

27 October 2016

Attention: William Allen  
Project Manager Licensing Branch  
Division of Spent Fuel Storage and Transportation  
Office of Nuclear Material Safety and Safeguards  
US Nuclear Regulatory Commission  
Washington DC 20555-0001

Docket No. 71-9338  
TAC No. L24687

**Subject:** CTR 2008/11, Safety Analysis Report Safkeg-HS Design No 3977A,  
Revision 11

Dear Mr. Allen

During the manufacturing process we were required to make some modifications to the Mo-99 stainless steel insert. This has necessitated the update of the SAR to include these changes to the licensing drawings. While we were updating the SAR, we took this opportunity to update section 7, to detail what actions were to be taken in the event of the failure of an insert bubble leak test during loading of the contents.

The update to the insert drawing does remove 5.75mm of steel from the top of the insert. This however has no effect to the shielding calculations because the highest dose rate is measured on the side of the package at 1.2 mSv/hr. Even if we take the highest calculated dose on the top of the package and essentially move the source 5.75 mm closer to the surface of the package the dose rate would be 0.62 mSv/hr which is bounded by the side dose rate.

Enclosed with this letter are the updated SAR (CTR 2008/11, Revision 10), licensing drawings and a drawing modification sheet to outline the changes made to the licensing drawings. These attached documents are listed below. If you require any assistance with this submission please contact:

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Please note that we ask that the licensing drawings be treated as proprietary information to be withheld under 10 CFR 2.390.

Yours sincerely



Sarah Bryson  
Operations Manager  
Croft Associates Limited

### Document Components

01 Transmittal Letter.pdf	79,000 bytes
02 CTR 2008-11 R11.pdf	106,000 bytes
03 licensing drawings.pdf	780,000 bytes
04 M914-A.pdf	154,000 bytes