

## ENCLOSURE 2

M250276

Response to Observation Obs-St-1

Non-Proprietary Information

### **IMPORTANT NOTICE**

This is a non-proprietary version of Enclosure 1, from which the proprietary information has been removed. Portions of the enclosure that have been removed are indicated by an open and closed bracket as shown here [[ ]].

## **OBSERVATION**

### **Structural Evaluation**

#### **Obs-St-1**

Clearly identify the changes to the approved drawings of the Model No. NPC and explain the rationale for the changes.

The staff noticed that all the drawings in the SAR have been revised, but it is not clear why these changes were made. It is also difficult to identify what has changed on these drawings because the revision description on the drawings simply states, "Reformatted with changes CA-00037044." The staff cannot clearly identify changes to the drawings and determine the reasons for the changes from the previously approved version of the drawings referenced in the CoC.

This information is needed to determine compliance with the regulatory requirements in 10 CFR 71.33.

#### **Obs-St-1 Response**

The following discusses the changes to each of the drawings and the reason for the changes from the previously approved version of the drawings referenced in the CoC.

### **Drawing 177D4970**

#### **Sheets 1 through 8**

Slight changes were made to views, fonts, line styles, and shade styles based on updated to the Three-Dimensional (3D) model to match current GNF drafting standards. These changes do not change the intent of the drawing or dimensional aspects of the parts and assemblies. Note that there were no changes to the drawings as the result of the change to the enrichment.

Additional changes to specific sheets are as noted below. Note that there are no additional changes for Sheets 2 through 5 and Sheets 7 and 8.

#### **Sheet 1, Revision 2**

The parts list was reorganized for better navigation into a single table with separate columns for the description, size (dimensions), material, and NUREG/CR-6407 (Reference 1) importance to safety classification. This change did not alter the intent of the drawing, and all details remain the same except for the addition of the NUREG/CR-6407 safety classification. The safety classification is based on Section 5.2 of NUREG/CR-6407 for Type A packages.

**Sheet 6, Revision 2**

The details of [[

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**Drawing 007N2495**

**Sheet 1, Revision 0**

GNF assigned a new drawing number to replace drawing number SK105E4037.

Slight changes were made to views, fonts, line styles, and shade styles based on updated to the 3D model to match current GNF drafting standards. These changes do not change the intent of the drawing or dimensional aspects of the parts and assemblies. Note that there were no changes to the drawings as the result of the change to the enrichment.

The parts list was reorganized for better navigation into a single table with separate columns for the part number, description, size (dimensions), material, and NUREG/CR-6407 (Reference 1) importance to safety classification. This change did not alter the intent of the drawing, and all details remain the same except for the addition of the NUREG/CR-6407 safety classification. The safety classification is based on Section 5.2 of NUREG/CR-6407 for Type A packages.

**Reference**

1. NUREG/CR-6407, "Classification of Transportation Packaging and Dry Spent Fuel Storage System Components According to Importance to Safety," February 1996.