



Global Nuclear Fuel

Global Nuclear Fuel-Americas, LLC

Proprietary Notice

~~This letter transmits proprietary information in accordance with 10 CFR 2.390.~~ Upon removal of Enclosure 2, the balance of the letter may be considered non-proprietary.

Shawn Lamb

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M190194
December 12, 2019

Chris Allen, Project Manager
Storage and Transportation Licensing Branch
Division of Fuel Management
Office of Nuclear Material and Safeguards
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001

Attention: Document Control Desk

Subject: GNF-A Request for Renewal and a Revision of the New Powder Container Certificate of Compliance (USA/9294/AF-96) to Introduce Additional Content

Mr. Allen,

Pursuant to 10 CFR 71.38, Global Nuclear Fuel-America, LLC (GNF-A) is requesting renewal of the of the New Powder Container (NPC) and a revision to the Certificate of Compliance (CoC) [Reference 1] to incorporate new content.

This letter transmits Revision 7 of the NPC Safety Analysis Report (SAR) [Reference 2] to introduce additional uranium compounds as part of the approved content. Revision 7 of the SAR also reestablishes the heterogeneous uranium payload limits currently justified in Revision 5 of the SAR [Reference 3].

While Revision 7 of the SAR is submitted in its entirety, most of the changes are limited to Chapters 1 and 6. The changes to the other SAR sections are purely editorial in nature. Those changes made in this revision are indicated with revision bars. A detailed revision summary is provided within the SAR.

Enclosure 1 contains the proprietary affidavit for Enclosure 2 as described below. Enclosure 2 is the proprietary version of the NPC SAR Revision 7. Enclosure 3 is a non-proprietary version of Enclosure 2. Enclosure 4 is a proposed mark-up of the requested changes to Revision 8 of the CoC to be included in CoC Revision 9. Enclosure 4 also serves as a summary guide for the requested content.

Please note that Enclosure 2 contains proprietary information of the type that GNF-A maintains in confidence and withholds from public disclosure. The information has been handled and classified as proprietary to GNF-A as indicated in its affidavit. The affidavit contained in Enclosure 1 identifies that the information contained in Enclosure 2 has been handled and classified as proprietary to GNF-A. GNF-A hereby requests that the information in Enclosure 2 be withheld from public disclosure in accordance with the provisions of 10 CFR 2.390 and 9.17.

GNF-A requests that the NRC issue Revision 9 of the NPC CoC with the required content changes within 6 months of this submittal to support timely renewal of the NPC.

If you have any questions about the information provided, please contact either Christopher Kmiec (christopher.kmiec@ge.com) or Erik Kirstein (erik.kirstein@ge.com).

Sincerely,

A handwritten signature in black ink, appearing to read "Shawn Lamb". The signature is fluid and cursive, with the first name "Shawn" and last name "Lamb" clearly distinguishable.

Shawn Lamb
Engineering Manager, Radiological and Stability Analysis
Global Nuclear Fuels-Americas, LLC

Docket No. 71-9294

References

1. "GNF-A Model No. NPC Certificate of Compliance No. 9294," Docket Number 71-9294, Revision 8, Package Identification Number USA/9294/AF-96, United States Nuclear Regulatory Commission ADAMS Accession Number ML15146A289.
2. Global Nuclear Fuel-Americas, NEDE-33881P, "New Powder Container (NPC) Safety Analysis Report," Revision 7.
3. Global Nuclear Fuel-Americas, "New Powder Container (NPC) Safety Analysis Report," Revision 5, October 2007. United States Nuclear Regulatory Commission ADAMS Accession Numbers ML15120A259, ML15042A187, ML15042A199, ML15042A217, ML15042A251, and ML15042A265.

Enclosures

1. Affidavit
2. NEDE-33881P NPC SAR Revision 7 – GNF-A Proprietary Information – Non-Public
3. NEDO-33881 NPC SAR Revision 7 – Non-Proprietary Information
4. Proposed NPC CoC Revision Mark-ups to be Included in Revision 9 of the CoC

cc: N Otto, NRC
M Catts, GEH Wilmington, NC
S Murray, GEH Wilmington, NC
C Kmiec, GEH Wilmington, NC
E Kirstein, GNF-A Wilmington, NC
PLM Specification 005N4936 Revision 0

Document Components:

001-M190194-Cover-Letter.pdf
002-M190194-Enclosure-1-Affidavit.pdf
003-M190194-Enclosure-2-NPC-SAR-Amendment-Proprietary.pdf
004-M190194-Enclosure-3-NPC-SAR-Amendment-Non-Proprietary.pdf
005-M190194-Enclosure-4-Rev-9-CoC-Mark-ups.pdf