

LTR-20000-100-09

March 20, 2019

ATTN: Document Control Desk,
Nishka Devaser, Project Manager
Nuclear Regulatory Commission
Spent Fuel Licensing Branch
Division of Spent Fuel Management, NMSS

Dear Nishka:

Daher-TLI hereby submits change pages to Revision 10 to the Versa-Pac Safety Analysis Report, Docket No. 71-9342. The changes made to SAR pages are limited to the Versa-Pac Licensing drawings in SAR Section 1.4. A review of the licensing drawings to the fabricated test package referenced in Section 2.13.7 of the SAR Revision 10 revealed that there was a difference between a weld in the flange region of the outer lid. Although the weld on the licensing drawing is similar in function to the weld on the tested package, and thus the fabrication drawing, the weld symbol is revised in the revised licensing drawings to match the tested package. A full review of all welds on the licensing drawing was completed to evaluate any other discrepancies between the licensing drawing and fabricated test packages. As a result of this review, there are additional minor changes to the licensing drawing weld callouts. The changes made to the licensing drawings include:

1. Multiple small weld changes to match the welds on the fabricated test package used for the updated drop testing discussed in Section 2.13.7 of the SAR.
 - i. The weld between Part PG and Part FB (marked with MT-10) is changed to a fillet weld in Detail 2 on Sheet 2 (D4).
 - ii. The weld between Part FK and Part PH (marked with MT-3) is changed to bevel groove weld on the far side in Detail 2 on Sheet 2 (D4).
 - iii. The weld between Part PF and Part FC is changed to bevel groove weld in Detail 1 on Sheet 2 (D5)
 - iv. The 1/16" fillet weld between parts FA and SA previously shown in Detail 5 on sheet 2 (B8) is removed.

Reason for changes: During the full review of all licensing drawing welds, these weld discrepancies were noted between the licensing drawing and fabricated test package. For the welds switched between fillet and bevel-groove welds (i, ii, and iii), it was determined that although the welds that were on the licensing drawing and the welds applied to the fabricated test package are similar in function, these welds should be revised to match what was tested with the increased weight. It was also noted that the weld removed from Detail 5 (iv) was not included in the fabricated test package. It was determined that it is acceptable to remove this weld because (1) the purpose of this weld is for fit-up when connecting the outer support structure to the 1/16" sheet liner, while the 3/16" welds connecting the stiffening rings to the vertical stiffeners provide the structural support for the package and (2) the fabricated test package used for updated drop testing performed properly without this weld.

2. The weld-all-around symbol was removed from the weld between Part BD and Part PA shown in the overhead view of the Inner Container on Sheet 2 (C5).

Reason for change: This weld is a stitch weld between the backing bar (Part BD) and inner container body (Part PA) to provide some additional support for the seam weld on the inner container. As this weld calls for a 2-inch length with a 6-inch pitch, there will be a 4-inch gap between welds on the backing bar. Because the bar is only 2-inches wide, the top and bottom may be left without a weld even with the weld-all-around callout. To simplify, the weld-all around symbol is removed and the stitch weld is applied to both sides of the backing bar.

3. The weld-all-around symbol was added to the weld between parts BC and FB (marked with MT-9) shown in Detail 2 on Sheet 2 (D4).

Reason for change: This was a noted difference between the licensing drawings and test package fabrication drawing. Based on the view shown in the licensing drawing, it's clear that this should be an all-around weld, so the weld-all-around symbol is added for clarification and to match the test package fabrication drawing.

4. Revised Note 5 on Sheet 1 to state (added text in italics): "Part BB-2 is an optional replacement for BB and BB-1. Part FE is optional when used with BB-2. *When BB-2 is used, the welds in Section E-E between part BB-2 and parts TB and FB may be replaced with flare-bevel groove welds, as necessary.*" Additionally, a delta note 5 was added in Section E-E on Sheet 2 to mark the affected welds that may be replaced with flare-bevel groove welds when part BB-2 is used.

Reason for change: Part BB is a square part (shown in C2 on Sheet 2), so the welds shown in Section E-E are appropriate for a flat part (BB) to other flat parts (TB and FB). However, Part BB-2 is a round part (shown in D1 on Sheet 2), so when this part is used a flare-bevel groove weld is appropriate for welding the round side of part (BB-2) to flat parts (TB and FB).

5. Revised Note 9 on Sheet 1 to state (revised text in italics): "Optional: Use Backing bar (part BE) or overlapping joint on *inner liner (Part SA).*"

Reason for change: This is strictly an editorial correction. It was noted during the weld review that the part referenced in this note previously was incorrect.

To keep the designs between the VP-55 and VP-110 equivalent, identical changes were made to the VP-110 licensing drawings to match the changes described above for the VP-55 licensing drawing. The only requested change to the content of Certificate 9342 is an update to the revision level of the referenced drawings to 'VP-55-LD Rev.3' and 'VP-110-LD Rev.3'.

In addition to the updated licensing drawing revisions, the five-year renewal of the Versa-Pac license is requested. Currently, for the Versa-Pac Certificate 9342 expires in August of 2020. To avoid the need for an additional renewal application in the near future, an extension of the license based on a five-year renewal term is requested.

The enclosures of this report are being submitted through the EIE system. Please address any questions or comments to the undersigned.

Sincerely,

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Non-Proprietary Enclosures:

Description:	File Name:
SAR Revision 10, Section 1 (Change Pages)	002 VP SAR Section 1 Rev 10 FINAL_pages_NP.pdf
Affidavit to Withhold Proprietary Information	LTR-20000-100-10-Affidavit.pdf

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SAR Revision 10, Section 1 (Change Pages)	002 VP SAR Section 1 Rev 10 FINAL_pages_P.pdf