



Global Nuclear Fuel

Bruce A. Bennett

Global Nuclear Fuel – Americas, LLC
Senior Licensing Engineer
3901 Castle Hayne Road
Wilmington, NC 28401 USA

Proprietary Notice

This letter transmits proprietary information in accordance with 10 CFR 2.390. Upon removal of Enclosure 1, the balance of the letter may be considered non-proprietary.

M260057

July 8, 2026

Director, Division of Spent Fuel Management
Office of Nuclear Materials Safety & Safeguards
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001

Attention: Document Control Desk

Subject: GNF-A Request for Revision of Certificate of Compliance (CoC) USA/9309/B(U)F-96 for Model No. RAJ-II Package

Pursuant to 10 CFR 71.19, 71.38 and as discussed with NRC staff on April 29, 2026 (Reference 1), Global Nuclear Fuel - Americas, LLC (GNF-A) is requesting a revision to the NRC Certificate of Compliance (CoC) USA/9309/B(U)F-96 (Reference 2) to approve modifications to the authorized contents and extend the expiration date. No modifications are requested to the previously approved package design.

The RAJ-II Safety Analysis Report (SAR) has been revised as follows:

- Section 1.1 has been revised to delete the revision number from NEDO-11209-A because the revision can be found in Reference 1-1 of the SAR.
- Section 1.2.2.1 and Table 1-3 have been revised for the incorporation of silicon allowance. Note that GNF-A previously requested a letter authorization to increase the silicon allowance for the RAJ-II package for shipment of lead test assemblies (Reference 3). This request was authorized by the NRC (Reference 4).
- Section 1.3.1.1 has been revised to correct the revision number of drawing 105E3738 sheets 2 and 3 to align with the current certificate of compliance.
- Section 1.3.2 has been revised to update the revision of NEDO-11209-A.
- Section 5.2.1 has been revised to correct the gamma source strength from actinides value to be 3.89E+10.

- Table 5-2 has been revised to correct a typographical error.

These changes are reflected in a proposed revision to the SAR package CoC.

The SAR has been designated NEDE-33869P Revision 12, and is provided in its entirety in Enclosure 1. Included in the SAR is a change table with a description and reason for each change to aid the NRC review.

Please note that Enclosure 1 contains proprietary information of the type that GNF maintains in confidence and withholds from public disclosure. The affidavit contained in Enclosure 4 identifies that the designated information in Enclosure 1 has been handled and classified as proprietary to GNF. GNF hereby requests that the information in Enclosure 1 be withheld from public disclosure in accordance with the provisions of 10 CFR 2.390 and 9.17.

Enclosure 2 is the non-proprietary version of Enclosure 1. Enclosure 3 contains a proposed mark-up of the requested changes to Revision 14 of the CoC.

GNF requests that the NRC issue Revision 15 of the NRC CoC with the required content changes within 12 months of this submittal to support business objectives.

Upon issuance of Revision 15 of the CoC, GNF is requesting that Revision 14 of the CoC also remain in effect for a period of two (2) years, consistent with Condition 11 in Revision 14 of the CoC. Allowing Revision 14 of the CoC to remain in effect will allow fuel assemblies which were designed, manufactured, and prepared for shipment under Revision 14 of the CoC to be shipped using the RAJ-II transportation package.

If you have any questions about the information provided, please contact me at (803) 331-7341.

Sincerely,



Bruce A. Bennett
Senior Licensing Engineer
Global Nuclear Fuel – Americas, LLC

Docket No. 71-9309
TAC No. L25154

References:

1. Letter, Lisa K. Schichlein (GNF) to NRC Document Control Desk, "Submittal of Presentation Slides for April 29, 2026 RAJ-II Meeting," M260026, April 15, 2026.
2. GNF Model No. RAJ-II Certificate of Compliance No. 9309, Docket Number 71-9309, Revision 14, Package Identification Number USA/9309/B(U)F-96.
3. Letter, Brian R. Moore (GNF) to NRC Document Control Desk, "GNF-A Request for Letter Authorization to Increase the Maximum Authorized Fuel Pellet Silicon Concentration for the RAJ-II Transportation Package," M240142, July 15, 2024.
4. Letter, Yoira Diaz-Sanabria (NRC) to Brian R. Moore (GNF), "Letter Authorization To Use The Model No. RAJ-II Package With An Increased Maximum Authorized Fuel Pellet Silicon Concentration," September 6, 2024.

Enclosures:

1. RAJ-II SAR, NEDE-33869P Revision 12, July 2026 – GNF Proprietary Information – Non-Public
2. RAJ-II SAR, NEDO-33869 Revision 12, July 2026 – Non-Proprietary Information
3. Markup of Revision 14 of the Certificate of Compliance No. 9309 – Non-Proprietary Information
4. Affidavit

cc: H Yilma, USNRC
E Lenning, USNRC
T Enfinger, GVH/Wilmington
P Ollis, GNF/Wilmington
PLM Specification 011N3209 Revision 0

Document Components:

- 001 M260057 Cover Letter.pdf
- 002 M260057 Enclosure 1 Proprietary.pdf
- 003 M260057 Enclosure 2 Non-Proprietary.pdf
- 004 M260057 Enclosure 3 Non-Proprietary.pdf
- 005 M260057 Enclosure 4 Affidavit.pdf