

# J.L. Shepherd & Associates

1010 Arroyo St.  
San Fernando, CA 91340  
818-898-2361

September 17, 2012

Mr. Pierre Saverot, Project Manager  
Licensing Branch  
Division of Spent Fuel Storage and Transportation  
Office of Nuclear Material Safety and Safeguards  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555-0001

**SUBJECT: APPLICATION FOR CERTIFICATE OF COMPLIANCE NO 9363 FOR  
THE MODEL NO BU650B PACKAGE – NOT ACCEPTED FOR REVIEW**

Dear Mr. Saverot:

J.L. Shepherd & Associates has received and reviewed the NRC's response regarding their recent application for CoC No. 9363. Given the concerns and comments of the staff regarding the presentation and depth of the information submitted with the application, J.L. Shepherd & Associates estimates that an additional time is needed to provide the level of detail necessary for favorable consideration. The exact amount of time necessary is unknown at this time but estimated to be approximately twenty-four months or less, in order to allow for physical testing of a prototype specimen.

Actions intended to be taken in order to bring the application technically correct are, but not limited to, the following: 1) Construction of a prototype cask and physical testing by a 3d party will require auditing of both the construction and testing facilities and then time to produce; 2) Limiting structural component stress/strain analyses to those associated with a sacrificial impact limiter and a sacrificial outer shell assembly, given containment is achieved by a doubly encapsulated sealed source and shielded liner; 3) Revision of drawings; 4) Re-define material specifications on a Master Bill of Materials; 5) Provide better information on testing configurations so that analysis can determine whether or not the most damaging configuration is evaluated; 6) Provide test information on Shielded Liners; 7) Provide fabrication information and QA verifications on Shielded Liners; 8) Identify the presence or lack of lead slump as a consequence of impact testing; 9) Obtain an independent review of Shielded Liner design and calculations which provides comparative data versus calculation when determining radiation output and shielding capability; and 10) Obtain furnace testing of a specimen package which will provide conclusive evidence of performance of the Kaolite 1600 thermal barrier material.

Mr. Pierre Saverot  
US Nuclear Regulatory Commission  
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We would like to thank the you and the staff for their consideration on this matter and look forward to working with NRC in the future.

Sincerely,

A handwritten signature in black ink, appearing to read "W.H. Brown". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

W.H. Brown  
BU650B Project Manager