

December 18, 2018

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

Attn: Document Control Desk

Subject: NAC's Request for a Revision to Certificate of Compliance (CoC) No. 9235 for the NAC-STC (Submittal 18C - Supplement 01)

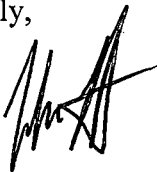
Docket No. 71-9235

- References:
1. Model No. NAC-STC Package, U.S. Nuclear Regulatory Commission (NRC) Certificate of Compliance (CoC) No. 9235, Revision 19, November 7, 2018
 2. Safety Analysis Report (SAR) for the NAC Storage Transport Cask (NAC-STC), Revision 18, NAC International, March 2017
 3. ED20180044, NAC's Request for a Revision to Certificate of Compliance (CoC) No. 9235 for the NAC-STC (Submittal 18C), June 7, 2018

NAC International (NAC) hereby submits a request to revise the NAC-STC Certificate of Compliance (CoC) No. 9235, Revision 19 (Reference 1) to modify Section 5.(b)(2)(4) first and second paragraphs. The use of the shield ring was not explicitly called out in the first paragraph. However, NAC is now requesting that this configuration require the use of the shield ring. In addition, NAC is requesting the second paragraph be deleted in its entirety. Attachment 1 to this submittal reflects the proposed changes.

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:

Attachment 1 - Proposed Changes for Certificate of Compliance Revision 18, NAC-STC SAR,
Revision 18C - Supplement 01

NMSS01
NMSS

Attachment 1

Proposed Changes for Certificate of Compliance Revision 18

NAC-STC SAR, Revision 18C

December 18, 2018

CoC Sections (revised)

Page 21 of 26

5.(b)(2) Maximum quantity of material per package (continued)

- (3) Low burnup assemblies, as described in 5.(b)(1)(i)(3), shall have a maximum decay heat not to exceed 22.1 kW per package. The use of the shield ring assembly, as configured in NAC International Drawing No. 423-927, is required.
- (4) For high burnup fuel assemblies, as described in 5.(b)(1)(i)(4), the number and the positioning of the fuel assemblies and shielded thermal shunts shall meet the requirements as shown in Configuration A, B or C of NAC International Drawing No. 423-800 and shall have a maximum decay heat not to exceed 24 kW per package. A maximum of four Zirc-4 fuel assemblies may be loaded per shipment. The use of the shield ring assembly, as configured in NAC International Drawing No. 423-927, is required.

Low burnup fuel assemblies described in Item 5.(b)(1)(i)(3) may be comingled with high burnup fuel assemblies described in 5.(b)(1)(i)(4), however, the requirements for contents described in Item 5.(b)(1)(i)(4) regarding assembly and thermal shunt numbers and positions apply to package containing the comingled loads. The use of the shield ring assembly, as configured in NAC International Drawing No. 423-927, is required.

- (ii) For the contents described in Item 5.(b)(1)(ii): Up to 36 intact fuel assemblies to the maximum content weight limit of 30,600 lbs. with a maximum decay heat of 12.5 kW per package. Intact fuel assemblies shall not contain empty fuel rod positions and any missing rods shall be replaced by a solid Zircaloy or stainless steel rod that displaces an equal amount of water as the original fuel rod. Mixing of intact fuel assembly types is authorized.
- (iii) For intact fuel rods, damaged fuel rods and fuel debris of the type described in Item 5.(b)(1)(ii): up to 36 RFAs, each with a maximum equivalent of 64 full length Yankee Class fuel rods and within fuel tubes. Mixing of directly loaded intact assemblies and damaged fuel (within RFAs) is authorized. The total weight of damaged fuel within RFAs or mixed damaged RFA and intact assemblies shall not exceed 30,600 lbs. with a maximum decay heat of 12.5 kW per package.