

January 26, 2017

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

Attn: Document Control Desk

Subject: Updated Request for a Revision to Certificate of Compliance (CoC) No. 9235 for the NAC-STC Cask

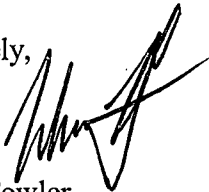
Docket No. 71-9235

- References:
1. Model No. NAC-STC Package, U.S. Nuclear Regulatory Commission (NRC) Certificate of Compliance (CoC) No. 9235, Revision 15, December 20, 2016
 2. Safety Analysis Report (SAR) for the NAC Storage Transport Cask (NAC-STC), Revision 17, NAC International, April 2011
 3. ED20170002, Request for a Revision to Certificate of Compliance (CoC) No. 9235 for the NAC-STC Cask, January 13, 2017

Via Reference 3, NAC International (NAC) submitted a request for a new CoC condition related to the requirements in NAC-STC SAR (Reference 1) Section 8.1.6, "Thermal Test", which states in part that prior to acceptance at the factory a thermal test shall be performed on each fabricated packaging. The previous request was for only one (1) of the next four (4) NAC-STCs (i.e., STC-3, -4, -5, and -6) being fabricated to be subjected to this test. Via Attachment 1 to this letter, NAC is revising that request to be more generic instead of being specific to a particular set of NAC-STC cask serial numbers. In addition, NAC is requesting that CoC Condition 9.(c) be revised to provide clarification that STC-1 and 2 do not need to be re-tested in order to ship high-burnup (HBU) fuel, in accordance with SAR Section 8.1.6, since these casks have already been constructed and factory tested in accordance with the existing CoC condition and SAR requirements.

If you have any comments or questions, please contact me on my direct line at 678-328-1236.

Sincerely,



Wren Fowler
Director, Licensing
Engineering

Attachment 1 – Proposed Changes for Certificate of Compliance Revision 15

NM 5501

Attachment 1

Proposed Changes for Certificate of Compliance Revision 15

January 2017

CoC Sections (revised)

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9. In addition to the requirements of Subpart G of 10 CFR Part 71 :

- a) The package must be prepared for shipment and operated in accordance with the Operating Procedures in Chapter 7 of the application, as supplemented.
- b) Each packaging must be acceptance tested and maintained in accordance with the Acceptance Tests and Maintenance Program in Chapter 8 of the application, as supplemented, except that the thermal testing of the package (including the thermal acceptance test and periodic thermal tests) must be performed as described in the NAC-STC Safety Analysis Report.
- c) For packaging Serial Numbers STC-1 and STC-2, only one of these two packagings must be subjected to the thermal acceptance test as described in Section 8.1.6 of the NAC-STC Safety Analysis Report. Only one thermal acceptance test needs to be performed. A separate thermal acceptance test does not need to be performed in order to ship any of the authorized contents in Item 5.(b)(1).
- d) For multiple packagings being fabricated at a particular facility, only the first packaging must be subjected to the thermal acceptance test as described in Section 8.1.6 of the NAC-STC Safety Analysis Report. Only one thermal acceptance test needs to be performed. A separate thermal acceptance test does not need to be performed in order to ship any of the authorized contents in Item 5.(b)(1).