

June 20, 2023
2021-035-SCL-03

ATTN: Document Control Desk
Director, Division of Fuel Management
Office of Nuclear Material Safety and Safeguards
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Subject: Amendment and Renewal Request for the Certificate of Compliance No. 9365 and Revision of the Safety Analysis Report for the RT-100 Package

Need by Date: 08/07/2023

Reference: RT-100, Certificate No. 9365 USA/9365/B(U)-96
Docket No. 71-9365

Document Control Desk, Dear Sir or Madam:

Pursuant to 10 CFR 71.38, Robatel Technologies, LLC hereby submits its Safety Analysis Report (SAR) Revision 10, to address the clarification questions letter dated May 31, 2023 regarding Robatel's RAI's response dated May 19, 2023 (ADAMS Accession No. ML23143A180). The purpose of this application is to amend and renew the Certificate of Compliance No. 9365 Revision 2 to add activated hardware contents, and to revise the filter shielding analysis to ship filters of varying activities with restricted content mass. Attached is a table summarizing the changes in the SAR, Revision 10.

This license amendment supports decommissioning nuclear power plants, such as Indian Point Energy Center, Oyster Creek, Palisades, Pilgrim, Vermont Yankee, and Crystal River via the safe and efficient transport of activated reactor vessel internals. The amendment would help maintain decommissioning workforce dose as low as reasonably achievable (ALARA) through the creation of larger segments requiring less cutting and loading of fewer packages, and by reducing the number of truck shipments of Class 7 material, reduce risk to the public. In particular, the amendment will support efficient shipments of segments of large cylindrically shaped components as well as smaller components that satisfy the specific activity requirements for definition of LSA-II material per 49 CFR 173.403 that either individually or as a packaged group of segments/components, have 3m dose rates that exceed the 1R/hr limit at 3m of 49 CFR 173.427(a)(1) thereby necessitating shipment in a Type B package.

Below is a high-level summary of the major SAR changes in each chapter. All changes are marked with revision bars and summarized on the Record of Revisions_RT-100 SAR REV 10 that is attached to this cover letter.

- Chapter 1 – Editorial changes to Section 1, changed the SAR revision from 9 to 10 and added the request to renew the CoC.
- Chapter 2 – Changes to this chapter are limited to the following,
 - Revised Section 2.6.1.1 to add a statement on the pressure employed in the NCT structural and finite element analyses. Removed the unit psig reported in parenthesis for the 342.7 kPa value to eliminate confusion.
 - Revised Section 2.6.7.2.2 to add a statement about the extreme cold case at -40°C that was analyzed in response to the clarification question 2.1.
 - Revised Section 2.7.1 to add a statement on the pressure employed in the HAC structural and finite element analyses.
 - Revised Section 2.7.4.2 to add a discussion on the omission of thermal expansion effects in the evaluation of HAC drop conditions.

- Revised Section 2.13.2.1.1 to correct the reference for the 250 kN/m² pressure value. Added a statement on the clearance analysis to prevent loading the primary lid bolts in shear.
- Revised Section 2.13.2.1.3 to correct the reference for the 250 kN/m² pressure value. Added a statement on clearance analysis to prevent loading the secondary lid bolts in shear.
- Revised Section 2.13.3, Tables 2.13.3-1 and 2.13.3-2 to remove the 35 psi value reported in parenthesis next to the 250 kN/m² pressure value.
- Chapter 3 – Editorial change to Section 3.3.2.5, removed the unit psig reported in parenthesis for the 342.7 kPa value to eliminate confusion.

Some of the content of the Safety Analysis Report is Robatel's proprietary and trade secret information. The exact details and references are made in the attached affidavit related to this submittal.

Should you or members of your staff have any questions about this submittal, please contact me at ashakhatreh@robateltech.com or Jared Bower at jbower@robateltech.com. Thank you for your attention to this submittal.

Respectfully,



Abdulsalam Shakhathreh
Engineering Manager
Robatel Technologies, LLC
ashakhatreh@robateltech.com

Attachments:

- 1) Affidavit_RT-100 SAR REV 10, concerning confidential information and trade secrets
- 2) Record of Revisions_RT-100 SAR REV 10

Enclosures:

- 1) RT-100 Safety Analysis Report Rev 10 (PROPRIETARY), Dated June 20, 2023.
- 2) RT-100 Safety Analysis Report Rev 10 (Non-PROPRIETARY), Dated June 20, 2023.