

DUKE POWER COMPANY
P.O. BOX 33189
CHARLOTTE, N.C. 28242

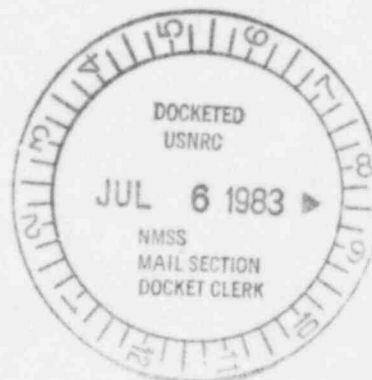
HAL B. TUCKER
VICE PRESIDENT
NUCLEAR PRODUCTION

~~71-6~~
~~71-6698~~
71-9183 PDR
Return to 39655
TELEPHONE (704) 373-4531

June 30, 1983

'83 JUL -5 P3:46

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



Re: Docket 71-6698
NSF-4 (NAC-1) Spent Fuel Shipping Cask

Dear Mr. MacDonald:

Certificate of Compliance No. 6698 Revision 15, Section 15(a), dated January 25, 1983, requires cask cavity measurements for shipment of spent fuel. Duke Power Company's interpretation is that this requirement does not pertain to irradiated nonfissile hardware.

The radioactivity in irradiated hardware is considerably less than in spent fuel. The radiological consequences of any accident are equally reduced. This fact is combined with the extremely low probability that the cask containment would be breached under normal or hypothetical accident conditions. That is, there is no undue risk to the health and safety of the public from the transport of non fuel-bearing components in the above cask.

Duke Power Company plans to ship material described in Section 5(b)(1)(iv) of the Certificate of Compliance. The material includes items such as orifice rod assemblies, fuel assembly holddown springs and thermal shield bolts located at our Oconee Nuclear Station. Shipment would begin in early fall to the low level Radioactive Waste Disposal Site in Barnwell, South Carolina. We would appreciate receiving your interpretation of Section 15(a) of the Certificate of Compliance by August 15, 1983 or earlier if possible.

Yours very truly,

Hal B. Tucker
H. B. Tucker *by PHS*
DFF/JSW/dyh

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PDR ADDCK 07106698
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22483

DOCKET NO. 71-6698
CONTROL NO. 22483
DATE OF DOC. 06/30/83
DATE RCVD. 07/05/83
FCUF _____ PDR
FCAP _____ LPDR _____
WM _____ I&E REF.
WMUR _____ SAFEGUARDS _____
SCTG OTHER _____

DESCRIPTION:

appreciate receiving
your interpretation
of section 15(a)
of the Certificate
of Compliance by 08/15/83
07/06/83 INITIAL ccc