



E-24084
September 26, 2006

Document Control Desk
US Nuclear Regulatory Commission
Washington, DC 20555-0001

Subject: Evaluation of 10CFR21 Deviation

Reference: Transnuclear Letter, Tara J. Neider to Document Control Desk, "Evaluation of a Deviation for Notification under Provisions of 10CFR21", No. E-23997, dated August 21, 2006

To Whom it May Concern

The purpose of this letter is to inform the NRC staff that TN has completed our review of the conditions associated with the failure to remove labels from Boral™ panels during the guide sleeve assembly for 24PT1-DSCs fabricated for use by Sothern California Edison at the San Onofre Nuclear Generating Station. TN has determined that the presence of the labels does not constitute a substantial safety hazard to the loaded canisters and does not require notification to the US NRC under 10CFR 21.

TN and our subcontractor have performed a detailed chemical analysis of the label composition to identify the constituent chemicals of the labels and adhesive and from this determined the quantity of potentially harmful chemicals that were sealed into the seventeen 24PT1-DSCs loaded with SONGS Unit 1 Fuel. The results of this analysis have been reviewed by independent chemical and metallurgical personnel and the concentrations determined to be at least two orders of magnitude below the threshold required to cause significant degradation of the stored Spent Fuel Assemblies, or the materials used in the fabrication of the DSC internals. Therefore, it is concluded that the unintentional inclusion of the paper labels into the 24PT1-DSC guide sleeves does not present a substantial safety hazard and does not result in a defect that would be reportable under 10CFR21.

Any questions you may have regarding this matter should be directed to Steven C. White, Director Corporate Quality Assurance at 410.910.6870.

Very Truly Yours,

Tara J. Neider
President and Chief Operating Officer

cc: J. Sebrosky (NRC), K. DeBoi (SCE), S. White, R. Grubb, G. Jackson