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TRANSNUCLEAR, INC.

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November 5, 1999

OF
ADJ

Secretary
U.S. Nuclear Regulatory Commission
Washington D.C., 20555-0001
Attn: Rulemakings and Adjudications Staff

DOCKET NUMBER
PROPOSED RULE PR 72
(64FR45923)

Subject: Comments concerning 10 CFR Part 72 proposed rulemaking "List of Approved Spent Fuel Storage Casks" (TN-32) Addition", August 23, 1999

Dear Sir:

Transnuclear, Inc. has begun fabrication of the TN-32 casks and request a few changes, made to the design of the TN-32 cask to allow for flexibility of manufacture and operation, be included in the Safety Analysis Report. These items do not affect the analysis of the cask or the ability of the casks to perform their function. Our specific comments follow.

1. Changes to the tolerances specified on the SAR drawings:

Drawing 1049-70-1. Increase the tolerance of the 102.22 inch dimension between trunnions to +/- 0.12".

Drawing 1049-70-3. The 4.60" dimension at the flange should be a reference dimension. This thickness cannot be precisely determined since it includes the weld overlay thickness.

Drawing 1049-70-3. Increase the tolerance on the 56.750 dia. Bolt circle for the 4 lift holes to 56.75 +/- 0.12 inches. This dimension is for attachment of slings. The exact location of these holes is not critical.

Drawing 1049-70-4. Increase the tolerance on the 87.75 inch o.d from 0.03 to +/- 0.12. This is not a critical dimension.

Drawing 1049-70-5, On the 10" and 20" dimensions, increase the tolerance between the rail mounting bosses/taps to +/- 0.06 from +/- 0.03". These are to locate the rails, and are difficult to locate precisely.

2. Drawing 1049-70-4. Add a note to specify that a test fitting may be supplied on the access port cover plate. This would allow the underside of the protective cover to be evacuated and backfilled with helium for the purpose of helium leak testing the overpressure system.

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PDR PR 72 64FR45923

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3. Drawing 1049-70-7. Add a note to allow alternate configurations for the plumbing of the pressure monitoring system. The precise fittings and layout used to connect the pressure switches to the o.p. tank is not critical to the operation of the pressure monitoring system. This would allow flexibility to the end user to develop the system which is best suited for its operations.
4. Drawing 1049-70-3. The vent and drain port cover seal groove diameters should be changes as follows. 5.88 groove O.D. should be changed to 5.92 and 4.70 groove I.D. should be decreased to 4.65. The seal groove dimensions are recommended by the seal manufacturer. A note to follow manufacturer's recommendations is more appropriate than specifying the exact dimensions, since different manufacturer's may have different recommendations.
5. In chapters 2 and 7, the metallic o-ring seals were specified as having a stainless steel liner. These liners should be specified as stainless steel or nickel alloy. The manufacturer uses different liners dependent upon the size of the seal.
6. Page 6.6-7, KENO input file, change the last zero in the unit cell resonance correction input in to a "3" (change void to water in fuel – cladding annulus). This has a negligible effect on the criticality results.

In addition, a clarification to the code should be made in Table 4.1-1 of the Technical Specifications. The weld of the lid shield plate to the lid is not impact tested. In accordance with NB-4335.1(b), if two different materials are joined, the fracture toughness requirements of either may be used for the weld metal. There are no fracture toughness requirements on the shield plate, and therefore none on the weld metal.

In the Technical Specifications, on pg. 4.0-1, a typo was made in Section 4.1.3. The basket is designed in accordance with Subsection NF of the ASME code, not NB. This error was followed through in Table 4.1-1 on sections referring to the basket. In particular on page 4 of Table 4.1-1, last entry, NB-2120 should be NF-2120, and on page 5 of Table 4.1-1, NB-4000/NB-5000 should be NF-4000/NF-5000 for the first entry and in the third entry, all references to NB should be changed to NF.

If you have any questions, please do not hesitate to contact us. We will make ourselves available for any SAR changes required during the public comment resolution period.

Sincerely,

Tara J. Neider
Vice President, Engineering