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OFFICE OF SECRETARY
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ADJUDICATIONS STAFF

From: "Tom Thompson" <TThompson@NACINTL.COM>
To: "Michael, Glenn A(Z01119)" <GMICHAEL@apsc.com>
Date: Tue, Oct 23, 2001 7:39 AM
Subject: Re: Editorial Observation on Preliminary NAC UMS CoC Amendment 2

Glenn,

In coordination with Becky Karas, NAC (Barbie and I, personally) reviewed the UMS CoC/Tech Specs for Amendment 2 in great detail and we are confident that they are now correct. (1) First, I compared the Amendment 1 Tech Specs to the initially published Tech Specs (Rev. 0) page by page and line by line, as well as the revision bars. There were/are some editorial errors in the Amendment 1 Tech Specs, i.e., the revision/amendment number and or the revision bars on some pages are not correct. (Since these items have no effect on the actual Tech Specs themselves and Amendment 2 was being issued as a Direct Final Rule to be effective by the end of 2001, no effort was expended to correct the published Amendment 1 Tech Specs, but rather the effort was made to ensure the correctness of the Amendment 2 Tech Specs.); (2) Second, I compared the Amendment 2 Tech Specs (in their final form) to "my corrected version of the Amendment 1 Tech Specs" to ensure that the appropriate revision/amendment number and or the revision bars were correct. Becky Karas was double-checking these comparisons. Barbie has just completed a detailed comparison of the "recently published Amendment 2 Tech Specs" to that which was prepared in conjunction with the NRC in August 2001, and has found them to be exactly the same. Thus, NAC is confident that the published Direct Final Rule version of the Amendment 2 Tech Specs is correct.

I hope that this will help you understand the process that got us to the published Amendment 2 Tech Specs.

Thanks for your continuing reviews of our UMS documents.

Tom

"Michael, Glenn A(Z01119)" <GMICHAEL@apsc.com>
10/16/01 07:21 PM

To: "'McCausland, Jayne M. (NRC)'" <jmm2@nrc.gov>
cc: "Hansen, Brian J(Z01015)" <BJHANSEN@apsc.com>, "Thompson, Tom (NAC)'" <tthompso@nacintl.com>, "Mountain, Sue (NAC)'" <SMountan@nacintl.com>, "Weber, Thomas N(Z00499)" <TWEBER01@apsc.com>
Fax to:
Subject: Editorial Observation on Preliminary NAC UMS CoC Amendment 2

To: Jayne McCausland, NRC

A notice was published in the October 16, 2001 Federal Register (66 FR

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SECY-02

52486) containing a direct final rule for amendment 2 of the NAC UMS dry cask certificate of compliance and tech specs. You are shown as the NRC contact for this amendment.

I downloaded the preliminary amendment 2 of the CoC and the TSs, and the preliminary SE from ADAMS for review. There appears to be an administrative/editorial error in the page footers in the preliminary amendment 2 package of the NAC UMS tech specs: a number of pages in the preliminary amendment 2 tech spec package are shown as amendment no. 1, when they should instead be amendment no. 0. Also, revision bars are shown on these pages that were not in the previous versions. Example pages are A3-13, A3-14, A3-15, A3-16, A3-18, A3-19, A3-20, and A5-5. This can be verified by looking at the NAC UMS tech spec amendment no. 1 document in ADAMS under accession no. ML010260245, which was transmitted to NAC International from NRC in a letter dated February 13, 2001 (ADAMS accession no. ML010440434).

This is not a significant adverse comment, but only an observation to help ensure that the final product will reflect the accurate revision numbers and rev bars. As a future user of the NAC UMS dry cask system, we have a vested interest in high quality cask licensing documents.

Thanks,

Glenn Michael
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