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August 16, 2024
E-63736

U.S. Department of Transportation
Attn: Mr. Richard W. Boyle, Chief
Pipeline & Hazardous Materials Safety Administration
Radioactive Materials Branch
1200 New Jersey Avenue, S.E.
East Building, PHH-20
Washington, DC 20590

Subject: Application for Competent Authority Certification for Revalidation and Renewal of J/2026/AF-96 for the Model MX-6 Package

Reference: [1] DOT Revalidation of Japanese Certificate of Approval J/2026/AF-96 – Certificate USA/0848/AF-96, Revision 0, dated September 22, 2023.

Dear Mr. Boyle:

TN Americas LLC (TN), on behalf of Transnuclear, Ltd., requests the revalidation of Japanese Competent Authority Certificate (CAC) J/2026/AF-96, Revision 1 for the Model MX-6 package in accordance with §173.473. The DOT issued CAC USA/0848/AF-96 [1] which expired on March 19, 2024. The Japanese Certificate of Approval Number J/2026/AF-96 (Revision 1) provides an expiration date of July 7, 2084. Although aging management considerations are described in the SAR for MX-6, Section II-F. 2, the U.S. revalidation should be issued for a period of only 5 years.

The following enclosures are provided to support this request for revalidation and renewal based on the revised contents as described in the application:

- Enclosure 1 provides recently issued Japanese Certificate of Approval Number J/2026/AF-96 (Revision 1)
- Enclosure 2 provides the Proprietary version of the SAR for MX-6.
- Enclosure 3 provides the Public version of the SAR for MX-6.
- Enclosure 4 provides a statement of proprietary information pursuant to 49 CFR 7.14, 49 CFR 105.30, and 10 CFR 2.390 to support withholding Enclosures 2, 5 and 7 as these documents contain proprietary and business sensitive information regarding the MX-6 Package.
- Enclosure 5 provides a proprietary version of a comparison of SARs among MX6 FFR series packages.

- Enclosure 6 provides a public version of the comparison of SARs among MX6 FFR series packages.
- Enclosure 7 provides a proprietary version of the MX-6 Design Approval Application.
- Enclosure 8 provides a public version of the MX-6 Design Approval Application.

TN respectfully requests that revalidation and renewal be completed by December 31, 2024. The need date for this request for revalidation and renewal is to allow for the issuance of a public notice in the first quarter of 2025 prior to shipments starting in the second half of 2025. These planned shipments are in furtherance of fresh fuel recovery from the spent fuel pools at the Fukushima Daiichi site.

Lastly, during the pre-application call, the DOT noted that the application should document the basis for the revised Transport Index value and whether the A₂ criteria are met. This information is addressed in SAR Chapter II-D, Shielding Analysis, which details the use of conservative assumptions regarding contamination that allow fuel assembly dose rate measurements taken during package loading to be compared to an operational criteria limit to ensure transportation requirements are met.

Should you have any questions or require additional information to support review of this application, please contact Mr. Doug Yates by telephone at 434-832-3101, or by e-mail at douglas.yates@orano.group.

Sincerely,

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SHAW Donis
Date: 2024.08.16
07:55:38 -04'00'

Don Shaw
Licensing Manager

cc:

Mr. Nobuhiko Suzuki, Mr. Yasuo Yamada, Mr. Yoshitaro Kawano, TN Tokyo
Mr. Norihiko Kaneko, Mr. Masateru Nakatani, Mr. Hiroshi Takahashi, Mitsubishi Nuclear
Fuel Co., Ltd
Mme. Julie Lesein, Mme. Juliette Vuong, Nuclear Packaging and Services
Laurence Labbe, TN Project Manager
Peter Vescovi, TN Licensing Engineer
Doug Yates, TN Licensing Engineer

Enclosures:

1. Competent Authority of Japan Approval Certificate Number J/2026/AF-96, Revision 1
2. MX-6 Safety Analysis Report (Proprietary Version)
3. MX-6 Safety Analysis Report (Public Version)
4. Transnuclear Ltd. Statement of Proprietary Information Pursuant to 49 CFR 7.14, 49 CFR 105.30, and 10 CFR 2.390
5. Comparison of SAR among MX6 FFR series packages (Proprietary Version)
6. Comparison of SAR among MX6 FFR series packages (Public Version)
7. MX-6 Design Approval Application (Proprietary Version)
8. MX-6 Design Approval Application (Public Version)