



QSA GLOBAL

71-9296

QSA Global, Inc.

40 North Avenue

Burlington, MA 01803

Telephone: (781) 272-2000

Toll Free: (800) 815-1383

Facsimile: (781) 359-9191

13 December 2005

Mr. Christopher Regan
Licensing Section
Spent Fuel Project Office
Office of Nuclear Material Safety and Safeguards
U.S. Nuclear Regulatory Commission
11555 Rockville Pike
One White Flint
Rockville, MD 20852

Docket No.: 71-9296

Subject: Amendment Request for the Model 880 Series Type B Packages

Dear Mr. Regan:

To further assist in the evaluation of this package amendment, I have enclosed a point by point evaluation of these packages and their compliance to the IAEA TS-R-1 regulations adopted into 10 CFR 71. Should you have any additional questions or wish to discuss this submission after receipt please contact me as shown below. Again your assistance is greatly appreciated in this matter.

Sincerely,

Lori Podolak
Product Licensing Specialist
Regulatory Affairs Department
Ph: (781) 272-2000 ext 241
Fax: (781) 359-9191
Email: Lori.Podolak@qsa-global.com

RA/QA Approval

13 Dec 05
Date

Engineering
Approval

13 Dec 05
Date

Enclosures:

880 Series Evaluation for Compliance to 10 CFR 71 Regulation Change for IAEA TS-R-1

N1MSS01

**Model 880 Series Type B Transport Package Evaluation for Compliance to Criteria
Adopted as Part of the Final Rule for 10 CFR 71 Effective October 1, 2004**

Adopted Compliance Criteria for 10 CFR 71 Final Rule Effective October 1, 2004	Description
Issue 2: Radionuclide Exemption Values	Not applicable based on package contents.
Issue 3: Revision of A ₁ and A ₂	Total package activity is limited on the Certificate of Compliance, therefore changes in the A ₁ and A ₂ values have no impact on the package ability to comply with the final rule.
Issue 4: Uranium Hexafluoride Package Requirements	Not applicable, the package is not used for transport of uranium hexafluoride.
Issue 5: Criticality Safety Index	Not applicable, the package is not used for transport of fissile material.
Issue 7: Deep Immersion Test	Not applicable, the package is not used for transport of material in amounts greater than 10 ⁵ A ₂ .
Issue 8: Grandfathering	The package complies with the final rule in 10 CFR 71, therefore grandfathering is not necessary for this package.
Issue 9: Changes to Various Definitions	No change is necessary to conform to the new rule.
Issue 10: Crush Test for Fissile Material Packages	Not applicable, the package is not used for transport of fissile material.
Issue 11: Fissile Material Package Design for Transport by Aircraft	Not applicable, the package is not used for transport of fissile material.
Issue 12: Special Package Authorizations	Not applicable, criteria needed to meet this requirement does not apply to this package.
Issue 13: Expansion of Part 71 Quality Assurance Requirements	QSA Global Inc. (previously AEA Technology QSA, Inc.) is the holder of an NRC-approved QA program, therefore the requirements of this rule are met.
Issue 16: Fissile Material Exemptions and General License Provisions	Not applicable, the package is not used for transport of fissile material.
Issue 17: Double Containment of Plutonium	Not applicable, the package is not used for transport of plutonium.
Issue 19: Modification of Events Reporting Requirements	No change is needed to the Certificate of Compliance or the package application to conform to the rule.