



April 22, 2014
E-38366

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
One White Flint North
11555 Rockville Pike
Rockville, MD 20852

Subject: Application for Revision to Certificate of Compliance No. 9302 for the
Model No. NUHOMS®-MP197 Packaging, Safety Analysis Report
Changes (Docket No. 71-9302; TAC No. L24627)

Based on discussions with the NRC staff, this submittal provides changes to the Certificate of Compliance No. 9302 (CoC 9302) safety analysis report (SAR) to facilitate and enhance the wording of the CoC.

Enclosure 1 provides an affidavit, in accordance with 10 CFR 2.390, specifically requesting that you withhold proprietary information included in this submittal.

The list of changed SAR pages is provided in Enclosure 2. The proprietary and non-proprietary versions of the SAR changed pages are provided in Enclosures 3 and 4, respectively. The changed pages are annotated as Revision 17, with changed areas indicated by italicized text and revision bars.

Should the NRC staff require additional information to support review of this application, please do not hesitate to contact Mr. Kamran Tavassoli at 410-910-6944 or me at 410-910-6820.

Sincerely,

A handwritten signature in black ink, appearing to read 'Paul Triska'.

Paul Triska
Vice President, Technical Services

cc: Pierre M. Saverot (NRC SFST) as follows:

- One paper copy of this cover letter and Enclosures 1 through 3.

AREVA TN

Handwritten: NMSS01
NMSS

List of Enclosures:

1. Affidavit Pursuant to 10 CFR 2.390
2. List of Changed Pages to the NUHOMS®-MP197 Transportation Package Safety Analysis Report
3. Replacement Pages for NUHOMS®-MP197 Transportation Package Safety Analysis Report, Revision 17, Proprietary Version
4. Replacement Pages for NUHOMS®-MP197 Transportation Package Safety Analysis Report, Revision 17, Non-proprietary Version

Enclosure 2 to TN E-38366

List of Changed Pages to the NUHOMS®-MP197 Transportation Package Safety Analysis Report

Safety Analysis Report – Proprietary and Nonproprietary Versions		
Current Page No.	Replacement Page No.	Reason for change
Cover Page	Cover Page	To update the SAR cover pages to Rev. 17 for the proprietary and non-proprietary versions
A.7-1	A.7-1, A.7-1a	To facilitate and enhance the wording of the CoC
A.7-19	A.7-19	To facilitate and enhance the wording of the CoC

Enclosure 4 to E-38366

Replacement Pages for NUHOMS[®]-MP197 Transportation
Package Safety Analysis Report, Revision 17
Non-Proprietary Version



NON-PROPRIETARY

**NUHOMS®-MP197 TRANSPORTATION PACKAGE
SAFETY ANALYSIS REPORT**

Revision 17

AREVA TN

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Chapter A.7

Package Operations

NOTE: References in this chapter are shown as [1], [2], etc., and refer to the reference list in Section A.7.5. A glossary of terms used in this chapter is provided in Section A.7.6.

This chapter contains NUHOMS®-MP197HB cask loading and unloading procedures that are intended to show the general approach to cask operational activities. The procedures in this chapter are intended to show the types of operations that will be performed and are not intended to be limiting. Site specific conditions and requirements may require the use of different equipment and ordering of steps to accomplish the same objectives or acceptance criteria which must be met to ensure the integrity of the package.

A separate operations manual (OM) will be prepared for the NUHOMS®-MP197HB cask to describe the operational steps in greater detail. The OM, along with the information in this chapter, will be used to prepare the site-specific procedures that will address the particular operational considerations related to the cask.

Proprietary Information Withheld Pursuant to 10 CFR 2.390

A.7.1 NUHOMS®-MP197HB Package Loading

The use of the NUHOMS®-MP197HB cask to transport fuel offsite involves (1) preparation of the cask for use, (2) verification that the fuel assemblies loaded in the dry shielded canister (DSC) meet the criteria set forth in this document, and (3) installation of a DSC into the cask. Also included herein are procedures to prepare and load fuel in an empty DSC contained in a NUHOMS®-MP197HB cask and to close the DSC.

The use of the NUHOMS®-MP197HB cask to transport dry irradiated and/or contaminated non-fuel bearing solid materials in radioactive waste canisters (RWCs) involves (1) preparation of the cask for use, (2) verification that the waste to be loaded meet the criteria set forth in this document, and (3) loading of the RWC and waste into the cask.

Offsite transport involves (1) preparation of the cask for transport, (2) assembly verification leakage-rate testing of the packaging containment boundary, (3) placement of the cask onto a transportation vehicle, and (4) installation of the impact limiters.

During shipment, the packaging contains any one of the DSCs as described in Chapter A.1, Appendices A.1.4.1 through A.1.4.9 or an RWC as described in Appendix A.1.4.9A. Type and

form of the content and their maximum quantity to be loaded in any of the nine DSCs are specified in Table A.7-2a. Type and form of the content and their maximum quantity to be loaded in an RWC are specified in Table A.7-2b. Procedures are provided in this section for (1) transport of the cask/DSC/RWC directly from the plant spent fuel pool and (2) transport of a DSC/RWC which was previously stored in a NUHOMS[®] horizontal storage module (HSM). Section A.7.7 contains an appendix for each DSC model detailing its loading procedures. Table A.7-3 lists these appendices.

A.7.1.1 NUHOMS[®]-MP197HB Cask Preparation for Loading

Procedures for preparing the cask for use after receipt at the loading site are provided in this section and are applicable for shipment of DSCs loaded with fuel or of RWCs loaded with dry irradiated and/or contaminated non-fuel bearing solid materials.

Table A.7-5

The Unloading Procedure which Shall Be Part of the User's Operating Procedures

NOTE: In the event that breach and/or reconfiguration of fuel are confirmed during unloading of high burnup fuel assemblies, a written report should be generated in accordance with 10 CFR 71.95. *The report shall include the required corrective action(s). The corrective action(s) shall be implemented prior to resumption of transports.*

Proprietary Information Withheld Pursuant to 10 CFR 2.390