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July 30, 2019
FS-19-0180

ATTN: Document Control Desk
Director, Spent Fuel Project Office
Office of Nuclear Material Safety and Safeguards
U. S. Nuclear Regulatory Commission
Washington, DC 20555-0001

SUBJECT: BRR Package Amendment Request (SAR Revision 16)

Dear Mr. Devaser:

Orano Federal Services LLC (Orano FS) hereby submits Revision 16 of the Safety Analysis Report (SAR) for the BRR Package, Docket No. 71-9341. The purpose of this amendment is to correct some typographical errors that have been identified in Chapter 7 of the application, Package Operations.

The errors occurred when Orano added certain operational steps to account for the cobalt-60 payload in Revision 11 of the SAR. The sequential number of steps following the inserted steps increased by one. However, there were several internal references to re-numbered steps, and the references were not updated. This caused the step references to be wrong. In addition, a new Section 7.1.3 had been added, and the old Section 7.1.3 was incremented to Section 7.1.4, but references to Section 7.1.3 were not updated. These errors have been corrected in SAR Revision 16. The detail changes are as follows:

- Section 7.1.2.1, *Wet Loading*, page 7.1-4, Steps 35 and 36, increment each of the referenced steps within these two steps by one.
- Section 7.1.2.2, *Dry Loading*, page 7.1-7, Steps 31 and 32, increment each of the referenced steps within these two steps by one.
- Section 7.2.2, *Removal of Contents*, page 7.2-1, increment the referenced step 6 to step 7.
- Section 7.2.2.1, *Wet Unloading*, page 7.2-3, Step 26, change "...Section 7.1.3, *Preparation for Transport*..." to "...Section 7.1.4, *Preparation for Transport*..."
- Section 7.2.2.2, *Dry Unloading*, page 7.2-4, Step 21, change "...Section 7.1.3, *Preparation for Transport*..." to "...Section 7.1.4, *Preparation for Transport*..."

As can be seen, these changes reflect corrections of typographical errors and do not change the design, analysis results, or operating steps of the package.

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Consequently, the BRR package complies with all of the applicable requirements of 10 CFR 71. All changes are marked with a revision bar in the right margin. Since these corrections are minor and restore the proper relationship of the existing operational steps, Orano requests that they be carried into the CoC revision that is currently being prepared, using the proposed schedule of no later than August 16, 2019.

Of note, the previous header for Chapter 7, Revision 11 showed the wrong year (2017 should be 2018). In this Revision 16, the headers of the pages that remain at Revision 11 have been corrected to show 2018, without revision bars.

Included with this letter is one paper copy of the revised SAR pages, and one CD containing the PDF file "BRR SAR Complete Rev. 16.pdf" (37,110 kb, 779 pages). The table below gives guidance to update a paper copy of the SAR. An extra cover sheet and spine sheet are provided to update the binder.

Should you have any questions regarding this submittal, please contact me at (233) 552-1321 or via email (phil.noss@orano.group).

Yours Truly,

Philip Noss
Licensing Manager
Orano Federal Services LLC

Paper copy update guide:

Delete Rev. 15	Insert Rev. 16	Contents/Remarks
Cover and Spine	Cover and Spine	---
Cover sht/blank pg	Cover sht/blank pg	---
Table of Contents	Table of Contents	---
Chapter 7.0 (complete)	Chapter 7.0 (complete)	Replace entire chapter. Revision 16 applies only to pages 7.1-4, 7.1-7, 7.2-1, 7.2-3, and 7.2-4 . All other pages remain at Revision 11, with the header corrected to show 2018 instead of 2017.



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Copies:

Attention: Nishka Devaser, Project Manager (incl. changed pages and CD)
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Donald Darrington, Idaho National Laboratory (incl. changed pages and CD)

John Coody, Project Manager, Orano Federal Services LLC