

February 14, 2005

E. William Brach  
Director, Spent Fuel Project Office  
Office of Nuclear Material Safety and Safeguards  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

Attn: Document Control Desk

Subject: NAC Corrective Action Report 04-01, Committed Actions  
Shipping Cask NAC-LWT CoC No. 9225, Docket No.: 71-9225

References: 1) NAC Letter ED20040060, dated 7/22/04  
2) NAC Letter 20040091, dated 10/15/04  
3) Exelon Generating Company Letter RA05-015, dated 2/7/2005

Dear Mr. Brach:

During a telephone conference on February 11, we indicated to Nancy Osgood that we would provide a listing of corrective actions taken pursuant to the subject NAC Corrective Action Report (CAR).

This CAR was developed by NAC to address the instance of reported free water in two NAC LWT shipping casks during unloading at the Idaho National Environmental Engineering Laboratory (INEEL). Later, the CAR was expanded to address a separately reported instance of free water in a different NAC LWT shipping cask during unloading at the Studsvik Nuclear AB Hotcell facility in Sweden. The INEEL shipment contained spent fuel from two reactor sites in Bandung and Yogyakarta, Indonesia respectively, while the Studsvik shipment contained spent fuel rods from the LaSalle Generating Station.

Even though NAC was not the fuel owner for either shipment and therefore not the official shipper, we were contractually committed for various actions for each shipment. In References 1 and 2, we provided to the NRC a 10 CFR 71.95 report and subsequent assessment of the Indonesia to INEEL shipment. Exelon Nuclear provided a 10 CFR 71.95 report/assessment to the NRC for the LaSalle to Studsvik shipment (Reference 3).

NAC performed a Root Cause Analysis (RCA) related to the Indonesian shipment that resulted in nine corrective actions. After performance of a subsequent RCA to address the different circumstances of the LaSalle to Studsvik shipment, an additional six corrective actions were specified. The attached listing includes all NAC corrective actions resultant from both RCA reports. Most of the listed actions are either fully implemented or are in the process of being

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fully implemented. All are/were controlled by NAC's Quality Tracking System (ATS) for timely resolution.

Please contact Howard Smith at (678) 328-1276 should you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read 'Anthony L. Patko'.

Anthony L. Patko  
Director, Licensing  
Engineering

ATTACHMENT: NAC CAR 04-01 Corrective Actions

**ATTACHMENT to ED20050011**  
**NAC CAR 04-01 Corrective Actions**

– **Root Cause Report 04-01 Issued 9/8/04**

- Revision of NAC LWT operating procedures consistent with lessons learned/best practices
- Include equipment drawings/sketches in the procedures to clarify the layout of the vacuum drying process
- Develop and implement NAC site-specific work process controls (travelers) to assure adequate records are developed/maintained
- Establish a formal process requirement for routine updating of operations procedures, consistent with SAR revisions
- Identify, procure and utilize optimized vacuum and pressure gauges for accuracy, span and precision
- Develop and implement guidance protocol for identification, communication and escalation of site noted issues
- Conduct training with NAC cask personnel emphasizing the importance of verbatim compliance with procedures, and cask CofC requirements
- Conduct and share results of a risk review to assure adequate understanding by cask personnel regarding loading and shipping
- Review and enhance NAC program for certification of LWT cask operators

– **Root Cause Addenda 1 to Report 04-01 Issued 1/5/05**

- Emphasize use of free flow or screened damaged fuel cans vs. sealed ones
- Specify and implement formal confirmatory qualification testing for the vacuum drying process
- Increase awareness regarding need for additional design verification when cask configuration changes
- Expand scope of NAC personnel to be trained regarding compliance and field reporting
- Expand listing of NAC personnel who will be required to acquire and indicate understanding of the LWT CofC for all personnel involved with cask operations
- If sealed can is to be used again, it should be subjected to enhanced design verification and qualification testing.