

71-9073



May 6, 1985

File: OH-142

Ref: 3775

Mr. Charles E. MacDonald, Chief
Transportation Certification Branch
U. S. Nuclear Regulatory Commission
Washington, DC 20555

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Dear Mr. MacDonald:

Enclosed please find 8 copies of the consolidated version of Revision 8 of the OH-142 Safety Analysis Report, Certificate of Compliance No. 9073. The changes made for Revision 8 were done in response to NRC comments dated April 15, 1985, and a brief explanation of how the comments were incorporated is included as Attachment I of this letter.

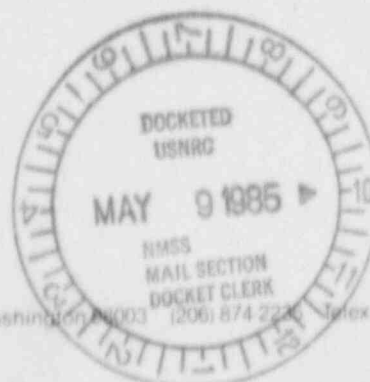
A consolidation of all previous submittals made by Nuclear Packaging has been made to eliminate confusion caused by some of the pages in previous submittals being printed on both sides of the paper. This has led to obsolete data having been retained in NRC files despite administrative controls to delete the information. We believe consolidation of the report to be the simplest means of insuring only current data is referenced. Because this submittal consolidates only the current applicable data from all previous submittals, previous submittals should be considered obsolete in their entirety.

This consolidation revision, including revised drawings, has been copyrighted. This entire submittal contains proprietary information per the notice included on the fly leaf of this report. We are aware of your requirements to place this submittal in the Public Documents Room. This may be done with our permission; however, this permission should not be construed as a waiver of or in any way prejudicial to our lawful proprietary rights to this material. It is done only to facilitate the issuance of a Certificate of Compliance.

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May 6, 1985

Mr. Charles E. MacDonald, Chief
U. S. Nuclear Regulatory Commission

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Thank you for your timely response to our application for minor amendment. In light of our current contractual obligations, it is very much appreciated. If you have any questions, please do not hesitate to call either myself or Stephen Goetsch.

Again, thank you very much.

Very truly yours,

NUCLEAR PACKAGING, INC.

Charles J. Temus
Technical Director

Enclosures: As stated above.

ATTACHMENT I

RESPONSES TO NRC COMMENTS DATED APRIL 15, 1985Drawings

1. The drawings should specify the number of bolts required for each closure arrangement and the torque requirement should also be noted.

The drawings have been modified to note these items.

2. Given that the inside diameter, shell thicknesses, and shielding thickness are the same for all models, the cask body diameter (76 in.) should be the same on all drawings including page 0-4c.

The drawings in Appendix 1.10 as well as the sketches in Section 0 have been modified to show the configurations currently being built. Apparent discrepancies in the cask body diameter as shown on the drawings arise from the previous outer shell thickness requirement of 1.125 in. when ASTM A36 is used. When ASTM A516 Gr. 70 is used, the outer shell is taken as 1.0 in. thick. Since no new casks are being built with the A36 material, all drawings have been made consistent with the A516 material. Note 13 on Drawing AL-20-203 allows the one unit fabricated to the A36 specification to continue in compliance to this drawing and, by reference, to Certificate of Compliance 9073.

3. The drawings numbers given at the top of page 0-4b do not agree with the drawing numbers given in the title block of the drawing in that the letter 'D' is not part of the drawing number as shown in the drawing title block.

The drawing numbers at the top of page 0-4b have been modified to agree with the title block drawing number.

4. Note 9 on Drawing No. Y-20-201D makes reference to magnetic particle examination per ASME Code, Section V, Article 2. The reference should be made to Article 7.

The drawing has been changed to reference Article 7.

5. The drawings should provide, either by note or detail, the marking and identification requirements of 10 CFR 71.85(c).

A note requiring the marking and identification described in 10 CFR 71.85(c) has been added to each of the drawings.

6. The drawings should specify, either by note or by detail, the application of a tamperproof feature to satisfy the requirements of 10 CFR 71.43(b).

A note requiring tamper-indicating devices has been added to each of the drawings.

6.0 Operating Procedures

1. Any movement of the cask from the vehicle to a loading area must be done prior to removal of the closure lid. An instruction relating to such handling requirements should be made prior to Step 6.1.1.

The cask cannot be moved at all without the presence of the closure lid. A note has been added prior to Step 6.1.1 stating that the instructions for loading the cask assume that the cask has been placed in the loading area and is ready to be loaded. The instructions have been expanded to include bottom-loading procedures, as well.

2. Step 6.1.1 should be expanded to require an inspection of each closure device with criteria for replacement.

Notes requiring inspection of closure devices prior to loading activities have been added throughout Section 6.1.

3. Step 6.1.5 should be expanded to specify the torque requirement on the closure device (ratchet binders and studs and nuts).

Torque requirements have been written into the procedures.

4. A step should be inserted between 6.1.5 and 6.1.6 requiring a radiation survey of the package prior to release for shipment to assure compliance with 10 CFR 71.47. The package should also be inspected for surface contamination to assure compliance with 10 CFR 71.81(i).

Steps have been added to the procedure to explicitly require the radiation survey and surface contamination inspections required by 10 CFR 71.

5. A step should be added requiring a leak test of all packages except those containing only low specific activity material transported by exclusive use vehicle.

A step requiring a leak test on all shipments except those containing only low specific activity has been added to the procedure.

6. The procedures for receiving and unloading the package should include a statement regarding compliance with the instructions of 10 CFR 20.205.

A statement requiring compliance with the instructions of 10 CFR 20.205 has been added to the unloading procedure in Section 6.2.

7.1 Acceptance Tests

The section on acceptance testing is incomplete in that it does not address the subjects of pressure testing when required by 71.85(b) and shield integrity testing.

The acceptance testing section has been augmented to require the leak test described in 10 CFR 71 as well as shield integrity testing. Shield integrity testing is described in Appendix 7.3 of the report.

7.2 Maintenance Program

1. The reference to Section 6.1 in paragraph 7.2.2 needs clarification. The reference cited does not contain the information being referenced.

The reference has been changed to reference the drawings, as it should have.

2. The maintenance program should be specific regarding the items to be examined and the frequency of routine examinations and periodic testing. Also replacement parts must be in accordance with the specification given in the application. Using equivalent parts is not acceptable.

The maintenance program has been enhanced to explicitly state inspection frequency and testing frequency. The use of the word 'equivalent' has been eliminated in the maintenance program.

General

The opposite side of pages 0-4, 1-83, and 1-94 should be deleted by revising the pages. The opposite side of the pages contain pages that have been superseded.

New copies of the pages indicated have been included with this latest consolidated revision. These new copies are printed on only one side. The use of double sided printing will be avoided in the future.