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MDS Nordion
Science Advancing Health

November 18, 2005

Mr. John D. Monninger
Section Chief
Licensing Section
Spent Fuel Project Office
Office of Nuclear Material Safety and Safeguards
Mail Stop: 13 D13
United States Nuclear Regulatory Commission
One White Flint North
11555 Rockville Pike
Rockville, MD
20852-2738

RE: Amendment to the Certificate of Compliance USA/9299/B(U)-85 for the F-423 Transport Package

Dear Mr. Monninger:

Further to the letter of September 1, 2005, MDS Nordion would like to include as part of the request to amendment to the Certificate of Compliance USA/9299/B(U)-85 a change to Appendix 9.2 of the MDS Nordion report IN/TR 1489 F423/GC220, "Safety Analysis Report for the F423/GC220 Transport Package."

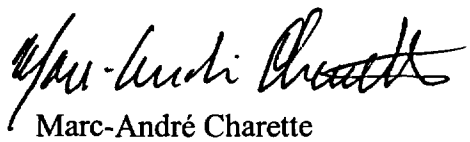
The only change to Appendix 9.2 is in section 2.4.2.3, where the word "pour" is changed to "batch". The word "pour" was incorrectly used. The test method consists of testing the compressive strength, fire retardancy and leachable chlorides to qualify the foam batch. Once the batch has been qualified, only density is tested after each foam pour. This test method is consistent with that used for MDS Nordion's F-430 and F-431, and has been approved by the United States Nuclear Regulatory Commission (ref Docket No. 71-9290 and 71-9310).

Attached are seven proprietary and two non-proprietary copies of the revised page number 197 for Appendix 9.2 of the MDS Nordion report IN/TR 1489 F423/GC220, "Safety Analysis Report for the F423/GC220 Transport Package." I have attached an affidavit to support MDS Nordion's request to withhold parts of the above-mentioned document from public disclosure. The document contains parts, which are specific to the design and fabrication of the F-423 transport packages and would enable a third party to manufacture a similar transport packages. Please note that the proprietary parts have been highlighted in yellow in the proprietary version.

NMSS01

If you have any questions or require further information please feel free to contact me by telephone at (613) 592-3400 extension 2421 or by email at mcharette@mds.nordion.com.

Yours sincerely



Marc-André Charette
International Transport & Nuclear Initiatives
Manager, Regulatory Affairs

Attached: Appendix 9.2 revised page number 197

Copy to: Rick Boyle, US Department of Transportation
Mike Krzaniak, Blair Menna, Luc Desgagne, MDS Nordion

AFFIDAVIT

I, E. S. Martell, in my capacity as Senior Vice President, Engineering, Development and Compliance, having been duly authorized to apply for withholding from disclosure of proprietary information by and on behalf of MDS Nordion, a division of MDS (Canada) Inc., ("MDS Nordion"), do depose and say:

1. I, E.S. Martell, am the Senior Vice President, Engineering, Development and Compliance, of MDS Nordion.

2. The information contained in the MDS Nordion's document No. IN/TR 1489 F423/GC220 (2a), "Safety Analysis Report for the F-423/GC-220 Transportation Package" is the property of MDS Nordion. The document contains proprietary information related to the design of the F-423 transport package.

3. MDS Nordion, has expended extensive funds and manpower in developing the aforementioned document and any release for disclosure of such information to third parties would enable and assist third parties to use the information to fabricate and register similar transport packages without incurring any development costs. This could compromise MDS Nordion's, ability to compete in the marketplace. Therefore, MDS Nordion, submits that parts of page 197 of the MDS Nordion document IN/TR 1489 F423/GC220 (2a), "Safety Analysis Report for the F-423/GC-220 Transportation Package," should be withheld from public disclosure.

4. The information has been held in confidence by MDS Nordion, and any disclosure thereof for developmental purposes, has been accompanied by a confidentiality agreement protecting the trade secrets contained herein.

5. The information has been transmitted to and received by the Nuclear Regulatory Commission in the United States in confidence.

6. This information is not available in public sources.

7. The information contained in this affidavit is to the best of my knowledge true and correct.

Sworn before me this 18th day of November, 2005 in the City of Ottawa, Ontario, Canada.

Neil Gotfrit
Notary Public in and
for the Province of Ontario, Canada

per:

E. S. Martell
Senior V.P., Engineering, Development & Compliance
MDS Nordion, a division of MDS (Canada) Inc.

Safety Analysis Report for the F-423/GC220 Transport Package

Signatures

Prepared by: _____ Date: 05/11/11

B. Menna, Package Engineering

Reviewed by: _____ Date: 05/11/14

M. A. Charette, Regulatory Affairs

Approved by: _____ Date: 05/11/17

M. Krzaniak, Manager, Package Engineering

Document History

Date	Version	Comments	Prepared by	Reviewed by	Approved by
Jun 00	1	Original Issue	B. Menna	M.A. Charette	M. Krzaniak
May 01	1A	DCN: A0972-D-13A Revised: toc, appen 1.2, chap's 2,4,9 & app 9.2. Added appendix 2.10	B. Menna	M.A. Charette	M. Krzaniak
May 04	2	DCN A2937-D-02	B. Menna	M.A. Charette	M. Krzaniak
Nov 05	2a	DC 19844 Revised pg. 197			

NOTE: The portion of this text affected by changes is indicated by a vertical line in the margin.

2.4 Rigid Polyurethane Foam

2.4.1 Specification

The Rigid Polyurethane foam shall be a closed cell polyurethane plastic foam of the self-extinguishing variety. The closed cell configuration will ensure that the foam will not be susceptible to significant water absorption. General Plastics Manufacturing Company, type FR-3700 or equivalent shall be used.

The foam shall have a [redacted]. Its static crush strength shall be as defined in Table 1.

Table 1: Static Crush Strength for [redacted] Rigid Polyurethane Foam		
Strain	Static Crush Strength Parallel to Rise	Static Crush Strength Perpendicular to Rise
[redacted]	[redacted]	[redacted]
[redacted]	[redacted]	[redacted]
[redacted]	[redacted]	[redacted]

2.4.2 Testing

2.4.2.1 Collection of Test Samples

For each material pour, at least one test box shall be filled. The sample shall be taken from the pour stream. The test box shall be allowed to cure for at least 12 hours before samples are cut for testing. From the test box, at least three test samples shall be cut.

2.4.2.2 Determination of Foam Density

The foam density shall be tested for each pour. The volume and mass of the test samples shall be measured and the density shall be calculated. [redacted].

2.4.2.3 Compressive Strength Testing

The compressive strength shall be tested for each batch. Compressive strength testing shall be in accordance with ASTM Method D1621-73 or an approved equivalent. The measured values must be within ± 15% of the values listed in Table 1. Stress-strain plots shall be prepared for both the parallel-to-rise and perpendicular-to-rise orientations.

2.4.2.4 Fire Retardancy Testing

Fire retardancy testing shall be performed for each batch of material. Fire retardancy testing shall be in accordance with Title 14, Code of Federal Regulations, Part 25 or an approved equivalent. The acceptance criteria are as follows: