

September 9, 2024

Mr. Pierre Saverot, Project Manager – Storage and Transportation Licensing Branch U.S. Nuclear Regulatory Commission Office of Nuclear Safety and Safeguards Two White Flint North 11545 Rockville Pike Rockville, MD 20852-2738

Attn: Document Control Desk

SUBJECT: REQUEST TO AMEND CERTIFICATE OF COMPLIANCE 9316

Docket No.: 71-9316 AOS Reference: FM9006.1-092024-002

Mr. Saverot:

Alpha-Omega Services, Inc. (AOS) would like to request an amendment to Certificate of Compliance No. 9316. The scope of the amendment request is to clarify the design, use and replacement schedule for the elastomeric and metallic cask lid seals. We are also making some minor editorial changes.

Attached for your review are the revised pages of SAR FM9054, revision J-4.

AOS would also like to request authorization to use Revision No. 11 beyond the current date shown on CoC 9316 Revision 12 (Condition 15 – Revision No. 11 may be used until October 31, 2024). AOS requests that a condition be added to the amendment authorizing use of Revision No. 11 until December 31, 2025. AOS currently has a contract for an international shipment in which the original shipment date was changed from 2024 to 2025. Revision 11 is the basis for USDOT CAC Revision 7, which the Competent Authority has approved for the international shipment. Allowing the condition of revision extension would assure the shipment is made without delay caused by re-applying to the Competent Authority for the change in document revisions.

Best Regards

Troy Hedger, President Alpha-Omega Services, Inc.

Attachments:

List of Changes to SAR AOS-FM9054 Rev. J-4 (6 pages)

Certification Drawings 105E9712 Rev. P (3 sheets), and 105E9719 Rev. P (2 sheets)

SAR FM9054 Revision J-4 (revised sections only) (26 pages)

AOS Affidavit for withholding from public records (re: certification drawings) (3 pages)