

September 6, 2011

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

Attn: Mr. Eric Benner
Branch Chief, Rules, Inspections and Operations Branch
Division of Spent Fuel Storage and Transportation
Office of Nuclear Material Safety and Safeguards

Subject: Supplement to Request for Review of NAC International, Inc. Change
Implementation via 10 CFR 72.48 Determinations NAC-09-MAG-003
and NAC-09-MAG-008

Docket 72-1031

- References:
1. ED20110093 – Request for Review of NAC International, Inc. Change Implementation via 10 CFR 72.48 Determinations NAC-09-MAG-003 and NAC-09-MAG-008, NAC International, August 12, 2011
 2. 71160-WP-002, NAC International White Paper: MAGNASTOR Concrete Cask Optional Inner Rebar Cage, August 12, 2011

Dear Mr. Benner:

The purpose of this communication is to supplement NAC International's (NAC) request for NRC Rules, Inspections and Operations Branch (RIOB) review of 10 CFR 72.48 Determinations NAC-09-MAG-003 and NAC-09-MAG-008 (Reference 1) based on discussions with RIOB personnel on August 30, 2011.

NAC has changed the inner rebar cage of the MAGNASTOR concrete cask into an optional component via the above two 10 CFR 72.48 determinations. Relative to compliance to the American Concrete Institute (ACI) Code 349-85, NAC documented its position in Reference 2, which was provided to the NRC via Reference 1.

To limit the scope of the desired review, NAC is requesting RIOB to provide its concurrence of the following:

The MAGNASTOR concrete cask is a special system of design as defined by the ACI Code 349-85 in Chapter 1, Paragraph 1.4. NAC applied this approach while developing the original MAGNASTOR application that was subsequently accepted by the NRC under the current MAGNASTOR CoC. This "special system of design" provision of the ACI code gives NAC the flexibility of making the inner rebar cage optional utilizing the 10 CFR 72.48 change process while maintaining full compliance to the applicable provisions of the ACI code and the MAGNASTOR CoC.

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Please refer to Reference 2 for substantiating discussion of the above statements. The NAC proprietary calculations submitted to the NRC with Reference 1 were provided as reference information only and their review is not being requested. However, these calculations (both the original and the revised calculations) were included to show that, using the same methodology as originally used (which forms the basis of the original NRC approval of the MAGNASTOR application), the stresses are actually reduced with the inner rebar cage removed. Reference 1 contained all NAC developed information pertinent to the herein described 72.48 change.

As stated in Reference 1, NRC's timely response is requested to the above in support of the current MAGNASTOR utilization schedule.

Should you have any questions or require additional information, please feel free to contact me on my direct line at 678-328-1274. NAC staff is available to provide additional supporting information or clarification in conference calls or in face-to-face closed meetings if needed.

Sincerely,



Anthony L Patko
Director, Licensing
Engineering