



Orano NCS GmbH, Margarete-von-Wrangell-Straße 7, D-63457 Hanau

U.S. Department of Transportation  
PHMSA  
attn. Rick Boyle

1200 New Jersey Ave, SE  
Washington, D.C. 20590

USA

**Orano NCS GmbH**

Unsere Zeichen/ Nachricht vom 0007-SVK-2021-004  
Our ref./ message dd.

Ihre Zeichen/ Nachricht vom  
Your ref./ message dd.

Telefon +49 61 81 501 241

Telefax +49 61 81 501 713

E-Mail maik.hennebach@orano-ncs.com

Datum 25.11.2021

### **BU-D – extension of validation (cert. USA/0412/AF-96, Rev. 17) to full content of German certificate**

Dear Mr. Boyle,

the revalidation of the BU-D package (with cert. USA/0412/AF-96, Rev. 17) is currently limited to a U-235 enrichment of 5.0 weight percent or less, whereas the German certificate of approval D/4305/AF-96 allows uranium oxide contents with U-235 enrichments up to 10.0 weight percent.

We hereby request the lifting of this enrichment limitation, i.e. a validation of all contents in the German certificate. Since this change only impacts the criticality safety analysis of the package, we have attached a calculation report (0007-BBR-2021-001) that demonstrates safe subcriticality for contents with up to 10.0 weight percent enrichment (and the fissile mass limit of 650 g for these higher enrichments) even under pessimistic assumptions. The report also contains a full validation of the criticality calculation code for contents with this higher enrichment.

Since this change of the validation is needed for a project that our client Westinghouse has planned for May 2022, we would be very grateful if you could provide the validation in April 2022.

We are, of course, available for you in case you require more information or clarification on this topic.

Sincerely,

Maik Hennebach  
Senior Manager

Yara van Wijk  
Project Manager

**Orano NCS GmbH**

Attachment:  
Calculation report 0007-BBR-2021-001, Rev. 0

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**Orano NCS GmbH, Margarete-von-Wrangell-Straße 7, 63457 Hanau, Deutschland**

Telefon: +49 (0) 61 81 501-0, Telefax: +49 (0) 61 81 57 36 92, E-Mail: info.ncs@orano-ncs.com, www.orano-ncs.com  
Sitz der Gesellschaft: Hanau, RG Hanau HR B 4428, USt-Id.-Nr. DE113574961, Gerichtsstand: Hanau, Geschäftsführer: Olaf Oldiges  
Bankverbindung: Société Générale Frankfurt (BLZ 512 108 00), Konto: 1095013031, SWIFT: SOGEDEFF, IBAN: DE 45 5121 0800 1095 0130 31  
Aufträge werden auf Grundlage unserer Allgemeinen Geschäftsbedingungen übernommen. Diese stehen Ihnen auf Wunsch zur Verfügung.

SV-0815/02-GF

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