

March 24, 2005

Dr. Keith E. Asmussen
General Atomics
3550 General Atomics Court
San Diego, CA 92121-1222

SUBJECT: CERTIFICATE OF COMPLIANCE NO. 6703 FOR THE MODEL NO. RG-1
PACKAGE

Dear Dr. Asmussen:

As requested by your application dated January 31, 2005, enclosed is Certificate of Compliance No. 6703, Revision No. 7, for the RG-1 package. This certificate supersedes, in its entirety, Certificate of Compliance No. 6703, Revision No. 6, dated April 2, 2004. Changes made to the enclosed certificate are indicated by vertical lines in the margin. The staff's Safety Evaluation Report is also enclosed.

General Atomics Company has been registered as a user of the package under the general license provisions of 10 CFR 71.17. The approval constitutes authority to use the package for shipment of radioactive material and for the package to be shipped in accordance with the provisions of 49 CFR 173.471.

If you have any questions regarding this certificate, please contact me or Ms. Nancy Osgood of my staff at (301) 415-8500.

Sincerely,

/RA/

Robert J. Lewis, Chief
Licensing Section
Spent Fuel Project Office
Office of Nuclear Material Safety
and Safeguards

Docket No. 71-6703
TAC No. L23813

Enclosures: 1. Certificate of Compliance
No. 6703, Rev. No. 7
2. Safety Evaluation Report

cc w/encl: R. Boyle, Department of Transportation
J. Shuler, Department of Energy
RAMCERTS

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* See Previous Concurrence

OFC	SFPO	E	SFPO	SFPO
NAME	NLOsgood	MRDeBose	RJLewis	
DATE	03/23/05	03/24/05	03/24/05	

C=Without attachment/enclosure E=With attachment/enclosure N=No copy **OFFICIAL RECORD COPY**

SAFETY EVALUATION REPORT
Docket No. 71-6703
Certificate of Compliance No. 6703
Revision No. 7

SUMMARY

By application dated January 31, 2005, General Atomics Company (GA) requested an amendment to Certificate of Compliance No. 6703, for the Model No. RG-1 package. GA requested that the certificate be revised to authorize additional transports for two packages of the RG-1 design, and that the certificate expiration date be extended. GA provided supplemental information regarding the fabrication, maintenance, and physical condition of the two packages.

Based on the statements and representations in the application, and for the reasons stated in this Safety Evaluation Report, the Certificate of Compliance has been amended as requested. These changes do not affect the ability of the package to meet the requirements of 10 CFR Part 71.

BACKGROUND

On April 2, 2004, NRC issued Certificate of Compliance No. 6703, Revision No. 6. The certificate was a limited approval that authorized one shipment of two packages (Serial Nos. -001 and -002) from the General Atomics facility to the Los Alamos National Laboratory. Subsequently, the U.S. Department of Energy (DOE) has identified additional shipments that it may need to make for the final disposition and disposal of the sources once they are received at the Los Alamos National Laboratory.

EVALUATION

By application dated January 31, 2004, GA requested that the certificate be amended to authorize additional shipments needed by DOE for the final storage, disposition, and disposal of the sources. In addition, GA requested that the expiration date of the certificate be extended to October 1, 2008, to allow DOE sufficient time to accomplish these shipments. GA provided additional information regarding these two packages that provides reasonable assurance that the packages meet applicable regulatory requirements and that authorizing additional shipments is justified.

GA stated that only 10 packages of this design were fabricated for military deployment. Eight of the packages were delivered to the U.S. Navy. The two remaining packages, which were fabricated in 1975, are the only units remaining at the GA facility. The two packages have been stored in a protected environment at the GA facility since the time of fabrication. GA stated that the packages are in excellent condition, and provided photographs that confirm that the packages appear new.

GA stated that it has not been able to locate the fabrication records for these two units. However, based on existing records and interviews with personnel, the GA consensus is that the packages were fabricated according to the NRC-approved quality assurance program in effect at the time of fabrication. In addition, internal documents describe the quality assurance requirements specifically imposed by the U.S. Navy in the fabrication of these units. The quality assurance requirements for packages are specified in 10 CFR Part 71, Subpart H. Sections

71.101(d) and (e) specifically authorize existing packages and designs approved prior to January 1, 1979, provided they were fabricated in accordance with the provisions of Part 71 in effect at the time of fabrication. GA believes and has records that provide reasonable assurance that the packages comply with the quality assurance requirements of Part 71 in effect at the time of fabrication.

GA is not aware of any operational problems with the packages that would affect their safety in transport. In addition, the packages are periodically leak tested by wipe testing. Prior to shipment, GA will perform routine maintenance on each of the packages, including leakage (wipe) tests, and will ensure that all closure bolts have been tightened with the proper torque, and that the packages satisfy the conditions specified in the Certificate of Compliance.

Based upon (1) the limited number of shipments expected, (2) the inspection of the packages prior to shipment, and (3) the expertise of the U.S. Department Energy in performing these shipments, the staff has concluded that authorizing these additional shipments is justified.

GA also requested that the expiration date be extended to October 1, 2008. This is consistent with the requirements of 10 CFR 71.19(a)(3), which specifies that Type B() packages may be used until October 1, 2008. Condition No. 10 of the certificate has been revised to show that the expiration date of the certificate is September 30, 2008, and that the certificate is not renewable, consistent with 10 CFR 71.19(a)(3).

CONCLUSION

As requested by the applicant, the Certificate of Compliance has been revised to authorize additional shipments by the U.S. Department of Energy as needed for storage, disposition, and disposal. The expiration date has been revised to September 30, 2008. The certificate is not renewable. 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. 6703,
Revision No. 7, on March 24, 2005.