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August 23, 2002

U.S. Nuclear Regulatory Commission
11555 Rockville Pike
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Attn: Document Control Desk

Subject: Submittal of NAC International Response to a Conference Call Request to Incorporate Periodic Thermal Testing in the NAC-STC SAR Amendment Request for Connecticut Yankee

Docket No. 71-9235

References: 1. Certificate of Compliance No. 9235 for the Model No. NAC-STC, Revision 3, United States Nuclear Regulatory Commission (NRC), August 8, 2001
2. Conference Call between NAC and the NRC Regarding an Additional SAR Clarification for Periodic Thermal Testing, August 22, 2002

NAC International (NAC) herewith submits eight copies of the response to the requested clarification (Reference 2) resulting from the NRC review of the NAC-STC Amendment Application. The requested amendment incorporates Connecticut Yankee Nuclear Power Plant spent fuel and GTCC waste as approved contents.

This submittal reinserts Section 8.2.6, Periodic Thermal Testing, in the NAC-STC Safety Analysis Report (SAR) as changed pages, which are designated as Revision STC-02E. Note: The enclosed SAR changed pages are to be inserted as replacement pages into the existing CY-STC SAR binder.

The changed pages have been prepared in accordance with the following conventions:

- Revision indicators (revision bars) are used to indicate changes. Revision bars are not used to indicate text flow.
- The changed pages for this submittal are designated as Revision STC-02E to provide a unique identification of the page and changes
- All of the pages in the List of Effective Pages are designated Revision STC-02E and no revision bars are used on those pages.

If you have any further questions, please contact me on my direct line at 678-328-1321.

Sincerely,

Thomas C. Thompson
Director, Licensing
Engineering & Design Services

Enclosure

cc: E. Glasbergen, Bechtel

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Public

ED20020557

ATLANTA WASHINGTON NEW YORK ZURICH LONDON TOKYO MOSCOW BOSTON SAN JOSE AIKEN

Revision STC-02E

August 2002

NAC-STC

NAC Storable Transport Cask

SAFETY ANALYSIS REPORT

Volume 1 of 2

**Amendment for
CONNECTICUT YANKEE ATOMIC POWER COMPANY**



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August 2002

NAC-STC

NAC Storable Transport Cask

SAFETY ANALYSIS REPORT

Volume 2 of 2

**Amendment for
CONNECTICUT YANKEE ATOMIC POWER COMPANY**



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verification leak tests shall be 1×10^{-7} cm³/sec (helium). Unacceptable leak test results shall be cause for rejection of the component tested. Corrective actions, including repair or replacement of the o-rings and/or closure component, shall be taken and documented as appropriate. The leak test shall be repeated and accepted prior to returning the cask to service.

8.2.3 Subsystems Maintenance

There are no subsystems maintenance requirements on the NAC-STC.

8.2.4 Valves, Rupture Disks and Gaskets on the Containment Vessel

There are no valves on the NAC-STC packaging providing a containment function. Four quick-disconnects, one each on the vent, drain, inner lid interseal test and interlid ports, are provided for ease of cask operation.

The quick-disconnect shall be inspected during each cask loading and unloading operation for proper performance and function. As necessary, the subject quick-disconnect shall be replaced. The quick-disconnects shall be replaced every two years during transport operations, and following fuel unloading after extended storage.

There are no rupture disks on the NAC-STC containment vessel.

All o-rings on the NAC-STC shall be visually inspected for damage during each cask operation. All metallic o-rings shall be replaced during each cask loading sequence. PTFE o-rings shall be replaced if damage is noted during the visual inspection and every two years during transport operations.

8.2.5 Shielding

The gamma and neutron shields of the NAC-STC packaging do not degrade with time or usage. The radiation surveys performed by licensees prior to transport and upon receipt of the loaded cask provide a continuing validation of the shield effectiveness of the NAC-STC.

8.2.6 Periodic Thermal Test

A periodic thermal test program will be established for each operational NAC-STC packaging. During use of the packaging for transport operations, the periodic thermal test will be performed every five years, or prior to the next use if the period exceeds five years. For NAC-STC packagings utilized for extended storage operations exceeding five years, the periodic thermal test will be performed prior to transport. The periodic thermal test shall be performed in accordance with written, approved procedures.

8.2.6.1 Periodic Thermal Test Set-Up

For periodic thermal test performance, the cask will be in a vertical orientation, loaded with spent fuel, and at thermal equilibrium. For the periodic thermal test, thermal equilibrium is defined as a temperature change of $\leq 3^{\circ}\text{F/hr}$ at a single centerline fin tip location.

The decay heat load and fuel cycle history of the fuel assemblies loaded in the cask will be known and recorded on the test data sheets. Thermocouples and/or a surface pyrometer calibrated to an accuracy of $\pm 2^{\circ}\text{F}$ will be used for temperature measurements during the test.

8.2.6.2 Periodic Thermal Test Procedure

With the cask in a vertical orientation located in a cask preparation area or on a storage pad, a temperature measurement will be taken at a marked cask neutron shield shell centerline fin tip and recorded. Repeat temperature measurement at the marked fin tip location until thermal equilibrium criteria of a temperature change of $\leq 3^{\circ}\text{F/hr}$ is met. Upon verification of thermal equilibrium, the test temperature measurements will be performed as follows:

- eight (8) fin tip locations will be marked and identified at 45° intervals in the top one-third of the neutron shield shell;
- eight (8) fin tip locations will be marked and identified at 45° intervals in the central one-third of the neutron shield shell;
- eight (8) fin tip locations will be marked and identified at 45° intervals in the bottom one-third of the neutron shield shell;

- four (4) upper forging surface locations will be marked and identified at 90° intervals above the neutron shield; and
- four (4) bottom forging surface locations will be marked and identified at 90° intervals below the neutron shield.

Temperature measurements will be taken and recorded at the twenty-four (24) marked fin tip locations and recorded on the test data sheets. Temperature measurements of the top forging and bottom forging will also be taken and recorded.

The test results will be reviewed and evaluated to verify the acceptance criteria of 8.2.6.3 are met. The results of the test will be documented in an approved test report and maintained in the packaging maintenance program records. If the acceptance criteria are not met, the cask will be tagged as non-conforming until corrective actions are taken. Upon completion of the corrective actions, the cask shall be retested to the original periodic thermal test requirements and acceptance criteria.

8.2.6.3 Periodic Thermal Test Acceptance Criteria

The relationship between the temperature of both ends of the cask relative to the average mid-plane temperature approaches unity as the cask heat load decreases from the design bases. The results of the periodic thermal test will be accepted if the test criteria of a), b), c), and d) below are met:

- a) The temperature ratio for the outside surface of the top forging with respect to the average mid-plane neutron shield shell surface temperature meets the test criteria:

Design

Test

$$\frac{T_{\text{Top}}}{T_{\text{mid-plane}}} = \frac{170}{243} = 0.7$$

$$1.0 \geq \frac{T_{\text{Top}}}{T_{\text{mid-plane}}} \geq 0.7$$

- b) The ratio of temperatures of the outside surface of the bottom forging with respect to average mid-plane neutron shield shell surface temperature meets the test criteria:

Design

$$\frac{T_{\text{Bottom}}}{T_{\text{mid-plane}}} = \frac{280}{243} = 1.2$$

Test

$$1.0 \leq \frac{T_{\text{Bottom}}}{T_{\text{mid-plane}}} \leq 1.2$$

- c) Measured temperatures at the top, bottom, and package mid-plane will be equal to or less than design values when corrected for heat load and ambient temperature in accordance with the following relationship:

$$T_{\text{Actual}} \leq \frac{Q_{\text{Decay}} (T_{\text{Design}} - 100)}{Q_{\text{Design}}} + T_{\text{Test Ambient}}$$

- d) The individual variations of fin tip temperatures around each zone (upper, middle, and lower) do not exceed 20°F from the zone average.

8.2.7 Miscellaneous

The transport impact limiters shall be visually inspected prior to each shipment. The limiters shall be visually inspected for gross damage or cracking to the stainless steel shells in accordance with approved written procedures and established acceptance criteria. Impact limiters not meeting the established acceptance criteria shall be rejected until repairs are performed and the component reinspected and accepted.

The cask cavity shall be visually inspected prior to each fuel loading. Evidence of gross scoring of the cavity surface, or build-up of other foreign matter in the cask cavity that could block the cavity drainage paths shall be cause for rejection of the cask for use until approved maintenance and/or repair activities have been acceptably completed. The basket assembly for the directly loaded (uncanistered) or canistered configuration shall be visually inspected for deformation of the basket disks or tubes. Evidence of damage shall be cause for rejection of the basket until approved repair activities have been completed, and the basket has been re-inspected and approved for use.

The overall condition of the cask, including the fit and function of all removable components, shall be visually inspected and documented during each cask use. Components or cask conditions

which are not in compliance with the Certificate of Compliance shall cause the cask to be rejected for transport use until repairs and/or replacement of the cask or component are performed, and the component reinspected and accepted.

The results of the visual inspections, leak tests, shielding and radiological contamination surveys; fuel identification information for the package contents; date, time, and location of the cask loading operations; and remarks regarding replaced components shall be included in the cask loading report for each loaded cask transport. The requirements of the cask loading report shall be detailed in the NAC-STC Operations Manual.

8.2.8 Maintenance Program Schedule

Table 8.2-1 presents the overall maintenance program schedule for the NAC-STC.

Table 8.2-1 Maintenance Program Schedule

Task	Frequency
Cavity Visual Inspection	Prior to Fuel Loading
Basket Visual Inspection	Prior to Fuel Loading
O-ring Visual Inspection	Prior to Fuel Loading
Outer Lid, Inner Lid and Port Coverplate Bolt Visual Inspection	Prior to installation during each use
Cask Visual and Proper Function Inspections	Prior to each Shipment
Lifting and Rotation Trunnion Visual Inspection Liquid Penetrant Inspection of surfaces and accessible welds	Prior to each Shipment Annually during use
Containment System Verification Leak Test of Inner Lid and Port Coverplate o-rings	Prior to each Shipment
Transport Impact Limiter Visual Inspection	Prior to each Shipment
Quick-disconnect Inspection for Proper Function	During each Cask Loading/Unloading Operation
Quick-disconnect Replacement	Every two years during transport operations
Metallic o-ring Replacement	Following removal of a component with a metallic o-ring
Inner and Outer Lid Bolt Replacement	Every 240 bolting cycles (Every 20 years at 12 cycles per year)
PTFE o-ring Replacement	Every two years during transport operations or as required by inspection.
Periodic Verification Leak Test	After 3rd use, annually thereafter, before use after extended storage, and following any containment system component replacement
Periodic Thermal Test	Every five years during transport operations, or prior to transport following extended storage periods exceeding five years.