

**Request for Additional Information
Nuclear Waste Partnership
Docket Nos. 71-9218 and 71-9279
Certificate of Compliance Nos. 9218 and 9279
Model Nos. TRUPACT-II and HalfPACT**

By letter dated August 18, 2022 (Agencywide Documents Access and Management System Accession No. ML22230C920), the Nuclear Waste Partnership, LLC (the applicant) requested that the U.S. Nuclear Regulatory Commission (NRC) staff perform a review of the proposed changes to Model Nos. HalfPACT and TRUPACT-II transport packages.

This request for additional information (RAI) identifies information needed by the NRC staff in connection with its review of the application. The requested information is listed by chapter number and title in the application. The NRC staff used NUREG-2216, "Standard Review Plan for Transportation Packages for Spent Fuel and Radioactive Material: Final Report," in its review of the application.

Each question describes information needed by the staff for it to complete its review of the application and to determine whether the applicant has demonstrated compliance with regulatory requirements.

MATERIALS EVALUATION (M)

RAI-M-1 Revise the wording in Note 33 (Drawing No. 2077-500SNP, Revision AB for TRUPACT-II and Drawing No. 707-SAR, Revision 11 for HalfPACT) to clarify if the intent of "optional" was to be a non-metallic tube, a coating, or not be present after foam pour.

The proposed wording could be interpreted such that the package could have neither a tube nor a coating on the foam and still be in accordance with the drawing requirements.

The outer containment vessel (OCV) vent port access tube is classified as a Category C component per NUREG-6407, Classification of Transportation Packaging and Dry Spent Fuel Storage System Components According to Importance to Safety," according to the application. The requested change appears to indicate that the tube is optional after foam pour, i.e., it is not needed. This appears to conflict with the definition of an important to safety component – it cannot be considered optional if relied on for a safety function. There could be options for choice of materials, but not the existence of an important to safety component.

The staff needs this information to determine compliance with Title 10 *Code of Federal Regulations* (10 CFR) 71.33(a).

RAI-M-2 Provide additional information in the safety analysis report regarding the coating discussed in the proposed change.

If the coating is intended to replace a NUREG-6407 Category C component, then it is also a Category C component. Specify the coating materials, the acceptance

criteria for this coating, and the inspection and maintenance program associated with the coating, in order to ensure that the coating remains able to perform its important to safety function.

The staff needs this information to determine compliance with 10 CFR 71.31(c) and 10 CFR 71.87(b).

RAI-M-3 Revise Sections 1.2.1.1.1, 1.2.1.4, and 1.3.2 in the safety analysis report to remove references to fiberglass as the material for the connecting tube/OCV vent port access tube.

Sections 1.2.1.1.1, 1.2.1.4, and 1.3.2 all refer to the tube as fiberglass. To be consistent with the requested changes to the drawing, please update these sections accordingly.

Furthermore, please clarify that both the non-metallic tube and the polymer resin surface coating described in the application are compatible with the surrounding materials and will not cause any reactions contrary to 10 CFR 71.43(d).

The staff needs this information to determine compliance with 10 CFR 71.43(d).