



BNG Fuel Solutions Corporation  
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June 30, 2005  
BFS/NRC 05-013  
Docket No. 72-1026  
File No. CMPC.0006.1

ATTN: Document Control Desk  
Director, Spent Fuel Project Office  
Office of Nuclear Material Safety and Safeguards  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

**Subject: Amendment Request for the FuelSolutions™ Storage System Certificate of Compliance**

- References:
- 1) Certificate of Compliance for Spent Fuel Storage Casks, Certificate No. 1026, Docket No. 72-1026, Amendment 3, Package Identification No. USA/72-1026.
  - 2) Letter from BNFL Fuel Solutions to USNRC, "Notice of Company Name Change," BFS/NRC 05-009, April 12, 2005.

Dear Sir or Madam:

BNG Fuel Solutions Corporation (BFS) hereby submits an application to amend the FuelSolutions™ Storage System Certificate of Compliance (CoC No. 1026) (Reference 1) in accordance with the requirements of 10 CFR 72.244. The license amendment request (LAR 1026-004) requests changes to the Technical Specification (TS) requirements related to periodic monitoring during storage operations. Specifically, the LAR proposes to permit longer surveillance intervals for casks with total heat loads lower than the design-basis heat load and permit either visual inspection of the cask vent screens or measurement of the cask liner temperature to satisfy the periodic monitoring requirements of 10 CFR 72.122(h)(4).

In addition, the LAR incorporates editorial changes to the FuelSolutions™ Final Safety Analysis Report (FSAR) associated with the company name change (Reference 2) that have been made in accordance with the BFS Quality Assurance Program. Accordingly, BFS hereby requests that CoC No. 1026 be issued to:

BNG Fuel Solutions Corporation  
2105 S. Bascom Ave., Suite 160  
Campbell, CA 95008

LMSSDI

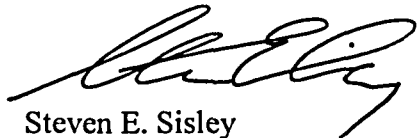
A summary of the changes requested by LAR 1026-004 and the reasons for the changes are provided in the Attachment to this letter.

Enclosed are two (2) copies of a CD-ROM containing electronic files of the FuelSolutions™ Storage System LAR 1026-004 and a supporting calculation package. The LAR and the supporting calculation package are being filed electronically in accordance with the requirements of 10 CFR 72.4. Please note that all of the enclosed information is publicly available.

Should you or any member of your staff have any questions, please contact the undersigned at:

2105 S. Bascom Ave., Suite 160  
Campbell, CA 95008  
(408) 558-3509  
E-Mail: [ssisley@BNGAmerica.com](mailto:ssisley@BNGAmerica.com)

Sincerely,



Steven E. Sisley  
Licensing/Regulatory Compliance Manager

Attachment:

Summary of Changes for FuelSolutions™ Storage System LAR 1026-004

Enclosure:

CD-ROM, labeled "FuelSolutions™ Storage System LAR 1026-004, June 30, 2005 – Publicly Available" (2 copies), containing the following four (4) files:

001\_LAR1026004\_R0.pdf, 20,231 KB, publicly available  
002\_LAR1026004\_R0.pdf, 16,329 KB, publicly available  
003\_LAR1026004\_R0.pdf, 16,804 KB, publicly available  
001\_Calc\_CMPC1505018\_R0.pdf, 2,382 KB, publicly available

cc: Mrs. J. Caverly, NRC NMSS w/ attachment and enclosure  
Mr. R. J. Lewis, NRC NMSS w/ attachment

### Summary of Changes for FuelSolutions™ Spent Fuel Management System LAR 1026-004

SAR	Section	Page	Description
WSNF-220	Acronyms and Abbreviations	xxxiv	Editorial revision for company name change
	1.	1-1	Editorial revision for company name change
	1.1	1.1-4	Editorial revision for company name change
	1.2.2.5	1.2-28	Revise for consistency with proposed TS periodic monitoring requirements
	1.2.2.7	1.2-29	Editorially revise parenthetical example
	1.3	1.3-1	Editorial revisions for company name change
	Table 2.0-1	2-4	Correct missing section cross-references
	2.1.2.1	2.1-2, 2.1-3	Revise for consistency with proposed TS periodic monitoring requirements
	2.3.4.8	2.3-17	Correct missing section cross-reference
	2.3.4.9	2.3-17	Change “daily” to “periodic” for consistency with proposed TS periodic monitoring requirements
	2.4.3.2	2.4-2	Delete text referring to regulatory requirement
	Table 2.6-1	2.6-2	Editorial revision for company name change
	3.7.1	3.7-1	Revise for clarity and consistency with proposed TS changes
	4.1.1.1	4.1-3	Changed “daily” to “periodically” for consistency with proposed TS periodic monitoring requirements
	4.3.1	4.3-2	Changed “daily” to “periodically” and “periodic” for consistency with proposed TS periodic monitoring requirements
	4.5.1.2	4.5-2	Revise for consistency with proposed TS periodic monitoring requirements
	4.6.1.2	4.6-4	Revise for consistency with proposed TS periodic monitoring requirements
	4.6.1.2.1	4.6-4, 4.6-5	Revise to include discussion of blocked vent analysis results for total cask heat loads that are less than the $Q_{max}$ design-basis heat load
	4.6.1.5.1	4.6-6	Revise description of design-basis case for clarity; change “daily” to “periodic”
	Table 4.6-2	4.6-9	Delete footnote (1) and associated call-out from table caption; add temperature units to column heading
	Table 4.6-3	4.6-10	Add new table for reduced-heat blocked vent analysis results
	Figure 4.6-4	4.6-3	Revised figure caption for clarity
	Figure 4.6-5	4.6-4	Add new figure for reduced-heat blocked vent analysis results

**Summary of Changes for FuelSolutions™ Spent Fuel Management System  
LAR 1026-004**

SAR	Section	Page	Description
WSNF-220 (continued)	5.2.1.2	5.2-3	Editorial revisions for company name change
	5.5.2.4	5.5-6	Editorial revisions for company name change
	8.1	8.1-1	Editorial revisions for company name change
	8.1.10.7	8.1-17	Revise for consistency with proposed TS periodic monitoring requirements
	8.1.11.4	8.1-21	Revise for consistency with proposed TS periodic monitoring requirements
	9.1	9.1-1	Editorial revisions for company name change
	9.1.2.6	9.1-7	Change "periodic temperature monitoring" to "periodic monitoring" for consistency with proposed TS periodic monitoring requirements
	9.1.2.7.1	9.1-8	Editorial revisions for company name change
	9.1.3.7.1	9.1-15	Editorial revisions for company name change
	9.2.2	9.2-1, 9.2-2	Revise for consistency with proposed TS periodic monitoring requirements
	Table 9.2-1	9.2-3	Revise descriptions of inspections to be consistent with the proposed TS periodic monitoring requirements
	10.3	10.3-1, 10.3-2	Revise for clarity
	11.2.1.2	11.2-2	Change "daily" to "periodic" for consistency with proposed TS periodic monitoring requirements
	11.2.1.3	11.2-2	Revise for clarity and accuracy
	11.2.7.4	11.2-13	Revise to require monitoring of the liner thermocouple temperature following a flood event
	Table 12.1-1	12.1-2	Revise for consistency with proposed TS changes; editorial corrections
	TS TOC	---	Revise section headings and page numbers
	TS 3.3.1	TS 3.3-1	Deleted
	TS 3.3.2	TS 3.3-2	Revise section heading
	TS Table 4.1-1	TS 4.0-5	Revise company name
	TS Table 4.1-2	TS 4.0-14	Revise company name
	TS 5.3.8	TS 5.0-6, TS 5.0-7	Added section
	TS Bases TOC	---	Revise section headings and page numbers
	TS B3.3.2	TS B3.3-2	Revise section heading
	13.	13-1	Editorial revision for company name change; correct docket number
WSNF-221	Acronyms and Abbreviations	xxx	Editorial revision for company name change

**Summary of Changes for FuelSolutions™ Spent Fuel Management System  
LAR 1026-004**

SAR	Section	Page	Description
WSNF-221 (continued)	1.	1-1, 1-2	Editorial revision for company name change
	1.3	1.3-1	Editorial revision for company name change
	Table 2.0-1	2-4	Change “daily” to “periodic” for consistency with proposed TS periodic monitoring requirements
	2.1.1	2.1-1	Editorial revision for company name change
	Table 2.5-1	2.5-2	Editorial revision for company name change
	3.1.1	3.1-1	Editorial revision for company name change
	4.	4-1	Editorial revision for company name change
	4.4.1.11	4.4-15	Change “daily” to “periodic” for consistency with proposed TS periodic monitoring requirements
	4.6.1.2.1	4.6-3	Revise for clarity
	4.6.1.6.1	4.6-5	Revise for clarity; add discussion comparing W21 canister thermal results to generic thermal results; change “daily” to “periodic” for consistency with proposed TS periodic monitoring requirements
	Table 4.6-1	4.6-6	Revise table to reference temperatures from the 25.0 kW generic all vents blocked analysis case
	4.7.4.1	4.7-9	Editorial revision for company name change
	6.	6-1	Editorial revision for company name change
	7.	7-1	Editorial revision for company name change
	8.	8-1	Editorial revision for company name change
	9.	9-1	Editorial revision for company name change
	9.1	9.1-1	Editorial revision for company name change
	Table 9.1-1	9.1-3	Change “periodic temperature monitoring” to “periodic monitoring” for consistency with proposed TS periodic monitoring requirements
	10.	10-1	Editorial revision for company name change
	11.	11-1	Editorial revision for company name change
	12.	12-1	Editorial revision for company name change
	Table 12.1-1	12.1-2	Revise for consistency with proposed TS changes; editorial corrections
	TS TOC	---	Revise section headings and page numbers
	TS 3.3.1	TS 3.3-1	Deleted
	TS 3.3.2	TS 3.3-2 thru TS 3.3-5	Change TS title; revise LCO 3.3.2 to permit either visual inspection of vent screens or liner thermocouple temperature monitoring; revise ACTIONS for periodic monitoring options; revise SURVEILLANCE REQUIREMENTS to refer to storage cask periodic monitoring program

**Summary of Changes for FuelSolutions™ Spent Fuel Management System  
LAR 1026-004**

SAR	Section	Page	Description
WSNF-221 (continued)	TS Table 4.1-1	TS 4.0-3	Revise company name
	TS 5.3.8	TS 5.0-1	Add section
	TS Bases TOC	---	Revise section headings and page numbers
	TS B3.3.1	TS B3.3-1	Deleted
	TS B3.3.2	TS B3.3-2 thru TS B3.3-6	Revise TS 3.3.2 bases to address proposed changes
	13.	13-1	Editorial revision for company name change
	14.	14-1	Editorial revision for company name change
WSNF-223	Acronyms and Abbreviations	xxxvi	Editorial revision for company name change
	1.	1-1, 1-2	Editorial revision for company name change
	1.3	1.3-1	Editorial revision for company name change
	Table 2.0-1	2-4	Change "daily" to "periodic" for consistency with proposed TS periodic monitoring requirements
	2.1.1	2.1-1	Editorial revision for company name change
	Table 2.5-1	2.5-2	Editorial revision for company name change
	3.1	3.1-1	Editorial revision for company name change
	3.5.1.2.1	3.5-3	Editorial revision for company name change
	3.5.1.3.1	3.5-7	Corrected missing section cross-reference
	4.4.1.10	4.4-13	Deleted last paragraph
	4.6.1.2	4.6-3	Replace "vent clearance" with "periodic monitoring" for consistency with proposed TS periodic monitoring requirements
	4.6.1.2.1	4.6-3, 4.6-4	Revise for clarity
	4.6.1.6.1	4.6-5, 4.6-6	Revise for clarity; add discussion comparing W74 canister thermal results to generic thermal results; change "daily" to "periodic" for consistency with proposed TS periodic monitoring requirements
	Table 4.6-1	4.6-7	Revise table to reference temperatures from the 25.0 kW generic all vents blocked analysis case
	6.	6-1	Editorial revision for company name change
	7.	7-1	Editorial revision for company name change
	8.	8-1	Editorial revision for company name change
	9.	9-1	Editorial revision for company name change
	9.1.1	9.1-1	Editorial revision for company name change

**Summary of Changes for FuelSolutions™ Spent Fuel Management System  
LAR 1026-004**

SAR	Section	Page	Description
WSNF-223 (continued)	Table 9.1-1	9.1-4	Change "periodic temperature monitoring" to "periodic monitoring" for consistency with proposed TS periodic monitoring requirements
	Table 9.1-2	9.1-7	Change "periodic temperature monitoring" to "periodic monitoring" for consistency with proposed TS periodic monitoring requirements
	9.1.8	9.1-12	Change "temperature monitoring" to "monitoring" for consistency with proposed TS periodic monitoring requirements
	9.1.9.2	9.1-13, 9.1-14	Editorial revision for company name change; added period to end of last sentence
	9.2	9.2-1	Change "temperature monitoring" to "monitoring" for consistency with proposed TS periodic monitoring requirements
	10.	10-1	Editorial revision for company name change
	11.	11-1	Editorial revision for company name change
	11.2.1.3	11.2-2	Revise for clarity and accuracy
	12.	12-1	Editorial revision for company name change
	Table 12.1-1	12.1-2	Revise for consistency with proposed TS changes; editorial corrections
	TS Cover Sheet	---	Add note for clarity
	TS TOC	---	Revise section headings and page numbers
	TS 3.3.1	TS 3.3-1	Deleted
	TS 3.3.2	TS 3.3-2 thru TS 3.3-5	Change TS title; revise LCO 3.3.2 to permit either visual inspection of vent screens or liner thermocouple temperature monitoring; revise ACTIONS for periodic monitoring options; revise SURVEILLANCE REQUIREMENTS to refer to storage cask periodic monitoring program
	TS Table 4.1-1	TS 4.0-3	Revise company name
	TS 5.3.8	TS 5.0-1	Add section
	TS Bases TOC	---	Revise section headings and page numbers
	TS B3.3.1	TS B3.3-1	Deleted
	TS B3.3.2	TS B3.3-2 thru TS B3.3-6	Revise TS 3.3.2 bases to address proposed changes
	13.	13-1	Editorial revision for company name change
	14.	14-1	Editorial revision for company name change