NAC INTERNATIONAL

Atlanta Corporate Headquarters
3930 East Jones Bridge Road, Suite 200
Norcross, GA 30092
Phone 770-447-1144
Fax 770-447-1797
www.nacintl.com

71-9225

March 2, 2007

U.S. Nuclear Regulatory Commission
11555 Rockville Pike
Rockville, MD 20852-2738

Attn: Document Control Desk

Subject: Submittal of Proposed Certificate of Compliance (CoC) Changes and a Supplement to the November 17, 2006 Request for an Amendment of CoC No. 9225 for the NAC-LWT Cask

Docket No. 71-9225

Reference:
1. Model No. NAC-LWT Package, Certificate of Compliance (CoC) No. 9225, Revision 43, U.S. Nuclear Regulatory Commission (NRC), December 15, 2006
2. Safety Analysis Report (SAR) for the NAC Legal Weight Truck Cask, Revision 37, NAC International, June, 2005
3. Submittal of a Request for an Amendment of Certificate of Compliance (CoC) No. 9225 for the NAC-LWT Cask to Incorporate Various Changes to the Authorized Contents and the Operating Procedures, NAC International, November 17, 2006

NAC International (NAC) herewith submits proposed revised wording for Revision 44 of Reference 1 and a supplement to Reference 3 consisting of clarification of the Criticality Safety Indexes listed in Chapter 1 and in Chapter 6 of Reference 2.

The proposed revised CoC wording to incorporate the changes requested in Reference 3 is described in Enclosure 2.

This submittal also includes eight copies of this transmittal letter and Revision LWT-07A changed pages for Reference 2 updated with the approved ANSTO amendment information. The affected pages incorporate the necessary clarification of the Criticality Safety Indexes. Consistent with NAC administrative practice, this proposed revision is numbered to uniquely identify the applicable changed pages. Revision bars mark the SAR text changes (on Revision LWT-07A pages) that are proposed. Upon final approval, the changed pages will be reformatted, assigned the next appropriate revision number, and incorporated into the NAC-LWT SAR.

Approval of this amendment request as supplemented herein will permit timely shipment of the proposed modified contents in the NAC-LWT cask. To support anticipated spent fuel shipping schedules, equipment preparation and project planning, NAC respectfully requests continued review and subsequent approval of this amendment request by April 30, 2007.

ED20070011

NMSS01

If you have any comments or questions, please contact me on my direct line at 678-328-1274.

Sincerely,

Anthony L. Patko
Director, Licensing
Engineering

Enclosure 1 – Supplemental SAR Changed Pages for the NAC-LWT Cask Transport Amendment, Rev. LWT-07A

Enclosure 2 – Proposed Changes for Revision 44 of CoC No. 9225 for the NAC-LWT Cask

Enclosure 1

February 2007

Revision LWT-07A

NAC-LWT

Legal Weight Truck Cask System

SAFETY ANALYSIS REPORT

Docket No. 71-9225

NAC INTERNATIONAL

Atlanta Corporate Headquarters: 3930 East Jones Bridge Road, Norcross, Georgia 30092 USA
Phone 770-447-1144, Fax 770-447-1797, www.nacintl.com

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9.0 REFERENCES 9-1

Chapter 1

1.0 GENERAL INFORMATION

This chapter of the NAC International, Legal Weight Truck spent fuel shipping cask (NAC-LWT) Safety Analysis Report (SAR) presents a general introduction to, and description of, the NAC-LWT cask. Terminology used throughout this report is presented in Table 1-1.

Shipment of the NAC-LWT cask by truck, ISO container, and/or by railcar, as a Type B(U)F-96 package, as defined in 10 CFR 71.4, is authorized for the following contents:

- PWR and BWR fuel assemblies[1];
- MTR fuel assemblies and plates;
- DIDO fuel assemblies, metallic fuel rods;
- 25 high burnup PWR and BWR fuel rods (including up to 14 fuel rods classified as damaged);
- TRIGA fuel elements and TRIGA fuel cluster rods;
- General Atomics (GA) High-Temperature Gas-Cooled Reactor (HTGR) and Reduced-Enrichment Research and Test Reactor (RERTR) Irradiated Fuel Materials (IFM);
- up to 700 PULSTAR fuel elements;
- spiral fuel assemblies; and
- MOATA plate bundles.

The authorized contents previously listed include both irradiated and unirradiated forms of the materials.

Irradiated hardware is also authorized to be shipped in the NAC-LWT cask by truck, ISO container, and/or by railcar, as a Type B(U)F-96 package, as defined in 10 CFR 71.4. Irradiated hardware is defined as solid, irradiated and contaminated fuel assembly structural or reactor internal component hardware, which may include fissile material, provided the quantity of fissile material does not exceed a Type A quantity and does not exceed the mass limits of 10 CFR 71.53.

[1] NAC-LWT casks containing PWR and BWR fuel assemblies are to be transported on a open trailer with a personnel barrier.

Shipment of the NAC-LWT cask by truck, ISO container, and/or by railcar, as a Type B(M)-96 package, as defined in 10 CFR 71.4, is also authorized for the following contents:

- up to 300 Tritium Producing Burnable Absorber Rods (TPBARs), of which two can be prefailed

In accordance with 10 CFR 71.59, the NAC-LWT cask is assigned a Criticality Safety Index (CSI) for criticality control of the approved contents as follows:

- 100 for PWR fuel assemblies;
- 33.4 for package with any number of canned PULSTAR fuel;
- 12.5 for DIDO fuel assemblies and TRIGA payloads in a nonpoisoned basket and no canisters, or a canister loaded withup to two equivalent TRIGA elements;
- 5.0 for BWR fuel assemblies; and
- 0.0 for metallic fuel rods, up to 25 PWR fuel rods, uncanned intact PULSTAR fuel assemblies and elements, 42 spiral fuel assemblies, MOATA plate bundles, TPBARS, up to 25 high burnup PWR and BWR rods, MTR fuel assemblies, TRIGA fuel elements, TRIGA elements loaded into a poisoned basket, TRIGA fuel cluster rods, TRIGA payloads with screened cans containing up to four TRIGA elements in a nonpoisoned basket, and GA IFM.

TPBARs do not contain fissile material and criticality assessments are not required. Solid, irradiated and contaminated hardware contents could include fissile material not exceeding a Type A quantity and the mass limits of 10 CFR 71.53. A CSI of 0 is assigned for these contents for documentation purposes.

The estimated Transport Index (TI) for shielding for the prior listed contents is shown in Table 5.1-1. The actual TI for individual shipments will be determined in accordance with 10 CFR 71.4 by the licensee.

Chapter 6

6.0 CRITICALITY EVALUATION

The NAC-LWT cask is designed to transport either 1 pressurized water reactor (PWR) assembly; up to 25 intact PWR or BWR rods in a rod holder or fuel assembly lattice; up to 25 PWR or BWR fuel rods with a maximum of 14 of the rods classified as damaged in a rod holder; 2 boiling water reactor (BWR) assemblies; 15 sound metallic fuel rods; 6 failed metallic fuel rods; up to 42 high enriched uranium (HEU), medium enriched uranium (MEU) or low enriched uranium (LEU) Materials Test Reactor (MTR) fuel elements, or DIDO fuel assemblies; up to 140 TRIGA fuel elements; two packages of General Atomics Irradiated Fuel Material (GA IFM); up to 560 TRIGA fuel cluster rods; 1 consolidation canister with up to 300 TPBARs (including up to 2 damaged TPBARs); up to 700 PULSTAR fuel elements; up to 42 spiral fuel assemblies; or up to 42 MOATA plate bundles. This chapter illustrates that all packages meet the requirements of parts 71.55, 71.59 and 71.71 of 10 CFR 71.

In accordance with the requirements of 10 CFR 71.59 (b), the NAC-LWT cask is assigned a Criticality Safety Index (CSI) for criticality control for the authorized contents as follows:

1.	For metallic fuel rods, up to 25 PWR fuel rods, uncanned intact PULSTAR fuel assemblies and elements, 42 spiral fuel assemblies, MOATA plate bundles, TPBARS, up to 25 high burnup PWR and BWR rods, MTR fuel assemblies, TRIGA fuel elements, TRIGA elements loaded into a poisoned basket, TRIGA fuel cluster rods, TRIGA payloads with screened cans containing up to four TRIGA elements in a nonpoisoned basket, and GA IFM:	0.0
2.	For PWR fuel assemblies:	100
3.	For BWR fuel assemblies:	5.0
4.	For DIDO fuel assemblies and TRIGA payloads in a nonpoisoned basket and no canisters, or a canister loaded with up to two equivalent TRIGA elements:	12.5
5.	For package with any number of canned PULSTAR fuel:	33.4

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NAC INTERNATIONAL

Enclosure 2

Proposed Changes for Revision 44 of

Certificate of Compliance No. 9225

for the NAC-LWT Cask

Proposed Changes for Revision 44 of Certificate of Compliance No. 9225 for the NAC-LWT Cask (changes are highlighted)

Page No.	Description of Change
1-23	CoC heading – 1.b.: Revision Number 44. Change the number of pages to 23 on each page. Remove previous revision bars throughout.
1 of 23	5.(a) Packaging, (2) Description – change to read as follows: The LWT is a steel-encased, lead-shielded shipping cask. The cask is designed to transport various radioactive contents as listed in 5.(b)(1). The overall dimensions … cubic feet.
2 of 23	5.(a)(3), Drawings (i) – change the revision number for the following two drawings: LWT 315-40-02, Rev. 20 (Sheets 1-2) Body Assembly LWT 315-40-08, Rev. 17 (Sheets 1-5) Cask Parts Detail
4 of 23	5.(a)(3)(ii), Drawings (continued) – add the following new drawing: LWT 315-40-145, Rev. 0 Irradiated Hardware, Lid Spacer, LWT Cask 5.(b), Contents – (1) Type and form of material – add the following new sentence before (i) to read as follows: All contents listed include both unirradiated and irradiated conditions. 5.(b), Contents – (1) Type and form of material – (i) delete "irradiated" so it reads as follows: (i) PWR fuel assemblies. The maximum fuel assembly … of the application.
5 of 23	5.(b)(1), Type and form of material –(ii) delete "irradiated" so it reads as follows: (ii) BWR fuel assemblies. The maximum fuel assembly … of the application.
6 of 23	5.(b)(1), Type and form of material (continued) – delete (iii) in its entirety. (iii) Deleted. 5.(b)(1), Type and form of material (continued) – (iv) delete "irradiated" so it reads as follows: (iv) MTR fuel elements composed of … of the application.
9 of 23	5.(b)(1), Type and form of material (continued) – replace this page with pages 3 & 4 of this document (pages 9 & 10 of 23 of the CoC)
new page 11 of 23	5.(b)(1), Type and form of material (continued) – (vii) delete "irradiated" so it reads as follows: (vii) TRIGA fuel cluster rods … prior to irradiation: 5.(b)(1), Type and form of material (continued) – (viii) delete "irradiated" so it reads as follows: (viii) High burnup PWR rods … 150 days.

5.(b)(1) Type and form of material (continued)

(vi) (a) TRIGA fuel elements acceptable for loading in the poisoned TRIGA basket and meeting the following specifications:

	TRIGA HEU (Notes 1, 2, 6 & 7)	TRIGA LEU (Notes 1, 2, 6 & 7)	TRIGA LEU (Notes 1, 2, 6 & 7)
Fuel Form	Clad U-ZrH rod	Clad U-ZrH rod	Clad U-ZrH rod
Maximum Element Weight, lbs	13.2	13.2	13.2
Maximum Element Length, in	47.74	47.74	47.74
Element Cladding	Stainless Steel	Stainless Steel	Aluminum
Clad Thickness, in	0.02	0.02	0.03
Active Fuel Length, in	15	15	14-15 (Note 4)
Element Diameter, in	1.478 max.	1.478 max.	1.47 max.
Fuel Diameter, in	1.435 max.	1.435 max.	1.41 max.
Maximum Initial U Content/Element, kilograms	0.196	0.845	0.205
Maximum Initial ^{235}U Mass, grams	137	169	41
Maximum Initial ^{235}U Enrichment, weight percent	70	20	20
Zirconium Mass, grams (Note 5)	2060	1886 - 2300	2300
Hydrogen to Zirconium Ratio, max. (Note 5)	1.6	1.7	1.0
Maximum Average Burnup, MWd/MTU	460,000 (80% ^{235}U)	151,100 (80% ^{235}U)	151,100 (80% ^{235}U)
Minimum Cooling Time	90 days (Note 3)	90 days (Note 3)	90 days (Note 3)

Notes:
1. Mixed TRIGA LEU and HEU contents authorized.
2. TRIGA Standard, instrumented and fuel follower control rod type elements authorized.
3. Maximum decay heat of any element is 7.5 watts.
4. Aluminum clad fuel with 14-inch active fuel is solid and has no central hole with a zirconium rod.
5. Zirconium mass and H/Zr ratio apply to the fuel material (U-Zr-Hx) and do not include the center zirconium rod.
6. Listed TRIGA fuel elements have a 0.225-inch diameter zirconium rod in the center.
7. Dimensions listed are as-fabricated (unirradiated) nominal values.

5.(b)(1) Type and form of material (continued)

(vi) (b) TRIGA fuel elements acceptable for loading in the nonpoisoned TRIGA basket and meeting the following specifications:

	TRIGA HEU (Notes 1, 2 & 5)	TRIGA LEU (Notes 1, 2 & 5)	TRIGA LEU (Notes 1, 2 & 5)
Fuel Form	Clad U-ZrH rod (Note 4)	Clad U-ZrH rod (Note 4)	Clad U-ZrH rod (Note 4)
Maximum Element Weight, lbs	13.2	13.2	13.2
Maximum Element Length, in	47.74	47.74	47.74
Element Cladding	Stainless Steel	Stainless Steel	Aluminum
Minimum Clad Thickness, in	0.01	0.01	0.01
Maximum Element Diameter, in	1.5 max.	1.5 max.	1.5 max.
Maximum Initial U Content/Element, kilograms	0.196	0.845	0.205
Maximum Initial ^{235}U Mass, grams	137	169	41
Maximum Initial ^{235}U Enrichment, weight percent	70	20	20
Maximum Average Burnup, MWd/MTU	460,000 (80% ^{235}U)	151,100 (80% ^{235}U)	151,100 (80% ^{235}U)
Minimum Cooling Time	90 days (Note 3)	90 days (Note 3)	90 days (Note 3)

Notes:
1. Mixed TRIGA LEU and HEU contents authorized.
2. TRIGA Standard, instrumented and fuel follower control rod type elements authorized.
3. Maximum decay heat of any element is 7.5 watts.
4. Element may contain a zirconium rod in the center.
5. Dimensions listed are as-fabricated (unirradiated) nominal values.

Page No.	Description of Change
new page 12 of 23	5.(b)(1), Type and form of material (continued) – (ix) delete "irradiated" so it reads as follows: (ix) High burnup BWR rods ... table below. 5.(b)(1), Type and form of material (continued) – (x) delete "irradiated" so it reads as follows: (x) DIDO fuel elements ... listed below.
new page 14 of 23	5.(b)(1), Type and form of material (continued) – (xii) delete "irradiated" so it reads as follows: (xii) Tritium-producing burnable absorber rods (TPBARs) ... 30 days.
new page 15 of 23	5.(b)(1), Type and form of material (continued) – (xiv) delete "irradiated" so it reads as follows: (xiv) Intact ANSTO fuel ... plate bundles. 5.(b)(1), Type and form of material (continued) – add new (xvi) as follows: (xvi) Solid, irradiated and contaminated fuel assembly structural or reactor internal component hardware, which may include fissile material, provided the quantity of fissile material does not exceed a Type A quantity and does not exceed the mass limits of 10 CFR 71.53. 5.(b)(2), Maximum quantity of material per package – change first sentence to read as follows: Not to exceed 4,000 pounds, including contents and fuel assembly basket or other internal support structure.
new page 16 of 23	5.(b)(2), Maximum quantity of material per package (continued) – delete (iii) in its entirety. (iii) Deleted.
new page 17 of 23	5.(b)(2), Maximum quantity of material per package (continued) – change (vii) to read as follows: (vii)(a) For TRIGA fuel elements as described in Item 5.(b)(1)(vi)(a): (1) Up to 140 intact fuel elements in the poisoned TRIGA fuel basket (four fuel elements per basket cell). (2) Maximum decay heat not to exceed 7.5 watts per TRIGA fuel element (or equivalent for damaged fuel) and 1050 watts per package. (3) Damaged TRIGA fuel elements will be transported in a sealed damaged fuel can (maximum of two) or in a screened damaged fuel can (maximum of four). (4) Damaged TRIGA fuel elements or fuel debris (up to two equivalent elements) will be transported in a sealed or screened damaged fuel can.

Page No.	Description of Change
new page 17 of 23 (cont'd)	(vii)(a) For TRIGA fuel elements as described in Item 5.(b)(1)(vi)(a): (cont'd) (5) The sealed cans are to be in accordance with NAC International Drawing Nos. 315-40-086, Rev. 1; 315-40-087, Rev. 5; and 315-40-088, Rev. 2. (6) The screened cans are to be in accordance with NAC International Drawing Nos. 315-40-074, Rev. 2; 315-40-075, Rev. 1; and 315-40-076, Rev. 1. (7) Up to 14 sealed or screened cans may be loaded in a poisoned TRIGA fuel basket module. (8) Mixed intact and damaged fuel contents and fuel debris are authorized. Base and top fuel basket modules may contain intact fuel elements, screened cans or sealed cans. Intermediate fuel basket modules may contain only intact TRIGA fuel elements. (vii)(b) For TRIGA fuel elements as described in Item 5.(b)(1)(vi)(b): (1) Up to 120 intact fuel elements in the nonpoisoned TRIGA fuel basket (four fuel elements per basket cell). (2) TRIGA fuel elements may not be loaded in the center cell of the nonpoisoned basket. (3) Maximum decay heat not to exceed 7.5 watts per TRIGA fuel element (or equivalent for damaged fuel) and 900 watts per package. (4) Damaged TRIGA fuel elements will be transported in a sealed damaged fuel can (maximum of two) or in a screened damaged fuel can (maximum of four). (5) Damaged TRIGA fuel elements or fuel debris (up to two equivalent elements) will be transported in a sealed or screened damaged fuel can. (6) The sealed cans are to be in accordance with NAC International Drawing Nos. 315-40-086, Rev. 1; 315-40-087, Rev. 5; and 315-40-088, Rev. 2. (7) The screened cans are to be in accordance with NAC International Drawing Nos. 315-40-074, Rev. 2; 315-40-075, Rev. 1; and 315-40-076, Rev. 1. (8) Up to 12 sealed or screened cans may be loaded in a nonpoisoned TRIGA fuel basket module. (9) Mixed intact and damaged fuel contents and fuel debris are authorized. Base and top fuel basket modules may contain intact fuel elements, screened cans or sealed cans. Intermediate fuel basket modules may contain only intact TRIGA fuel elements.

Proposed Changes for Revision 44 of Certificate of Compliance No. 9225 for the NAC-LWT Cask (changes are highlighted) (cont'd)

Page No.	Description of Change
new page 21 of 23	5.(b)(2), Maximum quantity of material per package (continued) – add new (xvii) to read as follows: (xvii) For solid irradiated hardware as described in Item 5.(b)(1)(xvi): Up to 4,000 pounds, including spacers, dunnage and containers, and meeting the gamma source defined in Table 1.2-12 of the application. An irradiated hardware spacer, per NAC Drawing No. 315-40-145, shall be installed. 5.(c), Criticality Safety Index – change (1) to read as follows: (1) For TRIGA fuel elements, TRIGA fuel cluster rods, metallic fuel rods, MTR fuel assemblies, up to 25 PWR fuel rods, up to 25 high burnup PWR or BWR rods , GA IFM, uncanned intact PULSTAR fuel assemblies and elements, 42 spiral fuel assemblies, MOATA plate bundles, TPBARS, TRIGA elements loaded in a poisoned basket, and TRIGA payloads with screened cans containing up to four TRIGA elements in a nonpoisoned basket: 0.0 5.(c), Criticality Safety Index – change (4) to read as follows: (4) For DIDO fuel assemblies and TRIGA payloads in a nonpoisoned basket and no canister, or a canister loaded with up to two equivalent TRIGA elements: 12.5
new page 22 of 23	9. First sentence remains as is. Delete "after third use" in the second sentence, so it reads as follows: Prior to first use, and at least once within the 12-month period prior to each subsequent use, the package must be leak tested to 5.5×10^{-7} std cm^3/sec (He). 11. Delete "individual PWR rods, or" in the first sentence. The second sentence remains as is. When shipping PWR, BWR, MTR, DIDO assemblies, TRIGA fuel elements, TRIGA fuel cluster rods, high burnup PWR or BWR rods, ... to 250°F. 12. First sentence remains as is. Change the second sentence to read as follows: Shipments of MTR, DIDO fuel assemblies, TRIGA fuel elements, TRIGA fuel cluster rods, individual PWR rods, high burnup PWR or BWR rods, TPBAR contents, PULSTAR fuel elements, spiral fuel assemblies, MOATA plate bundles, or irradiated hardware must use the ISO container or a personnel barrier.
new page 23 of 23	Revise item 18 to read as follows: 18. Revision 43 of this certificate may be used until April 30, 2008. Revise "Supplements dated" to read as follows: Supplements dated: December 15, 2005; April 17, May 26, June 9 and 15, August 18 and 22, October 12 and November 17, 2006; and March 2, 2007.