



CHEM-NUCLEAR SYSTEMS, INC.

220 Stoneridge Drive • Columbia, South Carolina 29210

71-9096

PDR

## RETURN TO 396-SS

August 26, 1985  
RA-0405-5

Mr. Charles E. MacDonald  
Chief, Transportation Certification Branch  
Division of Fuel Cycle and Material Safety  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Dear Mr. MacDonald:

REFERENCE: Docket No. 71-9096

We respectfully submit our response (Attachment 1) to the questions raised in your June 6, 1985 letter concerning Model CNS 21-300 shipping package.

The Safety Analysis Report (Attachment 2) has been revised in its entirety to include the responses discussed in Attachment 1 and to include page numeration.

In addition to the responses provided above, CNSI is requesting a change (Attachment 3) which has no safety related consequence.

Please do not hesitate to contact us with any questions regarding this matter.



LKP:als

Very truly yours,

CHEM-NUCLEAR SYSTEMS, INC.

*Leslie K. Poppe*  
Leslie K. Poppe  
Director, Licensing

Enclosures: Attachment 1 - Response to NRC letter of 6-6-85  
Attachment 2 - Revised SAR for Model CNS 21-300  
Attachment 3 - CNSI Request for non-safety related change

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PDR ADOCK 07109096  
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ATTACHMENT 1

Responses to NRC Request For Information dated June 6, 1985, Docket No. 71-9096.

Operating Procedures

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|---------------|------|---|
| NRC Comment   | C.1. | The operating procedures should include a discussion on the use of the auxiliary shield and load distribution pallet similar to that provided in the June 28, 1983 supplement.  |
| CNSI Response | C.1  | Operational steps covering the use of the auxiliary shield and load distribution pallet have been added in Section 7.   |
| NRC Comment   | Q.2  | The operational steps requiring a cask survey should be expanded to specify a radiation survey including a determination of surface contamination to assure compliance with 10 CFR 71.47 and 71.87.   |
| CNSI Response | A.2  | Section 7.1 Step 19 and Section 7.2 Step 11 have been added to require radiation surveys and removable contamination surveys.   |
| NRC Comment   | C.3. | Step 8 under 7.2 Loading Procedures for Liners requires the use of alignment marks to correctly position the secondary lid onto the primary lid. The packaging drawing should be revised to show the required alignment marks. It is noted that Section 8.0, Tests and Maintenance, also discusses lid alignment marks. |
| CNSI Response | A.3. | Revision K has been issued to CNSI Drawing 1-289-101 which shows the alignment marks. The reference to this drawing throughout Safety Analysis Report have been changed to identify the current drawing revision.   |
| NRC Comment   | C.4. | Procedures for receiving and unloading the package should include a statement regarding compliance with the requirements of 10 CFR 20.205.  |
| CNSI Response | A.4. | A note has been added to the beginning of Section 7.3 to require performance of receipt surveys.  |

ACCEPTANCE TESTS

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|---------------|--|--|
| CNSI Response |  | Additional units of the 21-300 packaging will not be fabricated, and therefore, no further responses are provided to these comments. |
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ATTACHMENT 2