



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

Non-Proprietary Request for Additional Information
Docket No. 71-9225
Certificate of Compliance No. 9225
Model No. NAC-LWT Package

By letter dated September 1, 2023 (Agencywide Documents Access and Management System [ADAMS] Accession No. ML23244A177), NAC International, Inc. submitted an application for revision to Certificate of Compliance No. 9225 for the Model No. NAC-LWT transport package. The application includes a request to add fuel rods and fuel rod segments with a FeCrAl-based alloy cladding.

This request for additional information identifies information needed by the U.S. Nuclear Regulatory Commission (NRC) staff in connection with its review of the application. The requested information is listed by chapter number and title in the applicant's safety analysis report (SAR). 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.

5.0 Shielding Evaluation

Clarify either the total maximum amount of Cobalt-60 mass or maximum mass of Cobalt-60 per kg of clad used to develop the source term.

It appears from the calculation package that the cobalt amount is being used as a limit/condition of the contents being acceptable and covered by the analysis, it seems to staff that there should likely be a condition on the max grams Co (or max grams Co/kg of clad material) and/or a step in the chapter 7, "Operating Procedures," that confirms the rods to be loaded do not exceed the total Cobalt mass or Co mass per mass of clad that was analyzed. There is no operation step in the chapter 7 and there is not a condition in the proposed certificate.

The staff needs this information to determine compliance with Title 10 of the *Code of Federal Regulations* 71.47 and 71.51.