

**CERTIFICATE OF COMPLIANCE
FOR RADIOACTIVE MATERIAL PACKAGES**

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2.. PREAMBLE

- a. This certificate is issued to certify that the package (packaging and contents) described in Item 5 below meets the applicable safety standards set forth in Title 10, Code of Federal Regulations, Part 71, "Packaging and Transportation of Radioactive Material."
 - b. This certificate does not relieve the consignor from compliance with any requirement of the regulations of the U.S. Department of Transportation or other applicable regulatory agencies, including the government of any country through or into which the package will be transported.
3. THIS CERTIFICATE IS ISSUED ON THE BASIS OF A SAFETY ANALYSIS REPORT OF THE PACKAGE DESIGN OR APPLICATION
- a. ISSUED TO (*Name and Address*)
U.S. Department of Energy
Washington, DC 20585
 - b. TITLE AND IDENTIFICATION OF REPORT OR APPLICATION
Safety Analysis Report, Advanced Test Reactor
Fresh Fuel Shipping Container, ATR FFSC, Revision
No. 14, dated May 2017, as supplemented.

4. CONDITIONS

This certificate is conditional upon fulfilling the requirements of 10 CFR Part 71, as applicable, and the conditions specified below.

5.

(a) Packaging

- (1) Model No.: ATR FFSC
- (2) Description

An insulated stainless steel package for the transport of unirradiated research reactor fuel, including intact fuel elements or fuel plates. The packaging consists of (1) a body, (2) a closure lid, and (3) inner packaging internals. The approximate dimensions and weights of the package are:

Overall package outer width and height	8 inches
Overall package length	73 inches
Cavity diameter	5-3/4 inches
Cavity length	68 inches
Packaging weight (without internals)	240 pounds
Maximum package weight (including internals and contents)	290 pounds

The body is composed of two thin-walled, stainless steel shells. The outer shell is a square tube with an 8-inch cross section, a 73-inch length, and a 3/16 inch wall thickness. The inner shell is a round tube with a 6-inch diameter and a 0.120-inch wall thickness. The inner tube is wrapped with ceramic fiber thermal insulation, overlaid with a stainless steel sheet. At the bottom end, the shells are welded to a 0.88-inch thick stainless steel base plate. At the top end (closure end), the shells are welded to a 1.5-inch thick stainless steel flange.

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5.(a)(2) Description (Continued)

The closure is composed of circular stainless steel plates with ceramic fiber insulation. The closure engages the top end flange by way of four bayonets that are rotated and secured by two spring pins. The closure is equipped with a handle, which may be removed during transport. The closure does not have a gasket or seal.

The package internals consist of either a Fuel Handling Enclosure (FHE) for intact Advanced Test Reactor (ATR), Massachusetts Institute of Technology (MIT), University of Missouri Research Reactor (MURR), Conversion Of Belgian Reactor 2 – an Alternative (COBRA fuel-both HEU and LEU), or Rhode Island Nuclear Science Center (RINSC) fuel elements and Small Quantity Payloads, or a Loose Fuel Plate Basket for ATR fuel plates. The RINSC, MIT, MURR, COBRA, and Small Quantity Payload FHE use ball lock pins and end spacers to lock closed while the ATR FHE uses a spring plunger.

(3) Drawings

The packaging is constructed and assembled in accordance with the following Areva Federal Services LLC. or Packaging Technology, Inc., Drawing Nos.:

60501-10, Sheets 1-5, Rev. 3	ATR Fresh Fuel Shipping Container SAR Drawing
60501-20, Rev. 1	ATR Loose Plate Basket Assembly
60501-30, Rev. 1	ATR Fuel Handling Enclosure
60501-40, Rev. 0	MIT Fuel Handling Enclosure
60501-50, Rev. 0	MURR Fuel Handling Enclosure
60501-60, Rev. 0	RINSC Fuel Handling Enclosure
60501-70, Rev. 0	Small Quantity Payload Fuel Handling Enclosure
60501-90, Rev. 0	COBRA Fuel Handling Enclosure

(b) Contents

(1) Type and form of material

Unirradiated Mark IV, V, VI, and VII ATR fuel elements. The Mark IV fuel material is composed of U_3O_8 while the Mark V, VI, and VII ATR fuel material is composed of uranium aluminide (UAl_x). The uranium is enriched to a maximum 94 weight percent U-235; the maximum U-234 content is 1.2 weight percent; and the maximum U-236 content is 0.7 weight percent. Intact ATR fuel elements contain 19 curved fuel plates fitted within aluminum side plates, and the maximum channel thickness between fuel plates is 0.087 inch. The fuel meat thickness is a nominal 0.02 inch for all 19 plates, and the fuel meat width ranges from approximately 1.5 inches to 3.44 inches. The nominal active fuel length is approximately 48 inches. The maximum mass of U-235 per intact ATR fuel element is 1200 grams. The ATR fuel element must be contained within the ATR Fuel Handling Enclosure, as specified in 5(a)(3).

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5.(b)(1) Type and Form of Material (continued)

Unirradiated ATR U-Mo fuel elements. The ATR U-Mo fuel element consists of a mixture of high-enriched uranium aluminide (UAl_x) fuel plates and low-enriched uranium and molybdenum alloy (U-Mo) fuel plates, with a maximum mass of U-235 per U-Mo fuel element of 1,240 grams. The ATR U-Mo fuel element contains 19 curved plates fitted within aluminum side plates; plates 1 through 4, and 16 through 18, contain high-enriched UAl_x fuel; plates 5 through 15 contain low-enriched U-Mo fuel; and plate 19 is an aluminum alloy plate. The maximum channel thickness between fuel plates is 0.087 inch. For the high-enriched UAl_x fuel plates, the uranium is enriched to a maximum 94 weight percent U-235; the maximum U-234 content is 1.2 weight percent; and the maximum U-236 content is 0.7 weight percent. For the low-enriched U-Mo fuel plates, the molybdenum content is a nominal 10 weight percent; the uranium is enriched to a maximum 20 weight percent U-235; the maximum U-234 content is 0.26 weight percent; and the maximum U-236 content is 0.46 weight percent. For the high-enriched UAl_x fuel plates, the fuel meat thickness is a nominal 0.02 inch; the fuel meat width ranges from approximately 1.5 inches to 3.44 inches; and the nominal active fuel length is approximately 48 inches. For the low-enriched U-Mo fuel plates, the fuel meat thickness is a nominal 0.013 inch, with a nominal 0.001 inch thick zirconium interlayer present between the fuel meat and the aluminum cladding layer; the fuel meat width ranges from approximately 2.25 inches to 3.28 inches; and the nominal active fuel length is approximately 48 inches. The ATR U-Mo fuel element must be contained within the ATR Fuel Handling Enclosure, as specified in 5(a)(3).

Unirradiated MIT fuel element. The MIT fuel material is composed of uranium aluminide (UAl_x). The uranium is enriched to a maximum of 94 weight percent U-235; the maximum U-234 content is 1.2 weight percent; and the maximum U-236 content is 0.7 weight percent. Each MIT fuel element contains 15 flat fuel plates fitted within aluminum side plates and the maximum channel thickness between fuel plates is 0.090 inch. The fuel meat thickness is a nominal 0.03 inch for all 15 plates and the fuel meat width ranges from approximately 1.98 inches to 2.17 inches. The nominal active fuel length is 22.375 inches. The maximum mass of U-235 per intact MIT fuel element is 515 grams. The MIT fuel element must be contained within the MIT Fuel Handling Enclosure, as specified in 5(a)(3).

Unirradiated MURR fuel element. The MURR fuel material is composed of uranium aluminide (UAl_x). The uranium is enriched to a maximum of 94 weight percent U-235; the maximum U-234 content is 1.2 weight percent; and the maximum U-236 content is 0.7 weight percent. Each MURR fuel element contains 24 curved fuel plates fitted within aluminum side plates and the maximum channel thickness between fuel plates is 0.090 inch. The fuel meat thickness is a nominal 0.02 inch for all 24 plates and the fuel meat width ranges from approximately 1.71 inches to 5.72 inches. The nominal active fuel length is 24 inches. The maximum mass of U-235 per intact MURR fuel element is 785 grams. The MURR fuel element must be contained within the MURR Fuel Handling Enclosure, as specified in 5(a)(3).

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5.(b)(1) Type and Form of Material (continued)

Small Quantity Payloads where the maximum mass of U-235 is 400 grams and maximum U-235 enrichment is 94 weight percent. The Small Quantity Payload must be in the form of unirradiated foils, fuel plates or fuel elements and miscellaneous non-fueled associated components. The Small Quantity Payload must not include beryllium, carbon, deuterium, or materials with a hydrogen density greater than that of water, except as specified in 6. The Small Quantity Payload must be contained within the Small Quantity Payload Fuel Handling Enclosure, as specified in 5(a)(3), except the RINSC fuel element must be contained within the RINSC Fuel Handling Enclosure, as specified in 5(a)(3). Aluminum plates, shapes, and sheets, miscellaneous steel or aluminum fasteners, and cellulosic material such as cardboard may be used as dunnage to fill gaps between the small quantity payloads and the small quantity FHE. Loose plates may be separated by craft paper and taped or wire tied together. Dunnage shall be used to limit motion of the small quantity payload within the FHE to 1/4" or less. 1/8" neoprene strips may be used between the small quantity FHE and small quantity payloads and/or between the optional aluminum dunnage and the small quantity payload. The 1/8" neoprene strips shall not be stacked in more than two layers between the small quantity payload and any interior face of the small quantity FHE.

COBRA fuel element. The COBRA HEU fuel element is composed of uranium aluminide (UAl_x) dispersed in aluminum powder, with the uranium enriched to a maximum of 94 weight percent U-235. The COBRA LEU fuel element is composed of uranium silicide (U_3Si_2) dispersed in aluminum powder, with the uranium enriched to a maximum of 20 weight percent U-235. The maximum mass of U-235 is 410.3 grams in the HEU configuration or 435.8 grams in the LEU configuration. The COBRA fuel element weighs a maximum of 20 lb., is bagged, and must be contained within the COBRA Fuel Handling Enclosure, as specified in 5(a)(3).

Mark IV, V, VI, and VII ATR loose fuel plates: ATR loose plates may either be flat or curved and may be banded or wire-tied in a bundle. The ATR loose plate payload is limited to 600 grams of U-235. Additional aluminum plates may be used as dunnage to fill gaps between the fuel plates and the basket payload cavity. The fuel plates must be contained within the ATR Loose Fuel Plate Basket, as specified in 5(a)(3).

(2) Maximum quantity of material per package

The maximum total weight of contents and internals, including dunnage and other secondary packaging, is 50 lbs. Radioactive contents are not to exceed a Type A quantity.

For intact ATR, ATR U-Mo, MURR, RINSC, COBRA, and MIT fuel elements: One fuel element.

For ATR loose fuel plates: A maximum of 600 grams U-235.

For Small Quantity Payloads: A maximum of 400 grams U-235.

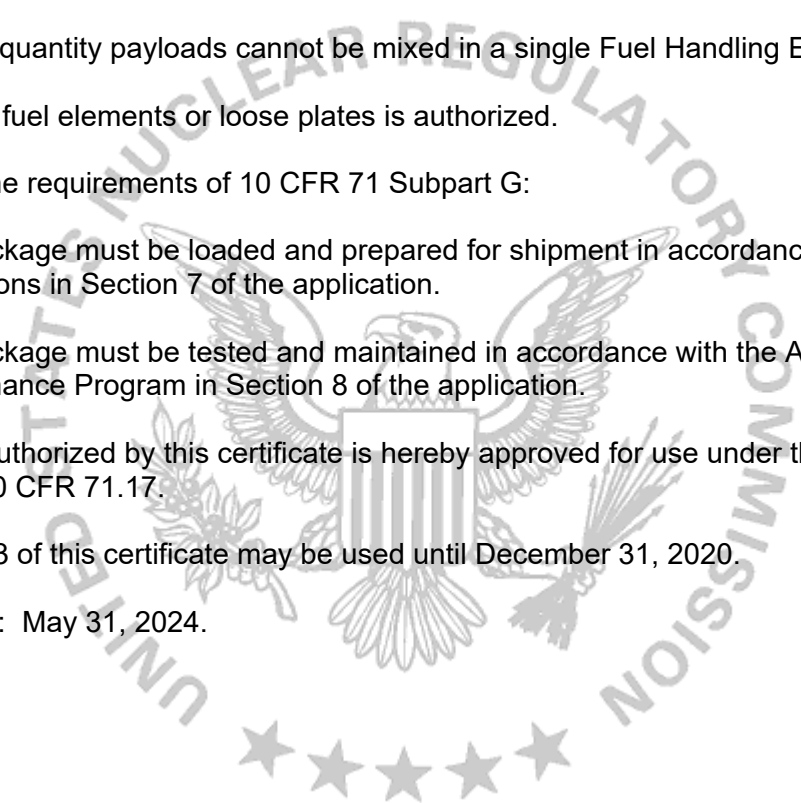
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(c) Criticality Safety Index (CSI):

For ATR, ATR U-Mo, MURR, MIT fuel elements or ATR loose fuel plates: 4.0
For Small Quantity Payloads: 25
For COBRA fuel elements: 4.0

6. Fuel elements and fuel plates may be bagged or wrapped in polyethylene. The maximum weight of the polyethylene wrap and tape shall not exceed 100 grams per package. The maximum weight of neoprene plus cellulosic material shall not exceed 4 kg per package.
7. Types of small quantity payloads cannot be mixed in a single Fuel Handling Enclosure.
8. Air transport of fuel elements or loose plates is authorized.
9. In addition to the requirements of 10 CFR 71 Subpart G:
 - (a) The package must be loaded and prepared for shipment in accordance with the Package Operations in Section 7 of the application.
 - (b) The package must be tested and maintained in accordance with the Acceptance Tests and Maintenance Program in Section 8 of the application.
10. The package authorized by this certificate is hereby approved for use under the general license provisions of 10 CFR 71.17.
11. Revision No. 13 of this certificate may be used until December 31, 2020.
12. Expiration date: May 31, 2024.



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REFERENCES

Safety Analysis Report, Advanced Test Reactor Fresh Fuel Container (ATR FFSC), Revision 15, dated June 2019.

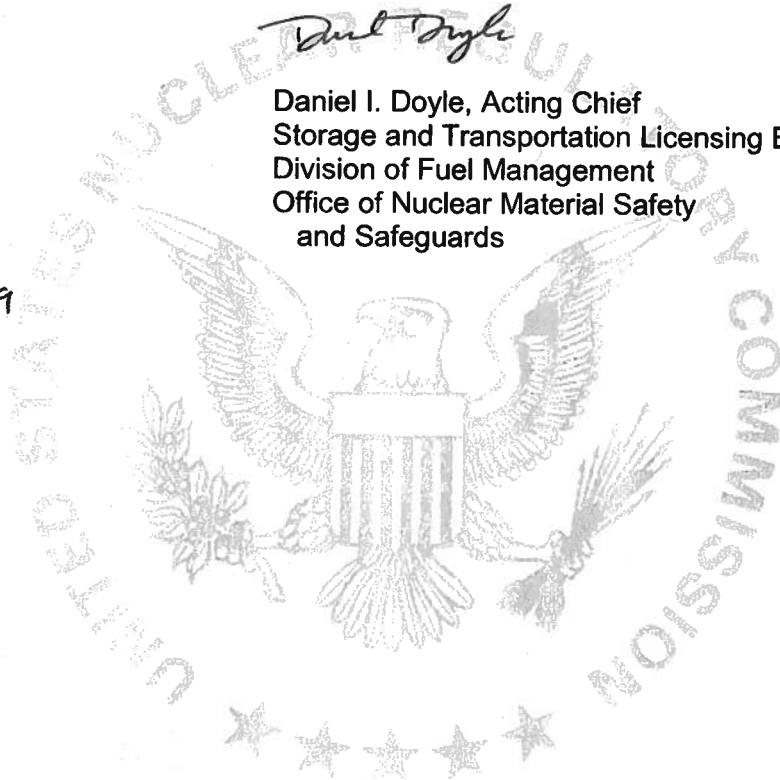
Amendment Request Letter, J. Shuler, U.S. Department of Energy to J. McKirgan, U.S. Nuclear Regulatory Commission, dated June 25, 2019.

FOR THE U.S. NUCLEAR REGULATORY COMMISSION



Daniel I. Doyle, Acting Chief
Storage and Transportation Licensing Branch
Division of Fuel Management
Office of Nuclear Material Safety
and Safeguards

Date: 12/23/2019





UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

December 23, 2019

SAFETY EVALUATION REPORT

Docket No. 71-9330
Model No. ATR-FFSC Package
Certificate of Compliance No. 9330
Revision No. 14

SUMMARY

By letter dated June 25, 2019 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML19184A173), the Department of Energy (DOE or the applicant) requested an amendment of the Certificate of Compliance (CoC) No. 9330 for the Model No. ATR-FFSC package.

The applicant requested removing common names and descriptions of Small Quantity Payload types from the CoC. The applicant requested that the CoC be amended based on the letter request and in lieu of a revision to the Safety Analysis Report (SAR).

The submittal was evaluated against the regulatory standards in Title 10 of the *Code of Federal Regulations* (10 CFR) Part 71, including the general standards for all packages, standards for fissile material packages, and performance standards under normal conditions of transport and hypothetical accident conditions.

The certificate has been amended based on the statements and representations in the application. The staff agrees that the changes do not affect the ability of the package to meet the requirements of 10 CFR Part 71.

EVALUATION

In the last revision of the SAR (Revision 14, ADAMS Accession No. ML17170A283), a small quantity payload was defined as a class of research and development plate-type fuels with U-235 as the fissile isotope, with a bounding U-235 loading up to 400 g, and U-235 enrichment up to 94%. Applicable fuel types included RINSC fuel elements, AFIP elements, U-Mo foils, DDEs, MIT loose fuel element plates, MURR loose fuel element plates, Cobra loose fuel element plates, and the FUTURE-HFIR loose plates.

The applicant is requesting that a small quantity payload be defined in the CoC to include only the details necessary for criticality safety, and not depend on common names or specific item descriptions (e.g., RINSC fuel elements, GRR-1 fuel elements) in cases where such details are unnecessary. The applicant revised SAR Section 1.2.2.4 to more clearly define the criticality characteristics of the small quantity payloads by adding an exclusion from the payload of beryllium, carbon, deuterium, or materials with a hydrogen density greater than water. This exclusion ensures that the reactivity of the payload will not be greater than was evaluated in the SAR. Explicit exclusion of reactivity-enhancing materials is added to the discussion to ensure that all small quantity payloads are bounded by the criticality evaluation in (SAR Section 6.11).

Changes have been made to the descriptions of the following fuel types (i.e., specificity removed):

1. RINSC fuel elements
2. GRR-1 fuel elements
3. ATR Full-size plate In Flux Trap Position (AFIP) elements
4. U-Mo foils
5. Design Demonstration Elements (DDEs) and similar test elements
6. MIT, COBRA or MURR loose fuel element plates, and
7. FUTURE-HFIR loose plates

Based on the statements and representations in the application, and the conditions listed in the CoC, the staff concludes that the ATR-FFSC package will continue to meet the requirements of 10 CFR Part 71 with the proposed changes to the CoC.

CONDITIONS

The following changes are included in Revision No. 14 to Certificate of Compliance No. 9330:

Condition No. 5(b)(1) was revised in many places to remove reference to seven fuel types. The description of the small quantity payload was revised to read as follows:

“The Small Quantity Payload must be in the form of unirradiated foils, fuel plates or fuel elements and miscellaneous non-fueled associated components. The Small Quantity Payload must not include beryllium, carbon, deuterium, or materials with a hydrogen density greater than that of water, except as specified in 6. The Small Quantity Payload must be contained within the Small Quantity Payload Fuel Handling Enclosure, as specified in 5(a)(3), except the RINSC fuel element must be contained within the RINSC Fuel Handling Enclosure, as specified in 5(a)(3).”

The following paragraphs were deleted:

1. Unirradiated RINSC fuel element
2. Unirradiated GRR-1 fuel element
3. AFIP fuel element
4. U-Mo Foils
5. DDEs and similar test elements
6. MIT and MURR loose fuel element plates
7. Paragraph beginning: “The approximate mass of U-235 per each MURR fuel plate ...”
8. COBRA loose fuel element plates

Condition No. 11 authorizes the use of Revision No. 13 of this certificate for approximately one year.

In addition, Revision 15 of the SAR and the June 2019 application have been added to the references section of this certificate.

CONCLUSION

Based on the statements and representations in the application, and the conditions listed above, the staff concludes that the Model No. ATR-FFSC package design has been adequately described and evaluated and that these changes do not affect the ability of the package to meet the requirements of 10 CFR Part 71.

Issued with Certificate of Compliance No. 9330, Revision No. 14, for the Model No. ATR-FFSC.