

NUCLEAR CONTAINERS, INC.

Chemical & Nuclear - Engineering and Equipment Fabrication

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November 2, 1992

United States Nuclear Regulatory Commission Washington, DC 20555

Attention: Mr. Charles E. MacDonald, Chief

Transportation Certification Breach

Division of Fuel Cycle and Materi 1 Safety, NMSS

Docket Numbers 71-4909 and 71-9234 Reference:

Gentlemen:

This is to request amendments to Certificates of Compliance Numbers USA/4909/AF, Rev. 8, and USA/9234/AF, Rev. 1, to approve the GE-21PF-1, the W-21PF-1, and the NCI-21PF-1 Protective Shipping Packages for the transportation of UF, enriched up to 5% U-235 contained in Model 30B UF, cylinders where the cylinders and/or the valves may be of either U. S. origin or Non-U. S. origin.

In either case, the cylinders and valves shall be fabricated, inspected, tested, and maintained in accordance with Section 5, ORO-651, Rev. 6 and in accordance with America, National Standard N14.1 (1990 edition). Cylinders of U. S origin shall be fa ricated in accordance with Section VIII, Division 1, of the ASME (American Society of Mechanical Engineers) Boiler and Pressure Vessel Code and be ASME code stamped.

Cylinders of Non-U. S. origin shall be fabricated and code stamped in accordance with the comparable pressure vessel code authority in the country of origin. Cylinders and valves of Non-U. S. origin shall be certified and marked in accordance with Section 5.2.3, ORO-651, Rev. 6.

The referenced Certificates-of-Compliance (4909 and 9234) approve only the COB cylinder for the transport of UF, enriched up to 5% U-235 after December 31, 1992, and these cylinders must be "... fabricated in accordance with Section VIII, Division 1, of the ASME Boiler and Pressure Vessel Code and be ASME code stamped. " While this precludes the use of cylinders and valves of Non-U. S. origin; ORO-651, Revisions 4, 5, and 6 specifically provide for equipment of Non-U. S. origin, and many users of these protective shipping packages have such cylinders and/or valves.

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Page 2 of 2, Charles E. MacDonald, USNRC, November 2, 1992

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Enclosed is NCI Check No. 15203 for \$150.00 to cover the initial fee for this request. We will greatly appreciate your earliest attention to this matter since the effective date (12/31/92) for the discontinuation of non-ASME code stamped cylinders is nearly upon us.

Very truly yours,

William R. Housholder

President