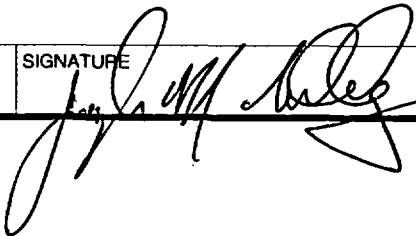


NRC FORM 699 (9-2003)		U.S. NUCLEAR REGULATORY COMMISSION		DATE <b>09/13/2006</b>
<b>CONVERSATION RECORD</b>				TIME <b>11:00am</b>
NAME OF PERSON(S) CONTACTED OR IN CONTACT WITH YOU <b>Jayant Bondre</b>		TELEPHONE NO.		TYPE OF CONVERSATION <input type="checkbox"/> VISIT <input checked="" type="checkbox"/> CONFERENCE <input type="checkbox"/> TELEPHONE <input type="checkbox"/> INCOMING <input type="checkbox"/> OUTGOING
ORGANIZATION <b>Transnuclear Inc.</b>				
SUBJECT <b>Phone call with Transnuclear, Inc. (TN) to discuss two issues associated with the NUHOMS HD rulemaking comments (Docket 72-1030)</b>				
SUMMARY (Continue on Page 2)				
Transnuclear, Inc. attendees: Bob Grubb, Jayant Bondre, Don Shaw, Jack Boshoven, Tom Hoppe, Ian McInnes				
Nuclear Regulatory Commission (NRC) attendees: Geoffrey Hornseth, Bob Shewmaker, Joe Sebrosky				
<p>The purpose of the phone call was to discuss two comments associated with the NUHOMS HD rulemaking. The staff is in the process of resolving comments associated with the rulemaking. One of the comments concerned the possibility of the dry shielded canister (DSC) support structure inside the Horizontal Storage Module (HSM) corroding from contact with air and humidity in the environment, particularly at coastal sites. The second comment concerned the possibility of an earthquake causing the potential for DSC movement when the DSC is being loaded into the HSM. These comments, and other comments, were sent to the staff in a May 16, 2006, letter (ADAMS accession number ML061510491).</p> <p>Below are the highlights of the discussions regarding these comments</p> <p>1) Possibility of Corrosion of DSC Support Structure Inside the HSM</p> <p>The staff stated that it had received a similar comment on past rulemakings (see comment #3 associated with the Standardized NUHOMS amendment 5 rulemaking dated January 7, 2004 (69 FR 850)). However, upon further review the staff believed additional data or commitments were needed to address the issue for coastal environments. The three options discussed were:</p> <p>1) For coastal sites, the staff believed TN should consider specifying in the safety analysis report (SAR) a minimum copper content for the structural steel of 0.20% or provide data that the corrosion of the steel is acceptable with a copper content below this level.</p>				
Continue on Page 2				
ACTION REQUIRED				
TN and NRC to consider the options discussed during the phone call. TN also committed to providing the staff with Figure 3.9.9-5 and 3.9.9-6 from the safety analysis report.				
NAME OF PERSON DOCUMENTING CONVERSATION <b>Joseph Sebrosky</b>		SIGNATURE 		DATE <b>9/21/06</b>
ACTION TAKEN				
TITLE OF PERSON TAKING ACTION		SIGNATURE OF PERSON TAKING ACTION		DATE

**CONVERSATION RECORD (Continued)**

SUMMARY (Continue on Page 3)

2) As an alternative to item 1 above, for coastal sites, the staff believed TN should consider specifying in the safety analysis report (SAR) a specification for the coating to be applied to the structural steel and the technical basis for the maintenance life of the coating and recommended inspection interval.

3) TN believed that the staff should consider that the preponderance of the evidence suggests that corrosion of the steel support structure is not an issue for the 20 year licensing basis life. TN believed that given that there is some corrosion resistance provided in the steel, that a coating is applied, and that the steel is inside the HSM protected from the environment nothing additional needed to be done.

Regarding the second comment about the possibility of an earthquake causing the potential for DSC movement when the DSC is being loaded into the HSM, TN and the staff discussed the issue in detail. The staff noted that the loading procedure for the NUHOMS HD appears to differ from that for the Standardized NUHOMS. The operating procedures for the Standardized NUHOMS have the transfer cask brought to within several inches (assumed to be less than 1 foot) of the HSM opening prior to the removal of the transfer cask lid. For the NUHOMS-HD this is not the case since the "several feet from the HSM-H" location of the trailer at the time of transfer cask lid removal leaves open the possibility that the several feet could be as much as or more than the length of the canister. TN indicated that the loading procedure for the Standardized NUHOMS design in subsequent amendments was very similar to the NUHOMS HD procedure in that the transfer cask lid was removed prior to backing the trailer close to the HSM. The staff and TN then discussed the sequence of events that would have to occur for the DSC to be separated from the transfer cask or HSM.

A large seismic event during the period of time from when the transfer cask lid is removed, while several feet from the HSM-H, until the transfer cask is anchored to the HSM-H with a sufficiently large horizontal axial component could overcome the frictional resistance that keeps the canister inside the transfer cask. This would not, however, be an uncontrolled DSC movement since the DSC inside the transfer cask has only an approximately 1/4-inch radial gap which controls the movement to essentially longitudinal/axial movement with the maximum lateral position of the DSC changing by approximately 1/64th-inch for each inch of longitudinal/axial movement. The longitudinal/axial movement is limited by the distance of several feet between the transfer cask opening and the face of the HSM-H. A longitudinal/axial movement of 2 to 3 feet of the DSC from the transfer cask opening would not constitute an uncontrolled DSC movement since that longitudinal/axial movement is limited by the face of the HSM-H module.

TN indicated that the possibility of the hypothesized scenario is considered to be much less than what is considered significant for design accident conditions arising from handling and storage of spent nuclear fuel. The seismic event to produce the hypothesized movement must have a large enough component of acceleration in the longitudinal/axial direction of the positioned transfer cask that can be at any point on the compass and the event must occur within a time period of 1.5 to 3 hours.

The staff indicated that it more fully understood the scenario and would inform TN if any additional information or commitments were needed. The staff noted during research for this issue that the safety analysis report was missing Figure 3.9.9-5 and 3.9.9-6. TN committed to providing these figures in a letter to the staff.

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