

Ret to G Thayer  
546-55

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Docket 70-371  
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SHO  
JRoth, RI

FEB 07 1986

GHB:FCUP  
70-371

UNC Naval Products  
ATTN: Mr. William F. Kirk, Manager  
Nuclear and Industrial Safety  
67 Sandy Desert Road  
Uncasville, Connecticut 06382

Gentlemen:

Enclosed are comments on your application for license amendment dated November 20, 1985. We will continue our licensing review upon receipt of your responses to our comments. Your responses should be in the form of revised pages.

The quality of your applications continues to need improvement. The proposed revised pages for Section 8, Part I, cannot be inserted into the existing license and still maintain a document having continuity. Per our discussion with your Mr. Gutman, we have terminated review of Section 8. In addition, changes were made to Section 3 and Section 8 without marginal notation of the changes. This increases the time for our review process with resultant increases in your licensing fees.

Sincerely,

Original Signed By:  
W. T. Crow

W. T. Crow, Acting Chief  
Uranium Fuel Licensing Branch  
Division of Fuel Cycle and  
Material Safety, NMSS

Enclosure: As stated

cc: Mr. Robert Gregg, UNC

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PDR ADOCK 07000371  
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FEB 07 1986

Comments and Request for Information  
UNC License Amendment Application  
November 20, 1985

1. Item 4, Table 3.9.5.1, Part I

The Limit/Quantity column should be revised to specify the minimum spacing between stacks and to specify the number of fillers per boat. The adequacy of the controls on the number of fillers per boat should be described in Part II. The number must be consistent with the analysis in Part II. The stack height in Part I should not exceed the height analyzed in Part II.

2. Item 7, Table 3.9.5.1, Part I

The Limit/Quantity column should be revised to specify only those fillers in Table 3.9.5.3, Part I, which have been analyzed in Sections 3.33, 3.34 and 3.35 of Part II. Section 3.33, Part II, should specify that the outside vendor has an SNM license.

3. Items 9 and 10, Table 3.9.5.1, Part I

The Ref. column apparently should refer to Part II. Please revise or supply the references. The cart design allows for the elements to be 12-inches apart. Interaction should be evaluated for this distance, not the average distance between elements on different carts. For item 10, double batching must be shown to be subcritical or physical controls must be provided. The proposed limits are in conflict with the limits in Section 8.2, Part I, for carts. As written, the limits in Section 8.2 would also apply.

4. Note 3, Table 3.9.5.1, Part I

Note 3 has been added to the table, but the units to which it applies have not been identified. Please clarify.

5. The limits and controls in Table 10.0-I should be the same as in Table 3.9.5.1, Part I. Different storage limits and controls in different sections of the license for the same component are not appropriate. Discussion of Class III limits should be eliminated since we do not review or approve transport activities.

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