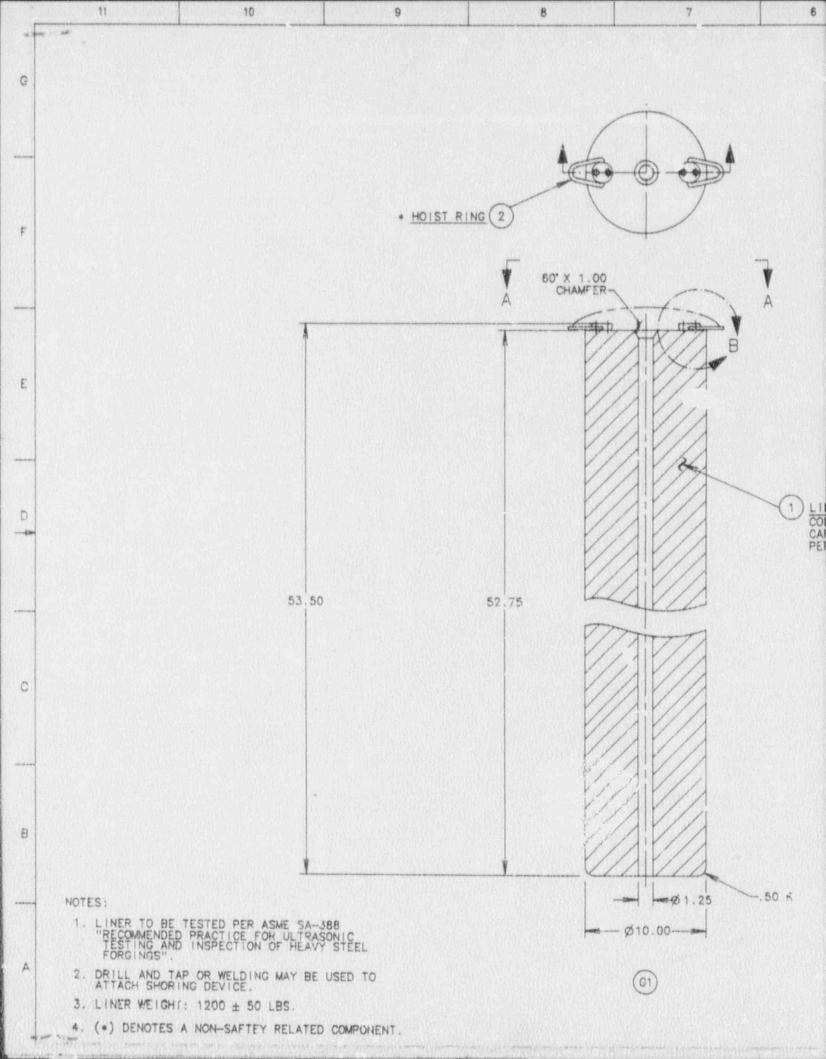
The above calculations demonstrate that as long as the contents of the liner do r t exceed 23,000 Ci of Co-60 or equivalent, all maximum permitted dose rate; will be met. (Note: Because of the small diameter of the liner cavity, the lack of the 10 inches of steel at the top and bottom of the liner poses no problem. Dose rates at the package surface will be approximately

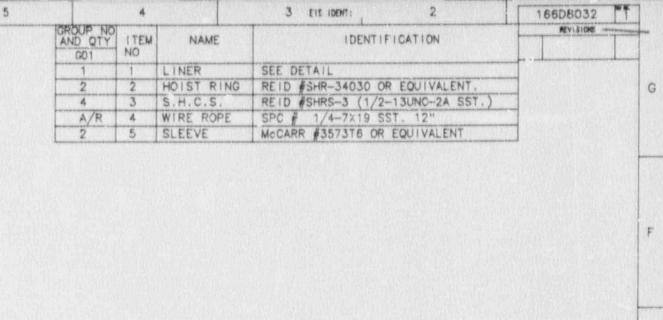
ne Model 1600 is only shipped exclusive use.

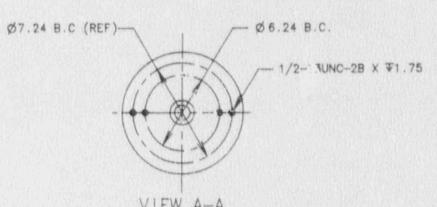
C. E. MacConald -3-February 5, 1991 25% of those at the side. All shipments will be measured for radiation levels prior to shipment.) Therefore, General Electric requests that Certificate of Compliance No. 9044 be modified to permit the use of the inner liner shown on Certification Drawing No. 166D8032, Rev. O when necessary, to provide additional shielding for shipments of nonfissile irradiated metal hardware with a content not exceeding 20,000 Ci of Co-60 or its equivalent. Section 5.(a)(3) of Certificate of Compliance No. 9044 lists an exception to Drawing No. 129D4735, Rev. 4 concerning the length of fastening bolts. GE is including in this submittal a revised drawing No. 129D4735, Rev. 5, which corrects the drawing to conform with the Certificate. It also includes a reference for the new steel liner. If you have any questions concerning this request, please contact me on (415) 862-4330. Thank you. Sincerely G. E. Cunningham Senior Licensing Engineer /ca Attachments

## Attachments

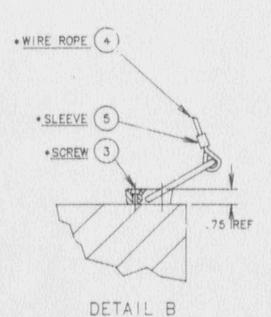
Certification Drawing No. 129D4735, Rev. 5 Certification Drawing No. 166D8032, Rev. 0





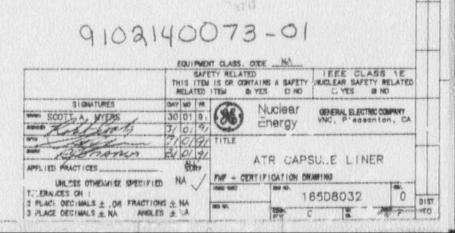


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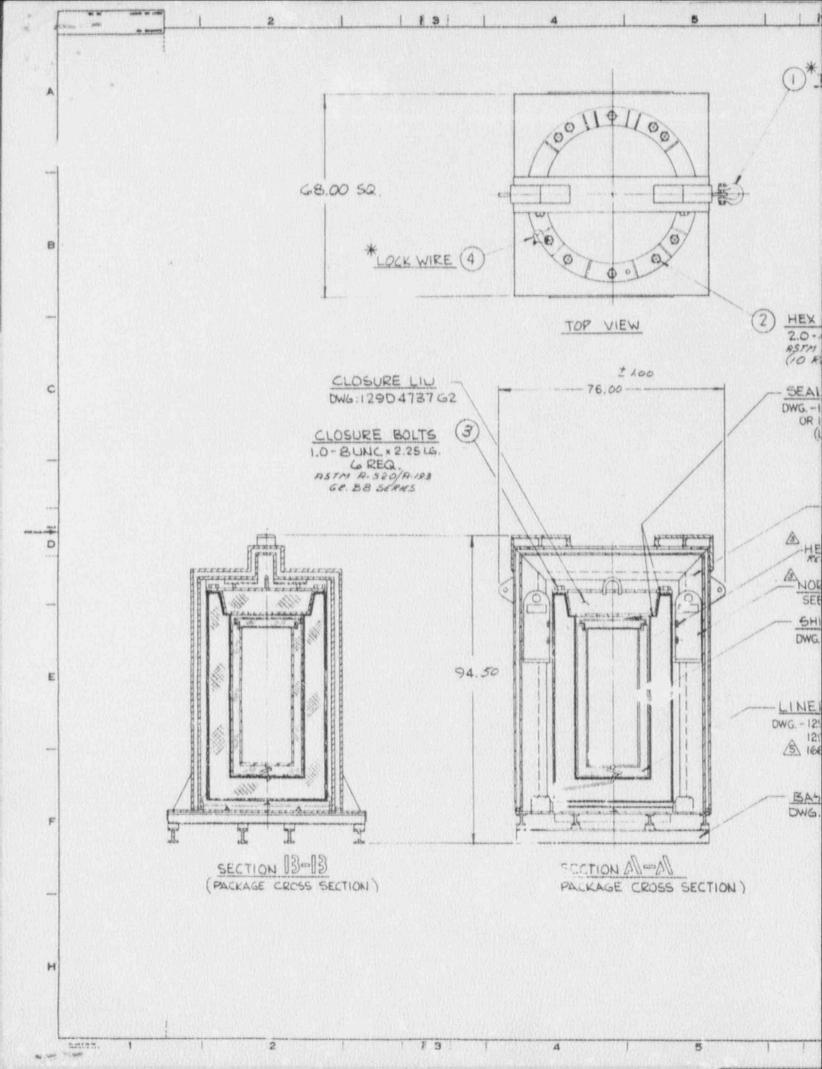
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BERSHAL @ BLECTRIC 12504735 6 SAPLIED PENCTICES T 2012345 MODEL 1600 TRANSPORT CONTAINER MELERTIFICATION DWG. IE DOWN SHACKLE 13 HD. BOLT A A 1.5 UNC - 2A . 4.5-5.0 LG. 9449 (OR EQUAL) rap) 2904737 G3 OR G5 (UPPER) 290 4737 G4 (LOWER) OCATION OPTIONAL) JACKET DW6-12904736 GI X HD. BOLT SI APERTURE MAL LIFTING EAR I SOMETRIC VIEW NOTE 1 OF MODEL 1600 PACKAGE CATO PPING CASK BODY -129D4737 GI Allo Available On An ature Card NOTE : 1. REDUNDANT LIFTING EARS (NOT SHOWN) ARE (ALL LINERS OPTIONAL) USED FOR CERTAIN IN-PLANT OPERATIONS, (SET 12904787) 04738 GI (SHOWN) 2. BASE AND JACKET INSIDE & OUTSIDE ARE D4738 G2 08032 PAINTED WITH RUSTOLEUM GRAY OR EQUAY. 3. DIMENSIONS AND TOLERANCES IMDICATE RAXIMUM VARIATIONS BETWEEN PACKAGES AND ARE NOT INDICATIVE OF "FET" OR INTERCHANGE SIC TY. A. NOMINAL DIMENSIONS FOR STRUMENT WITHIN STANDARD WILL TOLERAN " TAPES, PLATES, JESS, STC. WILL PALL - 12904736 G2 S. ALL OTHER DIMENSIONS ARE & 6.50 UNLESS SHOWN OTHERWISE. 6. PACKAGING MT = 25.500 lbs (\* er - 1000 lbs) MITHOUT LINES
30.850 lbs (\* er - 1000 lbs) MITHOUT LINES THE JACKET LIFTING BANS (1990/1995) ARE BOLTED CLOSED DURING TRANSPORT HITS A SEL. PLAY HIECH IS MARKED TO DEROTE THAT THEY ARE NOT TO BE USED FOR THE DOWN OR TO LIFT THE ENTINE PASKAGE. NOT SAFETY RELATED COMPONENT. SHOWN FOR CLARITY ONLY. PRINTS TO 2 NS 4545 11153 11570 11533 3 NS 4542 NOT FOR FABRICATION 75 11/18/80 TETEN N. ..... 12904735 CHRO FOR SOUTH 6-6-81